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FILE
BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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2011 MAY 31 PM 3:10
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In the Matter of the Application of
Suburban Natural Gas Company for
an Adjustment to the Infrastructure
Replacement Program Rider

Case No. 11- -GA-RDR
3234

PRE-FILING NOTICE OF SUBURBAN NATURAL GAS COMPANY

Pursuant to the Commission's September 15, 2009 Finding and Order in Case No. 09-573-GA-RDR, Suburban Natural Gas Company ("Suburban") hereby gives notice that Suburban intends to file an application for approval of an adjustment to Suburban's Infrastructure Replacement Program Rider ("Rider IRP") at the Public Utilities Commission of Ohio ("Commission"). Attached to this Pre-Filing Notice are the following exhibits:

- Exhibit 1: A statement of Notice of Intent to file an adjustment to Rider IRP which includes the service area to be included in the application and dates of the proposed test year.
- Exhibit 2: A listing of municipalities included in the application along with the names and addresses to the mayors and legislative authorities to whom notices of intent to file were sent.
- Exhibit 3: The proposed tariff schedules that are intended to replace or add to current tariff schedules.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician MA Date Processed MAY 31 2011

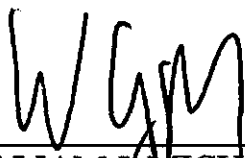
Exhibit 4: A copy of the letter sent to mayors and legislative authorities of municipalities listed in Exhibit 2 of the Pre-Filing Notice.

Exhibit 5: Schedules to the Rider IRP Pre-Filing Notice.

Respectfully submitted,

SUBURBAN NATURAL GAS COMPANY

By: _____

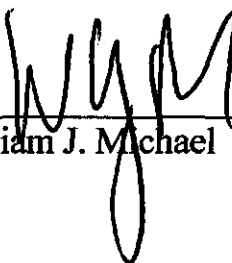

WILLIAM J. MICHAEL (0070921)
Attorney for Suburban Natural Gas Company
2626 Lewis Center Road
Lewis Center, OH 43035-9206
E-mail: bmichael@sngco.com
Telephone: (740) 548-2450

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Pre-Filing Notice was served upon the following parties of record or as a courtesy, via U.S. Mail, postage prepaid, on May 31, 2011.

Thomas Lindgren
Werner Margard
Attorney General
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

Doris McCarter, Division Chief
Capital Recovery and Financial Analysis
Utilities Department
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215



William J. Michael

NOTICE OF INTENT TO FILE

This document constitutes Suburban Natural Gas Company's ("Suburban") Notice of Intent to file an adjustment to its Rider IRP rates.

SERVICE AREA INCLUDED

The entire gas service area of Suburban will be included in the application for an adjustment of Rider IRP.

TEST YEAR

Test Year -- Twelve (12) months ended June 30, 2011.

LISTING OF MUNICIPALITIES INCLUDED IN THE APPLICATION
2011 VILLAGE CLERKS and FISCAL OFFICERS

CYGNET

Karen Hannah, Clerk/Treasurer
PO Box 190
110 Washington St
Cygnet, OH 43413
419-655-2165

WESTON

Sarah Schroeder, Fiscal Officer
13445 Ash St
Weston, OH 43569
419-669-3224

HAMLER

Shelly Grant, Fiscal Officer
916 Woodlawn Ct.
Napoleon, OH 43545
419-592-0915
419-274-7651

JERRY CITY

Tamara Stubbins, Fiscal Officer
PO Box 298
Jerry City, OH 43437
419-655-3811

GRAND RAPIDS

Donald E. Estep, Fiscal Officer
23871 Third St
Grand Rapids, OH 43522
419-832-5305- office
419-832-3505- home

DUNBRIDGE

Laurie Limes, Fiscal Officer
PO Box 206
Haskins, OH 43525
419-352-0432

MALINTA

Debra Wulff, Clerk/Treasurer
PO Box 69
Malinta, OH 43535
419-419-256-7961

HASKINS

Lisa Heft Clerk/Treasurer
PO Box 182
Haskins, OH 43525
419-823-1911

McCLURE

Connie Ehlers, Clerk/Treasurer
PO Box 340
McClure, OH 43534
419-748-8592

DESHLER

Karen Diem, Clerk/Treasurer
101 E. Main St
Deshler, OH 43516
419-278-2955-work
419-278-3882-home

TONTOGANY

Sherry Wallace Fiscal Officer
PO Box 238
Tontogany, OH 43565
419-823-4423

Note: When a village clerk lives outside the village limits, his/her title is changed to Fiscal Officer.

HOYTVILLE

Peg Phillips, Clerk/Treasurer
PO Box 135
Hoytville, OH 43529
419-278-6630

HOLGATE

Sally Nelson, Clerk/Treasurer
Po Box 217
327 Railway Ave.
Holgate, Oh 43527
419-264-3612

MAYORS FOR 2011

VILLAGE OF CYGNET

Mayor Nancy Myers
225 Union St
PO Box 190
Cygnet, OH 43413
H-419-655-2483 Bus 419-655-2715
nmyers@wcnet.org

VILLAGE OF HOLGATE

Mayor Wallace Snyder
PO Box 217
Holgate, OH 43527
419-264-8271- Home
419-264-3612-Bus

VILLAGE OF GRAND RAPIDS

Mayor Judy Keifer
PO Box 309
Grand Rapids, OH 43522
H-419-832-6453 Bus.419-832-5305
gr.mayor@verizon.net

VILLAGE OF JERRY CITY

Mayor Rick Tolbert
PO Box 173
Jerry City, OH 43437
419-655-3662
Work 419-343-6824

VILLAGE OF WESTON

Mayor Howard Lashuay
13330 Main St., PO Box 354
Weston, OH 43569
419-669-4241- Home
419-308-9060-Bus

CITY OF BOWLING GREEN

Mayor John Quinn
304 N. Church St.
Bowling Green, OH 43402
H-419-354-1833 Bus.419-354-6204
mayor@bgohio.org

VILLAGE OF DUNBRIDGE

Fred E. Vetter, Chairman
Middleton Township Trustee
11440 Devils Hole Rd
Bowling Green, OH 43402
H-419-353-7144 Bus.419-823-1480

VILLAGE OF HAMLER

Mayor Larry Dirr
PO Box 435
Hamler, OH 43524
H-419-274-4884 Bus. 419-274-7651

VILLAGE OF HASKINS

Mayor Randy Varner
PO Box 182
Haskins, OH 443525
Bus. 419-823-4406
mayor@haskinsvillage.org

VILLAGE OF MALINTA

Mayor Terry Wulff
PO Box 49
Malinta, OH 43535
H- 419-256-6168

VILLAGE OF DESHLER

Mayor Steve Gibson
542 W. Main St.
Deshler, OH 43516
H-419-278-0198 Bus.419-278-2955
www.villageofdeshler.com

VILLAGE OF MCCLURE

Mayor Dean Dawson
PO Box 340
McClure, OH 43534
H-419-748-8285 Bus.419-748-8592

VILLAGE OF HOYTVILLE

Mayor Edna Johnson
2429 S Maple St.
Hoytville, OH 43529
H-419-278-1930 Bus.419-278-6630

VILLAGE OF TONTOGANY

Mayor Nathan C. Wallace
PO Box 107
Tontogany, OH 43565
H-419-823-7703 Bus.419-823-901
n.wallace@tontoganyohio.org

EXHIBIT 3A

PROPOSED TARIFF SHEET

INFRASTRUCTURE REPLACEMENT PROGRAM RIDER

APPLICABILITY:

Applicable to all customers.

DESCRIPTION:

An additional charge per month per account, regardless of gas consumed, to recover costs associated with Suburban's riser inventory and identification process; customer notification and education; the replacement of customer-owned Natural Gas Risers identified in the November 24, 2006 Report by the Staff of the Public Utilities Commission of Ohio in Case No. 05-463-GA-COI as prone to failure and repair or replacement of service lines as specified in the Company's IRP Plan filed with the Public Utilities Commission of Ohio. This Rider shall be calculated annually pursuant to a Notice filed no later than May 31 of each year based on nine months of actual data and three months of estimated data for the reporting year. The filing shall be updated by no later than August 31 of the same year to reflect the use of actual reporting year data. Such adjustments to the Rider will become effective with bills rendered on November 1 of each year.

RATE:

\$0.29 per Month

ISSUED: _____, 2011 EFFECTIVE: _____ November 1, 2011

Filed pursuant to the Opinion and Order of the Public Utilities
Commission of Ohio in Case No. 11- -GA-RDR dated _____, 2011

ISSUED BY DAVID L. PEMBERTON, JR., PRESIDENT

EXHIBIT 3B

CHANGES TO CURRENT TARIFF SHEET

INFRASTRUCTURE REPLACEMENT PROGRAM RIDER

APPLICABILITY:

Applicable to all customers.

DESCRIPTION:

An additional charge per month per account, regardless of gas consumed, to recover costs associated with Suburban's riser inventory and identification process; customer notification and education; the replacement of customer-owned Natural Gas Risers identified in the November 24, 2006 Report by the Staff of the Public Utilities Commission of Ohio in Case No. 05-463-GA-COI as prone to failure and repair or replacement of service lines as specified in the Company's IRP Plan filed with the Public Utilities Commission of Ohio. This Rider shall be calculated annually pursuant to a Notice filed no later than May 31 of each year based on nine months of actual data and three months of estimated data for the reporting year. The filing shall be updated by no later than August 31 of the same year to reflect the use of actual reporting year data. Such adjustments to the Rider will become effective with bills rendered on November 1 of each year.

RATE:

\$0.2939 per Month

ISSUED: December 9, 2010 EFFECTIVE: January 1, 2011

Filed pursuant to the Opinion and Order of the Public Utilities
Commission of Ohio in Case No. ~~10-0763-GA-RDR~~ dated ~~November 22, 2010~~

ISSUED BY DAVID L. PEMBERTON, JR., PRESIDENT

EXHIBIT 3C

CURRENT TARIFF SHEET

INFRASTRUCTURE REPLACEMENT PROGRAM RIDER

APPLICABILITY:

Applicable to all customers.

DESCRIPTION:

An additional charge per month per account, regardless of gas consumed, to recover costs associated with Suburban's riser inventory and identification process; customer notification and education; the replacement of customer-owned Natural Gas Risers identified in the November 24, 2006 Report by the Staff of the Public Utilities Commission of Ohio in Case No. 05-463-GA-COI as prone to failure and repair or replacement of service lines as specified in the Company's IRP Plan filed with the Public Utilities Commission of Ohio. This Rider shall be calculated annually pursuant to a Notice filed no later than May 31 of each year based on nine months of actual data and three months of estimated data for the reporting year. The filing shall be updated by no later than August 31 of the same year to reflect the use of actual reporting year data. Such adjustments to the Rider will become effective with bills rendered on November 1 of each year.

RATE:

\$0.39 per Month

ISSUED: December 9, 2010 EFFECTIVE: January 1, 2011

Filed pursuant to the Opinion and Order of the Public Utilities
Commission of Ohio in Case No. 10-0763-GA-RDR dated November 22, 2010

ISSUED BY DAVID L. PEMBERTON, JR., PRESIDENT

EXHIBIT 4

**SAMPLE OF THE LETTER SENT TO MAYORS
AND LEGISLATIVE AUTHORITIES LISTED IN EXHIBIT 2**

SUBURBAN NATURAL GAS COMPANY
ESTABLISHED 1882



274 E. FRONT STREET, P.O. BOX 130
CYGNET, OHIO 43413-0130
(419) 655-2345

DAVID L. PEMBERTON, JR.
PRESIDENT

2626 LEWIS CENTER ROAD
LEWIS CENTER, OHIO 43035-9206
(740) 348-2450

May 31, 2011

Mayor Nancy Myers
Village of Cygnet
PO Box 190
Cygnet, OH 43413

Re: Application of the Suburban Natural Gas Company for an Adjustment to Rider IRP

Dear Mayor Myers:

This letter is to inform you that Suburban Natural Gas Company ("Suburban") intends to file an application for an adjustment to its Infrastructure Replacement Program Rider ("Rider IRP") with the Public Utilities Commission of Ohio ("PUCO"). The application will propose to decrease Suburban's Rider IRP from \$.39 per month to \$.29 per month.

Under its Infrastructure Replacement Program, Suburban is replacing prone to fail risers in Suburban's service territory over an accelerated time period. Suburban is also assuming the responsibility associated with the repair, replacement, and maintenance of customer service lines. In an Opinion and Order dated March 19, 2008 in *In the Matter of the Application of Suburban Natural Gas Company for Authority to Increase its Rates and Charges in Certain Areas of its Service Territory*, Case No. 07-689-GA-AIR, the PUCO approved a rider for the recovery of costs associated with the Infrastructure Replacement Program.

The proposed Rider IRP is subject to change by the PUCO. Although this letter is a formal notice to you, we also have representatives available to discuss our Rider IRP proposal. If you have any questions about our Rider IRP proposal, please call us at 419-655-2345 and we will respond to your inquiries.

Cordially,

David L. Pemberton, Jr.
President

EXHIBIT 5

SCHEDULES TO RIDER IRP PRE-FILING NOTICE

EXHIBIT 5 – Schedule 1

Suburban Natural Gas Company
Infrastructure Replacement Program and Rider
Replacement of Service Lines and Risers - Combined Effect
For the period July 2010 to June 2011 (9 mo actual 3 mo projected)

Account	Account Description	Actual July 2010 Month 10	Actual Aug 2010 Month 11	Actual Sept 2010 Month 12	Actual Oct 2010 Month 13	Actual Nov 2010 Month 14	Actual Dec 2010 Month 15	Actual Jan 2011 Month 16	Actual Feb 2011 Month 17	Actual Mar 2011 Month 18	Actual Apr 2011 Month 19	Estimated May 2011 Month 20	Estimated June 2011 Month 21
36080	IRP Service Lines	\$ 8,501	\$ 5,058	\$ 5,058	\$ 16,623	\$ 16,623	\$ 17,176	\$ 350	\$ 350	\$ 99	\$ 350	\$ 16,100	\$ 31,500
36070	IRP Risers	\$ 8,501	\$ 3,500	\$ 5,058	\$ 16,623	\$ 16,623	\$ 17,176	\$ 350	\$ 350	\$ 99	\$ 350	\$ 16,100	\$ 31,500
Total		\$ 17,002	\$ 8,558	\$ 10,116	\$ 33,246	\$ 33,246	\$ 34,352	\$ 700	\$ 700	\$ 198	\$ 700	\$ 32,200	\$ 63,000

50% of Replacement Cost Financed (taken out of rate base)

Account	Account Description	Actual July 2010 Month 10	Actual Aug 2010 Month 11	Actual Sept 2010 Month 12	Actual Oct 2010 Month 13	Actual Nov 2010 Month 14	Actual Dec 2010 Month 15	Actual Jan 2011 Month 16	Actual Feb 2011 Month 17	Actual Mar 2011 Month 18	Actual Apr 2011 Month 19	Estimated May 2011 Month 20	Estimated June 2011 Month 21
36080	IRP Service Lines	\$ 8,501	\$ 5,058	\$ 5,058	\$ 16,623	\$ 16,623	\$ 17,176	\$ 350	\$ 350	\$ 99	\$ 350	\$ 16,100	\$ 31,500
36070	IRP Risers	\$ 8,501	\$ 3,500	\$ 5,058	\$ 16,623	\$ 16,623	\$ 17,176	\$ 350	\$ 350	\$ 99	\$ 350	\$ 16,100	\$ 31,500
Total		\$ 17,002	\$ 8,558	\$ 10,116	\$ 33,246	\$ 33,246	\$ 34,352	\$ 700	\$ 700	\$ 198	\$ 700	\$ 32,200	\$ 63,000

50% recovered over 45 years (cost * 50% / 45 years) (not taken out of rate base)

Account	Account Description	Actual July 2010 Month 10	Actual Aug 2010 Month 11	Actual Sept 2010 Month 12	Actual Oct 2010 Month 13	Actual Nov 2010 Month 14	Actual Dec 2010 Month 15	Actual Jan 2011 Month 16	Actual Feb 2011 Month 17	Actual Mar 2011 Month 18	Actual Apr 2011 Month 19	Estimated May 2011 Month 20	Estimated June 2011 Month 21
36080	IRP Service Lines	\$ 8,501	\$ 5,058	\$ 5,058	\$ 16,623	\$ 16,623	\$ 17,176	\$ 350	\$ 350	\$ 99	\$ 350	\$ 16,100	\$ 31,500
36070	IRP Risers	\$ 8,501	\$ 3,500	\$ 5,058	\$ 16,623	\$ 16,623	\$ 17,176	\$ 350	\$ 350	\$ 99	\$ 350	\$ 16,100	\$ 31,500
Total		\$ 17,002	\$ 8,558	\$ 10,116	\$ 33,246	\$ 33,246	\$ 34,352	\$ 700	\$ 700	\$ 198	\$ 700	\$ 32,200	\$ 63,000

Return on Equity (based upon approved & 97% from rate case)

Account	Account Description	Actual July 2010 Month 10	Actual Aug 2010 Month 11	Actual Sept 2010 Month 12	Actual Oct 2010 Month 13	Actual Nov 2010 Month 14	Actual Dec 2010 Month 15	Actual Jan 2011 Month 16	Actual Feb 2011 Month 17	Actual Mar 2011 Month 18	Actual Apr 2011 Month 19	Estimated May 2011 Month 20	Estimated June 2011 Month 21
36080	IRP Service Lines	\$ 8,501	\$ 5,058	\$ 5,058	\$ 16,623	\$ 16,623	\$ 17,176	\$ 350	\$ 350	\$ 99	\$ 350	\$ 16,100	\$ 31,500
36070	IRP Risers	\$ 8,501	\$ 3,500	\$ 5,058	\$ 16,623	\$ 16,623	\$ 17,176	\$ 350	\$ 350	\$ 99	\$ 350	\$ 16,100	\$ 31,500
Total		\$ 17,002	\$ 8,558	\$ 10,116	\$ 33,246	\$ 33,246	\$ 34,352	\$ 700	\$ 700	\$ 198	\$ 700	\$ 32,200	\$ 63,000

Estimated Number of Customers

Projected Revised Rate

Estimated Number of Customers

Projected Revised Rate

EXHIBIT 5 – Schedule 2

Suburban Natural Gas Company Infrastructure Replacement Program and Rider Cost of Debt Calculation

For the period July 2010 to June 2011 (9 mo actual 3 mo projected)

	Actual July 2010 Month 10	Actual Aug 2010 Month 11	Actual Sept 2010 Month 12	Actual Oct 2010 Month 13	Actual Nov 2010 Month 14	Actual Dec 2010 Month 15	Actual Jan 2011 Month 16	Actual Feb 2011 Month 17	Actual Mar 2011 Month 18	Estimated Apr 2011 Month 19	Estimated May 2011 Month 20	Estimated June 2011 Month 21
Beginning Balance	\$ 57,306.50	\$ 60,317.98	\$ 60,740.23	\$ 61,905.12	\$ 68,799.81	\$ 75,797.92	\$ 74,203.94	\$ 72,606.32	\$ 70,879.57	\$ 69,527.27	\$ 75,791.11	\$ 88,712.24
Amount Borrowed	\$ 4,250.68	\$ 1,750.00	\$ 2,529.10	\$ 8,311.60	\$ 8,588.17	\$ 175.00	\$ 175.00	\$ 49.53	\$ 425.00	\$ 8,050.00	\$ 14,875.00	\$ 15,750.00
Amount Repaid (collected through rider - 1 mo. lag)	\$ 1,239.20	\$ 1,327.75	\$ 1,384.21	\$ 1,416.90	\$ 1,590.06	\$ 1,768.98	\$ 1,772.63	\$ 1,776.27	\$ 1,777.30	\$ 1,786.16	\$ 1,953.87	\$ 2,263.76
Ending Balance	\$ 60,317.98	\$ 60,740.23	\$ 61,905.12	\$ 68,799.81	\$ 75,797.92	\$ 74,203.94	\$ 72,606.32	\$ 70,879.57	\$ 69,527.27	\$ 75,791.11	\$ 88,712.24	\$ 102,198.48
Cost of Debt Per LOC	3.925%	3.925%	3.925%	3.925%	3.925%	2.428%	2.428%	2.428%	2.428%	2.428%	2.428%	2.428%
Interest to be Recovered	\$ 197.29	\$ 198.67	\$ 202.48	\$ 225.03	\$ 153.33	\$ 150.11	\$ 146.88	\$ 143.38	\$ 140.65	\$ 153.32	\$ 179.46	\$ 206.74

EXHIBIT 5 – Schedule 3

Suburban Natural Gas Company
Infrastructure Replacement Program and Rider
Rate of Return
For the period July 2010 to June 2011 (9 mo actual 3 mo projected)

	Actual July 2010 Month 10	Actual Aug 2010 Month 11	Actual Sept 2010 Month 12	Actual Oct 2010 Month 13	Actual Nov 2010 Month 14	Actual Dec 2010 Month 15	Actual Jan 2011 Month 16	Actual Feb 2011 Month 17	Actual Mar 2011 Month 18	Estimated Apr 2011 Month 19	Estimated May 2011 Month 20	Estimated June 2011 Month 21
Beginning Balance	\$ 59,288.17	\$ 63,428.70	\$ 65,060.67	\$ 67,468.51	\$ 75,654.16	\$ 84,100.99	\$ 84,118.75	\$ 84,136.18	\$ 84,027.82	\$ 84,294.84	\$ 92,186.07	\$ 106,887.39
Amount Expended	\$ 4,250.68	\$ 1,750.00	\$ 2,529.10	\$ 8,311.60	\$ 8,588.17	\$ 175.00	\$ 175.00	\$ 49.53	\$ 425.00	\$ 8,050.00	\$ 14,875.00	\$ 15,750.00
Amount Repaid (collected through rider - 1 yr. lag)	\$ 110.15	\$ 118.02	\$ 121.26	\$ 125.95	\$ 141.34	\$ 157.24	\$ 157.57	\$ 157.89	\$ 157.98	\$ 158.77	\$ 173.68	\$ 201.22
Ending Balance	\$ 63,428.70	\$ 65,060.67	\$ 67,468.51	\$ 75,654.16	\$ 84,100.99	\$ 84,118.75	\$ 84,136.18	\$ 84,027.82	\$ 84,294.84	\$ 92,186.07	\$ 106,887.39	\$ 122,436.17
Allowable Rate of Return	8.970%	8.970%	8.970%	8.970%	8.970%	8.970%	8.970%	8.970%	8.970%	8.970%	8.970%	8.970%
Return on Equity	\$ 474.13	\$ 486.33	\$ 504.33	\$ 565.51	\$ 628.65	\$ 628.79	\$ 628.92	\$ 628.11	\$ 630.10	\$ 689.09	\$ 798.98	\$ 915.21