

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Columbia Gas of Ohio, Inc. for an) Case No. 19-0421-GA-PIP
Adjustment to its Interim, Emer-)
gency and Temporary Percentage of)
Income Payment Plan Rider.)

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

Columbia Gas of Ohio, Inc. ("Columbia"), hereby submits its annual Interim, Emergency and Temporary Percentage of Income Payment Plan Rider Report ("PIP Plan Rider"), and also requests approval to increase its PIP Plan Rider rate. In support of its Application, Columbia states as follows:

1. In Paragraph 51 of the Commission's December 14, 2011 Finding and Order in Case No. 08-1229-GA-COI, the Commission directed each natural gas company to file an annual PIP Plan status report each May. The annual report is required to include the level of PIP Plan recoveries to write off and the rate, if applicable. In compliance with this Order, attached hereto as Attachment 1 is Columbia's annual PIP Plan Rider Report.

2. The December 14, 2011 Finding and Order also requires natural gas companies to file for approval of a PIP Plan Rider rate adjustment whenever an increase or decrease of ten percent or more can be justified.

3. Columbia's current PIP Plan Rider rate is \$0.1053 per Mcf. This rate became effective on May 31, 2018, and was designed to recover the projected level of arrears expected to occur during the subsequent twelve-month period.

4. Columbia's annual review of its PIP Plan Rider rate indicates that the PIP Plan Rider rate should be increased to \$0.1427 per Mcf, an increase of \$0.0374 per Mcf. Attachment 2 is a copy of the proposed tariff sheets that provide for the proposed increase in Columbia's PIP Plan Rider rate.

5. The development of the proposed PIP Plan Rider of \$0.1427 per Mcf and the change from the current rate is set forth on Attachment 3. The proposed rate is designed to recover the projected level of arrears expected to occur during the next twelve-month period, plus an under-collection of \$8,646,251.29.

6. The method of computing the proposed PIP Plan Rider for purposes of this Application is consistent with that approved by the Commission's December 2, 1993 Finding and Order in Case No. 88-1115-GE-PIP, 90-705-GE-PIP and 90-879-GE-ORD ("1993 Order"). The 1993 Order provides for a proceeding by a utility to adjust its PIP Plan Rider to a "true-up" rate in order to recover, over a twelve-month period, the PIP Plan arrearages accumulated over the year plus or minus any deficiency or excess recovered by the rider during a prior year. The Commission has continued to recognize that an emergency, as contemplated by R.C. § 4909.16, continues to exist, and, in response to such emergency, that the PIP Plan should continue to be available to residential customers, as set forth in the Stipulation and Recommendation in Case No. 88-1115-GE-PIP, et al., approved by the 1993 Order. Said Stipulation and Recommendation provides for the adjustment of PIP Plan Riders upon request of the affected utility.

7. In the 1993 Order, the Commission established a procedure that permits a utility to implement a new PIP Plan Rider rate on the forty-sixth day after the filing of an application, absent action by the Commission. This procedure is similar to the procedure established by the Commission in Case No. 93-1000-EL-FOR for recovery of certain State EPA Emission Application Fees. Columbia hereby requests that the proposed PIP Plan Rider rate set forth in this Application, absent Commission action, become effective on the forty-sixth day after the filing of this Application.

WHEREFORE, Columbia respectfully requests that the Commission approve this Application and proposed PIP Plan Rider rate as set forth herein and on Attachment 2, to become effective with the first billing unit for the month immediately following the forty-sixth day after the filing of this Application.

Respectfully submitted by,

COLUMBIA GAS OF OHIO, INC.

/s/ Joseph M. Clark

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Attorneys for

COLUMBIA GAS OF OHIO, INC.

ATTACHMENT 1
PIP PLAN RIDER REPORT

Columbia Gas of Ohio, Inc.
Computation of Annual Shortfall Requirement

Line No.	Description	Balance @ 3/31/2019	Balance @ 3/31/2018	Annual Change
1	(Over)/Under-Collection at March 31, 2018			8,324,685
2	Net Charge-offs Less Than 2 Months Old	8,684,925	11,730,657	(3,045,732)
3	Net Charge-offs Greater Than 2 Months Old	487,009,705	481,592,697	5,417,008
4	PIPP Arrearage Credit - Phase I	17,173,284	17,173,284	0
5	PIPP Arrearage Credit - Phase II	12,945,669	12,945,669	0
6	PIPP Arrearage Credit - Phase III	9,573,468	9,573,468	0
7	PIPP Arrearage Credit - Phase IV	4,396,175	4,396,175	0
8	PIPP PYMC Credit	1,140,675	1,140,675	0
9	PIPP Plus 1/24th Credit	108,012,425	96,162,082	11,850,343
10	PIPP Plus Delta Credit	107,626,516	103,972,010	3,654,506
11	PIPP Grad Plus 1/24th Credit	2,492,051	2,311,988	180,062
12	PIPP Grad Plus Delta Credit	13,520,547	13,259,604	260,944
13	PIPP Enrollment/Reverification Fee	1,181,680	921,784	259,896
14	PIPP Plus 1/24th Credit - ADJ	(598,263)	(560,519)	(37,745)
15	PIPP Plus Delta Credit - ADJ	(124,164)	(116,956)	(7,208)
16	PIPP Grad Plus 1/12th Credit - ADJ	(7,950)	(7,935)	(15)
17	PIPP Grad Plus Delta Credit - ADJ	46,066	46,224	(158)
18	Post PIPP 1/12th Credit	19,371	14,879	4,492
19	Post PIPP 1/12th Credit - ADJ	0	22	(22)
20	Net Charge Offs - Unbilled Revenue	(1,204,533)	137,281	(1,341,814)
21	Total	771,887,646	754,693,088	17,194,558
22	Recoveries	(759,671,869)	(743,540,435)	(16,131,434)
23	(Over)/Under-Collection, TME March 31, 2019			9,387,809

**ATTACHMENT 2
PROPOSED TARIFFS**

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

PIP PLAN TARIFF SCHEDULE RIDER

APPLICABLE:

To all volumes delivered under rate schedules SGS, SGSS, GS, GSS and LGS except for those volumes delivered to Customers taking service under these rate schedules that were Transportation Service Customers prior to April 1, 2012 and were not subject to payment of the PIPP Rider prior to April 1, 2012.

RATE RIDER:

All gas consumed per account per month

\$0.1427 per Mcf

RECONCILIATION ADJUSTMENT:

This Rider is subject to reconciliation or adjustment, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of PIP Plan expense upon which the rate was calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.

Filed in accordance with Public Utilities Commission of Ohio Entry dated

Issued:

Effective: With meter readings on or after

Issued By
Daniel A. Creekmur, President

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

26. GAS TRANSPORTATION SERVICE BILLING ADJUSTMENTS

INTERIM, EMERGENCY AND TEMPORARY

PIP PLAN TARIFF SCHEDULE RIDER

APPLICABLE

To all customers who were sales customers as of June 3, 1994, and any new customer account established after June 3, 1994.

PIP PLAN TARIFF BASE RATE RIDER

A PIP Plan base rate rider of \$0.1427 per Mcf will apply to all tariff volumes of applicable customers.

RECONCILIATION ADJUSTMENT

This Rider is subject to reconciliation or adjustment, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of PIP Plan expense upon which the rate was calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.

Filed under the authority of the Public Utilities Commission of Ohio in Case No. dated

Issued:

Effective: With meter readings on or after

Issued By
Daniel A. Creekmur, President

SECTION VII
PART 29 - BILLING ADJUSTMENTS

INTERIM, EMERGENCY AND TEMPORARY
PIP PLAN TARIFF SCHEDULE RIDER

29.1 Applicability

To all volumes delivered under rate schedules FRSGTS, FRGTS and FRLGTS except for those volumes delivered to Customers taking service under these rate schedules that were Transportation Service customers prior to April 1, 2012 and were not subject to payment of the PIPP Rider prior to April 1, 2012.

29.2 Rate

All gas consumed per account per month \$0.1427 per Mcf

29.3 Reconciliation Adjustment

This Rider is subject to reconciliation or adjustment, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of PIP Plan expense upon which the rate was calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.

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CURRENT TARIFFS

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

PIP PLAN TARIFF SCHEDULE RIDER

APPLICABLE:

To all volumes delivered under rate schedules SGS, SGSS, GS, GSS and LGS except for those volumes delivered to Customers taking service under these rate schedules that were Transportation Service Customers prior to April 1, 2012 and were not subject to payment of the PIPP Rider prior to April 1, 2012.

RATE RIDER:

All gas consumed per account per month

\$0.1053 per Mcf

RECONCILIATION ADJUSTMENT:

This Rider is subject to reconciliation or adjustment, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of PIP Plan expense upon which the rate was calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.

Filed in accordance with Public Utilities Commission of Ohio Entry dated December 2, 1993 in Case No. 88-1115-GA-PIP, et al.

Issued: May 30, 2018

Effective: With meter readings on or after May 31, 2018

Issued By
Daniel A. Creekmur, President

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

26. GAS TRANSPORTATION SERVICE BILLING ADJUSTMENTS

INTERIM, EMERGENCY AND TEMPORARY

PIP PLAN TARIFF SCHEDULE RIDER

APPLICABLE

To all customers who were sales customers as of June 3, 1994, and any new customer account established after June 3, 1994.

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A PIP Plan base rate rider of \$0.1053 per Mcf will apply to all tariff volumes of applicable customers.

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Issued: May 30, 2018

Effective: With meter readings on or after May 31, 2018

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SECTION VII
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INTERIM, EMERGENCY AND TEMPORARY
PIP PLAN TARIFF SCHEDULE RIDER

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To all volumes delivered under rate schedules FRSGTS, FRGTS and FRLGTS except for those volumes delivered to Customers taking service under these rate schedules that were Transportation Service customers prior to April 1, 2012 and were not subject to payment of the PIPP Rider prior to April 1, 2012.

29.2 **Rate**

All gas consumed per account per month \$0.1053 per Mcf

29.3 **Reconciliation Adjustment**

This Rider is subject to reconciliation or adjustment, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of PIP Plan expense upon which the rate was calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.

Filed in accordance with Public Utilities Commission of Ohio Order dated December 2, 1993 in Case No. 88-1115-GA-PIP.

Issued: May 30, 2018

Effective: With meter readings
on or after May 31, 2018

Issued By
Daniel A. Creekmur, President

REDLINED PROPOSED TARIFFS

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

PIP PLAN TARIFF SCHEDULE RIDER

APPLICABLE:

To all volumes delivered under rate schedules SGS, SGSS, GS, GSS and LGS except for those volumes delivered to Customers taking service under these rate schedules that were Transportation Service Customers prior to April 1, 2012 and were not subject to payment of the PIPP Rider prior to April 1, 2012.

RATE RIDER:

All gas consumed per account per month

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RECONCILIATION ADJUSTMENT:

This Rider is subject to reconciliation or adjustment, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of PIP Plan expense upon which the rate was calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.

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**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

26. GAS TRANSPORTATION SERVICE BILLING ADJUSTMENTS

INTERIM, EMERGENCY AND TEMPORARY

PIP PLAN TARIFF SCHEDULE RIDER

APPLICABLE

To all customers who were sales customers as of June 3, 1994, and any new customer account established after June 3, 1994.

PIP PLAN TARIFF BASE RATE RIDER

A PIP Plan base rate rider of \$0.~~4053~~1427 per Mcf will apply to all tariff volumes of applicable customers.

RECONCILIATION ADJUSTMENT

This Rider is subject to reconciliation or adjustment, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of PIP Plan expense upon which the rate was calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.

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SECTION VII
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INTERIM, EMERGENCY AND TEMPORARY
PIP PLAN TARIFF SCHEDULE RIDER

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Issued: ~~May 30, 2018~~

Effective: With meter readings
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ATTACHMENT 3
COMPUTATION OF PIP PLAN RIDER RATE

Columbia Gas of Ohio, Inc.
Computation of Proposed PIPP Rate

Line No.	Description	Reference	Amount
1	Projected PIPP Arrears Balance @ May 31, 2019	Attachment 3, page 3 of 4	\$ 8,646,251.29
2	Projected Increase/Decrease in PIPP Arrears June 2019 - May 2020	Attachment 3, page 2 of 4	16,750,835.85
3	Total		25,397,087.14
4	Projected Throughput Subject to PIPP Surcharge Twelve Months Ending May 31, 2020	Attachment 3, page 4 of 4	178,024,691
5	Proposed PIPP Rate Per Mcf		0.1427

Columbia Gas of Ohio, Inc.
Computation of Projected Change in PIPP Arrears
April 2019 Through May 2020

	PIPP Customers (1)	Projected PIPP Consumption (2)	Projected Usage/ Customer Mcf (3 = 2 ÷ 1)	Customer Charge (4)	IRP Charge (5)	IDR Charge (6)	CEP Charge (7)	Federal Tax Reform Credit (8)	Commodity Charge (9 = 3 X 18)	Gas Cost (10=3 X 17)	Gross Receipts Tax (11)	Total Bill (12)	Total PIPP Billings (13 = 1 X 12)	Less Customer Payments (14)	Less HEAP/Other Payments (15)	Incremental Change PIPP Arrears (16)	Projected DSS Rate (17)	Projected Commodity Rate (18)
APR 2019	54,085	584,572	10.81	16.75	8.91	0.01	3.51	(1.06)	8.62	42.08	3.93	82.75	4,475,574.88	2,111,478	649,147	1,714,949.41	3.8930	0.7978
MAY	51,091	275,670	5.40	16.75	9.38	0.01	3.51	(1.06)	4.10	20.96	2.68	56.33	2,877,850.05	1,994,593	473,765	409,492.05	3.8850	0.7599
TOTAL APR 2019 - MAY 2019																2,124,441.46		
JUN	49,805	119,481	2.40	16.75	9.38	0.02	3.51	(1.06)	1.94	9.43	1.99	41.96	2,089,738.75	1,944,387	231,130	(85,778.24)	3.9300	0.8076
JUL	49,240	81,722	1.66	16.75	9.38	0.02	3.51	(1.06)	1.33	6.56	1.82	38.32	1,886,743.26	1,922,330	186,613	(222,199.34)	3.9550	0.8033
AUG	50,421	84,636	1.68	16.75	9.38	0.02	3.51	(1.06)	1.35	6.67	1.83	38.45	1,938,538.60	1,968,436	17,325	(47,222.17)	3.9750	0.8033
SEP	49,302	89,266	1.81	16.75	9.38	0.02	4.15	(1.06)	1.45	7.23	1.89	39.82	1,963,169.22	1,924,750	19,281	19,138.14	3.9950	0.8033
OCT	49,736	137,455	2.76	16.75	9.38	0.02	4.15	(1.06)	3.23	11.01	2.17	45.65	2,270,638.09	1,941,693	17,177	311,767.18	3.9840	1.1704
NOV	49,014	357,000	7.28	16.75	9.38	0.02	4.15	(1.06)	8.52	29.47	3.35	70.59	3,459,766.96	1,913,507	53,049	1,493,211.90	4.0460	1.1704
DEC	50,648	725,235	14.32	16.75	9.38	0.02	4.15	0.00	16.76	60.08	5.34	112.49	5,697,155.70	1,977,298	265,219	3,454,638.60	4.1960	1.1704
JAN 2020	53,887	1,066,239	19.79	16.75	9.38	0.02	4.15	0.00	24.26	84.69	6.94	146.19	7,877,686.40	2,103,748	1,031,304	4,742,633.77	4.2800	1.2260
FEB	54,824	1,051,571	19.18	16.75	9.38	0.02	4.15	0.00	23.52	81.23	6.73	141.78	7,773,020.89	2,140,329	4,183,432	1,449,260.28	4.2350	1.2260
MAR	54,046	847,061	15.67	16.75	9.38	0.02	4.15	0.00	19.22	64.26	5.67	119.45	6,455,695.02	2,109,956	1,407,732	2,938,007.60	4.1000	1.2260
APR	54,467	588,042	10.80	16.75	9.38	0.02	4.15	0.00	12.54	41.16	4.19	88.18	4,803,070.92	2,126,392	649,147	2,027,532.17	3.8120	1.1614
MAY	51,452	277,520	5.39	16.75	10.80	0.02	4.15	0.00	6.26	20.37	2.91	61.27	3,152,297.39	2,008,686	473,765	669,845.95	3.7770	1.1614
TOTAL JUN 2019 - MAY 2020																16,750,835.85		

1) Projected Commodity Rate consists of PIPP Rider, Excise Tax Rider, Regulatory Assessment Rider, Demand Side Management, Non-Temperature Balancing Service and CHOICE/SCO Reconciliation Rider.

2) Average PIPP Payment = \$39.04

Columbia Gas of Ohio, Inc.
Computation of Projected Change In PIPP Balance at May 31, 2019

	Projected Change PIPP Arrears (1) \$	PIPP Surcharge Recoveries (2) \$	Actual/ Projected Balance (3) \$	Projected Surcharge Volumes (4) Mcf	Projected/ Actual Surcharge Rate (5) \$
JAN 2019			11,022,709		
FEB			9,768,191		0.1053
MAR			9,387,810		0.1053
APR	1,714,949	1,874,000	9,228,759	17,796,771	0.1427
MAY	409,492	992,000	8,646,251	9,420,703	0.1427
JUN	(85,778.24)	745,140.19	7,815,333	5,223,172	0.1427
JUL	(222,199.34)	586,628.55	7,006,505	4,112,061	0.1427
AUG	(47,222.17)	564,951.74	6,394,331	3,960,114	0.1427
SEP	19,138.14	596,112.15	5,817,357	4,178,538	0.1427
OCT	311,767.18	783,074.60	5,346,050	5,489,079	0.1427
NOV	1,493,211.90	1,738,208.83	5,101,053	12,184,236	0.1427
DEC	3,454,638.60	3,309,777.23	5,245,914	23,200,380	0.1427
JAN 2020	4,742,633.77	4,705,221.57	5,283,326	32,981,956	0.1427
FEB	1,449,260.28	4,646,965.16	2,085,621	32,573,599	0.1427
MAR	2,938,007.60	3,812,408.15	1,211,221	26,723,647	0.1427
APR	2,027,532.17	2,555,153.44	683,600	17,910,731	0.1427
MAY	669,845.95	1,353,445.54	(0)	9,487,179	0.1427

Columbia Gas of Ohio, Inc.
Projected Surcharge Volumes at May 31, 2020

	Projected Surcharge Volumes
	Mcf
Apr 2019	17,796,771
May 2019	<u>9,420,703</u>
TOTAL THROUGHPUT APR 2019 - MAY 2019	27,217,474
JUN 2019	5,223,172
JUL	4,112,061
AUG	3,960,114
SEP	4,178,538
OCT	5,489,079
NOV	12,184,236
DEC	23,200,380
JAN 2020	32,981,956
FEB	32,573,599
MAR	26,723,647
APR	17,910,731
MAY	9,487,179
TOTAL THROUGHPUT TME May 2020	178,024,691

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 19-0421-GA-PIP

Summary: Application for an Adjustment to its Interim, Emergency, and Temporary Percentage of Income Payment Plan Rider electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.