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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Columbia Gas of Ohio, Inc., for Approval) Case No. 08-1344-GA-EXM
of a General Exemption of Certain Natural)
Gas Commodity Sales Services or)
Ancillary Services.)

**COMMENTS OF NORTH COAST GAS TRANSMISSION, LLC,
ON REVISED PROGRAM OUTLINE**

Now comes North Coast Gas Transmission, LLC ("NCGT"), and respectfully files these comments on the Revised Program Outline filed by Columbia Gas of Ohio, Inc. ("Columbia") on April 15, 2011. With that filing, Columbia seeks approval to make certain changes to its existing transportation service and CHOICE program in order to implement a Standard CHOICE Offer ("SCO") auction in February, 2012. NCGT's comments are limited to one item: Its concern over the inefficient use of NCGT's firm transportation capacity resulting from the capacity allocation process established in Sections 18 through 20 of the Revised Program Outline.

NCGT is a Commission-regulated intrastate pipeline authorized to provide transportation service to Columbia and its customers since 2004. See Finding and Order, PU-CO Case No. 04-265-PL-ATA (Mar. 30, 2004). It is also a participant in Columbia's Standard Service Offer ("SSO") program, providing firm transportation capacity to CHOICE and SSO suppliers by virtue of the SSO Program established through the Settlement Program Outline dated November 12, 2009. See, e.g., Section 19 of the Settlement Program Outline ("For those PSPs within which Columbia has contracted for firm transportation capacity with North Coast Gas Transmission, LLC ("NCGT"), the assignment of NCGT firm transportation capacity shall be within the percentage calculated he-

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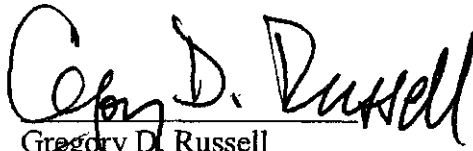
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reunder.”). It is NCGT’s experience in the SSO Program that prompts these comments today.

The SSO Program identified approximately 58,000 Dth of NCGT firm transportation capacity for use by CHOICE and SSO suppliers. See, e.g., Settlement Program Outline, Attachment 19A. While substantial in the aggregate, that capacity has become virtually unused since being artificially divided up into significantly smaller volumes amongst the tranches assigned to program suppliers pursuant to Sections 18 through 20 of the Settlement Program Outline. This is because, in part, small customers end up with a minute fraction of the capacity, making it inefficient for participating suppliers to economically administrate and therefore discouraging their use of NCGT’s capacity. Because the Revised Program Outline contemplates a similar capacity allocation methodology (see Sections 18 through 20), NCGT is understandably concerned that it will yield similar results – an inefficient use of the NCGT firm transportation capacity held by Columbia and dedicated to this program.

WHEREFORE, NCGT believes it makes sense, therefore, to provide for greater aggregation – and therefore greater use – of its firm transportation capacity as part of the SCO Program. This could be done, for example, by removing NCGT’s capacity from the allocation provisions contained in Sections 18 through 20 of the Revised Program Outline, and authorizing Columbia to release that capacity first to suppliers desiring to make use of it in order to fulfill their obligations under the Program, and then to other suppliers to the extent that the capacity remains otherwise unused.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gregory D. Russell". The signature is written in a cursive, flowing style with a large initial "G".

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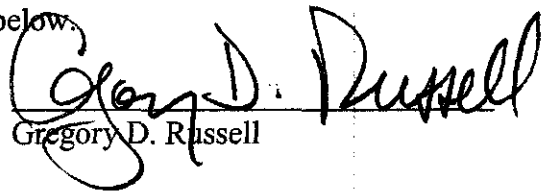
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served by regular U.S. mail, postage prepaid, or by email, where applicable, this 9th day of May, 2011, on the parties listed below.


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