

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Co-)
lumbia Gas of Ohio, Inc. for Approval) Case No. 11-5515-GA-ALT
of an Alternative Form of Regulation.)

**REPORT OF COLUMBIA GAS OF OHIO, INC.
ON INSTALLATION OF
AUTOMATIC METER READING DEVICES**

By Opinion and Order dated November 28, 2012, in this case, the Commission authorized Columbia Gas of Ohio, Inc. ("Columbia") to complete its installation of automatic meter reading devices ("AMRD"). In so doing the Commission directed Columbia to file a report, stating:

If Columbia does not complete the installation of AMRD on all active meters by December 31, 2013, Columbia shall file an explanation for not completing such installations, a quantification of the associated impact on O&M savings, and its plans for completing such installations.¹

Pursuant to the Commission's directive, Columbia provides the following report.

REPORT ON INSTALLATION OF AUTOMATIC METER READING DEVICES

Status of AMRD Installations and Plan for Completion

As of December 31, 2013, Columbia had 1,102 active meters remaining without AMRD, which equates to about 0.075% of all meters on Columbia's system. While each of these 1,102 meters represents a unique situation, the reasons for meters not having AMRD's installed fall into three general categories. The following is a description of these categories and Columbia's strategy for completing installations for customers in each category. Note that some customers may

¹ Case No. 11-5515-GA-ALT, Opinion and Order (November 28, 2012) at 8.

fall into more than one category, or move between categories as additional information regarding the customer's situation becomes available.

1. *Customer Refusal* – Columbia has a very small number of customers (less than 20) who have simply refused to allow Columbia to install an AMRD on their meter due to health and/or security concerns. Columbia has made every effort to convince these customers that their fears are unfounded, and has offered alternatives such as using devices with less powerful and more intermittent signals, to no avail. In these cases, Columbia has chosen to avoid more draconian measures such as termination of service, choosing instead to simply “wait the customer out.” Columbia will install AMRDs at the customers’ discretion or after the customer has vacated the premise.
2. *Failure to Gain Access* – Columbia has approximately 150 customers who have failed to provide access to their meters for more than twelve consecutive months. Columbia has three processes in place that, while taking some time, serve as good mechanisms for gaining access to these meters. Columbia and contract service and meter reading personnel have been instructed to install AMRDs whenever the opportunity arises as a result of Columbia’s response to one of these processes.
 - a. *Failure to Gain Access (“FGA”) Process* - Columbia will continue to notify customers whose meters have not been read for a period of five or more consecutive months of the necessity of providing access to meters for meter reading purposes as prescribed by the Minimum Gas Service Standards through the FGA process as described in Columbia’s current meter reading plan.
 - b. *Inaccessible Meter Process* - Columbia has also implemented a process for the purpose of gaining access to meters in order to perform DOT required corrosion inspections on an annual or triennial basis. This process is similar in nature to the FGA process in that it is designed to put increasing pressure on customers regarding the necessity for providing access to meters. Due to the safety and compliance aspects of this process, it is designed to be more robust than the FGA process and is more likely to result in termination of service to those customers who do not make arrangements for Columbia to access the meter.

- c. Collections Process – Columbia has been successful at gaining access to meters in situations where service has been terminated for non-payment, and will continue to “piggyback” on this process as a means of installing AMR devices on hard to access meters.
3. *Appointment Required* – Most of the remaining meters without AMR require an appointment with the customer due to the fact that some sort of work involving service interruption is required. Many of these customers are commercial accounts and/or require extensive work in order get an AMRD installed. For this reason, it is important that Columbia and the customer come to a mutual agreement on the work to be done and a time to do it that will be least disruptive to the customer. Columbia has had success in getting this type of work done over the life of the AMRD program, but scheduling can be complicated by things like weather, customer schedules, resource availability, and the low priority nature of this sort of non-emergency/non-compliance work. Columbia will continue to work with customers to schedule and complete this work in as timely a fashion as possible.

Impact on O&M Savings

When Columbia began transitioning from manual meter reading to drive-by meter reading, the meter reading contract was changed from a per read rate to a man-day rate in recognition of the fact that the numbers of manual and AMRD meter reads required would be in a constant state of flux over the life of the program. This type of contract allowed Columbia to drive meter reading savings through reductions in the number of meter reading personnel required as more and more AMRD devices were installed, while at the same time requiring meter readers to obtain an actual read for every meter regardless of whether the reading was to be obtained via the AMRD or manually.

In its efforts to maximize savings to customers, Columbia has managed this very closely, and, over the course of the AMRD program has been able to eliminate approximately 62 contract meter reading personnel (down from approximately 85 at the beginning of the program to 23 today). Columbia’s contractor now utilizes just one meter reader in most meter reading locations to collect all AMRD and manual meter readings over the 21-day meter reading period. With the 1,102 meters without AMRD devices spread across all of Columbia’s meter

reading locations, each of the meter readers will be responsible for collecting just two or three manual meter readings a day on average.² Because the structure of Columbia's contract allows Columbia to pay the same man-day rate regardless of the number of manual reads that have to be done, Columbia does not believe that the remaining 1,102 meters without AMRD devices installed will have any impact on meter reading savings.

Respectfully submitted,

COLUMBIA GAS OF OHIO, INC.

/s/ Stephen B. Seiple

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² This number refers to the 1,102 meters without AMRD devices installed. Meter readers are also required to investigate and obtain manual meter readings for "failed" AMRD reads.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Report of Columbia Gas on of Ohio, Inc. on Installation of Automatic Meter Reading Devices was served upon all parties of record by electronic mail this 3rd day of March, 2014.

/s/ Stephen B. Seiple

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Summary: Report on Installation of Automatic Meter Reading Devices electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.