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December 10, 2012

Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street, 11th Floor
Columbus, OH 43215

RE: Case No. 12-2637-GA-EXM
In the matter of the Application of Columbia Gas of Ohio

Dear Chairman Snitchler and Commissioners Lesser, Porter, Roberto and Slaby:

I am writing to you today on behalf of the Council of Smaller Enterprises ("COSE") a support organization for small businesses located in Northeast Ohio. COSE, on behalf of its 14,000 members, advocates on behalf of small business policies being discussed in the Congress, at the General Assembly, and in regulatory agencies as to matters that impact the small business community.

Most of COSE's members are in the Dominion East Ohio service area but a significant number are also retail customers of Columbia Gas of Ohio. Five years ago, Columbia Gas of Ohio began a process of deregulating its natural gas service to medium and small sized commercial customers in much the same fashion as Dominion East Ohio. Thus far, those deregulation steps taken by Columbia have resulted in more competitive prices for natural gas commodities, a greater number of independent suppliers, and more diverse natural gas programs and products.

COSE has been informed of a proposed additional deregulation proposal for medium and small commercial customers in Columbia once the percentage of shopping customers reaches 70%. This new proposal has been presented to the Commission in the form of a stipulation endorsed by Columbia, the Staff of the Commission, the Consumers' Counsel Office and the Retail Energy Supply Association. This would among other items move commercial customers who have not selected a natural gas supplier from the utility to run standard contract offer to competitive suppliers. Competitive suppliers would offer default gas supplies using a Monthly Variable Rate (MVR) program patterned after the once in existence rate available today for Dominion East Ohio. COSE is very familiar with the MVR program as used in the Dominion East Ohio service area for the last several years. In fact, last month, COSE supported the petition of Dominion East Ohio to expand its MVR program.

In a similar fashion, COSE would like to add its support to the Stipulation in the Columbia Case. COSE believes the MVR program would be a beneficial step towards bringing market pricing for natural gas to medium and small commercial customers in the Columbia Gas of Ohio service territory. Further, having both Columbia Gas of Ohio and Dominion East Ohio, the state's two largest natural gas utilities, using the same program for default natural gas supply would be a benefit especially to small businesses that have facilities in both service areas.

On behalf of COSE, I would like to thank the Commission for this opportunity to be heard on the subject of the Columbia Gas of Ohio petition to move to an MVR program automatically, once commercial shopping in Columbia hits the 70% trigger.

Sincerely,


Nicole Stika
Director, Energy Programs

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