

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

COMMENTS OF OHIO GAS COMPANY

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COUNSEL FOR OHIO GAS COMPANY

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Staff has proposed several changes to the Public Utilities Commission of Ohio's ("Commission") rules in Chapter 4901:1-13, Ohio Administrative Code ("O.A.C.") that would be unreasonable and lead to customer confusion if Ohio Gas Company ("Ohio Gas" or "Company") were required to comply with the proposed rule language. The proposed language at issue addresses providing customers with information regarding the Standard Choice Offers ("SCO"), Gas Cost Recovery ("GCR") mechanisms and Competitive Retail Natural Gas ("CRNG") providers; items that do not exist in the Company's service area. As discussed in more detail below, Ohio Gas proposes tweaks to the language that would not require Ohio Gas to provide the proposed potentially misleading information for so long as the underlying items do not exist in the Company's service area.

I. COMMENTS

A. Rule 4901:1-13-11(B)(13), O.A.C.

In this rule Staff proposes the following price-to-compare statement be required on bills:

The following price to compare statement: "In order for you to save money by selecting a competitive retail natural gas provider, your price to compare,

which is the standard choice offer (SCO) rate or the gas cost recovery (GCR) rate, is (dollar amount per Mcf) for this billing month. The SCO rate or GCR rate is approved by the public utilities commission.”

Ohio Gas proposes that the Commission add the following clause to the beginning of the proposed rule language “If the applicable company has a choice program, . . .” This would be consistent with how the issue has been addressed in Rule 4901:1-13-11(B)(28), O.A.C.

B. Rule 4901:1-13-11(F), O.A.C.

This rule would require Ohio Gas to take certain actions regarding customer lists that would be available to government aggregators and CRNG providers. Ohio Gas does not have any government aggregators or CRNG providers operating in its service area. Ohio Gas would propose the Commission add the following language to the beginning of Part (F) of the Rule, “If the gas or natural gas company has a choice program, ...” If the Commission does not add this language at the beginning of the rule, it should at least modify subpart (F)(3) with the same language. Again, without the modification, Ohio Gas will be required to send notices to its customers 4 times a year about a program/option that does not exist in the Company’s service territory.

C. 4901:1-13-14(B) & (C), O.A.C.

Part (B) of the Rule would require natural gas companies to file supplier agreements with their tariff and Part (C) would require natural gas companies to potentially modify their tariffs to identify in the tariff the information that is included in the customer list. The Commission should either confirm that neither requirement would apply to Ohio Gas or modify the rules with the following language at the beginning of each: “If the natural gas company has an active choice program.”

II. CONCLUSION

Ohio Gas thanks the Commission for the opportunity to weigh in on the proposed rule changes. The Company urges the Commission to adopt the modifications suggested herein to reduce unnecessary expense, and more importantly, to reduce potential customer confusion.

Respectfully submitted,

/s/ Matthew Pritchard

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Comments of the Ohio Gas Company was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on January 17, 2020. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ Matthew R. Pritchard

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Summary: Comments of the Ohio Gas Company electronically filed by Mr. Matthew R. Pritchard on behalf of Ohio Gas Company