BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of) Columbia Gas of Ohio, Inc. for Ap-) proval of an Adjustment to its Uncol-) lectible Expense Rider Rate.)

Case No. 17-321-GA-UEX

APPLICATION OF COLUMBIA GAS OF OHIO, INC.

Columbia Gas of Ohio, Inc. ("Columbia"), hereby submits its annual Uncollectible Expense Rider Report, and also requests approval to decrease its Uncollectible Expense Rider rate. In support of its Application, Columbia states as follows:

1. By Finding and Order dated December 17, 2003 (the "December 17 Order"), in Case No. 03-1127-GA-UNC, the Commission approved, in concept, an Uncollectible Expense Rider for Columbia and several other natural gas companies.

2. Pursuant to the December 17 Order, Columbia is required to file an annual report each May that identifies the amounts recovered, deferred and, as applicable, amortized pursuant to the Uncollectible Expense Rider. Attached hereto as Attachment 1 is Columbia's annual Uncollectible Expense Rider Report.

3. By Entry dated April 7, 2004, in Case No. 03-2572-GA-ATA, the Commission approved Columbia's initial Uncollectible Expense Rider rate. However, the December 17 Order further provided utilities with the opportunity to adjust their Uncollectible Expense Rider rates. Pursuant to Columbia's Uncollectible Expense Rider tariffs,¹ Columbia shall request "approval to change the rate if

¹ See Section V, Sixteenth Revised Sheet No. 29, for customers served under rate schedules SGS and GS; Section VI, Eighth Revised Sheet No. 69, for customers served under rate schedules SGTS and GTS; and Section VII, Sixteenth Revised Sheet No. 29, Page 9 of 11, for customers served through Columbia's CHOICE Program. All tariff sheets include identical billing rates and adjustment provisions.

the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections."

4. On April 14, 2016, Columbia filed an Application for Approval of an Adjustment to its Uncollectible Expense Rider in Case No. 16-0321-GA-UEX. This filing proposed the establishment of a revised Uncollectible Expense Rider rate of \$0.0555 per Mcf. By Finding and Order dated June 15, 2016, the Commission approved the amended application and revised Uncollectible Expense Rider rate to \$0.0555 per Mcf.

5. Attachment 2 shows the impact per Mcf of the projected over-collection of bad-debt expense to be experienced by Columbia during the period July 2016 through May 2017. On May 31, 2017, Columbia projects it will have an overcollected balance of \$2,196,287. Without accounting for any projected changes in the bad debt balance, a decrease of \$0.0124/Mcf would be required to pass back this prior period over-collection. Rather than decreasing the Uncollectible Expense Rider to pass back this over collection, Columbia recommends subtracting this over-collection of \$2,196,287 from the projected total bad debt to be incurred by Columbia from June 2017 through May 2018. Therefore, included as Attachment 3, is a projection of Columbia's anticipated bad debt under-recovery for the period June 2017 through May 2018. Attachment 3 shows a projected bad debt write off of \$9,943,767 during the period June 2017 through May 2018. Combining the projected over-collected balance at May 31, 2017 of (\$2,196,287), with the bad debt projection for the twelve-month period ending May 31, 2018 results in a bad-debt recovery requirement of \$7,747,480 or a revised rate of \$0.0438. Therefore, Columbia proposes to decrease its current Uncollectible Expense Rider by \$0.0117/Mcf in order that it may properly match its projected bad-debt experience with recoveries during the period twelve months ending May 31, 2018.

6. Columbia believes it is reasonable to consider the prospective application of the Uncollectible Expense Rider in the development of the appropriate Uncollectible Expense Rider rate because it better matches expenses with recoveries. The computation of the Uncollectible Expense Rider rate based on the collection year: (1) properly matches recoveries with expenses; (2) is consistent with the method approved by the Commission in Case No. 16-0321-GA-UEX for determining Columbia's current Uncollectible Expense Tracker rate; and (3) in the aggregate, cannot result in over-collection of costs due to the annual true-up program requirements. For this reason, Columbia, therefore, proposes to decrease its Uncollectible Expense Rider rate from \$0.0555 to \$0.0438 per Mcf. The rate is comprised of: (1) Columbia's projected deferred uncollectible expenses at May 31, 2017; and (2) Columbia's estimated uncollectible accounts expense for the twelvemonth period ending May 31, 2018. The calculation of the proposed Uncollectible Expense Rider rate is shown on Attachment 4.

7. The resulting Uncollectible Expense Rider rate of \$0.0438 per Mcf is just and reasonable and Columbia requests that the Commission expeditiously approve the proposed rate. Clean copies of the proposed tariff sheets and scored current tariff sheets are attached hereto as Attachment 5.

WHEREFORE, Columbia respectfully requests that the Commission approve the proposed Uncollectible Expense Rider rate proposed herein.

Respectfully submitted by,

COLUMBIA GAS OF OHIO, INC.

<u>/s/ Joseph M. Clark</u> Joseph M. Clark, (Counsel of Record)

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

Columbia Gas of Ohio, Inc. Uncollectible Expense Rider Report

Line

No.						Calend	dar Year 2016 Ac	tual Balances					
		January	February	March	April	May	June	July	August	September	October	November	December
1	Balance - Beginning of Month (a)	8,050,518.94	4,229,425.12	472,729.77	(2,063,954.42)	(3,546,822.72)	(2,831,950.47)	(1,079,511.98)	1,226,374.10	3,148,032.40	4,642,228.28	4,841,662.56	3,034,509.05
2	Bad Debts Written Off	2,531,790.78	2,266,582.33	2,109,286.25	2,188,859.18	2,498,252.13	2,817,325.15	2,946,856.59	2,685,207.37	2,376,922.24	2,906,151.68	11,807,452.42	3,457,952.19
3	Amortization of 2001 Deferral	-	-	-	-	-					-	-	-
4	Recovery - Base Rates	-			-	-					-	-	-
5	Consultant Fees			-									
6	Recovery - Bad Debt Rider	(3,366,785.64)	(3,589,523.89)	(2,729,346.52)	(1,983,037.92)	(1,089,078.29)	(606,858.69)	(182,478.03)	(177,479.76)	(180,579.90)	(288,469.30)	(520,069.23)	(1,267,869.48)
7	Recovery - Other	(2,989,290.92)	(2,434,976.03)	(1,915,987.68)	(1,686,446.15)	(691,432.43)	(456,464.01)	(458,535.43)	(587,348.45)	(704,424.44)	(2,421,021.33)	(13,096,839.81)	(4,339,546.55)
8	Incremental Bad Debt (2)+[(3)+(4)+(5)+(6)+(7)	(3,824,285.78)	(3,757,917.59)	(2,536,047.95)	(1,480,624.89)	717,741.41	1,754,002.45	2,305,843.13	1,920,379.16	1,491,917.90	196,661.05	(1,809,456.62)	(2,149,463.84)
9	Balance Subtotal (1) + (8)	4,226,233.16	471,507.53	(2,063,318.18)	(3,544,579.31)	(2,829,081.31)	(1,077,948.02)	1,226,331.15	3,146,753.26	4,639,950.30	4,838,889.33	3,032,205.94	885,045.21
10	Carrying Charges [(1)+[(9)/2]x(12)	3,191.96	1,222.24	(636.24)	(2,243.41)	(2,869.16)	(1,563.96)	42.94	1,279.14	2,277.98	2,773.23	2,303.11	1,273.86
11	Balance - End of Month (9)+(10)	4,229,425.12	472,729.77	(2,063,954.42)	(3,546,822.72)	(2,831,950.47)	(1,079,512)	1,226,374	3,148,032	4,642,228	4,841,663	3,034,509	886,319
12	Monthly Pool Rates	0.08%	0.08%	0.08%	0.08%	0.09%	0.08%	0.09%	0.09%	0.09%	0.09%	0.09%	0.10%

Attachment 1 Sheet 1 of 3

Attachment 1 Sheet 2 of 3

Columbia Gas of Ohio, Inc. Uncollectible Expense Rider Report Calendar Year 2017 Actual

Line				
No.			Actual	
		January	February	March
1	Balance - Beginning of Month	886,319	(752,058)	(2,121,422)
2	Bad Debts Written Off	1,947,422	1,759,885	2,193,659
3	Amortization of 2001 Deferral	-	-	-
4	Recovery - Base Rates			
5	Consultant Fees			-
6	Recovery - Bad Debt Rider	(1,760,591)	(1,431,982)	(1,317,375)
7	Recovery - Other	(1,825,257)	(1,695,830)	(1,787,816)
8	Incremental Bad Debt (2)+[(3)+(4)+(5)+(6)	(1,638,425)	(1,367,928)	(911,531)
9	Balance Subtotal (1) + (8)	(752,106)	(2,119,986)	(3,032,953)
10	Carrying Charges [(1)+[(9)/2]x(11)	48	(1,436)	(2,835)
11	Balance - End of Month (9)+(10)	(752,058)	(2,121,422)	(3,035,788)
12	Monthly Pool Rates	0.11%	0.10%	0.11%

Attachment 1 Sheet 3 of 3

NISOURCE INC. AND SUBSIDIARIES OPERATING COMPANIES MONEY POOL RATES January 2016 Through March 2017

	AVERAGE DAILY BALANCES			MONTHLY	MONTHLY RATES *					
MONTH	DAYS	S-T DEBT \$	INVESTMENT \$	COMPOSITE \$	S-T DEBT \$	INVESTMENT \$	COMPOSITE \$	S-T DEBT %	INVEST %	COMPOSITE %
JAN 2016	31	282,599,096.77	714.68	282,599,811.45	239,420.42	0.19	239,420.61	1.00%	0.31%	1.00%
FEB	29	204,379,310.34	0.00	204,379,310.34	155,069.45	0.00	155,069.45	0.95%	0.00%	0.95%
MAR	31	322,903,225.81	0.00	322,903,225.81	264,640.28	0.00	264,640.28	0.96%	0.00%	0.96%
APR	30	459,912,666.67	0.00	459,912,666.67	377,568.19	0.00	377,568.19	1.00%	0.00%	1.00%
MAY	31	606,167,709.68	0.00	606,167,709.68	530,260.26	0.00	530,260.26	1.03%	0.00%	1.03%
JUN	30	776,569,700.00	0.00	776,569,700.00	659,420.71	0.00	659,420.71	1.03%	0.00%	1.03%
JUL	31	920,664,129.03	0.00	920,664,129.03	806,559.97	0.00	806,559.97	1.03%	0.00%	1.03%
AUG	31	914,202,774.19	0.00	914,202,774.19	817,640.58	0.00	817,640.58	1.05%	0.00%	1.05%
SEP	30	960,882,000.00	0.00	960,882,000.00	827,902.67	0.00	827,902.67	1.05%	0.00%	1.05%
OCT	31	827,355,161.29	0.00	827,355,161.29	767,541.20	0.00	767,541.20	1.09%	0.00%	1.09%
NOV	30	1,092,472,000.00	0.00	1,092,472,000.00	978,178.42	0.00	978,178.42	1.09%	0.00%	1.09%
DEC	31	1,198,220,483.87	0.00	1,198,220,483.87	1,227,459.50	0.00	1,227,459.50	1.21%	0.00%	1.21%
JAN 2017	31	1,065,531,741.94	0.00	1,065,531,741.94	1,172,404.92	0.00	1,172,404.92	1.30%	0.00%	1.30%
FEB	28	934,300,892.86	0.00	934,300,892.86	903,468.82	0.00	903,468.82	1.26%	0.00%	1.26%
MAR	31	1,015,902,096.77	0.00	1,015,902,096.77	1,123,069.18	0.00	1,123,069.18	1.30%	0.00%	1.30%

Attachment 2 Sheet 1 of 1

Columbia Gas of Ohio, Inc. Uncollectible Expense Rider Report Based on Historic Balance @ March 31, 2017

Line No.	Description	Amount
1	Deferred Uncollectible Accounts Expense Balance As of May 31, 2017	(2,196,287)
2	Projected Volumes Twelve Months Ending May 31, 2018	176,863,529
3	Plus: Under(Over) Recovery of Uncollectible Expense TME May 31, 2017 per Mcf (Line 1 / Line 2)	(0.0124)

Attachment 3 Sheet 1 of 1

Columbia Gas of Ohio, Inc. Uncollectible Expense Rider Calculation

Line

No.							Projection through	gh May 31, 2018							
		April	May	June	July	August	September	October	November	December	January	February	March	April	May
1	Balance - Beginning of Month	(3,035,788)	(3,417,431)	(2,196,287)	634,202	3,985,569	6,629,868	8,392,499	8,569,914	6,539,079	5,425,650	5,175,706	5,045,663	5,069,817	5,827,338
	Bad Debts Written Off	601,051	1,744,825	2,831,323	3,349,710	2,640,491	1,757,416	171,331	(2,036,080)	(1,117,721)	(253,747)	(133,355)	20,526	753,737	1,915,273
3	Amortization of 2001 Deferral			-	-		-				-	-	-		
	Recovery - Base Rates		-	-	-				-	-	-				
	Recovery - Bad Debt Rider	(979,248)	(520,583)	-	-	-	-	-	-	-	-	-	-	-	-
6	Recovery - Other			-	-		-				-	-	-	-	
7	Incremental Bad Debt (2)+[(3)+(4)+(5)+(6)	(378,198)	1,224,242	2,831,323	3,349,710	2,640,491	1,757,416	171,331	(2,036,080)	(1,117,721)	(253,747)	(133,355)	20,526	753,737	1,915,273
	Balance Subtotal (1) + (7)	(3,413,986)	(2,193,189)	635,036	3,983,912	6,626,060	8,387,284	8,563,830	6,533,834	5,421,358	5,171,903	5,042,351	5,066,189	5,823,555	7,742,611
	Carrying Charges [(1)+[(8)/2]x(11)	(3,446)	(3,097)	(834)	1,657	3,808	5,215	6,085	5,245	4,292	3,803	3,312	3,628	3,783	4,869
10	Balance - End of Month (8)+(9)	(3,417,431)	(2,196,287)	634,202	3,985,569	6,629,868	8,392,499	8,569,914	6,539,079	5,425,650	5,175,706	5,045,663	5,069,817	5,827,338	7,747,480
11	Monthly Pool Rates	0.11%	0.11%	0.11%	0.11%	0.11%	0.11%	0.11%	0.11%	0.11%	0.11%	0.10%	0.11%	0.11%	0.11%
12	Balance - End of Month May 2018 (Line 10)														7,747,480
13	Balance - End of Month May 2017 (Line 10)														(2,196,287)

14 Incremental Bad Debt June 2017 - May 2018 (Line 12 - Line 13)

9,943,767

Attachment 4 Sheet 1 of 2

Columbia Gas of Ohio, Inc. Uncollectible Expense Rider Calculation

5	Proposed Revised Rate Effective June 1, 2017 per Mcf	\$	0.0438
	(Attachment 2, Line 3)		
4	Plus: Under(Over) Recovery of Uncollectible Expense TME June 1, 2017 per Mcf		(0.0124)
	(Line 3 / Line 4)		
3	Proposed Revised Rate Effective June 1, 2017 per Mcf		0.0562
2	Projected Volumes TME May 31, 2018	1	76,863,529
1	Incremental Net Charge Offs for TME May 31, 2018 (Attachment 3 line 14)		9,943,767
Line No.	Description	۵	mount \$

(Line 5 + Line 6)

Columbia Gas of Ohio, Inc.
Projected Bad-Debt Recovery @ Current Rates

Attachment 4 Sheet 2 of 2

		Current	
	Throughput	Rate	Revenue
Apr	17,644,115.3	0.0555	979,248
May	9,379,874.2	0.0555	520,583
Jun	4,853,195.7	-	-
Jul	3,497,970.3	-	-
Aug	3,425,131.6	-	-
Sep	3,589,748.0	-	-
Oct	5,407,745.4	-	-
Nov	12,057,597.6	-	-
Dec	23,667,997.3	-	-
Jan	33,679,278.9	-	-
Feb	32,787,144.6	-	-
Mar	26,410,215.7	-	-
Apr	18,253,648.5	-	-
May	9,233,855.0	-	-
Total	176,863,529		-

Seventeenth Revised Sheet No. 29 Cancels Sixteenth Revised Sheet No. 29

COLUMBIA GAS OF OHIO, INC.

RULES AND REGULATIONS GOVERNING THE DISTRIBUTION AND SALE OF GAS

UNCOLLECTIBLE EXPENSE RIDER

APPLICABLE:

To all customers served under rate schedules SGS and GS.

UNCOLLECTIBLE EXPENSE RIDER:

A charge of \$0.0438 per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

Filed in accordance with Public Utilities Commission of Ohio Entry dated.

COLUMBIA GAS OF OHIO, INC.

RULES AND REGULATIONS GOVERNING THE DISTRIBUTION AND SALE OF GAS

UNCOLLECTIBLE EXPENSE RIDER

APPLICABLE:

To all customers served under rate schedules SGS and GS.

UNCOLLECTIBLE EXPENSE RIDER:

A charge of <u>\$0.0555\$0.0438</u> per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

Filed in accordance with Public Utilities Commission of Ohio Entry dated June 16, 2016 in Case No. 16 321-GA-UEX.

Ninth Revised Sheet No. 69 Cancels Eighth Revised Sheet No. 69

COLUMBIA GAS OF OHIO, INC.

RULES AND REGULATIONS GOVERNING THE DISTRIBUTION AND SALE OF GAS

UNCOLLECTIBLE EXPENSE RIDER

APPLICABLE

To all customers served under rate schedules SGTS and GTS.

UNCOLLECTIBLE EXPENSE RIDER

A charge of \$0.0438 per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

Issued:

COLUMBIA GAS OF OHIO, INC.

RULES AND REGULATIONS GOVERNING THE DISTRIBUTION AND SALE OF GAS

UNCOLLECTIBLE EXPENSE RIDER

APPLICABLE

To all customers served under rate schedules SGTS and GTS.

UNCOLLECTIBLE EXPENSE RIDER

A charge of <u>\$0.0555</u><u>\$0.0438</u> per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

Section VII Sixteenth Revised Sheet No. 29 Cancels Fifteenth Revised Sheet No. 29 Page 9 of 11

Columbia Gas of Ohio, Inc.

SECTION VII PART 29 - BILLING ADJUSTMENTS

UNCOLLECTIBLE EXPENSE RIDER

29.18 Applicability

To all customers served under rate schedules FRSGTS and FRGTS.

29.19 UNCOLLECTIBLE EXPENSE RIDER

A charge of \$0.0438 per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

Section VII Fifteenth-Sixteenth Revised Sheet No. 29 Cancels FourteenthFifteenth Revised Sheet No. 29 Page 9 of 11

Columbia Gas of Ohio, Inc.

SECTION VII PART 29 - BILLING ADJUSTMENTS

UNCOLLECTIBLE EXPENSE RIDER

29.18 Applicability

To all customers served under rate schedules FRSGTS and FRGTS.

29.19 UNCOLLECTIBLE EXPENSE RIDER

A charge of <u>\$0.0555_\$0.0438</u> per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

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in

Case No(s). 17-0321-GA-UEX

Summary: Application for Approval of an Adjustment to its Uncollectible Expense Rider Rate electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.