

FILE

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DEC 27 2017

DOCKETING DIVISION
Public Utilities Commission of Ohio**THE PUBLIC UTILITIES COMMISSION OF OHIO**

DEC 27 2017

In the Matter of the Complaint
Of Gregory T. Howard,

Complainant,

Case No. 17-2536-GA-CSS

-vs-

Columbia Gas of Ohio, Inc.,

Respondent.

**COMPLAINANT'S MOTION FOR EXPEDITED RULING ON HIS REQUESTED
RELIEF CONTAINED HIS COMPLAINT AND MEMORANDUM IN SUPPORT OF HIS
COMPLAINT ALLEGING UNFAIR AND UNJUST BILLING PRACTICES AS FILED
HEREIN
ON DECEMBER 21, 2017****I. INTRODUCTION AND STATEMENT OF FACTS**

Now Comes Complainant Gregory T. Howard, pursuant to the provisions at Ohio Administrative Code, at chapters 4901-1 and 4901-9, specifically Ohio Adm. Rule 4901-1-12(A) and hereby provides the following Memorandum in Support of the Complaint alleging unfair and unjust billing practices. Complainant respectfully requests this Commission approve his Complaint as it is well-founded as will be set forth more fully herein.

On or about August 30, 2017, the Commission determined that complainant met his burden of proof relative to the allegations regarding Columbia's or its agent, Bermex failure to provide a disconnection notice in a conspicuous location at the premises on the date of

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disconnection. In regards to all other allegations of the Complaint in Case No. 15-873-GA-CSS, the Commission determined that Complainant had failed to meet his burden of proof.

The Complainant filed an application for Rehearing on August 31, 2017 which was ultimately denied on December 20, 2017, by the Commission. On December 21, 2017, complainant filed a complaint with the Commission requesting appropriate relief because he had met his burden of proof relative to all other allegations of the Complaint, the Commission determined complainant had failed to meet his burden of proof. In summary, Complainant has provided evidence regarding all other allegations of the complaint, the Commission determined that Complainant had failed to meet his burden of proof in Case No. 15-873-GA-CSS.

II. LAW AND ARGUMENT

A. COMPLAINANT HAS DEMONSTRATED THAT HE HAS MET HIS BURDEN OF PROOF RELATIVE TO ALL OTHER ALLEGATIONS OF THE COMPLAINT, THE COMMISSION DETERMINED THAT COMPLAINANT HAD FAILED TO MEET HIS BURDEN OF PROOF

The attached photographic exhibit dated June 23, 2015, supports the assertion regarding damage to the driveway at the premises and is justification for the Commission's finding that Complainant met his burden of proof relative to the allegations concerning the damage consists of uneven cement. See Complaint at ¶6. Additionally, at the time of the installation of the service line, Columbia's agent, Infra Source, damaged the driveway which resulted in the cement being uneven. See, Complainant's unopposed Amended motion requesting an expedited review and consideration on reconnection of utility service and correction of the Commission's Opinion and Order filed in Case No. 15-873-GA-CSS on November 8, 2017, which is incorporated herein by reference.

Furthermore, the exhibit dated April 14, 2015 supports Complainant reconnection claims of utility service during the winter reconnect season, which ended on April 15, 2015. The records

provides evidence that following Complainant's payment on February 4, 2015, he was in the process of reverifying his Percentage of Income Payment Plan (PIPP) Plus eligibility and that no payment had been determined during the winter reconnect season, which ended on April 15, 2015. Therefore, the Complainant asserts that he met his burden of proof with respect to the reconnection claims and is justification for the Commission's finding that complainant met his burden of proof concerning the reconnection claims. See Complaint at ¶'s 7-8.

The exhibit attached to the Complaint as Exhibit 1 supports Complainant's claim of a faulty meter relocated outside the premises by Columbia's agent, Infra Source, on September 30, 2011, that is overstating the natural gas usage and support the claim that the billed amount on both accounts is incorrect. The record provides evidence that the faulty meter relocated outside the premises by Columbia's agent, Infra Source, on September 30, 2011, as of November 6, 2017, is still overstating the natural gas usage and support the claim that the billed amount on both accounts is incorrect. See Complaint at ¶9. Complainant's complaint has stated reasonable grounds for the instant complaint. Further a hearing on these well-supported claims is not necessary.

III. CONCLUSION

Complainant has met his burden of proof relative to the allegations that Columbia Gas of Ohio Inc., has violated the Commission's rules relative to (1) Columbia's agent, Infra Source, damaged the driveway which resulted in the cement being uneven; (2) the allegations concerning the reconnection claims; and (3) that the faulty meter relocated outside the premises by Columbia's agent, Infra Source, on September 30, 2011, as of November 6, 2017, is still overstating the natural gas usage and support the claim that the billed amount on both accounts is incorrect.

The Complainant respectfully requests that the requested relief set forth in the complaint alleging unfair and unjust billing practices be granted without a hearing as the Commission has authority to consider a written complaint filed against a public utility by any person or corporation regarding any rate, service, regulation, or practice relating to any service furnished by the public utility that is in any respect unjust, unreasonable, insufficient, or unjustly discriminatory.

Respectfully submitted,



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PROOF OF SERVICE

This is to certify that a regular copy of the foregoing of Gregory T. Howard was sent via ordinary U.S. Mail or via email, or facsimile this 27th day of December, 2017 to:

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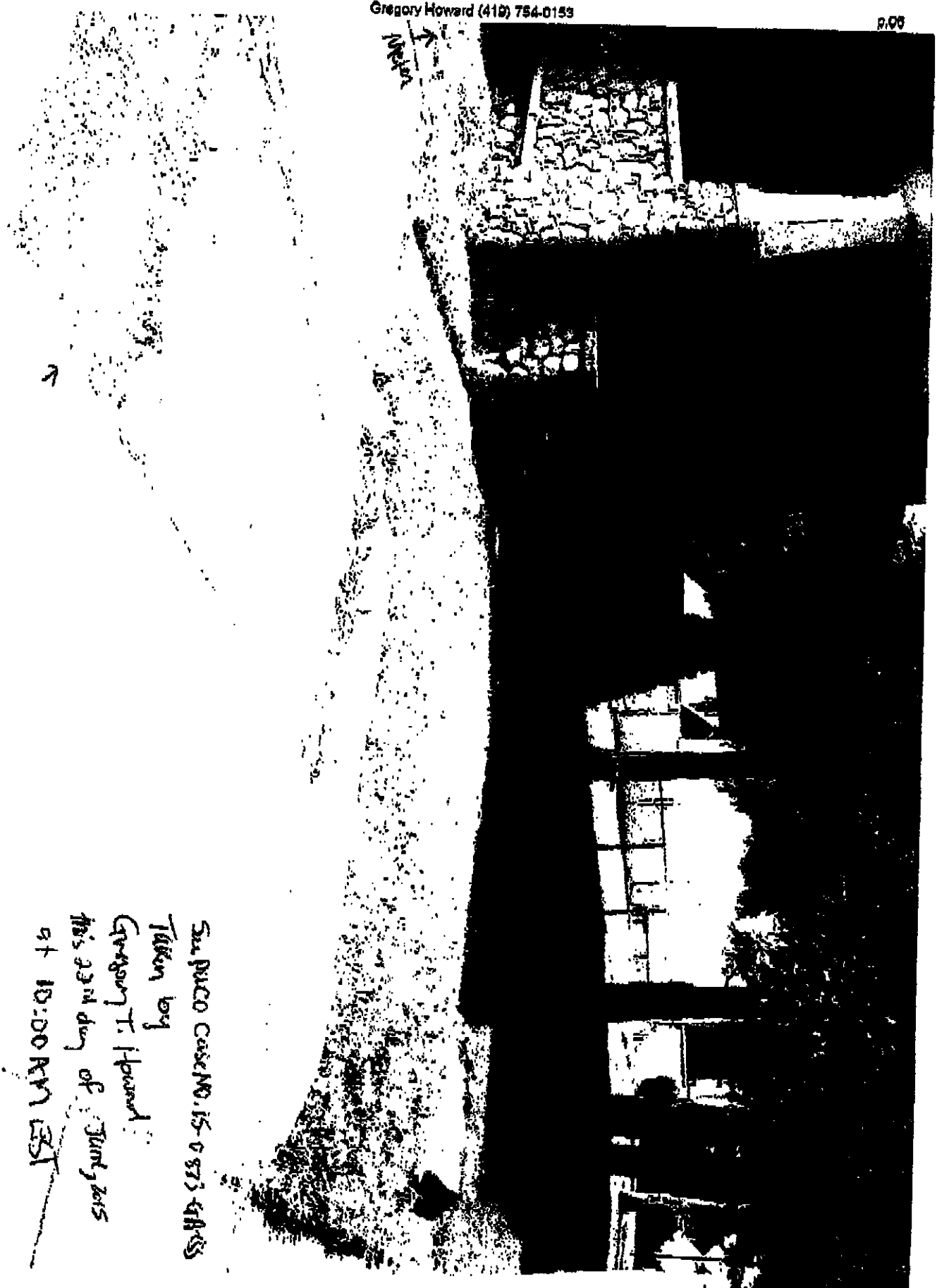
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Gregory T. Howard
Plaintiff-Claimant, pro-se

Gregory Howard (419) 754-0153

p.09



San PUCO Case NO. 15-0873-GH-SS
Taken by
Gregory T. Howard
this 23rd day of July 2015
at 10:00 AM EST

ATTACHMENT 3(A)

OPER ACTION ==> _____ REMARKS 34 1121 200099589 04/50
 CUST NAME BRENDA PALMER PCID 16065723 CUST 005 3
 SERV ADDR 381 S DETROIT AV CHECKFREE-ZIPCHECK
 CITY TOLEDO ST OH ZIP 436092068 NON PARTICIPANT

POST DATE 04142015 CUSTOMER REMARKS TEXT PAGE 1 OF 1

LAURA / PATHWAY // ADV IN ORDER FOR CUST TO RSTR SRVC, THEY CAN RVRFY
 PIPP SO THAT CUST CAN PAY AMNT TO RSTR + 52 RCP. NO AMNT DETERMINED
 YET...U904331/ESKELLY/PA-NCO

F1=HELP F2=WRK-FUN F3=QUIT F4=ORD-TAK F5=INQ F6=ORD-EX F7=PREV
 F8=NEXT F9=INQ-CTL F10=EX-CTL F11-TAK-CTL F12=INFO F14=CONTACT F24=CASH

Case No. 17-2536-GA-CSS---Exhibit OTH- 2

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