

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Co- )  
lumbia Gas of Ohio, Inc. for a Waiver of ) Case No. 16-0653-GA-WVR  
Ohio Administrative Code Section )  
4901:1-13-11(B). )

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

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Pursuant to Ohio Admin. Code 4901:1-13-02(C), Columbia Gas of Ohio, Inc. (“Columbia”) files this application to request a waiver from Ohio Admin. Code 4901:1-13-11(B)(9). 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. Columbia is a public utility and natural gas company under Rev Code §§ 4905.02(A) and 4905.03(E), and is subject to the Commission’s jurisdiction.

2. Columbia requests a waiver from Ohio Admin. Code 4901:1-13-11(B)(9), which requires gas utility bills to include the “rate for purchase of the gas or natural gas commodity, expressed in dollars and cents per Mcf or Ccf.”

3. In Case No. 12-2637-GA-EXM, Columbia, along with Staff of the Public Utilities Commission of Ohio and other stakeholders (collectively, the “Stipulation Parties”), agreed to implement numerous billing enhancements for the competitive retail natural gas suppliers participating in Columbia’s CHOICE Program.<sup>1</sup> Two of these bill enhancements, Bill Ready and CHOICE Prepay, require Columbia to bill customers a charge, not a rate, provided by suppliers. Bill Ready is “the billing method which the Supplier provides charges to Columbia that are ready to be placed on the bill.”<sup>2</sup> CHOICE Prepay provides customers the

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<sup>1</sup> See *In the Matter of the Joint Motion to Modify the December 2, 2009 Opinion and Order and the September 7, 2011 Second Opinion and Order in Case No. 08-1344-GA-EXM*, Case No. 12-2637-GA-EXM, Amended Joint Motion to Modify Orders Granting Exemption, Joint Exhibit 2 (Amended Stipulation and Recommendation) (November 27, 2012) at 14-16.

<sup>2</sup> *Id.* at 15.

opportunity to prepay the supplier's commodity portion of the bill, and a "credit amount will be provided by the Supplier and applied to the customer's bill; the credit will be used to offset supplier charges."<sup>3</sup> The Stipulation Parties further agreed that, to the extent the billing enhancements conflicted with the Commission's rules, Columbia would file an application requesting a waiver of those conflicting provisions.<sup>4</sup> The Commission approved the Stipulation in Case No. 12-2637-GA-EXM by Opinion and Order dated January 9, 2013.

4. For both Bill Ready and CHOICE Prepay billing, Columbia cannot provide the suppliers' rate for service, as it is only receiving from the suppliers the total charges for service. Understanding that the supplier is in the best position to explain to customers the rates pursuant to its confidential contracts with CHOICE customers, Columbia requests a waiver of Ohio Admin. Code 4901:1-13-11(B)(9) for customers that are enrolled in Bill Ready or CHOICE Prepay service with a supplier, pursuant to the Stipulation in Case No. 12-2637-GA-EXM as approved by the Commission.

5. In addition to this waiver, Columbia proposes to provide these customers with a bill message on both Bill Ready and CHOICE Prepay bills. This proposed bill message will inform customers, on average, what they are paying for the gas commodity and will encourage them to contact their individual supplier for specific rate questions. Columbia, therefore, proposes a bill message similar to the message listed below.

Current billing charges include sales tax of \$X.XX and [Supplier Name] gas supply cost of \$XX.XX, which equates to an average per Ccf rate of \$X.XXXXX; however, the terms and conditions of your rate structure with [Supplier Name] is provided in your contract with this supplier. If you have any questions regarding your specific rates, please contact [Supplier Name] at the number listed below.

6. In addition to the changes described above, Columbia also notes for the Commission that it is revising the programming associated with its Bill Ready billing system. When implemented, Columbia's actual meter readings show as estimated meter readings on customer bills. Columbia is implementing software to address this issue and will be placing this programming into effect with the June 2016 Unit 1 Bill Ready bills.

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<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

7. With Commission approval of this Application, Columbia will be able to implement the proposed bill message on Bill Ready bills beginning with its Unit 1 billing on August 1, 2016. Columbia has not implemented CHOICE Prepay billing, but it will be utilizing this bill message for all bills rendered with its roll out of CHOICE Prepay billing on or before April 1, 2017.

**WHEREFORE**, for the reasons set forth above, Columbia respectfully requests that the Commission approve the rule waiver requested herein, and grant it all other necessary and proper relief.

Respectfully submitted by,

**COLUMBIA GAS OF OHIO, INC.**

/s/ Stephen B. Seiple

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**Case No(s). 16-0653-GA-WVR**

Summary: Application for a Waiver of Ohio Administrative Code Section 4901:1-13-11(B) electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.