

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Mini- )  
mum Gas Service Standards in Chapter ) Case No. 19-1429-GA-ORD  
4901:1-13 of the Ohio Administrative )  
Code. )

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

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Pursuant to the Commission's December 18, 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 Chapter 4901:1-13 reflect some of the changes suggested at the Commission's workshop held on August 13, 2019. Columbia requests that the Commission consider revising these rules as described in these Initial Comments.

**Ohio Adm. Code 4901:1-13-05(C)(4) – Scheduled Appointments**

The Commission's rules provide that gas utilities must meet scheduled appointments with customers. This rule is understandable as many customers must be present at home for some of the work conducted by a gas utility, such as appliance inspections and relights. Sometimes, however, utilities struggle to meet these scheduled appointments, especially when there are unexpected priority work called into the utility, such as gas odor calls. There are times when Columbia is forced to make a decision between meeting a scheduled appointment or responding to an odor of gas call. For Columbia, the safety of its customers is the priority; however, by making this decision, Columbia risks falling out of compliance with this rule's 95% compliance threshold. Columbia requests that the compliance threshold be revised to take into account these situations where safety of customers is the utility's priority.

Therefore, Columbia requests the following rule change to Ohio Adm.Code 4901:1-13-05(C):

(C) Scheduled appointments with customers.

(4) When the gas or natural gas company will not be able to meet a scheduled appointment with a customer, the company shall reasonably attempt to notify the customer in advance of the failure. If the gas or natural gas company must miss the scheduled appointment due to an emergency or priority order that requires immediate response, then the rescheduled appointment shall not be considered a missed appointment. Under the rule, the gas or natural gas company shall arrange either:

(a) A next business day appointment (following the date of the missed appointment) with no expected arrival time window; or

(b) A four-hour window appointment within two business days after the date of the missed appointment.

#### **Ohio Adm. Code 4901:1-13-10(G) – Dedicated Call Center**

The Commission's proposed rules add a section requiring a dedicated telephone number that must be staffed from 8:00 am to 5:00 pm. This utility dedicated telephone line must be ready to answer complaints referred to the utility by the Commission's own call center, which is staffed Monday through Friday from 8:00 am to 5:00 pm. Columbia has operated a dedicated telephone number with a competent and experienced staff for years. Columbia's requested revision attempts to clarify the proposed rule to both mirror the Commission's call center hours and reflect the practice of Columbia's dedicated phone staff.

Therefore, Columbia requests the following amendment to Ohio Adm. Code 4901:1-13-10(G):

(G) Each gas or natural gas company will provide a dedicated telephone number to commission staff to use and provide to consumers when escalating consumer complaints. The gas or natural gas company staff assigned to answer these calls will have the authority to address the escalated consumer complaint. This dedicated line will be staffed from eight a.m. to five p.m., Monday through Friday, excluding state holidays or company holidays, and is in addition to complaints received in accordance with this rule....

### **Ohio Adm. Code 4901:1-13-12(G) – Switching Block**

The Commission proposes a new rule allowing a customer to put a block on his or her account to prevent switching to another retail natural gas supplier. The Commission provides a parenthetical prescriptive method to ensure the customer is placing the block on the account with either a customer-provided code or pin number. These two methods, however, will require customers to remember this pin, as well as IT changes to incorporate the recordkeeping and protection of this pin (in the event the utility is even permitted to keep it on file). In lieu of a customer-provided code or pin number, Columbia suggests there may be a more customer friendly solution – a verified customer authorization. If a customer calls into Columbia’s call center, Columbia verifies that the caller is the customer of record. Once verified, Columbia would be able to place a block on the account, with customer authorization, which would alleviate the customer from remembering a code or a pin number.

Therefore, Columbia requests the following amendment to Ohio Adm. Code 4901:1-13-12(G):

(G) Each gas or natural gas company will allow any customer to request a retail natural gas supplier block be placed on the customer’s account. The block will prevent the customer’s commodity service provider from being switched without the customer’s authorization (via [either a customer-provided code ~~or pin number~~ or other means provided by the gas or natural gas company](#)) to the gas or natural gas company. The release will be provided to the gas or natural gas company from the customer or other authorized person on the account.

### **Ohio Adm. Code 4901:1-13-14(B) – Supplier Agreement**

The Commission proposes a rule requiring that a template of the supplier agreement with retail natural gas suppliers is filed in the natural gas utility’s tariff docket, similar to the utility’s credit and collateral requirements. To make this rule more clear, Columbia requests a minor change.

Therefore, Columbia requests the following amendments to Ohio Adm. Code 4901:1-13-14(B):

(B) A gas or natural gas company shall execute a supplier agreement with each retail natural gas supplier and governmental aggregator to operate under the terms of the gas or natural gas company's tariff. At a minimum, the supplier agreement shall include representations and warranties, indemnification, limitations on liability, default (breach), remedies, force majeure, commencement, and term. A current copy of the supplier agreement is to be filed with the gas or natural gas company's tariff [docket](#).

#### **Ohio Adm. Code 4901:1-13-14(F) and (I) – Electronic notification**

The Commission rules incorporate the use of electronic notification, especially as it relates to communications with customers. Columbia recommends including electronic notification for two additional rules to provide customers with another method of receiving notification of an enrollment or cancellation with a supplier.

Therefore, Columbia requests the following amendments to Ohio Adm.Code 4901:1-13-14(F) and (I):

(F) The gas or natural gas company shall, within two business days of confirming a retail natural gas supplier's or governmental aggregator's valid electronic enrollment and prior to commencing enrollment, mail [or send an electronic notification to](#) the customer a competitively neutral confirmation notice stating....

(I) Within three business days of notifying a retail natural gas supplier of a customer cancellation, the gas or natural gas company shall provide to the customer by mail [or electronic notification](#) a notice stating all of the following....

Respectfully submitted by,

**COLUMBIA GAS OF OHIO, INC.**

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## CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 17th day of January, 2020, upon the parties listed below.

/s/ Joseph M. Clark

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