

FILE

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
 Columbia Gas of Ohio, Inc. for)
 Approval of a General Exemption of)
 Certain Natural Gas Commodity Sales)
 Services or Ancillary Services from) Case No. 08-1344-GA-EXM
 Chapters 4905, 4909, and 4935 except)
 Sections 4905.10, 4935.01, and 4935.03,)
 and from specified sections of Chapter)
 4933 of the Revised Code.)

**COLUMBIA GAS OF OHIO, INC.'S
 MEMORANDUM CONTRA
 THE APPLICATION FOR REHEARING OF
 THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

PUCO

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On June 1, 2011, the Commission issued an Entry in this docket in which the Commission established a procedural schedule for this case. On June 9, 2011 the Office of the Ohio Consumers' Counsel ("OCC") filed an application for rehearing of that Entry. For the reasons set forth in this Memorandum Contra, Columbia Gas of Ohio, Inc. ("Columbia") recommends that Commission deny the OCC Application for Rehearing.

PROCEDURAL BACKGROUND

On January 30, 2009, as supplemented on March 26 and 31, 2009, Columbia filed an application pursuant to Section 4929.04, Revised Code, for approval of a general exemption of certain natural gas commodity sales services or ancillary services contained in Chapters 4905, 4909, and 4935, Revised Code.

On October 7, 2009, the parties filed a Stipulation. The Stipulation was signed by all of the parties, with the exception of JP Morgan, NJR Energy, and Sempra Energy Trading LLC, which stated that they do not oppose the Stipulation.

The Stipulation provided that Columbia will conduct two auctions in order to implement two consecutive one-year long Standard Service Offer ("SSO") periods, starting in April 2010 and April 2011. Through those auctions, Columbia

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will obtain commodity gas supplies from alternative suppliers for both its PIPP and SSO requirements and pass the price of the gas on to its sales customers at a monthly SSO rate. Bid winners of the SSO auctions will be assigned an undivided percentage of the standard service customers' demand. The Stipulation also provided that Columbia will conduct a third auction for the annual period beginning April 2012. This auction will be a Standard Choice Offer ("SCO") auction. Bid winners of the SCO auction will be assigned to individual customers.

Three parties, including the OCC, stated in the Stipulation, that, "while they support the Stipulation, that support should not be interpreted as support for SCO auctions in general, or in this Stipulation."¹ The parties agreed that prior to the SCO auction date (February 2012), any party may petition the Commission to suspend the SCO auction in favor of another SSO auction. In the event that a party files an objection to an SCO auction the parties supporting the SCO auction agree to present evidence intended to demonstrate the anticipated benefits to be derived from an SCO auction.²

The Commission approved the Stipulation in an Opinion and Order dated December 2, 2009, and held, "We further find that the SSO and SCO auctions represent a reasonable structure through which to test the potential benefits of market-based pricing of the commodity sales by the company. Columbia is, therefore, authorized to proceed with the auctions."³

On April 15, 2011, Columbia filed a Revised Program Outline, which reflects the operational changes necessary to implement the initial SCO auction in February 2012. As Columbia explained in its April 15 filing, a Commission order approving this Program Outline is necessary by September 1, 2011 in order to complete the programming of Columbia's IT systems and to implement the SCO auction in February 2012.

By Entry dated April 27, 2011, the Commission directed that any party desiring to comment upon the Revised Program Outline do so by May 9, 2011. In addition, the Entry provided that any petitions/objections requesting that the SCO auction be suspended must also be filed by May 9, 2011.

Pursuant to the Commission's April 27, 2011 Entry, on May 9, 2011 the OCC and Ohio Partners for Affordable Energy ("OPAE") filed objections to the transition to an SCO auction.

By Entry dated June 1, 2011, the Commission established a procedural schedule for this case. Among other things, that Entry provides for the filing of testimony by June 23, 2011, and a hearing on June 29, 2011. At the close of the hearing there are to be closing statements instead of briefs. This expedited hear-

¹ Joint Stipulation and Recommendation (October 9, 2009) at 2, 9, footnotes 6 and 9.

² Id. at 9.

³ Opinion and Order (December 2, 2009) at 14-15.

ing schedule appears to be structured so that the Commission can issue an order by September 1, 2011 – the date by which Columbia needs a definitive outcome in this proceeding in order to complete the programming of computer systems in order to transition to an SCO auction.

On June 9, 2011, the OCC filed an application for rehearing of the Commission's June 1 Entry. In that application for rehearing the OCC takes exception to the procedural schedule in this case and suggests an approximate two-month extension of the procedural schedule, with a hearing on September 1, 2011. The schedule that the OCC suggests would make it impossible for Columbia to complete the computer programming necessary to implement an SCO auction as planned and provided for in the Commission-approved Stipulation, and the Commission should reject the OCC's attempt to manipulate the procedural schedule to bolster its ultimate substantive objective in this case – that being maintenance of an SSO auction instead of a transition to an SCO auction.

THE OCC'S SUGGESTED CHANGES TO THE PROCEDURAL SCHEDULE ARE UNREASONABLE BECAUSE THE CHANGES WOULD NOT PERMIT THE COMMISSION TO ISSUE AN ORDER IN TIME FOR COLUMBIA TO IMPLEMENT AN SCO AUCTION IN FEBRUARY 2012

The OCC has asked the Commission to postpone the hearing in this case until September 1, 2011.⁴ The OCC has also asked that post-hearing briefs be permitted in lieu of closing statements.⁵ The revisions to the procedural schedule suggested by the OCC would make it difficult for the Commission to issue an order before October 1 at the very earliest. Were the OCC's suggested changes to be adopted, the delay in the issuance of a Commission order would make it impossible for Columbia to implement all the computer programming changes necessary to transition to an SCO auction in February 2012. By thus manipulating the procedural schedule the OCC would make it impossible for Columbia to implement the SCO auction as scheduled, which is the OCC's ultimate goal. The Commission should reject this type of gamesmanship and decide this case on the merits by September 1, 2011. The procedural schedule set forth in the June 1 Entry is designed to permit a timely resolution of the issues in this case, and the OCC has not provided sufficient reason to adopt the schedule it proposes.

In support of its arguments, the OCC makes the disingenuous statement that, "[g]iven that any SCO auction would not be conducted until sometime in the February-March timeframe, there has been no justification for Columbia to have nearly six months time to prepare for the SCO auction."⁶ In its filing of the

⁴ OCC Application for Rehearing at 3.

⁵ *Id.*

⁶ *Id.* at 8.

Revised Program Outline Columbia explained that in order to fully implement the IT programming necessary to transition to an SCO auction in February 2012, it must know by September 1 whether the Commission is going to permit the transition as originally approved or whether it intends to suspend that transition in response to objections filed by other parties.⁷

In the months preceding the filing of the Revised Program Outline, Columbia met with its stakeholders, including the OCC, on several occasions. At those meetings Columbia explained to the stakeholders its computer programming lead time, and the need for this September 1, 2011 "deadline."

In its most recent discovery, the OCC also asked about the costs of the transition to an SCO auction and Columbia explained to the OCC that Columbia estimates it will need 12,910 to 16,175 hours of programming at a cost of between \$1,018,600 and \$1,277,375.⁸ While Columbia has already started this IT programming effort, it cannot commit to all of it until the Commission has acted on the OCC and OPAE objections. Should the Commission modify the Revised Program Outline in any way, additional computer programming time and costs may well be necessary.

Despite the OCC's professed lack of knowledge about the justification of the time needed for computer programming, it should be clear to the Commission that this OCC assertion is baseless. While the OCC may not fully appreciate the effort involved in making major modifications to business programming systems, the fact is that under the procedural schedule proposed by the OCC Columbia simply cannot make the IT changes necessary to implement timely an SCO auction in the event that the Commission rejects the OCC and OPAE objections.

THE OCC HAS HAD, AND CONTINUES TO HAVE, AMPLE OPPORTUNITY FOR DISCOVERY

The OCC alleges that it will suffer "undue prejudice" because of the Commission's denial of adequate and ample discovery.⁹ This is simply not the case.

The Commission approved the Stipulation in this case by Opinion and Order dated December 2, 2009. Thus, the OCC has had 18 months in which to undertake discovery efforts with respect to the issues it now wants to litigate. Between December 2009 and the present the OCC never once availed itself of the

⁷ Revised Program Outline (April 15, 2011) at 2.

⁸ Columbia responses to OCC Interrogatory number 4 and OCC Request to Produce number 4, both of which are attached hereto.

⁹ OCC Application for Rehearing at 5.

opportunity to request any kind of informal discovery with Columbia – a process that Columbia has embraced in other litigated regulatory proceedings.

Between December 2, 2009 and April 28, 2011 the OCC served no formal discovery responses upon Columbia. While Columbia very likely might have objected to such formal data requests in the absence of a scheduled hearing, had the OCC served formal data requests much earlier in this proceeding, and filed a motion to compel if necessary, it would have had an opportunity to get its discovery issues before the Commission much earlier.

Notwithstanding the OCC's lack of discovery efforts earlier in this proceeding, the Commission has not denied the OCC adequate and ample discovery. While, the June 1 Entry established a compressed procedural schedule the schedule provided for discovery, and drastically shortened the time for responses to discovery requests. This shortened response period should enable the OCC to obtain the responses to relevant data requests with sufficient time to use the information in the preparation of testimony.

Columbia filed its Revised Program Outline on April 15, 2011. That filing asked that the Commission issue an order by September 1, 2011, and requested that the Commission expeditiously schedule a prehearing conference to discuss issues related to review of the Revised Program Outline. The OCC participated in stakeholder meetings prior to the filing of the Revised Program Outline, and was thus well aware of the contemplated filing and the request for expedited review of the filing. Yet, the OCC wasted nearly two weeks by waiting until April 28, 2011 to serve its initial data requests.

Furthermore, the issues associated with the transition from an SSO auction to an SCO auction are not new issues. The Commission, OCC, and other parties have already dealt with identical issues in the context of similar auction programs for Dominion East Ohio¹⁰ and Vectren Energy Delivery of Ohio.¹¹ Therefore, it must be assumed that the OCC already has an in-depth understanding of the matters associated with its philosophical opposition to SCO auctions. Additional discovery likely will add little to those philosophical underpinnings.

Despite the OCC's dilatory discovery efforts in this proceeding, the expedited procedural schedule in this case provides the OCC with adequate and ample opportunity for discovery. The June 1 Entry imposes no limit upon the number and frequency of OCC data requests. Instead of wasting all parties' time arguing about the compressed procedural schedule, the OCC should instead be using this limited time for discovery to the extent it has relevant questions to which it needs responses in order to prepare its testimony.

¹⁰ See Case No. 07-1224-GA-EXM.

¹¹ See Case No. 07-1285-GA-EXM.

COLUMBIA HAS RESPONDED TO ALL OF THE OCC DATA REQUESTS

In its Application for Rehearing the OCC alleges that Columbia only partially responded to the OCC's data requests.¹² This is simply untrue.

Columbia responded to each and every data request served by the OCC. In those responses Columbia objected to a large number of OCC questions because the questions had no bearing whatsoever on the issues associated with the transition from an SSO auction to an SCO auction. It is duplicitous for the OCC to imply that a legitimate objection is equivalent to a failure to respond.

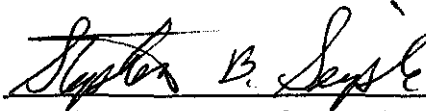
When the OCC serves relevant data requests Columbia endeavors to fully provide substantive responses to such questions. However, as long as the OCC continues to use discovery in every case as a "fishing expedition" for information it plans to use in other cases, Columbia will continue to object to such questions.

CONCLUSION: THE OCC'S APPLICATION FOR REHEARING SHOULD BE DENIED BECAUSE THE EXPEDITED PROCEDURAL SCHEDULE HAS PROVIDED THE OCC WITH ADEQUATE AND AMPLE DISCOVERY RIGHTS

Expedited procedural schedules often place burdens on all parties, as is the case here. However, notwithstanding the compressed procedural schedule the Commission has provided all parties with sufficient time to conduct discovery and prepare testimony. This is particularly true for parties such as the OCC which is again retrying issues it has raised in earlier cases. Therefore, for the reasons set forth herein, the Commission should deny the OCC's Application for Rehearing and adhere to the procedural schedule established by the June 1, 2011 Entry.

¹² OCC Application for Rehearing at 7.

Respectfully submitted,
COLUMBIA GAS OF OHIO, INC.

A handwritten signature in black ink, appearing to read "Stephen B. Seiple", is written over a horizontal line.

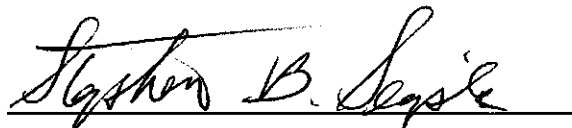
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Stay Discovery was served upon all parties of record by electronic mail this 13th day of June, 2011.



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ATTACHMENTS

COLUMBIA RESPONSES TO OCC DATA REQUESTS

COLUMBIA GAS OF OHIO, INC.
RESPONSE TO OCC'S FIRST SET OF INTERROGATORIES
DATED APRIL 28, 2011

Interrogatory No. 4:

Referring to Page 2 of the Revised Program outline, please identify any additional expenses or costs which Columbia may incur as a result of its proposal to provide service to its sales customers through an SCO auction process, instead of an SSO auction process.

Response:

At this time Columbia projects it may incur the following additional estimated expenses related to implementation of the SCO auction process:

Customer Notification Costs	\$ 380,000
Information Technology Costs for Project Management, Auto Marketer Setup, DIS Choice, DIS Online, DIS Reporting, DIS Bill Format, DIS Other, IVR, Web Self Service, Aviator, Gas Transportation Billing and Development of Demand Curves.	1,300,000
Total	\$ 1,680,000

PUCO Case No. 08-1344-GA-EXM
OCC Request for Production No. 4
Respondent: Larry W. Martin

**COLUMBIA GAS OF OHIO, INC.
RESPONSE TO OCC'S FIRST SET OF REQUEST FOR
PRODUCTION OF DOCUMENTS
DATED APRIL 28, 2011**

Request for Production No. 4:

Please provide any workpapers, studies or analysis associated with the response to OCC Interrogatory No. 4 regarding additional expenses associated with conducting an SCO auction.

Response:

See attached.

Standard Choice Offer Customer Education Cost Estimate

Budgeted Costs

• Direct Mail Customer Communication	\$362,800 (Print/Insert and Postage)
• Billing Insert	\$15,700 (Production)
• <u>Pocket Card for Field Employees</u>	<u>\$1,500 (Printing)</u>
• TOTAL:	\$380,000

This estimate assumes that Columbia Gas of Ohio will:

- Send one direct mail piece to all customers explaining the SCO
- Send one billing insert to all customers
- Produce 1,000 "pocket cards" for field service employees to carry with them and provide to customers who ask them about the SCO.

The direct mail and billing insert cost estimates are based on invoices for SSO customer education costs in 2010. The invoices cover production of a direct mail customer letter, postage for the letter and production costs for a bill insert. The \$1,500 estimate for the "pocket card" production is a good-faith estimate based on past production costs for similar pieces.

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VECTRA

Marketing Services By Vectra, Inc.

3950 Business Park Drive ■ Columbus, Ohio 43204
Phone 614 351 6868 ■ Fax 614 351 6900

INVOICE NO.	PAGE
307900	
INVOICE DATE	
4/26/2010	

BILL TO: COLUMBIA GAS OF OHIO
NISOURCE ACCOUNTS PAYABLE
PO BOX 30130
COLLEGE STATION TX 77842
US

SHIP TO:

SNET
MAY 03 2010
REC'D

ORDER NO.	ORDER DATE	CUSTOMER NO.	LOC	SALES REP
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REC'D

CGO00001	MH
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INTERNAL ORDER NO. / CUSTOMER PO NO.	JOB NO.	ATTN:
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2596

ITEM NUMBER DESCRIPTION	ORDER DATE	QTY SHIPPED/RETURNED QTY. BACKORDERED	UNIT PRICE	UOM DISC%	EXTENDED PRICE
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1,293,250

155,839.19

Columbia Gas of Ohio Project Mailing
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Print 8.5 x 11 Insert-static.
Print #10 Window envelope with Vectra indicia
Simplex Laser; Fold, Insert, Mail

1,293,250
155,839.19
1,293,250
155,839.19

EMPLOYEE ID: U462485 / LOCATION: CIVIC CENTER

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VECTRA

EMPLOYEE ID: U462485 / LOCATION: CIVIC CENTER

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VECTRA

COMMENTS: THE GAS COMPANY HAS REQUESTED FOR THE
PRINTING OF THE FOLLOWING:
1. 8.5 x 11 Letterhead
2. 8.5 x 11 Insert
3. #10 Window envelope with Vectra indicia
4. Simplex Laser; Fold, Insert, Mail

TERMS: Net 30

SALE AMOUNT	155,839.19
SHIPPING	5,085.25
SALES TAX	0.00
BALANCE DUE	160,924.44

C034
10124350

listening[™]
VECTRA
3950 Business Park Dr., Columbus, Ohio 43204
Phone: 614 351 - 6868 Fax: 614 351 - 6900

INVOICE NO. PAGE	
305181	1
INVOICE DATE	
3/17/2010	

BILL TO:

SHIP TO:

COLUMBIA GAS OF OHIO
NISOURCE-ACCOUNTS-PAYABLE
PO BOX 30130
COLLEGE STATION TX 77842
US

ORDER NO.	ORDER DATE	CUSTOMER NO.	LOC	SALES REP
	3/1/2010	CGO00001		MH

INTERNAL ORDER NO./CUSTOMER PO NO.

JOB NO.

ATTN:

2596

ITEM NO./DESCRIPTION	ORDER DATE	QUANTITY	UNIT PRICE	UOM	EXTENDED PRICE
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201,871.58

POSTAGE- 1,293,239 PCS COLUMBIA GAS OF OHIO CHOICE MAILING

EMPLOYEE ID: 124350 - LOCATION: CIVIC CENTER

SALE AMOUNT	0.00
SHIPPING	0.00
SALES TAX	0.00

TERMS Net 30

BALANCE DUE	201,871.58
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Marketing Services By Vectra, Inc.

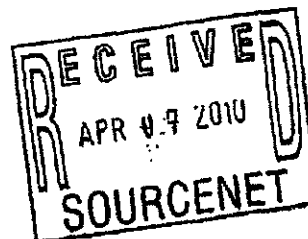
3950 Business Park Drive ■ Columbus, Ohio 43204
Phone 614 351 6868 ■ Fax 614 351 6900

INVOICE NO.	PAGE
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3/31/2010	

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COLUMBIA GAS OF OHIO
NISOURCE ACCOUNTS PAYABLE
PO BOX 30130
COLLEGE STATION TX 77842
US

SHIP TO:



ORDER NO.	ORDER DATE	CUSTOMER NO.	LOC	SALES REP	
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INTERNAL ORDER NO. / CUSTOMER PO NO.			JOB NO.	ATTN.:	
			2968		
ITEM NUMBER	ORDER DATE		QTY SHIPPED/RETURNED	UNIT PRICE	UOM
DESCRIPTION			QTY. BACKORDERED		DISC%
					EXTENDED PRICE

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COH-SSO INSERT-GAS PRICING INSERT, 4X7, 60# WH. OFFSET, 4C/4C,
PAPERBAND

EMPLOYEE ID: I24350 - LOCATION: CIVIC CENTER

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COMMENTS:

SALE AMOUNT	15,610.00
SHIPPING	110.30
SALES TAX	0.00
BALANCE DUE	15,720.30

TERMS: Net 30

COH SCO Auction

6/2/2011

Systems Impacted	Area/Item	Hours Estimated By Area	Costs Estimated by Area
Aviator	Aviator	160 - 200	\$8,800 - 11,000
	PIPP and/or DSM Rider Exemption for DIS		
	Automate New Choice Marketer Set Up		
	Automated DAT File Process for SCO Assignment & Enrollment Process		
	Customer Education		

COH SCO Auction

6/2/2011

Systems Impacted	Area/Item	Hours Estimated By Area	Costs Estimated by Area
DIS	DIS Billing Process for SCO Customers	9,350 - 11,750	\$822,800 - 1,034,000
	DIS Demand Curve Input File - Modification		
	GALIST & SOLIST (by Zip Code and Whole State)		
	GTS Billing & Allocation Modification		

All data subject to change based on settlement and PUC approval

COH SCO Auction

6/2/2011

Systems Impacted	Area/Item	Hours Estimated By Area	Costs Estimated by Area
	GTS Month-End Accounting Report		
	GTS Program Eligibility		
	Monthly Choice Reports - Modification (TOM Report/Mainframe)		
	New Rate Schedule for SCO & DIS On-Line Screen Modification		
	New SCO Supplier Reports/ to be FTP		
	PM, Planning Meeting		
	Revenue Reporting		
	SCO and DSS Consumption to GTS		

COH SCO Auction

6/2/2011

Systems Impacted	Area/Item	Hours Estimated By Area	Costs Estimated by Area
	SCO Supplier Code Set-Up		
	SSO Demand Curve Override Keyword		
Dot Net (Demand Curve)	Dot Net /Demand Curve Modification	900 - 1,125	\$49,500 - 61,875
GTS	GTS Billing & Allocation Modification	2,500 - 3,100	\$137,500 - 170,500
	GTS Month-End Accounting Report		
	GTS Program Eligibility		
	GTS Remove Backup and Supplemental References		
	GTS Web Report		
	PM, Planning Meeting		
	Revenue Reporting		
	SCO and DSS Consumption to GTS		
	SCO Supplier Revenue (Receivable) Billing in GTS		
	Totals:	12,910 - 16,175	\$1,018,600 - \$1,277,375

All data subject to change based on settlement and PUC approval