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## BEFORE THE PUBLIC UTILITES COMMISSION OF OHIO

In the Matter of the Application of Columbia Gas	)	
of Ohio, Inc. for Approval of an Adjustment to its	)	Case No. 09372GA-UEX
Uncollectible Expense Rider Rate	)	

## APPLICATION OF COLUMBIA GAS OF OHIO, INC.

Columbia Gas of Ohio, Inc. ("Columbia") hereby submits its annual Uncollectible Expense Rider Report, and also requests approval to decrease its Uncollectible Expense Rider rate. In support of its Application, Columbia states as follows:

- By Finding and Order dated December 17, 2003 (the "December 17 Order"), in Case No. 03-1127-GA-UNC, the Commission approved, in concept, an Uncollectible Expense Rider for Columbia and several other natural gas companies.
- 2. Pursuant to the December 17 Order, Columbia is required to file an annual report each May that identifies the amounts recovered, deferred and, as applicable, amortized pursuant to the Uncollectible Expense Rider. Attached hereto as Attachment 1 is Columbia's annual Uncollectible Expense Rider Report.
- 3. By Entry dated April 7, 2004, in Case No. 03-2572-GA-ATA, the Commission approved Columbia's initial Uncollectible Expense Rider rate. However, the December 17 Order further provided utilities with the opportunity to adjust their Uncollectible Expense Rider rates. Pursuant to Columbia's Uncollectible Expense Rider tariffs, Columbia shall request "approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections."

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<sup>&</sup>lt;sup>1</sup> See Section IV, Ninth Revised Sheet No. 29, for customers served under rate schedules SGS, GS, SGTS and GTS. Please refer to Section VII, Eighth Revised Sheet 29, Page 9 of 11, for customers served through Columbia's CHOICE Program. Both tariff sheets include identical billing rates and adjustment provisions.

- 4. On May 1, 2008, Columbia filed an Application for Approval of an Adjustment to its Uncollectible Expense Rider established pursuant to the Commission's April 7, 2004, Entry. This filing proposed the establishment of a revised Uncollectible Expense Rider rate of \$.2265/Mcf which includes Gross Receipts Tax. By Entry dated June 25, 2008, in Case No. 08-564-GA-UEX, the Commission approved the application and the revised Uncollectible Expense Rider rate. This rate was reduced to \$.2157/Mcf in December 2008 as a result of the Commission's Order in Case Nos. 08-0072-GA-AIR et al., when the Gross Receipts Tax was removed from the rate.
- 5. Attachment 2 hereto shows that an adjustment of -\$.0007/Mcf in Columbia's current Uncollectible Expense Rider is required to pass back prior period over-collections. This adjustment is based on actual balance of -\$121,201 at March 31, 2009. The implementation of this adjustment in rates results in a revised Uncollectible Expense Rider of \$.2150/Mcf, a decrease of -.31%. However, Columbia has also prepared another schedule, attached hereto as Attachment 3, in which Columbia projects uncollectible expenses and recoveries for the twelve-month period ending March 31, 2010. Attachment 3 shows that absent further adjustment, Columbia will experience an over-collection of \$5,085,092 during the twelve months ending March 31, 2010. To attempt to prevent this over-collection during the next reporting period, Columbia's current Uncollectible Expense Rider would need to be decreased by approximately 14% rather than the .31%.
- 6. Columbia believes that it is reasonable to consider the prospective application of the Uncollectible Expense Rider in the development of the appropriate Uncollectible Expense Rider rate since it better matches expenses with recoveries. The computation of the Uncollectible Expense Rider rate based on the collection year: (1) properly matches recoveries with expenses; (2) is consistent with the method approved by Commission in Case No. 08-564-GA-UEX for determination of Columbia's current Uncollectible Expense Tracker rate; and, (3) in the aggregate

cannot result in over-collection of costs due to the annual true-up program requirements. For this reason, Columbia therefore proposes to decrease its Uncollectible Expense Rider rate from \$.2157/Mcf to \$.1866/Mcf. The rate is comprised of: (1) Columbia's deferred uncollectible expenses at March 31, 2009; (2) Columbia's estimated uncollectible accounts expense for the twelve-month period ending March 31, 2010; and, (3) a portion of the deferred accounts receivable balance as authorized by the Commission in Case No. 01-3278-GA-AAM. The calculation of the proposed Uncollectible Expense Rider rate is shown on Attachment 4. To arrive at the proposed Uncollectible Expense Rider rate, the three components described above were summed together.

7. The resulting Uncollectible Expense Rider rate of \$.1866/Mcf is just and reasonable and Columbia requests that the Commission expeditiously approve the proposed rate. Clean copies of the proposed tariff sheets and the scored current tariff sheets are attached hereto as Attachment 5.

**WHEREFORE**, Columbia respectfully requests that the Commission approve the proposed Uncollectible Expense Rider rate proposed herein.

Respectfully submitted,

Stephen B. Seiple, Trial Attorney

Stephen B. Seiple, Assistant General Counsel

Daniel A. Creekmur, Counsel

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Attorneys for

COLUMBIA GAS OF OHIO, INC.

ATTACHMENT 1	

Columbia Gas of Ohlo, Inc. Uncollectible Expense Rider Report

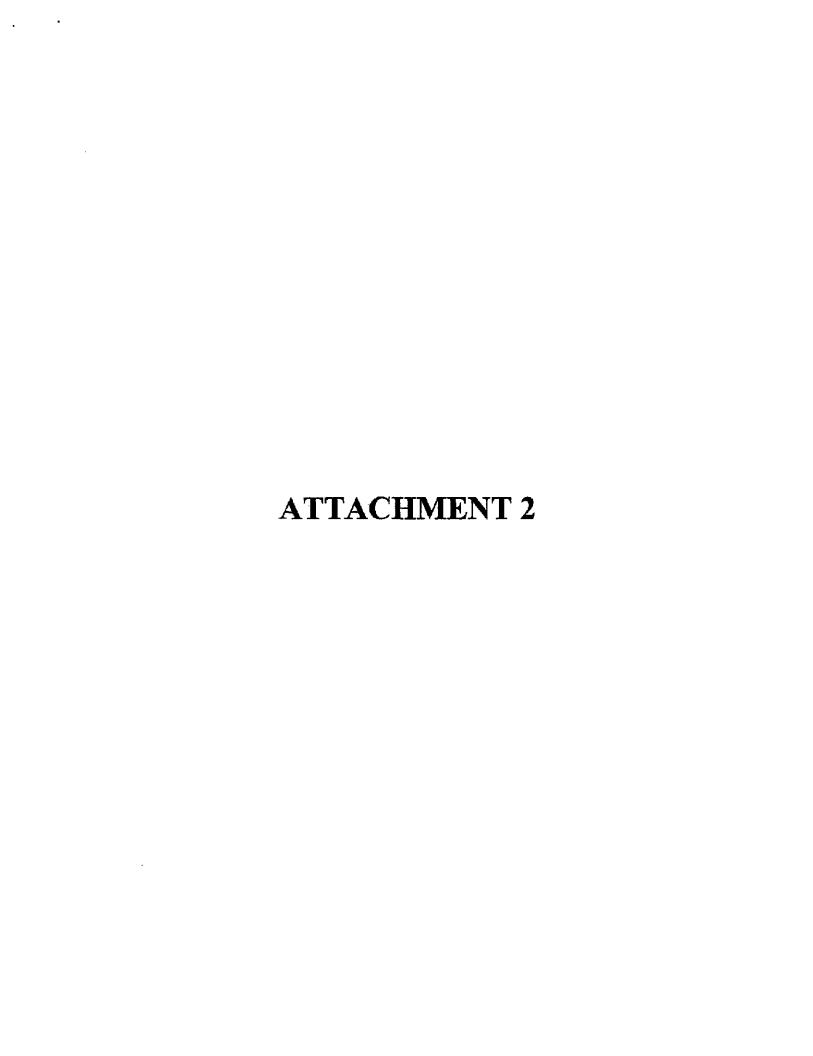
E.													
Ś						S	ellendar Year 2004	8 Actual Balances					
		January	February	March	April	Мау	June	July	August	September	October	November	December
-	Batance - Beginning of Month (a)	16,437,860	12,133,388	8,012,526	4,493,574	3,889,761	6,022,681	10,657,735	17,394,213	22,771,353	27,108,626	28,340,403	22,922,917
2	Bad Debts Written Off	3,884,600	3,943,370	3,339,178	4,275,584	4,428,513	6,149,391	8,436,142	7,082,080	6,527,469	8,959,239	12,500,878	6,451,508
9	Amortization of 2001 Deferral	383,847	383,847	383,847	383.847	383,847	383,847	383,847	383,847	383,847	383,847	383.847	383.847
4	Recovery - Base Rafes	•			-				•	•			
5	Recovery - Bad Debi Rider	(4,675,005)	(4,874,815)	(4,635,356)	(2,985,797)	(4,300,255)	(789,177)	(763,865)	(685,700)	(709,817)	(1,031,829)	(2.828,320)	(5,058,483)
9	Recovery - Other	(3,939,628)	(3,594,204)	(2,618,803)	(2,284,524)	(1,388,198)	(1,125,549)	(1,343,329)	(1,437,000)	(1,908,339)	(7,142,483)	(16,523,764)	(6 969 292)
7	Incremental Bad Debt (2)+[(3)+(4)+(5)+(6)	(4,346,187)	(4,141,802)	(3,531,134)	(610,890)	2,123,907	4,621,512	6,712,795	5,343,228	4,295,161	1,168,775	(5,467,359)	(5.792,420)
<b>&amp;</b>	Balance Subtotal (1) + (7)	12,091,673	7,991,596	4,481,392	3,882,684	6,013,669	10,644,193	17,370,529	22,737,441	27,066,513	28,277,401	22.873.044	17,130,557
D)	Carrying Charges [(1)+[(7)/2]x(11)	41,724	20,930	12,182	7,078	9,012	13,542	23,684	33,911	42,113	63,002	49,933	20,828
¥	Balance - End of Month (8)+(9)	12,133,398	8,012,526	4,493,574	3,889,781	6,022,081	10,857,735	17,394,213	22,774,363	27,108,626	28,340,403	22,922,977	17,151,385
Ξ	11 Monthly Pool Rates	0.45%	0.32%	0.30%	0.26%	0.28%	0.25%	0.26%	0.26%	0.26%	0.35%	0.30%	0.18%

Columbia Gas of Ohio, Inc. Uncollectible Expense Rider Report Calendar Year 2009 Actual

Line				
Š			Actual	
		January	February	March
_	Balance - Beginning of Month	17,151,385	10,197,968	4,067,452
N	Bad Debts Written Off	4,356,555	4.079.289	4,173,121
ന	Amortization of 2001 Deferral	383.847	383.847	383,847
4	Recovery - Base Rates			
വ	Recovery - Bad Debt Rider	(7,570,329)	(7,190,992)	(5,573,815)
9	Recovery - Other	(4,131,487)	(3,406,369)	(3,173,473)
<b>!~</b>	Incremental Bad Debt (2)+[(3)+(4)+(5)+(6)	(6.961,414)	(6,134,224)	(4.190.319)
ထ	Balance Subtotal (1) + (7)	10,189,971	4.063.744	(122,867)
တ	Carrying Charges [(1)+[(7)/2]x(11)	7,997	3,708	1,667
10	Balance - End of Month (8)+(9)	10,197,968	4,067,452	(121,201)
7	11 Monthly Pool Rates	0.09%	0.08%	0.13%

NISOURCE INC. AND SUBSIDIARIES OPERATING COMPANIES MONEY POOL RATES January 2008 Through March 2009

		AVER	AVERAGE DAILY BALANCES	VCES	MONTHLY	MONTHLY INTEREST ACCRUALS	RUALS	MON	MONTHLY RATES	ATES *
MONTH	H DAYS	S-T DEBT	INVESTMENT \$	COMPOSITE \$	S-T DEBT	INVESTMENT COMPOSITE S-T DEBT INVEST COMPOSITE \$ % % % %	COMPOSITE \$	S-T DEBT %	INVEST %	COMPOSITE %
JAN	31	919,345,161.29	36,285,829.40	955,630,990.69	4,195,388.47	146,519.95	4,341,908.42	5.37%	4.75%	5.35%
FEB	28	594,703,445.28	78,110,603.89	672,814,049.17	1,877,877.05	296,537.22	2,174,414.27	3.97%	4.78%	4.07%
MAR	3	441,470,967.74	27,086,967.47	468,557,935.21	1,329,924.23	78,445.22	1,408,369.45	3.55%	3.41%	3.54%
APR	33	605,166,666.67	35,795,476.76	640,962,143.43	1,575,420.89	91,994.30	1,667,415.19	3.17%	3.13%	3.17%
MAY	3	319,225,806.45	139,824,235.45	459,050,041.90	976,370.82	319,613.18	1,295,984.00	3.60%	2.69%	3.32%
S S	30	430,666,666.67	88,630,467.43	519,297,134.10	1,121,338.53	191,915.83	1,313,254.36	3.17%	2.63%	3.08%
Ę	સ	576,235,483.87	3,055,887.23	579,291,371.10	1,502,325.63	6,046.12	1,508,371.75	3.07%	2.33%	3.07%
AUG	ઌ	890,387,096.77	6,946,719.31	897,333,816.08	2,333,716.25	14,215.73	2,347,931.98	3.09%	2.41%	3.08%
SEP	30	1,057,700,000.00	5,729,689.50	1,063,429,689.50	2,807,219.95	11,331.00	2,818,550.95	3.23%	2.41%	3.22%
OCT	31	1,264,235,483.87	6,971,133.99	1,271,206,617.86	4,381,924.36	13,683.45	4,395,607.81	4.08%	2.31%	4.07%
>0N	99	1,424,990,000.00	3,780,167.06	1,428,770,167.06	4,337,034.98	8,934.05	4,345,969.03	3.70%	2.88%	3.70%
)   	<u>ب</u>	1,303,554,838.71	14,318,252.10	1,317,873,090.81	2,133,015.40	31,143.40	2,164,158.80	1.93%	2.56%	1.93%
JAN	ઝ	1,071,161,290.32	86,367,654.34	1,157,528,944.66	946,354.76	119,186.38	1,065,541.14	1.04%	1.62%	1.08%
FEB	28	844,417,857.14	53,256,313.32	897,674,170.46	669,630.64	53,437.25	723,067.89	1.03%	1.31%	1.05%
MAR	ઝ	220,272,580.65	43,382,308.82	263,654,889.47	308,926.29	26,189.66	335,115.95	1.65%	0.71%	1.50%



Attachment 2 Sheet 1 of 1

# Columbia Gas of Ohio, Inc. Uncollectible Expense Rider Report Based on Historic Balance @ March 31, 2009

Line No.	Description	Amount
4	Deferred Uncollectible Accounts Expense Balance As of March 31, 2009	-121,201
N	Projected Volumes Twelve Months Ending March 31, 2010	178,666,273
က	Rate Adjustment Per Mcf	-0.0007
4	Approved Rate Per Mcf Implemented May 31, 2008	0.2157
ß	Percent of Change From Current Rate	-0.31%
ဖ	Proposed Revised Rate Effective May 31, 2008	0.2150

## ATTACHMENT 3

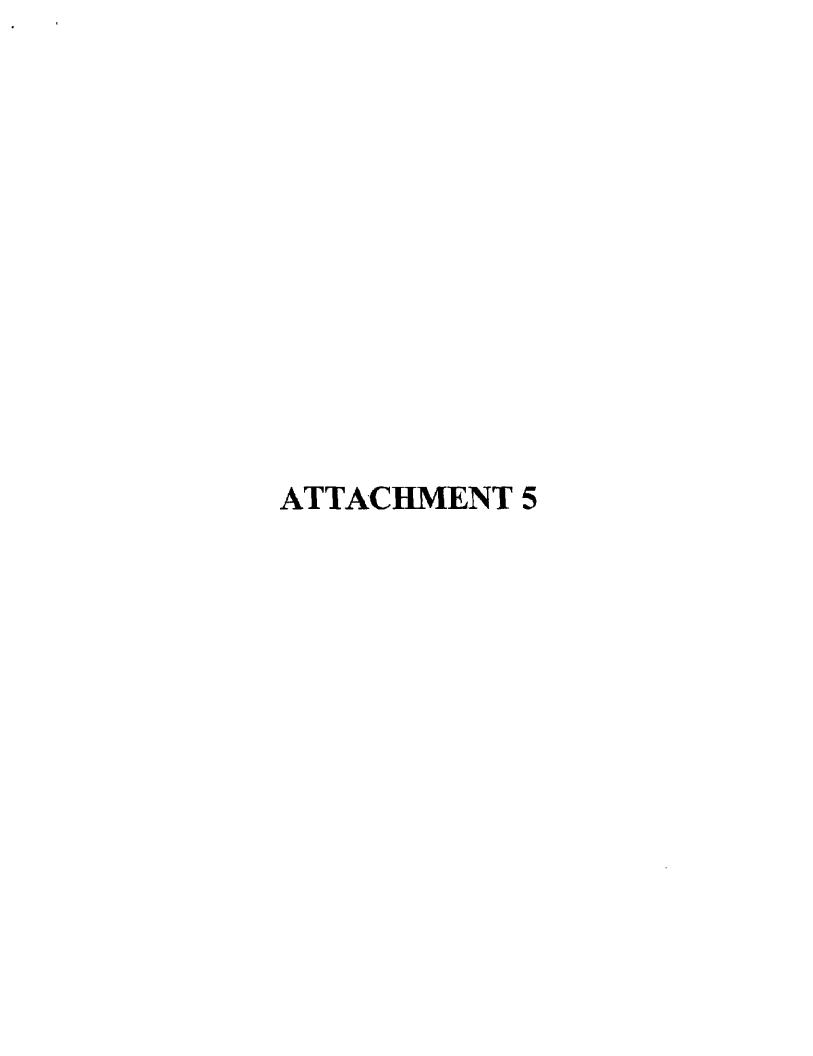
Cotumbia Gas of Ohlo, Inc. Uncollectible Expense Rider Calculation

Ē													
ž						÷	weive Months End	Ing March 31, 201	0				
		April	May	June	Jof		September	October	November	December	January	February	March
_	Balance - Beginning of Month	(121,201)	(2,149,482)	335,544	3,199,883		13,787,341	19,897,888	21,432,439	17,029,324	11,208,781	4,388,105	(973,352)
2	Bad Debts Written Off	2,018,215	4,510,839	3,930,853	5,899,075		8,678,745	2,935,719	(1,624,487)	(729,964)	474,212	1,583,111	1,453,087
6	Amortization of 2001 Deferral	•	•	•						· ·	. '		. '
4	Recovery - Base Rates				,			,		,	,	ι	
40	Recovery - Bad Debt Rider	(4.045,496)	(2,024,987)	(1,088,171)	(755,033)		(762,961)	(1,219,873)	(2,795,572)	(5,105,453)	(7,319,959)	(6,905,864)	(5,683,214)
60	Recovery - Other	•	•	•	. '		•	. •	•	•	•	•	. '
۲-	Incremental Bad Debt (2)+[(3)+(4)+(5)+(6)	(2,027,281)	2,485,852	2,862,782	5,144,042		5,915,784	1,715,846	(4 420,059)	(5,835,417)	(8,845,747)	(5,342,853)	(4,230,127)
æ	Balance Subtotal (1) + (7)	(2,148,482)	336,369	3,198,326	B,343,925		19,683,125	21,413,715	17 012,380	11 193 907	4.361,014	(974,748)	(5,203,480)
æ	Carrying Charges [(1)+[(7)/2]x(11)	(1,000)	(826)	1,658	6 258		14 743	18,724	16,945	12,854	7,090	1,386	(2,813)
₽	Balance - End of Month (8)+(9)	(2,149,482)	336,544	3,199,883	8,349,182		19,697,868	21,432,439	17,029,324	11,208,761	4,369,106	(973,352)	(5,206,293)
Ξ	11 Monthly Pool Rates	8448	0.14%	0.14%	0.14%	0.14%	0.14%	4% 0.14%	0.14%	0.14%	0.14%	0.13%	0.14%

## **ATTACHMENT 4**

Columbia Gas of Ohio, Inc. Uncollectible Expense Rider Calculation

Line So.	Description	Amount
٦		
_	Change in Balance March 2010 vs. March 2009	(5,085,092)
7	Projected Volumes TME March 31, 2010	178,666,273
ო	Additional Rate Adjustment Per Mcf	(0.0285)
4	Rate Adjustment Per Attachment 2, Sheet 1	-0.00068
ĸ	Total Proposed Adjustments (3) + (4)	(0.0291)
ဖ	Approved Rate Per Mcf Implemented May 31, 2008	0.2157
2	Percent of Change From Current Rate (5) / (6)	-14%
8	Proposed Revised Rate Effective May 31, 2009 (5) + (6)	0.1866



Ninth Revised Sheet No. 29
Cancels
Eighth Revised Sheet No. 29

#### COLUMBIA GAS OF OHIO, INC.

### RULES AND REGULATIONS GOVERNING THE DISTRIBUTION AND SALE OF GAS

#### UNCOLLECTIBLE EXPENSE RIDER

#### APPLICABLE:

To all customers served under rate schedules SGS and GS.

#### UNCOLLECTIBLE EXPENSE RIDER:

An additional charge of \$0.1866 per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover cost associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

Filed in accordance with Public Utilities Commission of Ohio Entries dated July 6, 1989 in Case No. 89-500-GA-TRF.

Issued: Effective:

#### P.U.C.O. No. 2

NinthEighth Revised Sheet No. 29
Cancels
EighthSeventh Revised Sheet No. 29

COLUMBIA GAS OF OHIO, INC.

## RULES AND REGULATIONS GOVERNING THE DISTRIBUTION AND SALE OF GAS

#### UNCOLLECTIBLE EXPENSE RIDER

#### APPLICABLE:

To all customers served under rate schedules SGS and GS.

#### UNCOLLECTIBLE EXPENSE RIDER:

An additional charge of \$0.21571866 per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover cost associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or undercollections.

Section VII
Eighth Revised Sheet No. 29
Cancels
Seventh Revised Sheet No. 29
Page 9 of 11

Columbia Gas of Ohio, Inc.

## SECTION VII PART 29 - BILLING ADJUSTMENTS

#### UNCOLLECTIBLE EXPENSE RIDER

#### 29.18 Applicability

To all customers served under rate schedules FRSGTS and FRGTS.

#### 29.19 UNCOLLECTIBLE EXPENSE RIDER

An additional charge of \$0.1866 per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover cost associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

Filed in accordance with Public Utilities Commission of Ohio Entries dated July 6, 1989 in Case No. 89-500-AU-TRF.

#### P.U.C.O. No. 2

Section VII SeventhEighth Revised Sheet No. 29 Cancels SixthSeventh Revised Sheet No. 29 Page 9 of 11

Columbia Gas of Ohio, Inc.

#### <u>SECTION VII</u> PART 29 - BILLING ADJUSTMENTS

#### UNCOLLECTIBLE EXPENSE RIDER

#### 29.18 Applicability

To all customers served under rate schedules FRSGTS and FRGTS.

#### 29.19 UNCOLLECTIBLE EXPENSE RIDER

An additional charge of \$0.24571866 per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover cost associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.