

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Commission's)
Review of the Alternative Rate Plan) Case No. 11-5590-GA-ORD
and Exemption Rules Contained in)
Chapter 4901:1-19 of the Ohio)
Administrative Code.)**

**INITIAL COMMENTS TO STAFF'S REVISED RULES
OF COLUMBIA GAS OF OHIO, INC.**

Pursuant to the Commission's August 22, 2012 Entry on Rehearing, Columbia Gas of Ohio, Inc. ("Columbia") incorporates the arguments raised in its Application for Rehearing filed on August 1, 2012, as its Initial Comments to Staff's revised Chapter 4901:1-19 rules issued on July 2, 2012.

The Commission should, therefore, further amend Staff's revised Chapter 4901:1-19 rules in accordance with Columbia's comments to be more consistent with Am. Sub. H.B. No. 95.

Respectfully submitted,

/s/ Brooke E. Leslie

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Initial Comments of Staff's Revised Rules was sent by electronic mail to the parties listed below on this 4th day of September, 2012.

/s/ Brooke E. Leslie

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Summary: Comments electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.