

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Columbia Gas of Ohio, Inc. for a)	Case No. 15-696-GA-WVR
Waiver of Ohio Administrative Code)	
Section 4901:1-18-15(G).)	

**APPLICATION OF
COLUMBIA GAS OF OHIO, INC.**

Pursuant to Ohio Adm. Code 4901:1-18-02(B)(3), Columbia Gas of Ohio, Inc. ("Columbia"), files this application to request a temporary waiver from Ohio Adm. Code 4901:1-18-15(G) until October 1, 2015. In support of its Application, Columbia states as follows:

1. Columbia is an Ohio corporation engaged in supplying natural gas to approximately 1.4 million customers in 61 counties in Ohio. Columbia is a public utility and natural gas company in accordance with R.C. 4905.02(A) and 4905.03(E), and as such, is subject to the Commission's jurisdiction.

2. Columbia requests a temporary waiver from part of newly revised Ohio Adm. Code Chapter 4901:1-18 (Termination of Residential Service). These rules were amended in Case No. 13-274-AU-ORD, and will become effective April 15, 2015. The rule revisions will result in numerous changes to the Percentage of Income Payment Plan ("PIPP") Plus. The PIPP Plus program changes will require Columbia to reprogram and test the necessary systems to implement the revised rules.

3. Under newly revised Ohio Adm. Code 4901:1-18-15(G), public utilities are required to offer a new payment arrangement to PIPP Plus customers who, under certain conditions, close their accounts with arrears. Under the new arrangement, the Post-PIPP Plus payment "shall be no more than the total accumulated arrearage divided by sixty," and "[e]ach time the former PIPP Plus customer makes his or her payment by the due date, the public utility shall reduce the account arrearage by one-twelfth."

4. The Post-PIPP Plus program prescribed under newly adopted Ohio Adm. Code 4901:1-18-15(G) requires substantial reprogramming efforts. This is a new payment plan that the natural gas companies, including Columbia, must implement. It requires a payment plan unlike any currently offered by Columbia. Moreover, unlike the current PIPP Plus program, payments under the Post-PIPP Plus will not be calculated based on a percentage of monthly income and will trigger different kinds of incentive crediting.

5. In addition to new programming requirements, the Post-PIPP Plus program will require an additional bill message and a billing notice sent to a person who no longer has an active account. To effectuate this change, Columbia must modify its bill programming process to include the information of the Post-PIPP Plus balance, the actual account balance, the incentive credits, the default amount, and the monthly amount due.

6. Columbia intends to complete the reprogramming and testing of the upgrades to its system and to implement the new Post-PIPP Plus program by October 1, 2015.

WHEREFORE, Columbia respectfully requests that the Commission approve the rule waiver requested herein through October 1, 2015, and grant it all other necessary and proper relief.

Respectfully submitted by,

COLUMBIA GAS OF OHIO, INC.

/s/ Brooke E. Leslie

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Summary: Application of Columbia Gas of Ohio, Inc. for a Waiver of Ohio Administrative Code Section 4901:1-18-15(G) electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.