

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of the Consumer)	
Privacy Protection, Customer Data Access,)	Case No: 11-277-GE-UNC
and Cyber Security Issues Associated with)	
Distribution Utility Advanced Metering and)	
Smart Grid Programs.)	

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

On January 18, 2011, the Public Utilities Commission of Ohio ("Commission") issued its initial Entry in this proceeding ("Entry"). On February 2, 2011, the Commission issued an Entry inviting interested parties to comment on privacy and data access concerns related to advanced metering. Columbia Gas of Ohio, Inc ("Columbia") filed comments on March 3, 2011 in response to the Commission's Entry. On October 18, 2011, the Commission issued another Entry inviting interested entities to file reply comments to the comments filed in response to the February 2, 2011 entry. Columbia hereby submits its comments.

As noted in its original comments, Columbia is currently installing the Itron Mobile Automated Meter Reading ("AMR") system. The AMR devices (also known as encoder receiver transmitter or "ERT") transmit data in response to a signal from a radio-equipped handheld computer or vehicle-based mobile computer collection system. The AMR device attaches to the gas meter and encodes consumption and tamper information from the meter to the radio equipment sending device.

The Commission should take into consideration the unique difference between Columbia's AMR system and smart meters (a.k.a. "smart grids or "AMIs") before adopting general rules relating to consumer data privacy. The primary difference between the AMR system used by Columbia and smart meters used by electric utilities is that the AMR system includes no unencrypted data. Given the limited amount of sensitive data transmitted through Columbia's AMR devices, Columbia does not believe that there are the same privacy concerns as there are with the AMI devices used by electric utilities. As such, Columbia believes that any rules adopted by the Commission relating to smart meters should only be applied to electric utilities.

Columbia is willing to participate in any technical workshops the Commission deems necessary to assist the Commission in identifying the differences between AMRs and smart meters.

Respectfully submitted by,
COLUMBIA GAS OF OHIO, INC.

_____/s/ Brooke E. Leslie_____

Brooke E. Leslie, Trial Counsel

Stephen B. Seiple, Assistant General Counsel
Brooke E. Leslie, Counsel
200 Civic Center Drive
P.O. Box 117
Columbus, Ohio 43216-0117
Telephone: (614) 460-5558
Fax: (614) 460-6986
Email: bleslie@nisource.com

Attorneys for
COLUMBIA GAS OF OHIO, INC.

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Summary: Comments COMMENTS OF COLUMBIA GAS OF OHIO, INC.
electronically filed by Ms. Amy M Mescher on behalf of Columbia Gas of Ohio, Inc.