BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Uncollectible Expense)	
Rider of Orwell Natural Gas Company)	Case No. 11-312-GA-UEX
)	

ANNUAL UNCOLLECTIBLE EXPENSE RIDER REPORT AND APPLICATION FOR APPROVAL OF AN ADJUSTMENT TO UNCOLLECTIBLE EXPENSE RIDER RATE

Orwell Natural Gas Company (hereinafter, "Orwell") submits herewith its Annual Report for June 1, 2010 through May 31, 2011, plus the information required in Paragraph 12 of the Commission's Finding and Order dated August 19, 2009 in Case No. 08-1229-GA-COI, *In the Matter of the Five-Year Review of Natural Gas Company Uncollectible Riders* for calendar year 2010. Applicant respectfully requests the approval of the Commission to revise its Uncollectible Expense Rider ("Rider") rate as explained below. In support of this Application, Applicant states the following:

In support of its Application, Orwell states the following:

- By its Finding and Order entered on August 18, 2010 in Case No., 10-312-GA-UEX, the Commission authorized Orwell to file compliance tariffs revising its Uncollectible Expense Rider applicable to the Small General Service (SGS) rate schedule at \$0.05331 per Mcf.
- 2. Attached hereto and marked Attachment 1 is Orwell's Annual Uncollectible Expense Report for calendar year 2010. The Annual Report, Attachment 1, at page 1 shows the actual Uncollectible Account Rider balance through December 31, 2010. In the Staff Report submitted by the Commission Staff on November 24, 2010 in Case No. 10-312-GA-UEX, Audit of the Uncollectible Mechanisms for the period July 2007 through

December 2009, Staff recommended that Orwell should adjust its January, 2010 Annual beginning balance to \$68,034.72 from (\$16,603.78) to correct prior errors in the Annual Balance Reconciliation. Although there has been no Finding and Order in Case No. 10-312-GA-UEX, which has been consolidated for hearing with Case No. 10-212-GA-GCR, Orwell concurs in the recommendations of Staff in the Staff Report submitted on November 24, 2010, and Page 1 of Attachment 1 reflects a January 2010 beginning balance of \$68,034.72.

- 3. Page 2 of Attachment 1 shows actual uncollectible balances for January through May, 2011 and estimates through December, 2011. Orwell has reported an actual Uncollectible Account balance of \$58,524.33 at May 31, 2011. Attachment 1, Page 3 shows estimated balances by month through May, 2012, estimated bad debt expense by month, and the estimated monthly sales volumes, as applicable. At May 31, 2012, the estimated Uncollectibles account balance is \$98,170.59.
- 4. Orwell believes it is appropriate and 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 Commission has found this procedure to be reasonable in applications for an adjustment in the Uncollectible Expense Rider rates of Columbia Gas of Ohio, Inc. in Case No. 10-578-GA-UEX, and Duke Energy Ohio in Case No. 10-726-GA-UEX.
- 5. Page 2 of Attachment 1 details the calculation of the change in Orwell's Uncollectible

 Expense Rider Rate based on its estimated bad debt write-offs, UEX Rider recoveries and
 sales volumes through May, 2012. The revised Rider rate proposed to be effective on
 and after July 1, 2011 is calculated to be \$0.17081 per Mcf, which is an increase of
 \$0.1175 per Mcf from the currently effective rate of \$0.05331/Mcf. Orwell's tariff SGS
 provides, pursuant to the Commission's guideline adopted in Case No. 03-1127-GA-

UNC, that an annual adjustment in an Uncollectible Expense Rider rate is appropriate when the over- or under-collection balance would exceed plus/minus ten percent absent adjustment, which is the case in this instance.

- 6. For this reason, Orwell Natural Gas Company submits that the proposed increase from its currently effective Uncollectible Expense Rider rate of \$0.05331 per Mcf to \$0.17081 per Mcf is appropriate. It is based on actual experience for the twelve months ended May, 2011 as adjusted for estimated uncollectible accruals and projected sales volumes through May, 2012 and should be approved to be effective July 1, 2011 subject to adjustment when Orwell files its next Annual Report of Uncollectible Expense Rider Balance as of the twelve months ending May, 2012.
- 7. Attachment 2 includes redlined and clean proposed revisions to Orwell's tariff reflecting the decreased Uncollectible Expense Rider rate proposed herein.

Respectfully submitted this 2th day of June, 2011.

/s/ Andrew J. Sonderman
Andrew J. Sonderman (0008610)
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asonderman@keglerbrown.com
Counsel for Applicant
Orwell Natural Gas Company

ATTACHMENT 1, PAGE 1

UNCOLLECTIBLE ACCOUNTS EXPENSE RIDER

(Over Collected

2010 Annual Balance Reconciliation

£ (9) Balance - End of Month (7)+(8) (8) Carrying Charges $\{[(1)+(7)]/2\}x(d)$ Э (6) Incremental Bad Debt (2)-[(3)+(4)+(5) (13,913.59) (5) Recovery - Other (b) (3) Recovery - Base Rates Ø (1) Balance - Beginning of Month Balance Subtotal (1)+(6) Recovery - Bad Debt Rider (a) **Bad Debts Written Off** \$68,034.72 ** 54,269.73 54,269.73 54,121.13 13,913.59 148.60 January 0.00 0.00 0.00 (13,608.77) (9,440.04) 40,660.96 13,608.77 40,776.45 February 115.48 0.00 0.00 0.00 31,336.41 40,776.45 31,424.13 9,440.04 87.73 March 0.00 0.00 0.00 10,939.08 31,424.13 42,363.21 42,452.97 5,999.21 16,938.29 89.76 0.00 0.00 April 38,861.90 3,591.07 (3,591.07) 42,452.97 38,960.82 98.92 0.00 0.00 0.00 May 38,960.82 43,620.95 4,660.13 6,559.02 43,721.41 1,898.89 100.46 0.00 0.00 June 42,004.36 43,721.41 42,108.65 (1,717.05)1,717.05 104.29 0.00 0.00 0.00 July 40,885.88 (1,222.77)42,108.65 40,986.84 1,213.57 100.96 August 0.00 0.00 (9.20)40,463.12 40,986.84 40,562.21 September (523.72)743.29 219.30 99.08 (0.27)0.00 39,186.74 40,562.21 39,283.76 (1,375.46)1,348.47 October (26.26) 97.01 0.73 0.00 39,283.76 40,952.45 1,668.69 41,050.05 3,004.74 4,674.43 November 97.61 1.00 0.00 \$84,554.90 84,402.29 41,050.05 43,352.24 49,296.12 5,942.91 December 152.61 0.97 0.00 \$77,651,70 \$62,421.61 \$84,554.90 \$1,292.52 \$0.00 \$2.43

Consists of customer payments, net-collection agency revenue, and other collections

5 136,088 94,400 59,992 35,911 18,989 \$0.10 \$0.10 \$0.10 \$0.10	(2,879) (2,567) (2,232) (1,843) (9) (23) (3) (3)	Sales Volumes - MCF'S * 141,031 138,279 97,288 62,582 38,145 20,835 18,2	(d) Annual CC rate (Staff calc) 2.9196% 2.9196% 2.9196% 2.9196% 2.9196% 2.9196% 2.9196%	(c) Net monthly carrying charge rate (e) 0.2433% 0.2433% 0.2433% 0.2433% 0.2433% 0.2433% 0.2433%	(0) сольны от сизиотет раушения, пет-сопесаном авенсу темение, ана опист колестиотя
17,171 \$0.10	(1,038) (3)	18,211	2.9196%	0.2433%	
12,136 \$0.10	(3)	13,130	9196% 2.9196%	2433% 0.2433%	
_	(1,017) (1,687) (3) (3)		2.9196% 2.9196%	0.2433% 0.2433%	
\$6,364 111,478 \$0.05331 \$0.05331	1		2.9196% 2.9196%	0.2433% 0.2433%	
720,901.60	(26,931,20 (64,20	747,897.00	-		

^{** =} Represents adjusted balance per the "Audit of the Uncollectible Expense Mechanism" for the period of July 2007 through Decembe 2009

 ⁽a) Calculated: actual consumption times authorized rider rate
 (b) Consists of customer payments, net-collection agency revei

ATTACHMENT 1, PAGE 2 ORWELL NATURAL GAS COMPANY UNCOLLECTIBLE ACCOUNTS EXPENSE RIDER 2011 Annual Balance Reconciliation

		<u>a</u>	<u>©</u>	(a)		9	8	Э	9	(5)	4	(3)	2	Ξ		
Less DEOGCR Volumes with a Rider Rider Rate of Recovery	Sales Volumes - MCF'S * Less LGS	Annual CC rate (Staff calc)	Net monthly carrying charge rate (e)	Calculated: actual consumption times authorized rider rate Consists of customer payments, net-collection agency revenue, and other collections		Balance - End of Month (7)+(8)	Carrying Charges {[(1)+(7)]/2}x(d)	Balance Subtotal (1)+(6)	Incremental Bad Debt (2)-[(3)+(4)+(5 (8,550.95)	Recovery - Other (b)	Recovery - Bad Debt Rider (a)	Recovery - Base Rates	Bad Debts Written Off	Balance - Beginning of Month		
(5) 160,240 \$0.05331	165,484 (5,239)	2.9196%	0.2433%	s authorized 1 collection age		76,199.27	195.32	76,003.95	: (8,550.95)	8.54	8,542.41	0.00	0.00	84,554.90	January	ACTUCINE
(9) 158,442 \$0.05331	163,613 (5,162)	2.9196%	0.2433%	rider rate incy revenue,	Actual and I	66,604.30	173.51	66,430.79	(9,768.48)	118.08	8,446.53	0.00	(1,203.87)	76,199.27	February	
(8) 108,266 \$0.05331	112,449 (4,176)	2.9196%	0.2433%	and other co	Actual ending balance Actual and Estimated Billing Volumes Over collected - Give Back	66,486.67	161.71	66,324.96	(279.34)	50.42	5,771.65	0.00	5,542.73	66,604.30	March	20
(6) 89,091 \$0.05331	93,022 (3,925)	2.9196%	0.2433%	llections	ng balance ling Volumes ck	61,181.54	155.12	61,026,42	(5,460.25)	447.82	4,749.43	0.00	(263.00)	66,486.67	<u>April</u>	2011 Annual Balance Reconciliation
(4) 45,671 \$0.05331	47,745 (2,069)	2.9196%	0.2433%		58,524 <u>842,795</u> \$0.06944	58,524.33	145.45	58,378.88	(2,802.65)	1.18	2,434.72	0.00	(366.75)	61,181.54	Мау	Salance Rec
19,369 \$0.05331	Estimated V 19,369	2.9196%	0.2433%			65,025.89	150.12	64,875.78	6,351.45	0.00	1,032.54	0.00	7,383.99	58,524.33	<u>June</u>	onciliation
17,514 \$0.05331	Estimated Volumes going forward with 2% increase 19,369 17,514 12,378 14,222	2.9196%	0.2433%		12 months of es Estimated Billi	75,355.89	170.57	75,185.33	10,159.43	0.00	933.67	0.00	11,093.10	65,025.89	July	'
12,378 \$0.05331	forward with 12,378	2.9196%	0.2433%		12 months of estimated write-offs (June2011 - May 2012) Estimated Billing Volumes (June 2011 - May 2012) Sub-Total	85,985.13	196.03	85,789.10	10,433.21	0.00	659.89	0.00	11,093.10	75,355.89	August	
14,222 \$0.05331	h 2% increase 14,222	2.9196%	0.2433%	Calculated Increase	timated write-offs (June2011 - May 2 ng Volumes (June 2011 - May 2012) Sub-Total	96,541.85	221.77	96,320.08	10,334.94	0.00	758.16	0.00	11,093.10	85,985.13	September	
25,801 \$0.05331	25,801	2.9196%	0.2433%	Calculated Bad Debt Ridty - New Increase	ne2011 - May 1 - May 2011	106,506.22	246.71	106,259.51	9,717.66	0.00	1,375.44	0.00	11,093.10	96,541.85	October	
57,491 \$0.05331	57,491	2.9196%	0.2433%	der - New	[,] 2012) 2)	114,803.38	268.90	106,259.51 114,534.48 119,834.70	8,028.26	0.00	3,064.84	0.00	11,093.10	106,506.22	November	
113,708 \$0.05331	113,708	2.9196%	0.2433%	\$0.117081 \$0.1175	77,652 <u>766,021</u> \$0.10137	106,506.22 114,803.38 120,120.14	285.44	119,834.70	5,031.33	0.00	6,061.77	0.00	11,093.10	114,803.38	December	
(32.40) 822,192.00	842,795.40 260,482 (20,571.00)			garacco.		\$120,120.14	\$2,370.63			\$626.04	\$43,831.06	\$0.00	\$77,651.70 73,943			

ORWELL NATURAL GAS COMPANY ATTACHMENT 1, PAGE 3

UNCOLLECTIBLE ACCOUNTS EXPENSE RIDER

2012 Annual Balance Reconciliation

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	January	February	March	April	May	June	<u>Vluľ</u>	August	September	October	November December	December	
(1) Balance - Beginning of Month	120,120.14	113,457.60 106,865.24 102,667.16	106,865.24		99,379.98	98,170.59	98,409.44	98,409.44	98,409.44	98,409.44	98,409.44 98,409.44	98,409.44	
(2) Bad Debts Written Off	741.82	741.82	741.82	741.82	741.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$3,709.11
(3) Recovery - Base Rates	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$0.00
(4) Recovery - Bad Debt Rider (a)	7,688.17	7,601.88	5,194.48	4,274.49	2,191.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$26,950.27
(5) Recovery - Other (b)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$0.00
(6) Incremental Bad Debt (2)-[(3)+(4)+(5 (6,946.35) (6,860.06) (4,452.66) (3,532.67) (1,449.43)	5 (6,946.35)	(6,860.06)	(4,452.66)	(3,532.67)	(1,449.43)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
(7) Balance Subtotal (1)+(6)	113,173.79	106,597.54	102,412.57	113,173.79 106,597.54 102,412.57 99,134.49 97,930.56	97,930.56	98,170.59	98,409.44	98,409.44	98,409.44 98,409.44 98,409.44 98,409.44 98,409.44	98,409.44	98,409.44	98,409.44	
(8) Carrying Charges {[(1)+(7)]/2}x(d)	283.80	267.70	254.59	245.49	240.03	238.85	0.00	0.00	0.00	0.00	0.00	0.00	\$1,530.45
(9) Balance - End of Month (7)+(8)	113,457.60	106,865.24	102,667.16	99,379.98	98,170.59	98,409.44	98,409.44	98,409.44	113,457.60 106,865.24 102,667.16 99,379.98 98,170.59 98,409.44 98,409.44 98,409.44 98,409.44 98,409.44 98,409.44 98,409.44 98,409.44 98,409.44 98,409.44	98,409.44	98,409.44	98,409.44	\$98,409.44

⁽a) Calculated: actual consumption times authorized rider rate(b) Consists of customer payments, net-collection agency revenue, and other collections

Sales Volumes Rider Rate of Recovery	(d) Annual CC rate (Staff calc)	(c) Net monthly carrying charge rate (e)
Estimated V 144,216 \$0.05331	2.9196%	0.2433%
Estimated Volumes (used last year volumes @90% 144,216 142,598 97,439 80,182 \$0.05331 \$0.05331 \$0.05331 \$0.05331	2.9196%	0.2433%
l last year vol 97,439 \$0.05331	2.9196%	0.2433%
umes @90% 80,182 \$0.05331	2.9196%	0.2433%
41,104 \$0.05331	2.9196%	0.2433%
0 \$0.05331	2.9196%	0.2433%
505,538.73		

ATTACHMENT 2 PAGE 1

Orwell Natural Gas Company Orwell, Ohio

Section 5
<u>Second Revised</u>
Sheet No. 2

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P.U.C.O. No. 1

accordance with Chapter 4901:1-14 of the Ohio Administrative Code which is incorporated herein by this reference, and shall be subject to Subparagraphs (ii) through (v), below.

- (ii) Gross Receipts Tax Rider. The Company will charge and collect each billing period the effect of the gross receipts taxes assessed against the Company under all applicable rates and charges. However, this Gross Receipts Tax Rider will not be applied to bills of customers statutorily exempt from the payment of gross receipts taxes. The current gross receipt tax rate is 4.75 percent, thus the current gross receipts tax charged will be at the effective rate of 4.98725 percent.
- (iii) Mcf Tax Rider. In addition to the above rates, the Company will charge and collect each billing period the effect of its excise tax liability. For each Mcf delivered, the Mcf tax will be \$.0411.
- (iv). Uncollectible Accounts Rider. In addition to and independent of the adjustments provided for in Subsections A and B above, the rates will be adjusted by an additional charge of \$0,17081 per Mcf by the Company to recover costs associated with uncollectible accounts for customers served pursuant to this schedule. No more frequently than annually, the Company may file an application with the Public Utilities Commission of Ohio requesting approval to adjust this charge if the Company determines that in the preceding year uncollectible accounts expense was over or under-recovered by plus or minus ten percent.

(C). Miscellaneous Charges

(i) Late Payment Charge. Payment of the total amount due must be received by Company or an authorized agent by the due date shown on the Bill which shall be fourteen (14) days from the date rendered. If a bill payment is not received within fourteen days of the date of the invoice, an additional amount of one and one half percent (1.5%) of the unpaid balance on the Customer's bill will be added to the Customer's subsequent bill and be due and payable as part of Customer's total obligation. This provision is not applicable to unpaid account balances of any customer enrolled in a payment plan pursuant to Rule 4901:1-18-04, Ohio Administrative Code.

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Filed under Authority of the Public Utilities Commission of Ohio in Case No. 11-312-GA-UEX

ISSUED: June 2011

EFFECTIVE: for bills rendered on or after July 1,2011

ATTACHMENT 2 PAGE 2

Orwell Natural Gas Company Orwell, Ohio

Section 5 Second Revised Sheet No. 2

P.U.C.O. No. 1

accordance with Chapter 4901:1-14 of the Ohio Administrative Code which is incorporated herein by this reference, and shall be subject to Subparagraphs (ii) through (v), below.

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Case No(s). 11-0312-GA-UEX

Summary: Report Annual Uncollectible Expense Rider Report and Application for Approval of an Adjustment to Uncollectible Expense Rider Report electronically filed by Mr. Andrew J Sonderman on behalf of Orwell Natural Gas Company