

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Eastern Natural Gas Company, for Approval	)	Case No. 08-940-GA-ALT
of an Alternative Rate Plan Proposing a	)	
Revenue Decoupling Mechanism	)	

In the Matter of the Application of	)	
Pike Natural Gas Company, for Approval	)	Case No. 08-941-GA-ALT
of an Alternative Rate Plan Proposing a	)	
Revenue Decoupling Mechanism	)	

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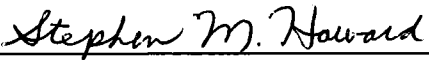
**MOTION FOR SUSPENSION OF  
COLLECTION OF DEMAND SIDE MANAGEMENT RIDERS**

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Eastern Natural Gas Company ("Eastern") and Pike Natural Gas Company ("Pike") respectfully move for a suspension of the collection of their respective Demand Side Management ("DSM") Riders for a period of time so that the Demand Side Management programs can be re-evaluated by the Staff, the Ohio Partners for Affordable Energy, Eastern, Pike and ultimately the Public Utilities Commission of Ohio. The Commission should direct that Eastern, Pike, the Staff and the Ohio Partners for Affordable Energy ("OPAE") informally meet to discuss the Eastern and Pike Demand Side Management programs or alternatives. Good cause exists for this Motion as set forth in the accompanying Memorandum in Support.

WHEREFORE, Eastern and Pike move that the collection of their Demand Side Management Riders be suspended and that the Commission approve the proposed tariff sheets contained in Exhibit B attached to this motion.

Respectfully submitted,



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**MEMORANDUM IN SUPPORT**

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On August 1, 2008, Eastern Natural Gas Company and Pike Natural Gas Company filed the above-captioned applications for approval of alternative rate plans proposing revenue decoupling mechanisms and a Demand Side Management (DSM) Rider. Amended applications were subsequently filed on February 26, 2009 and on May 1, 2009.

By their applications, Eastern and Pike requested approval of alternative rate plans, proposing revenue coupling mechanisms, which provided for movement toward a Straight Fixed Variable (SFV) rate design. In addition, Eastern and Pike each proposed the establishment of a DSM program and a Rider that would produce revenues for conservation projects in each service territory.

On March 19, 2009, Eastern, Pike, the Staff and the Ohio Partners for Affordable Energy entered into a stipulation that addressed DSM programs.

The stipulating parties agreed that Eastern and Pike would establish DSM programs, funded annually through riders designed to collect approximately \$90,000 per

company. The DSM Riders for Eastern's residential and commercial customers would be \$1.03 per month and \$0.95 per month for Pike's customers. The Ohio Partners for Affordable Energy ("OPAЕ") was to administer the funds to provide weatherization pursuant to the Ohio weatherization program standards and provide weatherization-related repairs. Weatherization-related repairs could include roof repair, window replacement, and other similar home improvement needs, and such repairs may be necessary to facilitate the installation of energy efficiency and weatherization measures. Energy efficiency and weatherization measures were to be done as cost effectively as possible. OPAЕ would manage the weatherization program and receive an annual fee of five percent. The DSM program would initially focus on reducing the demand of high-use, low-income PIPP customers according to a list of the 30 highest-use customers to be provided to OPAЕ by Eastern and Pike. OPAЕ would provide the signatory parties and the OCC an annual summary of activities, including the reasons for not weatherizing units and the repairs necessary to permit weatherization of the residences. Any signatory party could request a meeting of the signatory parties to discuss the status of the program, and could also request information as related to the DSM program from OPAЕ at any time and OPAЕ would provide the requested information promptly. The programs would not be implemented until Eastern and Pike have recovered one-fourth of the rider funding and the shareholder money had been funded for the program.

On June 16, 2010, the Commission approved the stipulation, recognizing that DSM programs that are cost-effective, produce demonstrable benefits, and produce a reasonable balance between reducing total costs and minimizing impacts on non-

participants. The Commission noted that the programs were designed to focus on the thirty highest-use PIPP customers which would be designed to significantly reduce usage by PIPP customers and would benefit all customers by potentially lowering the long-term expenses associated with the companies' PIPP programs.

Eastern's DSM Rider contained in Original Sheet No. 31 of its tariff, P.U.C.O. No. 2, was approved by the Commission and went into effect for all bills rendered after August 1, 2010. Likewise, Pike's DSM Rider contained in its Original Sheet No. 33 of its tariff, P.U.C.O. No. 7, was also approved and became effective on the same date. These current tariff sheets are attached as Exhibit A.

The DSM programs of Eastern and Pike have been implemented over the last several years. However, the expenditures for the weatherization programs in the Eastern and Pike service territories have not kept pace with the level of revenues collected under the DSM Rider for both companies. Eastern and Pike believe that it would be in the public interest to suspend the collection of the DSM Riders and to work with the OPAE and the Staff to re-evaluate the DSM programs. In other words, Eastern and Pike believe it would be in the public interest to suspend the collection of the DSM Rider from customers at least until the Commission has had an opportunity to evaluate the continuation of these DSM programs or consider alternatives. This suspension would reduce Eastern customer bills by \$1.03 per month and Pike customer bills by \$0.95 per month.

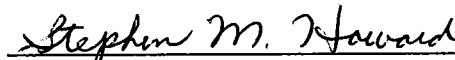
Eastern and Pike have met with the OPAE representatives and have met with the Staff about this issue. The Ohio Consumers' Counsel has withdrawn from these cases. Eastern and Pike propose that the Commission approve the suspension of the DSM

Riders with respect to collections as set forth in the proposed tariff sheets contained in Exhibit B. Eastern and Pike additionally request that the Commission direct it, the Staff and OPAE to informally meet to re-evaluate the Demand Side Management programs and to consider alternatives.

Eastern and Pike submit that it would be in the public interest for the Commission to grant this motion to suspend the collection of the DSM Rider by both Eastern and Pike so that the DSM programs can be re-evaluated and alternatives considered which may benefit customers. This suspension would reduce rates of Eastern customers by \$1.03 per month and the rates of Pike customers by \$0.95 per month.

WHEREFORE, Eastern and Pike move that the collection of their Demand Side Management Riders be suspended and that the Commission approve the proposed tariff sheets contained in Exhibit B attached to this motion.

Respectfully submitted,



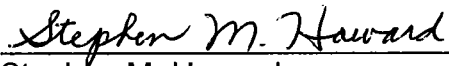
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Attorney for Eastern Natural Gas Company  
and Pike Natural Gas Company

CERTIFICATE OF SERVICE

Under the PUCO's electronic filing system, a copy of this motion will be sent to all parties of record. The undersigned hereby certifies that a true and accurate courtesy copy of the foregoing Motion for Suspension of the Collection of the DSM Riders was served upon the following parties of record this 31st day of May, 2017, via electronic mail.

  
\_\_\_\_\_  
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## **EXHIBIT A**



**SECTION VII – RATE SCHEDULES**

1. **General Service Residential Rate – GSR**

**Availability.** Available and applicable to all residential customers who consume gas for household purposes and have properly completed an application for service within the service area covered by this tariff, who will be serviced from existing Company facilities, for total gas requirements, for a single location, of a single customer, regardless of use.

**Monthly Charges**

The monthly customer charge shall be \$13.75 for each customer location.

Plus \$0.125 per Ccf for all Ccf of gas;

Plus, all delivered gas shall be subject to an adjustment per one hundred cubic feet (CCF) as set forth on:

Sheet No. 28, Rider PIPP, Percentage of Income Payment Plan.

Sheet No. 29, Uncollectible Expense Rider

Sheet No. 30, Rider GCR, Gas Cost Recovery Rate.

Plus, the fixed charge per account per month as set forth on:

Sheet No. 31, Demand Side Management Rider.

**Gross Receipts Tax Rider**

All bills rendered pursuant to this tariff will be adjusted to provide for the recovery of the Company's gross receipts tax liability of said bills through the application of the gross receipts tax rider specified on Sheet No. 27 of this tariff. This gross receipts tax rider shall not be applicable to customers that are statutorily exempt from the payment of the gross receipts tax.

**Late Payment Charge**

If applicable, an additional late payment charge of 1.5% (one and one-half percent) of the overdue unpaid balance shall be assessed as provided in Section IV, Paragraph 1(d), of the Company's Rules and Regulations Governing the Distribution and Sale of Gas.

**Service Reestablishment Charge**

Subject to the provisions of Section II, Paragraph 7 herein, if service under this rate schedule is discontinued at the request of the customer, the Company shall not be under any obligation to resume service to the same customer on the same premises until the customer has made payment of an amount equal to the Reconnection Charge specified in Section IV(1)(a) above.

1A. General Service Commercial Rate – GSC

Availability. Available and applicable to all non-residential and commercial customers who consume gas for non-household purposes, who do not qualify for the Industrial Service Rate (IS), who have properly completed an application for service within the service area covered by this tariff, who will be serviced from existing Company facilities, for total gas requirements, for a single location, of a single customer, regardless of use.

Monthly Charges

The monthly customer charge shall be \$25.00 for each customer location.

Plus \$0.15893 per Ccf for all Ccf of gas;

Plus, all delivered gas shall be subject to an adjustment per one hundred cubic feet (CCF) as set forth on:

Sheet No. 28, Rider PIPP, Percentage of Income Payment Plan.

Sheet No. 29, Uncollectible Expense Rider

Sheet No. 30, Rider GCR, Gas Cost Recovery Rate.

Plus, the fixed charge per account per month as set forth on:

Sheet No. 31, Demand Side Management Rider.

Gross Receipts Tax Rider

All bills rendered pursuant to this tariff will be adjusted to provide for the recovery of the Company's gross receipts tax liability of said bills through the application of the gross receipts tax rider specified on Sheet No. 27 of this tariff. This gross receipts tax rider shall not be applicable to customers that are statutorily exempt from the payment of the gross receipts tax.

Late Payment Charge

If applicable, an additional late payment charge of 1.5% (one and one-half percent) of the overdue unpaid balance shall be assessed as provided in Section IV, Paragraph 1(d), of the Company's Rules and Regulations Governing the Distribution and Sale of Gas.

Service Reestablishment Charge

Subject to the provisions of Section II, Paragraph 7 herein, if service under this rate schedule is discontinued at the request of the customer, the Company shall not be under any obligation to resume service to the same customer on the same premises until the customer has made payment of an amount equal to the Reconnection Charge specified in Section IV(1)(a) above.

9. **Demand Side Management Rider**

**APPLICABILITY**

To all sales customers under the Company's General Service Rate Schedules (GSR and GSC).

**DESCRIPTION**

An additional charge, for all gas consumed, to fund the costs associated with the implementation of cost-effective energy efficiency programs made available to all residential and small commercial customers under the General Service Rate Schedules (GSR and GSC).

**RATE**

A charge of \$1.03 per month to be applied per General Service (Rates GSR and GSC) Rate schedule accounts.

Issued: June 28, 2010

Effective for all bills rendered after: August 1, 2010

Filed Under Authority of Case No. 08-940-GA-ALT  
Issued by the Public Utilities Commission of Ohio

Issued by Brian R. Jonard, President

2A. General Service Commercial Rate – GSC

Availability. Available and applicable to all non-residential and commercial customers who consume gas for non-household purposes, who do not qualify for the Industrial Service Rate (IS), and who have properly completed an application for service within the service area covered by this tariff, who will be serviced from existing Company facilities, for total gas requirements, for a single location, of a single customer, regardless of use.

Monthly Charges

The monthly customer charge shall be \$15.00 for each customer location.

Plus \$0.16401 per Ccf for all Ccf of gas;

Plus, all delivered gas shall be subject to an adjustment per one hundred cubic feet (CCF) as set forth on:

Sheet No. 30, Rider PIPP, Percentage of Income Payment Plan.

Sheet No. 31, Uncollectible Expense Rider

Sheet No. 32, Rider GCR, Gas Cost Recovery Rate.

Sheet No. 33, Demand Side Management Rider

Gross Receipts Tax Rider

All bills rendered pursuant to this tariff will be adjusted to provide for the recovery of the Company's gross receipts tax liability of said bills through the application of the gross receipts tax rider specified on Sheet No. 29 of this tariff. This gross receipts tax rider shall not be applicable to customers that are statutorily exempt from the payment of the gross receipts tax.

Late Payment Charge

If applicable, an additional late payment charge of 1.5% (one and one-half percent) of the overdue unpaid balance shall be assessed as provided in Section IV, Paragraph 1(d), of the Company's Rules and Regulations Governing the Distribution and Sale of Gas.

Service Reestablishment Charge

Subject to the provisions of Section II, Paragraphs 6 and 7 herein, if service under this rate schedule is discontinued at the request of the customer, the Company shall not be under any obligation to resume service to the same customer on the same premises until the customer has made payment of an amount equal to the Reconnection Charge specified in Section IV(1)(a) above.

2. General Service Residential Rate – GSR

Availability. Available and applicable to all residential customers who consume gas for household purposes and who have properly completed an application for service within the service area covered by this tariff, who will be serviced from existing Company facilities, for total gas requirements, for a single location, of a single customer, regardless of use.

Monthly Charges

The monthly customer charge shall be \$11.00 for each customer location.

Plus \$0.12598 per Ccf for all Ccf of gas;

Plus, all delivered gas shall be subject to an adjustment per one hundred cubic feet (CCF) as set forth on:

Sheet No. 30, Rider PIPP, Percentage of Income Payment Plan.

Sheet No. 31, Uncollectible Expense Rider

Sheet No. 32, Rider GCR, Gas Cost Recovery Rate.

Sheet No. 33, Demand Side Management Rider

Gross Receipts Tax Rider

All bills rendered pursuant to this tariff will be adjusted to provide for the recovery of the Company's gross receipts tax liability of said bills through the application of the gross receipts tax rider specified on Sheet No. 29 of this tariff. This gross receipts tax rider shall not be applicable to customers that are statutorily exempt from the payment of the gross receipts tax.

Late Payment Charge

If applicable, an additional late payment charge of 1.5% (one and one-half percent) of the overdue unpaid balance shall be assessed as provided in Section IV, Paragraph 1(d), of the Company's Rules and Regulations Governing the Distribution and Sale of Gas.

Service Reestablishment Charge

Subject to the provisions of Section II, Paragraphs 6 and 7 herein, if service under this rate schedule is discontinued at the request of the customer, the Company shall not be under any obligation to resume service to the same customer on the same premises until the customer has made payment of an amount equal to the Reconnection Charge specified in Section IV(1)(a) above.

9. **Demand Side Management Rider**

**APPLICABILITY**

To all sales customers under the Company's General Service Rate Schedules (GSR and GSC).

**DESCRIPTION**

An additional charge, for all gas consumed, to fund the costs associated with the implementation of cost-effective energy efficiency programs made available to all residential and small commercial customers under the General Service Rate Schedules (GSR and GSC).

**RATE**

A charge of \$.95 per month to be applied per General Service (Rates GSR and GSC) Rate schedule accounts.

Issued: June 28, 2010

Effective for all bills rendered after: August 1, 2010

Filed Under Authority of Case No. 08-941-GA-ALT  
Issued by the Public Utilities Commission of Ohio

Issued by Brian R. Jonard, President

## **EXHIBIT B**

9. **Demand Side Management Rider**

**APPLICABILITY**

To all sales customers under the Company's General Service Rate Schedules (GSR and GSC).

**DESCRIPTION**

An additional charge, for all gas consumed, to fund the costs associated with the implementation of cost-effective energy efficiency programs made available to all residential and small commercial customers under the General Service Rate Schedules (GSR and GSC).

**RATE**

A charge of \$1.03 per month to be applied per General Service (Rates GSR and GSC) Rate schedule accounts.

**The collection of the Demand Side Management Rider has been suspended until the Public Utilities Commission of Ohio re-evaluates the Demand Side Management programs.**

Issued: May 31, 2017

Effective for all bills rendered after: \_\_\_\_\_

Filed Under Authority of Case No. 08-940-GA-ALT  
Issued by the Public Utilities Commission of Ohio

Issued by Andy Duckworth, President



9. **Demand Side Management Rider**

**APPLICABILITY**

To all sales customers under the Company's General Service Rate Schedules (GSR and GSC).

**DESCRIPTION**

An additional charge, for all gas consumed, to fund the costs associated with the implementation of cost-effective energy efficiency programs made available to all residential and small commercial customers under the General Service Rate Schedules (GSR and GSC).

**RATE**

A charge of \$.95 per month to be applied per General Service (Rates GSR and GSC) Rate schedule accounts.

**The collection of the Demand Side Management Rider has been suspended until the Public Utilities Commission of Ohio re-evaluates the Demand Side Management programs.**

Issued: May 31, 2017

Effective for all bills rendered after: \_\_\_\_

Filed Under Authority of Case No. 08-941-GA-ALT  
Issued by the Public Utilities Commission of Ohio

Issued by Andy Duckworth, President

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**5/31/2017 3:23:59 PM**

**in**

**Case No(s). 08-0941-GA-ALT**

Summary: Motion for Suspension of Collection of Demand Side Management Riders  
electronically filed by Mr. Stephen M Howard on behalf of Pike Natural Gas Company