

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Re-)
view of Ohio Adm.Code Chapters) Case No. 19-52-AU-ORD
4901:1-17 and 4901:1-18.)

**INITIAL COMMENTS OF
COLUMBIA GAS OF OHIO, INC.**

Pursuant to the Commission's June 19, 2019 Entry in the above-referenced docket, Columbia Gas of Ohio, Inc. ("Columbia") is submitting these Initial Comments for the Commission's consideration. Staff's proposed changes to Ohio Adm. Code Chapters 4901:1-17 and 4901:1-18 reflect some of the changes suggested at the Commission's workshop held on February 5, 2019. Columbia requests that the Commission consider revising these rules as described in these Initial Comments.

PIPP Plus Program Eligibility

The Commission originally adopted the Percentage of Income Payment Plan in 1983.¹ At that time, the original PIPP required customers with incomes up to 150% of the federal poverty guidelines to pay a percent of their monthly household incomes to the utility or utilities providing their primary and secondary heating service. Since 1983, the PIPP program has been limited to customers with incomes at or below 150% of the federal poverty guidelines. Columbia recommends, in the interim period between this rulemaking and the next rulemaking for Chapters 4901:1-17 and 4901:1-18, that the Commission hold a workshop with all utilities, including electric and gas, to determine whether it is feasible and reasonable to increase the PIPP plus customer eligibility standard to 175% of the federal poverty guidelines.

Columbia is recommending further investigation and consideration of this program's eligibility requirements primarily because it would allow additional customers to participate in the benefits of this program. Currently, customers with incomes at or below 175% of the federal poverty guidelines are eligible for Home Energy Assistance Program

¹ *In the Matter of the Investigation into Long-Term Solutions Concerning Disconnection of Gas and Electric Service in Winter Emergencies*, PUCO Case No. 83-303-GE-COI, Opinion and Order (November 23, 1983).

(HEAP). This energy assistance is specifically allocated to those that the federal government deems low income. Further, in Columbia's own experience, it has seen the need of its customers. In 2018, for example, Columbia's customers utilized \$11.4 million in HEAP funding. One of Columbia's other energy assistance programs, HeatShare, is also available for customers with incomes at or below 175% of federal poverty guidelines. This program, administered by the Salvation Army, helps some of Columbia's neediest customers by providing \$78,210 per year in assistance funding.

Through these energy assistance programs Columbia served 96,000 customers during 2018. Columbia would like to work with the Commission and interested stakeholders to start to explore the possibility of reviewing the PIPP program's eligibility limitations to see whether it would be possible to increase PIPP eligibility from 150% to 175% of the federal poverty guidelines.

Respectfully submitted by,

COLUMBIA GAS OF OHIO, INC.

/s/ Joseph M. Clark

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/19/2019 2:53:08 PM

in

Case No(s). 19-0052-AU-ORD

Summary: Comments /Initial Comments electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.