

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Amendment of)
Certain Rules of the Ohio Administra-)
tive Code to Implement Section) Case No. 11-4910-AU-ORD
4911.021, Revised Code.)

**COMMENTS OF
COLUMBIA GAS OF OHIO, INC.**

On September 7, 2011, the Public Utilities Commission of Ohio (“Commission”) issued its initial Entry in this proceeding (“Entry”). The Entry invited interested parties to comment on rule revisions proposed to implement Rev. Code § 4911.21. Columbia Gas of Ohio, Inc. (“Columbia”) hereby submits its Comments.

Revised Code § 4911.21 was recently amended to eliminate the Office of the Ohio Consumer’s Counsel’s (“OCC”) call center. The statute further provides that consumer complaint calls received by the OCC shall be forwarded to the Commission’s call center. In light of the revisions to Revised Code § 4911.21 the Staff has proposed to revise the wording of those rules which require that certain documents and bills contain contact information for the OCC.

The Commission’s rules contain numerous requirements for the provision of OCC contact information to customers. The applicable language in all the rules is fairly consistent. In conjunction with the Entry the Staff did not propose to eliminate the sentences containing the OCC’s contact information. Instead, the Staff proposed to eliminate only that wording which indicated that residential customers may contact the OCC for assistance with complaints and utility issues. Staff did not delete the remainder of the wording which provides the OCC’s contact information. With respect to those rules that apply to natural gas companies, Columbia respectfully suggests that the Commission should delete more OCC contact language than proposed by Staff in conjunction with the rule revisions which are the subject of these Comments.

As noted in paragraph 3 of the Entry, the Commission is required to consider the continued need for its rules and any factors that have changed in the subject matter area affected by the rules. Given the recent enactment of Revised Code § 4911.21 there is no need for any natural gas company documents or bills to include contact information for the OCC, unless otherwise mandated by statute. While the OCC can represent residential customers in Commission proceedings it no longer maintains a call center for assisting customers with complaints and utility issues. Such calls are now to be directed to the Commission's call center. That being the case, it makes no sense for the Commission's rules to require that customers be provided with OCC contact information. There is simply no need for the routine provision of OCC contact information when the OCC is no longer permitted to assist customers with complaints and utility issues.

Revised Code § 4929.22(C)(4) continues to require the provision of OCC customer contact information on the bills of natural gas suppliers and governmental aggregators. For that reason, the Staff's proposed revisions to Ohio Admin. Code § 4901:1-29-12(B)(12) are appropriate. With regard to all of the other Ohio Admin. Code provisions applicable to natural gas companies, the sentences which contains OCC contact information should be deleted in their entirety. The sentences, as proposed by Staff, which should be deleted typically read:

The Ohio Consumers' Counsel (OCC) represents residential utility customers in matters before the PUCO. The OCC can be contacted at 1-877-742-5622 (toll free) from 8:00 a.m. to 5:00 p.m. weekdays, or at www.pickocc.org.

The sentences above are not required by statute, serve no practical purpose, and will only result in customer confusion and, therefore, should be deleted from the following rules: Ohio Admin. Code sections 4901:1-13-06(C), 4901:1-13-09(B)(2)(d), 4901:1-13-09(C)(2)(e), 4901:1-13-11(B)(5), 4901:1-18-06(A)(5)(d) and 4901:1-29-11(B)(10).

Respectfully submitted by,
COLUMBIA GAS OF OHIO, INC.

/s/ Stephen B. Seiple
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Summary: Comments Comments of Columbia Gas of Ohio, Inc. electronically filed by B. Scott
on behalf of Columbia Gas of Ohio