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PUCO EXHIBIT FILING

Date of Hearing: December 6, 2012

Case No. 12-2637-GA-EXM - Volume II

PUCO Case Caption: In the Matter of the Application to Modify, in accordance with section 4929.08, Revised Code, the Exemption Granted Columbia Gas of Ohio, Inc. in Case No. 08-1344-GA-EXM.

List of exhibits being filed:

Dominion Retail Exhibit No. 1

OGMG/RESA Exhibit No. 6.

OPAE Exhibit No. 2A

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2012 DEC -7 PM 3:35
PUCO

Reporter's Signature: _____

Maria DiPaolo Jones

Date Submitted: _____

12/6/12

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BEFORE PUBLIC UTILITIES COMMISSION OF OHIO

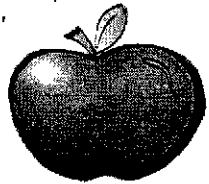
In the Matter of the :
Application to Modify, :
in accordance with :
Section 4929.08, Revised :
Code, the Exemption : Case No. 12-2637-GA-EXM
Granted Columbia Gas of :
Ohio, Inc. in Case :
No. 08-1344-GA-EXM. :

PROCEEDINGS

before Ms. Christine M.T. Pirik, Hearing Examiner, at
the Public Utilities Commission of Ohio, 180 East
Broad Street, Room 11-A, Columbus, Ohio, called at
9:00 a.m. on Wednesday, December 6, 2012.

VOLUME II

ARMSTRONG & OKEY, INC.
222 East Town Street, 2nd Floor
Columbus, Ohio 43215
(614) 224-9481 - (800) 223-9481
Fax - (614) 224-5724



PUCO Apples to Apples Natural Gas Rate Comparison Chart Columbia Gas of Ohio

Publication Date: November 27, 2012

The PUCO produces the *Apples to Apples* charts to provide consumers with a snapshot comparison of current natural gas supplier price options and contract terms for individual customers. You may also want to check with your local government to see if your community has grouped together citizens into a buying pool to purchase gas. The PUCO updates the charts on a weekly basis and verifies each supplier offer to ensure accuracy. As with all contracts, consumers should carefully read and understand all terms and conditions before signing any forms or agreeing to enroll with a supplier for natural gas service. For a description of *Apples to Apples* chart-related terms, please refer to **Chart Definitions** that follows the **Supplier Plans, Rates, Terms and Conditions** section.

The PUCO provides the tools you need to calculate your estimated cost. The **Self-Calculation Worksheet** that follows **Chart Definitions** walks you through the steps needed to manually calculate your own estimated cost. You can also visit www.puco.ohio.gov and click on the **Apples to Apples** link to access the **Apples to Apples Interactive Calculator** and automatically calculate your estimated costs.

Columbia Gas of Ohio's Rate

The Standard Choice Offer (SCO) rate is based on the New York Mercantile Exchange month-end settlement price, plus a Retail Price Adjustment of \$0.153 per ccf. The SCO is a monthly variable rate and represents cost associated with the securing gas for CGO customers.

Columbia Gas of Ohio's (CGO) current total rate is **\$0.58048** per hundred cubic feet (ccf)

Effective from **November 28, 2012 to December 30, 2012**

This total rate includes:

The Standard Choice Offer (SCO) of	\$0.52260 per ccf
A Sales Tax amount of	\$0.03528 per ccf, @6.75%
Transportation costs of	\$0.02260 per ccf (gross receipts tax included)

Contact information for Columbia Gas of Ohio: 200 Civic Center Dr., Columbus, OH 43215, (800) 344-4077, www.ColumbiagasofOhio.com.

PUCO-Certified Retail Natural Gas Suppliers Actively Soliciting New Customers

<u>Supplier Name</u>	<u>Web Page Address</u>	<u>Telephone</u>
Border Energy, Inc.	http://www.border-energy.com/	(888) 479-4427
Constellation Energy Gas Choice, Inc.	http://www.constellation.com	(800) 785-4373
Direct Energy Services, LLC	http://www.directenergy.com	(888) 566-9988
Dominion Energy Solutions	http://www.dom.com/about/companies/retail/choice_eoe.jsp	(800) 990-4090
Energy Cooperative of Ohio	http://www.ohioenergycoop.org	(877) 439-3706
Energy Plus Natural Gas LP	http://www.energypluscompany.com/	(855) 405-3098
Integrus Energy Services, Inc.	http://www.integrusenergy.com	(866) 336-5547
Just Energy	http://www.justenergy.com/	(877) 226-5371
Ohio Natural Gas	http://www.onlyong.com	(888) 466-4427
Santanna Energy Services	http://www.santannaenergyservices.com	(800) 827-0067
Spark Energy Gas, LP	http://www.sparkenergy.com	(800) 982-1468
Volunteer Energy Services, Inc.	http://www.volunteerenergy.com	(800) 977-8374
XOOM Energy Ohio, LLC	http://www.xoomenergy.com	(888) 997-8979

Supplier Plans, Rates, Terms and Descriptions

Listed below are the natural gas plan offers of PUCO-certified suppliers, per Ccf. Published offers are subject to change without prior notice. The **Supplier Total Rate**, which is the price to compare, includes the **Supplier Base Rate** and CGO's current transportation charge. If comparing Supplier Total Rate to CGO's total SCO rate, which is currently set at **\$0.58048/Ccf**, keep in mind that the Supplier Base Rate is exclusive of applicable state and county sales tax, whereas CGO's total SCO rate includes applicable sales tax at an average rate of 6.75%. As CGO's transportation rate historically changes quarterly, the Supplier Total Rate is subject to change post publication; therefore, this information should be used only as a guide. Consumers should verify offers with the supplier before signing a contract. **The PUCO is not responsible for selections you make based on the information contained herein.**

Fixed Rate Plans

	<u>Plan ID</u>	<u>Supplier Base Rate</u>	<u>Supplier Total Rate</u>	<u>Contract Term</u>	<u>Plan Description</u>	<u>Contract Early Termination Fee</u>
Border Energy, Inc.	20681	\$0.63900	\$0.66160	9-Month	.639 per Ccf Nov 2012 to May 2013; variable thereafter	\$75.00
Just Energy	20687	\$0.69900	\$0.72160	12-Month		\$50.00
Dominion Energy Solutions	20652	\$0.63000	\$0.65260	Through 11/2013 Billing Cycle		\$50.00
Direct Energy Services, LLC	20695	\$0.62900	\$0.65160	12-Month		\$0.00
Integrus Energy Services, Inc.	20669	\$0.61900	\$0.64160	36-Month	Term is January 2013 - December 2015	\$75.00
	20668	\$0.59800	\$0.62060	24-Month	Term is January 2013 - December 2014	\$75.00
	20667	\$0.57900	\$0.60160	12-Month	This Fixed Rate includes the Price Match Guarantee	\$75.00
Constellation Energy Gas Choice, Inc	20636	\$0.54900	\$0.57160	12-Month		\$150.00
Ohio Natural Gas	20623	\$0.69900	\$0.72160	12-Month	Get 10K Delta Miles. See onlyong.com/delta or use	\$150.00
	20622	\$0.67900	\$0.70160	6-Month	Get 10K Delta Miles. See onlyong.com/delta or use	\$75.00
	20621	\$0.59900	\$0.62160	5-Month	Winter Fixed-10K Delta Miles-onlyong.com/delta use	\$75.00
Spark Energy Gas, LP	20664	\$0.68900	\$0.71160	12-Month	\$0.689 per Ccf	\$100.00
Santanna Energy Services	20643	\$0.61900	\$0.64160	12-Month	After 12 month term, renews monthly on market price plan.	\$0.00
XOOM Energy Ohio, LLC	20647	\$0.59900	\$0.62160	12-Month	XOOM Energy's SureLock 12 fixed plan	\$110.00

Monthly Variable Rate Plans

<u>Plan ID</u>	<u>Supplier Base Rate</u>	<u>Supplier Total Rate</u>	<u>Contract Term</u>	<u>Plan Description</u>	<u>Contract Early Termination Fee</u>
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Monthly Variable Rate Plans

	<u>Plan ID</u>	<u>Supplier Base Rate</u>	<u>Supplier Total Rate</u>	<u>Contract Term</u>	<u>Plan Description</u>	<u>Contract Early Termination Fee</u>
Energy Cooperative of Ohio	20707	\$0.48900	\$0.51160	Monthly		\$0.00
Integrus Energy Services, Inc.	20670	\$0.61900	\$0.64160	Monthly	Billing Month is December 2012	\$0.00
Constellation Energy Gas Choice, Inc	20637	\$0.65900	\$0.68160	Monthly		\$0.00
Ohio Natural Gas	20625	\$0.59900	\$0.62160	Monthly		\$0.00
	20624	\$0.44900	\$0.47160	Monthly	Variable Plan with a discounted rate for the first 2 months	\$0.00
Volunteer Energy Services, Inc.	20700	\$0.49510	\$0.51770	Monthly		\$0.00
XOOM Energy Ohio, LLC	20646	\$0.49900	\$0.52160	Monthly	XOOM Energy's Introductory SimpleFlex variable rate	\$0.00

Quarterly Variable Rate Plans

	<u>Plan ID</u>	<u>Supplier Base Rate</u>	<u>Supplier Total Rate</u>	<u>Contract Term</u>	<u>Plan Description</u>	<u>Contract Early Termination Fee</u>
Integrus Energy Services, Inc.	20666	\$0.52900	\$0.55160	12-Month	Billing Period is October - December 2012.	\$75.00

Variable Rate Plans

	<u>Plan ID</u>	<u>Supplier Base Rate</u>	<u>Supplier Total Rate</u>	<u>Contract Term</u>	<u>Plan Description</u>	<u>Contract Early Termination Fee</u>
Just Energy	20688	\$0.48580	\$0.50840	Monthly	5% below Utility for first 1 month	\$0.00
Energy Plus Natural Gas LP	20684	\$0.50500	\$0.52760	Monthly	Forecasted rate for your first month of service	\$0.00

Chart Definitions

Ccf: One hundred cubic feet; a unit used to measure natural gas usage.

Contract Term: The length or duration of the contract (i.e. monthly, yearly, multiple-year).

County Sales Tax: When natural gas is purchased from another supplier or as part of Columbia's Standard Choice Offer (SCO) program, the natural gas is subject to Ohio sales or use tax. Because county sales tax rates vary throughout Ohio, the county sales tax is not included in the alternate supplier's total rate. For Columbia SCO customers, sales tax at an average of 6.75% is included in the current total SCO rate. Use the attached map to determine your county's actual sales tax rate.

Current Offer: Comprised of suppliers' current commodity options and base rates, exclusive of sales tax, the local utility transportation charge, and customer service charges. Commodity options may be a fixed, variable, or stable rate plan.

Fixed Rate Plan: A constant rate for the contracted period.

Gross Receipts Tax: The local utility must pay a gross receipts excise tax of 4.987% which is applied to the combined Monthly Customer Charge and the Transportation rates charged on the volume of gas consumed (per Ccf).

Standard Choice Offer (SCO): A monthly variable rate and represents cost associated with the securing gas for CGO customers. The rate is based on the New York Mercantile Exchange month-end settlement price, plus a Retail Price Adjustment of \$0.153 per ccf. The Retail Price Adjustment of \$0.153 per ccf will be in effect from April 1, 2012 through March 31, 2013.

Supplier Name: PUCO-certified suppliers that are actively enrolling new customers.

Supplier Total Rate: Comprised of the supplier's natural gas commodity prices, plus the LDC transportation rate charge.

Transportation Rate Charge: The transportation rate charge, which can fluctuate quarterly, is comprised of a base rate, PUCO approved and tariffed riders, and a Gross Receipts Tax.

Variable Rate Plan: A fluctuating rate within the contracted period.

Questions to ask Suppliers

- Are there any deposit requirements?
- Do you charge any early termination fees? If so, how much?
- Do you charge any switching, membership, or other fees?
- Are you certified by the PUCO?
- Is your rate fixed, or does it change?
- If it is a variable rate, how does it change?
- Is there a customer incentive for signing up?
- Are there any built-in price increases or decreases?
- Are there any special add-on services?
- How long is the contract for this offer?
- Does your service cover all months of the year?
- What happens when my contract expires?
- Will I receive one or two bills a month?

Self-Calculation Worksheet

This self-calculation worksheet will provide you with an estimate of your monthly natural gas costs, based on your average monthly gas usage, current supplier price, transportation and service charges, and local sales tax. You may also wish to visit www.PUCO.ohio.gov to access our interactive *Apples to Apples* calculator to automatically calculate your estimated monthly natural gas costs.

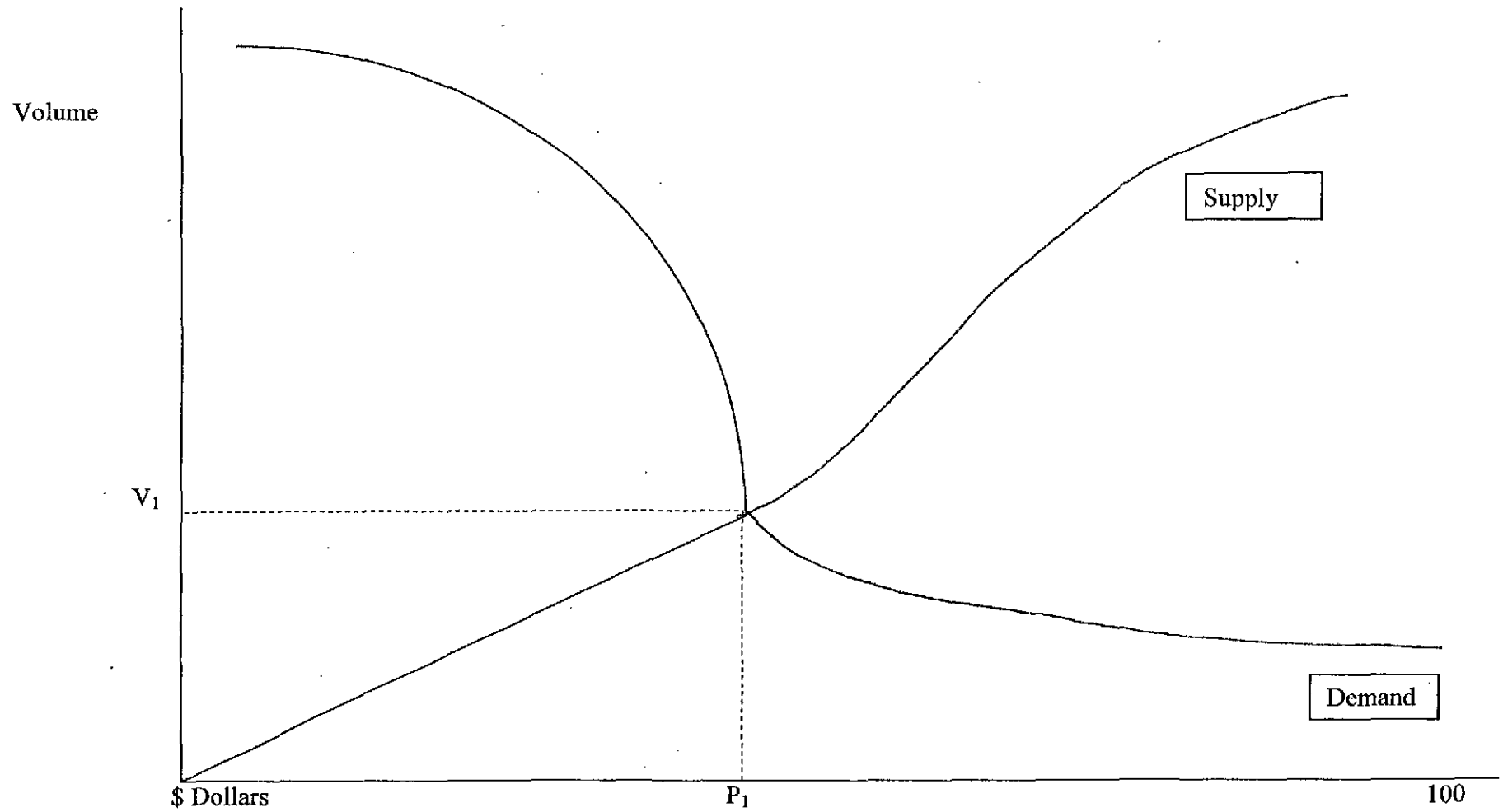
	Example	Your Calculation
Step 1: Supplier Offer Insert the supplier's current offer.	Supplier Offer: \$0.53048/Ccf	Supplier Offer: \$ _____/Ccf
Step 2: Figure your Average Monthly Usage Divide your annual gas usage in Ccf (provided on your monthly bill) by 12.	(annual gas usage) 804 Ccf + 12 Average Monthly Usage: 67 Ccf	(annual gas usage) _____/Ccf + 12 Average Monthly Usage: _____ Ccf
Step 3: Supplier Charge Multiply the supplier offer by your monthly gas usage.	(supplier offer) \$0.53048 (average monthly usage) x 67 Supplier Charge: \$ 35.54	(supplier offer) \$ _____ (average monthly usage) x _____ Supplier Charge: \$ _____
Step 4: Tax on Supplier Charge Multiply the supplier charge by your <u>county sales tax rate</u> that can be ascertained online through the Ohio Department of Taxation.	(supplier charge) \$ 35.54 (county sales tax rate) x 0.07 Tax on Supplier Charge: \$ 2.31	(supplier charge) \$ _____ (county sales tax rate) x 0. _____ Tax on Supplier Charge: \$ _____
Step 5: Transportation (Delivery) Charge Multiply the delivery rate by your average monthly usage (includes gross receipts tax).	(delivery rate) \$0.02260 (average monthly usage) x 67 Delivery Charge: \$ 1.51	(delivery rate) \$0.02260 (average monthly usage) x _____ Delivery Charge: \$ _____
Step 6: Supplier Estimated Monthly Cost Add the supplier charge, the tax on supplier charge, the delivery charge, and a monthly customer charge of \$22.45 (includes riser surcharge and gross receipts tax).	(supplier charge) \$ 35.54 (sales tax on supplier charge) 2.31 (delivery charge) 1.51 (monthly customer charge) + 22.45 Supplier Estimated Monthly Cost: \$ 61.99	(supplier charge) \$ _____ (sales tax on supplier charge) _____ (delivery charge) _____ (monthly customer charge) + 22.45 Supplier Estimated Monthly Cost: \$ _____
Step 7: Columbia Gas of Ohio (CGO) Estimated Monthly Cost Multiply CGO's current total rate (includes gas charges with an applicable average sales tax of 6.75%, and delivery charges including a gross receipts tax) by your average monthly usage, then add the monthly customer charge.	(CGO's current total rate) \$0.58048 (average monthly usage) x 67 (subtotal) 38.89 (monthly customer charge) + 22.45 CGO Estimated Monthly Cost: \$ 61.34	(CGO's current total rate) \$0.58048 (average monthly usage) x _____ (subtotal) _____ (monthly customer charge) + 22.45 CGO Estimated Monthly Cost: \$ _____
Step 8: Compare Compare the supplier's estimated monthly cost as of Ohio.	Supplier: \$61.99/month Columbia Gas of Ohio: \$61.34/month The Public Utilities Commission of Ohio	Supplier: \$ _____/month Columbia Gas of Ohio: \$ _____/month



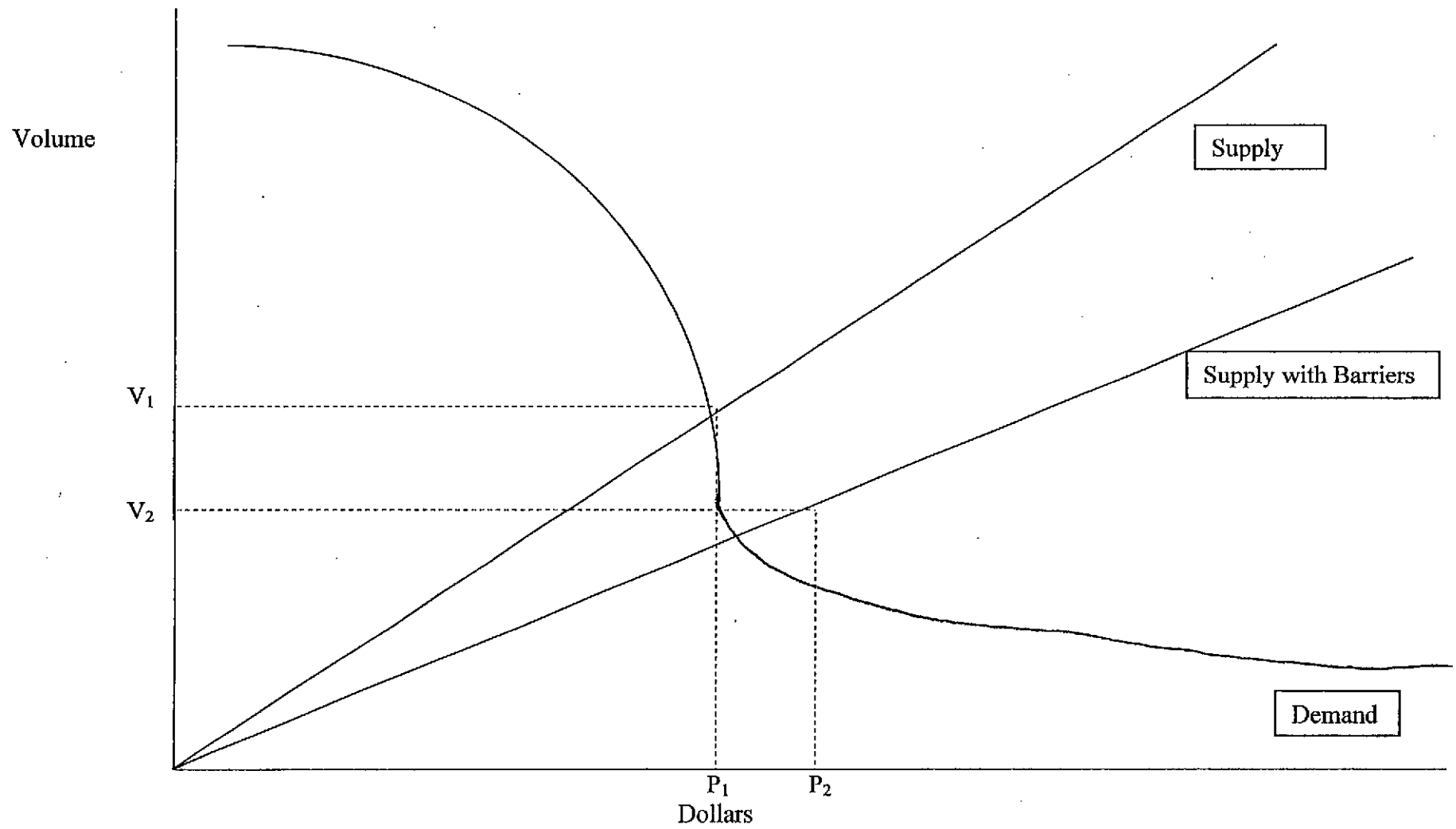
The Public Utilities
Commission of Ohio

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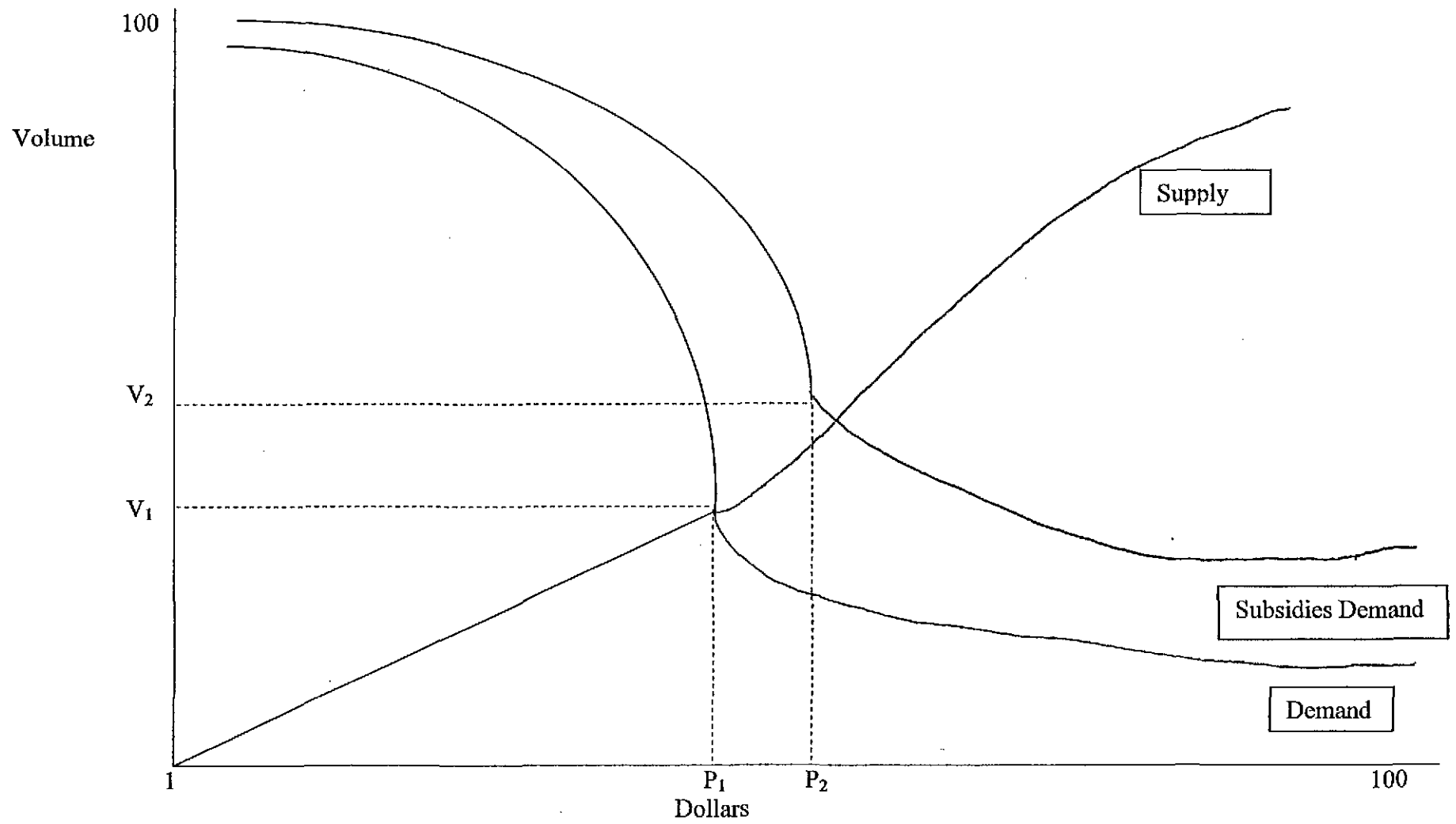
Perfect Market Demand and Supply Curves



Barriers to Entry Demand and Supply Curves



Subsidies Demand and Supply Curves



4929.02

State policy as to natural gas services and goods.

(7) Promote an expeditious transition to the provision of natural gas services and goods in a manner that achieves effective competition and transactions between willing buyers and willing sellers to reduce or eliminate the need for regulation of natural gas services and goods under Chapters 4905. and 4909. of the Revised Code;

(8) Promote effective competition in the provision of natural gas services and goods by avoiding subsidies flowing to or from regulated natural gas services and goods;

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Joint Motion to)	
Modify the December 2, 2009 Opinion)	
and Order and the September 7, 2011)	Case No. 12-2637-GA-EXM
Second Opinion and Order in)	
Case No. 08-1344-GA-EXM.)	

**DIRECT TESTIMONY OF
STACIA HARPER
ON BEHALF OF OHIO PARTNERS FOR AFFORDABLE ENERGY**

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Trial Attorney
Colleen L. Mooney
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cmooney@ohiopartners.org

November 30, 2012

**Counsel for Ohio Partners for
Affordable Energy**

1 Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

2 A. My name is Stacia Harper. My business address is 231 West Lima Street,
3 Findlay, Ohio 45840. I am the Director of Regulatory Affairs and Energy
4 Policy for Ohio Partners for Affordable Energy (OPAE), and I appear in this
5 case as a witness on its behalf.

6

7 Q. PLEASE DESCRIBE YOUR BACKGROUND AND QUALIFICATIONS
8 FOR YOUR TESTIMONY IN THIS PROCEEDING.

9 A. My career has covered a broad spectrum of activities in the energy
10 industry including policy analysis at both the federal and state levels;
11 experience in wholesale and retail market activities in both natural gas and
12 electric markets; extensive involvement with regional transmission
13 organizations; trading experience in PJM/ECAR; and the development of
14 national energy modeling methods and systems. I have worked with
15 alternative fuel implementation and distributed generation and have
16 extensive knowledge of energy and environmental policy, including
17 renewable energy development and sustainability.

18

19 I have a Bachelor of Arts degree with dual majors in Political Science and
20 Economics from West Virginia University (1995) and Master of Science
21 degree in Resource and Applied Economics (2000), with a specialization
22 in Energy Economics from the University of Alaska Fairbanks. I have also

1 A. No. Natural gas utilities require the natural gas that flows through their
2 systems to meet certain standards. There can be no difference in the
3 quality of gas flowed through the system.
4

5 Q. HOW WILL ELIMINATION OF THE SCO OPTION AFFECT THE PRICE
6 PAID BY COMMERCIAL AND RESIDENTIAL CUSTOMERS?

7 A. Generally, customers will see price increases. Customers formerly on the
8 SCO will be reassigned from the marketers currently serving them to
9 marketers that are willing to accept customers through the MVR process
10 described above. This means that the customers will be served at the
11 lowest variable rate the CRNGS has chosen to offer and posted on the
12 Apples to Apples list maintained by the PUCO. I have analyzed the
13 SSO/SCO service prices provided by Columbia suppliers between
14 December 7, ~~2012~~ 2010 and October 2, 2012. The analysis as attached
15 as Exhibit SH-3.
16

17 As the Exhibit indicates, the SSO and subsequently the SCO is typically a
18 lower price than offerings from CRNGS featuring similar terms and
19 conditions. Exhibit SH-4 shows that fixed price CRNGS offers are
20 consistently higher than the SSO and SCO.
21

1
2 CRNGS currently serve 26% of the industrial market, 52% of the
3 commercial market and 41% of the residential market, either through
4 direct contracts with customers or governmental aggregations. See
5 Exhibit SH-2. It is interesting that those least likely to take service from
6 CRNGS are industrial customers, which are generally viewed as the most
7 sophisticated customers.

8
9 CRNGS have achieved inroads into the market, capturing large numbers
10 of customers, despite that fact that since ~~November, 2006~~April 1997, their
11 customers have paid \$861,175,104 more for natural gas. Exhibit SH-7

12
13 Many customers prefer fixed price contracts. Those are available through
14 CRNGS. Long-term contracts are available through CRNGS. Variable
15 rates with a cap are available through CRNGS. Theoretically, other types
16 of contracts such as a guaranteed bill option or a price coupled with
17 weatherization services, the cost of which is recovered through the rate,
18 could be provided by CRNGS, just to mention two options. The fact that it
19 is very difficult for CRNGS to compete with the SCO on price stimulates
20 creativity in product offering and marketing techniques that maximizes
21 competitive options available to customers, enhancing the competitive
22 options available to customers consistent with the policy of the state.

1 A. There is no mention in the Ohio statute of a preference for bilateral
2 contracts between customers and CRNGS providers over other
3 competitive options. Ohio Revised Code Section 4929.02(A)(8)
4 specifically seeks to "[p]romote effective competition in the provision of
5 natural gas services and goods by avoiding subsidies flowing to or from
6 regulated natural gas services and goods." The "subsidy" provided to the
7 SCO that is alluded to in filed testimony by Columbia, RESA and OGMG is
8 the cost of the auction, a mere \$70,000 for the most recent SCO auction.
9 Exhibit SH- 8. Because the auction provides a benefit by providing a price
10 benchmark that benefits all customers and SCO service is available to all
11 customers, it makes sense to spread the cost of the auction among all
12 customers. On the other hand, the cost of the ~~SSO~~ SCO auction could be
13 incorporated into the SCO rate. That would embed the costs of providing
14 SCO service within the SCO rate much as marketers must embed the cost
15 of marketing into the rates they offer to customers bilaterally.

16
17 Q. ARE THERE EXPERIENCES WHERE SUPPLY OPTIONS HAVE BEEN
18 LIMITED TO BILATERAL CONTRACTS WITH MARKETERS?

19 Yes. Atlanta Gas and Light ("AGL") shifted all customers to bilateral
20 contracts in October 1999.⁵ In 1999 when the Georgia exit occurred,
21 residential customers of AGL were paying approximately the United

1 customers and suppliers produces prices that are higher than prices
2 established through market processes based on an auction. In Ohio, a
3 variety of competitive options -- bilateral contracts, governmental
4 aggregations, and the SCO -- should be available to customers to
5 overcome the problematic aspects identified in choice markets.

6 Q.. ARE THE ALLOCATION METHODOLOGIES PROPOSED BY DIRECT
7 ENERGY AND IGS THAT WOULD AWARD MVR CUSTOMERS BASED
8 ON THE PERCENTAGE SHARE OF CUSTOMERS OF INDIVIDUAL
9 MARKETERS CONSISTENT WITH PROMOTING A COMPETITIVE
10 MARKET?

11 A. No. They promote the status quo of suppliers and establish a barrier to
12 market entry for other suppliers. The allocation mechanism has not
13 received adequate deliberation and should be settled in a separate case if
14 the SCO service is eliminated. The current process established in the
15 SCO is an effective mechanism to assign retail energy suppliers to
16 customers. Abandoning rotational allocation presents significant issues of
17 management/program administration, as well as poses potential equity
18 issues to the approved suppliers. Currently, one supplier serves ~~38~~37% of
19 non-SCO customers, SH-2. The proposed allocation process as put forth
20 by Direct Energy and IGS retain the status quo for the larger suppliers and
21 make it more difficult for the smaller suppliers trying to participate in the

Reporting Month: October 2012

Enrollment			
	Enrolled	Eligible	% of Eligible
Residential	492,716	1,207,242	41%
Commercial	54,965	106,136	52%
Industrial	289	1,101	26%
Total	547,970	1,314,479	42%

EXHIBIT SH-2

Choice Marketers: 23

Marketer	Number of Enrolled Customers & Market Share Ranking				Volumes (Mcf)			
	Residential	Commercial	Industrial	Total	Residential	Commercial	Industrial	Total Mcf
AZ	8,498	327	2	8,827	25,326	2,530	206	28,061
DA	107	2	0	109	258	12	0	270
ED	91,035	12,057	30	103,122	265,340	98,065	143	363,548
EI	5,532	68	10	5,610	15,755	487	315	16,556
EM	1,840	1,400	10	3,250	6,034	742	231	7,007
FN	524	25	0	549	1,475	750	0	2,225
GP	365	149	0	504	1,124	1,035	0	2,179
IB	3	153	4	160	7	23,394	271	23,671
IX	172	1,102	15	1,289	925	28,521	657	30,103
K	226	31	4	261	688	1,070	17	1,775
LI	17,897	3,553	33	21,483	52,850	63,263	2,359	118,472
MA	9	229	2	240	26	8,370	207	8,602
MO	1,776	313	2	2,091	5,025	3,584	22	8,731
QR	14,942	744	3	15,689	40,370	5,215	32	45,617
QQ	77	636	9	722	493	20,849	934	22,275
Q	186,121	15,064	76	201,263	541,555	222,369	7,505	771,729
RA	78,365	4,264	15	82,644	222,858	27,322	866	251,046
RV	0	14	1	15	0	626	142	768
TA	33,149	598	2	33,749	84,319	1,767	16	89,102
TZ	12,440	5,147	32	17,619	37,424	180,751	2,231	220,405
VA	35,694	8,451	36	44,181	110,635	100,650	1,392	212,676
X	1,500	503	1	2,004	4,144	9,407	1	13,552
YV	2,454	135	0	2,689	6,930	-446	0	6,484
Total	492,716	54,965	289	547,970	1,423,559	803,451	17,842	2,244,851

NOTE: All numbers above include Governmental Aggregation customers (details are listed below)

Includes Co-Ops served by Retail Natural Gas Suppliers

Governmental Aggregators	# of Customers
Canfield Township	398
City of Alliance	2,124
City of Bowling Green	2,846
City of Canfield	1,014
City of Clyde	412
City of Columbiana	601
City of Findley	5,529
City of Fostoria	704
City of Gallipolis	617
City of Marion	3,278
City of Mt Vernon	2,124
City of Pickerington	3,749
City of Rittman	415
City of Salem	1,473
Ene County	3,412
Fairfield Township	235
Stark County	1,230
St. Clairsville	1,401
Village of Albany	166
Village of Barnesville	770
Village of Bethesda	144
Village of Bradner	19
Village of Brewster	215
Village of Bridgeport	435
Village of Cadiz	448
Village of Elmore	137
Village of Fredericktown	362
Village of Grafton	309
Village of McConnelsville	329
Village of Milan	145
Village of Navarre	169
Village of Pomeroy	202
Village of Warsaw	137
Village of Woodville	185
NOAC Communities	
City of Genoa	0
City of Martin	0
City of Maumee	3,522
City of Northwood	898
City of Oregon	2,302
City of Rossford	0
City of Sylvania	4,317
City of Toledo	33,014
Lake Township (Walbridge, Milbury, Perrys)	5,674
Lucas County (Curtice)	31
Village of Holland	1,876
NOPEC	74,615
TOTAL	161,973

**Columbia Gas of Ohio
STANDARD CHOICE OFFER (SCO) PROGRAM DATA**

Date: November 13, 2012
 Reporting Month: October 2012
 SCO Rider: 4.5530
 SCO Suppliers: 5
 SCO Supplier Defaults: 0

Number of SCO Customers						SCO Volumes (Mcf)					
Residential*	Commercial	Industrial	Other	Public Utility	Total	Residential*	Commercial	Industrial	Other	Public Utility	Total Mcf
640,643	43,837	304	0	0	684,784	1,399,644	400,983	49,077	0	0	2,049,804

Number of DSS Customers						DSS Volumes (Mcf)					
Residential*	Commercial	Industrial	Other	Public Utility	Total	Residential*	Commercial	Industrial	Other	Public Utility	Total Mcf
143,516	5,496	750	1	1	149,764	442,709	54,851	27,348	0	11,511	481,623

* Residential DSS includes 73,102 PIPP Customers & 284,248 Mcf PIPP Volumes.

Suppliers	Non Compliance		
	Tranche Number	Volumes Dth	Dollars
IR	4	0	\$0
PX	4	0	\$0
NA	4	0	\$0
Q	2	0	\$0
VA	2	0	\$0
Total	16	0	\$0

Note: Includes Choice non compliance charges for Suppliers in both programs.



EXHIBIT SH-3

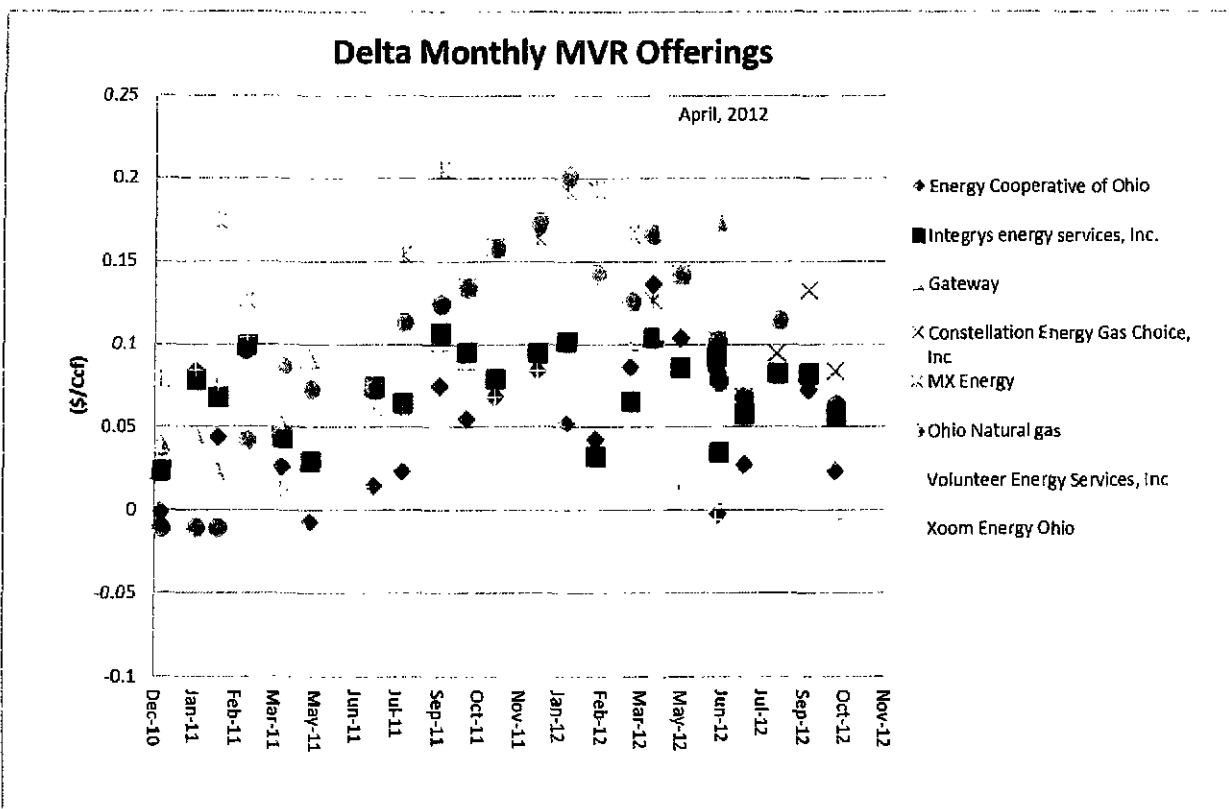


EXHIBIT SH-9

Prices of Residential Natural Gas Deliveries, GA, US, OH 1998-2012

