

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Re-	)	
view of Chapters 4901-7, Ohio Admin-	)	
istrative Code, Standard Filing Re-	)	Case No. 12-2338-AU-ORD
quirements for Rate Increases.	)	

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**COLUMBIA GAS OF OHIO, INC.'S  
APPLICATION FOR REHEARING**

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Pursuant to R.C. 4903.10 and Rule 4901-1-35, Ohio Administrative Code, Columbia Gas of Ohio, Inc., ("Columbia") hereby files its Application for Rehearing of the Order in the above-captioned case on April 3, 2014 ("Order").

The Entry is unreasonable and unlawful for the following reason:

1. The Commission should reconsider its revision to Chapter II A (5)(d) to the Appendix to the Standard Filing Requirements contained in Chapters 4901-7 of the Ohio Administrative Code. Specifically, the Commission should considering changing the 30-day requirement to file actual valuation data when a date certain beyond the filing date is used to 60 days.

The reasoning for Columbia's Application is more fully explained in the attached Memorandum in Support.

Respectfully submitted by,  
**COLUMBIA GAS OF OHIO, INC.**

/s/Brooke E. Leslie

Brooke E. Leslie, Counsel of Record

Stephen B. Seiple, Asst. General Counsel  
Brooke E. Leslie, Senior Counsel  
200 Civic Center Drive  
P.O. Box 117  
Columbus, Ohio 43216-0117

Telephone: (614) 460-5558  
Fax: (614) 460-6986  
Email: sseiple@nisource.com  
bleslie@nisource.com

**Attorneys for**  
**COLUMBIA GAS OF OHIO, INC.**

## MEMORANDUM IN SUPPORT

On January 16, 2013 the Commission issued for comment OAC 4901-7-01 and the Appendix to that rule. At that time, the Commission Staff did not make any proposed rule changes, but rather invited interested parties to file comments. Several parties, including Columbia, filed initial comments as well as reply comments. On April 3, 2014, the Commission issued an Order containing several changes to the rule. Many of the changes reflect the statutory changes resulting from H.B. 95, as recommended by Columbia and other utilities in their comments.

While Columbia appreciates the many changes made, Columbia does take issue with one particular change. In Chapter II A(5)(d) of the Appendix, the Commission added the following language:

Notwithstanding the above provisions, any natural gas, waterworks, or sewage disposal system company that elects to use a date certain that is beyond the application filing date need not provide, within two months of the date of the filing, actual valuation data. Instead, such natural gas, waterworks, or sewage disposal system company must provide the data required within 30 days after the date certain.

Columbia respectfully requests that the Commission reconsider the 30 day deadline and instead implement a 60 day deadline. The additional time is needed to submit all new base rate related schedules, including plant, reserve for depreciation, deferred taxes and working capital. Additionally, a utility will have to submit updated revenue requirement schedules that reflect the impact of the change in plant balances, e.g., annualized depreciation, annualized property taxes and federal income taxes. Columbia normally closes its books around the 10<sup>th</sup> of the month and adoption of the 30 day time line could pose significant problems. Indeed, Columbia anticipates that it will be impossible to file the actual valuation data within 30 days of the date certain.

The Commission proscribes a 60 day deadline for companies to submit updated data when a utility uses estimated valuation data more than nine months of estimated operating income data in the application. This same time consideration should be given when a company uses a date certain that is beyond the filing date. As such, Columbia proposes the following language:

Notwithstanding the above provisions, any natural gas, water-works, or sewage disposal system company that elects to use a date certain that is beyond the application filing date need not provide, within two months of the date of the filing, actual valuation data. Instead, such natural gas, waterworks, or sewage disposal system company must provide the data required within 60 days after the date certain.

For the foregoing reasons, Columbia respectfully requests that the Commission grant the instant Application for Rehearing and modify its Order as described herein.

Respectfully submitted by  
**COLUMBIA GAS OF OHIO, INC.**

/s/Brooke E. Leslie

Brooke E. Leslie, Counsel of Record

Stephen B. Seiple, Asst. General Counsel  
Brooke E. Leslie, Senior Counsel  
200 Civic Center Drive  
P.O. Box 117  
Columbus, Ohio 43216-0117  
Telephone: (614) 460-5558  
Fax: (614) 460-6986  
Email: sseiple@nisource.com  
bleslie@nisource.com

**Attorneys for**  
**COLUMBIA GAS OF OHIO, INC.**

## CERTIFICATE OF SERVICE

I hereby certify the foregoing Application for Rehearing was served upon all parties of record via electronic mail on May 2, 2014.

/s/Brooke E. Leslie

Counsel of Record for Columbia  
Gas of Ohio, Inc.

Matt Satterwhite  
American Electric Power Services  
Corp.  
1 Riverside Plaza, 29<sup>th</sup> Floor  
Columbus, Ohio 43215  
[mjsatterwhite@aep.com](mailto:mjsatterwhite@aep.com)

Jeanne Kingery  
Duke Energy  
155 E. Broad St., 21<sup>st</sup> Floor  
Columbus, Ohio 43215  
[Jeanne.kingery@duke-energy.com](mailto:Jeanne.kingery@duke-energy.com)

Andy Campbell  
Greg Williams  
Whitt Sturtevant LLP  
88 E. Broad St., Suite 1590  
Columbus, Ohio 43215  
[Campbell@whitt-sturtevant.com](mailto:Campbell@whitt-sturtevant.com)  
[Williams@whitt-sturtevant.com](mailto:Williams@whitt-sturtevant.com)

Andrew Sonderman  
Kegler Brown Hill & Ritter  
65 E. State St., Suite 1800  
Columbus, Ohio 43215  
[asonderman@keglerbrown.com](mailto:asonderman@keglerbrown.com)

Larry Sauer

Office of the Consumers' Counsel  
10 West Broad St., Suite 1800  
Columbus, Ohio 43215  
[sauer@occ.state.oh.us](mailto:sauer@occ.state.oh.us)

William Wright  
Public Utilities Commission of Ohio  
180 E. Broad St.  
Columbus, Ohio 43215  
[William.wright@puc.state.oh.us](mailto:William.wright@puc.state.oh.us)

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Summary: Application for Rehearing of Columbia Gas of Ohio, Inc. electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.