

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)	
Review of its Rules for Competitive)	
Retail Natural Gas Service Contained)	Case No. 12-925-GA-ORD
in Chapters 4901:1-27 through 4901:1-)	
34 of the Ohio Administrative Code.)	

INITIAL COMMENTS OF COLUMBIA GAS OF OHIO, INC.

By Entry dated November 7, 2012, the Public Utilities Commission of Ohio ("Commission") proposed amendments to the Competitive Retail Natural Gas Service ("CRNGS") rules contained in Chapters 4901:1-27 through 4901:1-34, of the Ohio Administrative Code. In addition to its proposed amendments outlined in Attachment B to the Entry, the Commission posed several questions in Attachment A to be addressed by interested parties in conjunction with filed comments. Columbia Gas of Ohio, Inc. ("Columbia") hereby submits its comments and responses to the Entry.

Initial Comments to Proposed Rule Changes

Columbia agrees generally with the Commission's proposed language contained in Attachment B of the Entry. Columbia does, however, propose adding language to 4901-27-11 to clarify how the Commission proceeds once a notice of material change has been filed by a retail natural gas supplier or governmental aggregator. As proposed, 4901:1-27-11 (A)(2) states,

(t)he Commission may suspend, rescind or conditionally rescind a retail natural gas supplier's or governmental aggregator's certificate if it determines that the material change will adversely affect the retail natural gas supplier's or governmental aggregator's fitness or ability to provide the services for which it is certified; or to provide reasonable financial assurances sufficient to protect natural gas companies and the regulated sales service customers from default.

While Columbia agrees with the added language, there are no additional provisions addressing what action the Commission may take if the material

change does not adversely affect the supplier's or aggregator's ability to provide the service for which it is certified. As such, Columbia suggests the following language be added,

(A)(3) If the Commission does not act upon the notice of material change within ninety days of the filing date of such notice, the certification with the material changes shall be deemed automatically approved on the ninety-first day after the official filing date.

This proposed language not only provides clarity, but also is consistent with the Commission's proposed language in 4901:1-27-12(B)(5).

Rule 4901:1-29-06 contemplates generally that customer enrollment for retail natural gas supply programs shall be through the retail natural gas suppliers or governmental aggregators. Columbia suggests that customers should also be permitted to enroll with retail natural gas suppliers when customers contact natural gas companies to initiate service. Permitting such action would ease the administrative burden customers can face when initiating service and desiring to also initiate participation in a retail natural gas supply program. Therefore, Columbia suggests adding language to 4901:1-29-06 that would permit new customers to enroll with a retail natural gas supplier when the customer first requests service with a natural gas company. Columbia suggests adding the following language,

(L) A customer may elect to enroll in a retail natural gas supply program, at the time the customer requests service with a natural gas company.

Responses to Questions Posed in Attachment A

Q1. Columbia has no opinion on Question 1.

Q2. Aggregation incentives, such as financial contributions to the community, should be disclosed in the opt-out notices. Such disclosure would provide transparency and ensure that consumers are fully educated and informed within the opt-out community.

Q3. Columbia believes that suppliers should be required to disclose all inducements to contract. Such disclosure would provide transparency and ensure that consumers are fully educated and informed within the opt-out community.

Q4. Rule 4901:1-29-06(E) should also require competitive retail natural gas service providers, governmental aggregators or independent third-party verifiers to record the sales pitch segment of the call. The recording will provide additional support when a utility or the Commission has to investigate complaints alleging high pressured sales tactics.

Q5. Complaint data should be added to the Apples to Apples chart to ensure that customers are fully informed and able to shop for suppliers with the most comprehensive information available.

Columbia respectfully requests that the Commission take into consideration Columbia's responses to the question posed in Attachment A and adopt the changes to the rules as detailed herein.

Respectfully submitted,

/s/ Brooke E. Leslie

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Summary: Comments Initial Comments of Columbia Gas of Ohio, Inc. electronically filed by Mrs. Christine J Kowalczyk on behalf of Columbia Gas of Ohio, Inc.