

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Motion to Sus- )  
pend of Columbia Gas of Ohio, Inc. )  
for Procedures and Process During ) Case No. 20-0637-GA-UNC  
the Declared State of Emergency and )  
Related Matters. )

---

---

**MOTION TO SUSPEND  
AND MEMORANDUM IN SUPPORT  
OF COLUMBIA GAS OF OHIO, INC.**

---

---

Pursuant to Ohio Adm.Code 4901-1-12(A) and the March 12, 2020 and March 13, 2020 Entries in this docket, Columbia Gas of Ohio, Inc. ("Columbia") hereby requests that the Public Utilities Commission of Ohio ("Commission") grant Columbia a suspension of the rules and orders identified herein for the duration of the state of emergency in Ohio, as commenced under Executive Order 2020-01D ("Executive Order").

The reasons for this Motion to Suspend are more fully explained in the attached Memorandum in Support.

Respectfully submitted by,

**COLUMBIA GAS OF OHIO, INC.**

/s/ Joseph M. Clark

Joseph M. Clark, Counsel of Record

Joseph M. Clark, Asst. Gen. Counsel  
(0080711)  
P.O. Box 117  
290 W. Nationwide Blvd.  
Columbus, Ohio 43216-0117  
Telephone: (614) 460-6988

E-mail: josephclark@nisource.com

(Willing to accept service by e-mail)

Attorney for  
**COLUMBIA GAS OF OHIO, INC.**

## MEMORANDUM IN SUPPORT

On March 9, 2020, Governor Mike DeWine issued Executive Order 2020-01D, putting the entire State of Ohio in a state of emergency to protect the well-being of Ohioans from the dangerous effects of COVID-19. The Executive Order and state of emergency will remain until the COVID-19 emergency no longer exists.

On March 12, 2020, the Commission issued an Entry in this docket detailing the powers of the Commission's emergency authority, empowering the Chair and Deputy Chair of the Commission for certain matters, and issued certain directives to all public utilities in Ohio that are regulated by the Commission.<sup>1</sup> Specifically, the Entry directed all utilities to (among other things): (1) review their service disconnection policies, practices, and tariff and identify areas where it may be prudent to suspend, for the duration of the emergency, otherwise applicable requirements that may impose a service continuity hardship on customers or create unnecessary risks of social contact; and (2) promptly seek any necessary approval, for the duration of the emergency, to suspend otherwise applicable requirements that may impose a service continuity hardship on customers or create unnecessary risks of social contact.<sup>2</sup> These filings are automatically approved on an emergency basis for a period of at least 30 days, effective as of the filing date or until such time as the Commission may otherwise specify, which shall not be less than 30 days.<sup>3</sup> On March 13, 2020, the Commission issued an additional Entry that also extended the Winter Reconnect Order through May 1, 2020.<sup>4</sup>

Columbia reviewed its disconnection policies, practices, and tariff as well as the Commission's rules and orders applicable to Columbia (*e.g.*, otherwise applicable requirements) in relation to service continuity hardships as well as possible unnecessary risks of social contact. Columbia is unilaterally taking steps to suspend any policies, practices, or tariff provisions related to disconnection that may impose a service continuity hardship on customers or create unnecessary risks of social contact.<sup>5</sup>

---

<sup>1</sup> Entry at 3 (March 12, 2020).

<sup>2</sup> *Id.*

<sup>3</sup> *Id.*

<sup>4</sup> Entry at 3 (March 13, 2020).

<sup>5</sup> Entry at 3 [¶ 7(a)] (March 12, 2020).

Columbia hereby files this Motion to Suspend, for the duration of the emergency, the Commission rules identified in Appendix A that relate to disconnection that may impose a service continuity hardship on customers or create unnecessary risks of social contact between Columbia personnel, customers, and the general public. Columbia likewise plans to suspend any corresponding tariff requirements further expounding upon the rules listed in Appendix A.

Finally, Columbia is also requesting the suspension of the 75% underperforming customer participation threshold for its energy efficiency programs that involve work in customers' homes (e.g., WarmChoice®, Home Energy Audits), as continuing to do these programs during the pandemic would create unnecessary risks of social contact between Columbia personnel, Columbia contractors, Columbia customers, and the general public.<sup>6</sup> Columbia will file an additional or updated Motion to Suspend to continue and modify necessary rule suspensions throughout the emergency as changing conditions may dictate. Columbia also requests a suspension through implication of any rules not identified in this Motion to Suspend that Columbia does not comply with as Columbia adapts to the continuing emergency.

---

<sup>6</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of Demand-Side Management Programs for Its Residential and Commercial Customers*, Case No. 16-1309-GA-UNC, et al., Second Entry on Rehearing (April 10, 2019) at ¶23.

Respectfully submitted,  
**COLUMBIA GAS OF OHIO, INC.**

By: /s/ Joseph M. Clark  
Joseph M. Clark (Counsel of Record)

Joseph M. Clark, Asst. Gen. Counsel  
(0080711)  
290 W. Nationwide Blvd.  
P.O. Box 117  
Columbus, Ohio 43215  
Telephone: (614) 460-6988  
Email: josephclark@nisource.com

(Willing to accept service by email)

Attorney for  
**COLUMBIA GAS OF OHIO, INC.**

## **Appendix A**

### **Enumerated Rules for Suspension**

<b>Rule</b>	<b>Rule Name</b>	<b>Service Continuity or Social Contact</b>
4901:1-13-04(D)	Meter Test at Customer's Request	Social Contact
4901:1-13-04(G)	Meter Reading	Social Contact
4901:1-13-05(A)	New Service Requests	Social Contact
4901:1-13-05(B)	Telephone Response	Service Continuity
4901:1-13-05(C)	Scheduled Appointments with Customers	Social Contact
4901:1-13-05(D)	Repairs of Service Lines Leaks	Social Contact
4901:1-13-08(E)	Reconnection of Small Commercial Customers	Social Contact
4901:1-16-04(I)	Remediation of Leaks	Social Contact
4901:1-18-07(A)	Reconnection of Service	Social Contact
4901:1-18-07(B)	Reconnection of Service	Social Contact
4901:1-18-07(C)	Reconnection of Service	Service Continuity
4901:1-18-12(C)	PIPP Eligibility	Service Continuity
4901:1-18-12(D)	PIPP Reverification of Eligibility	Service Continuity
4901:1-18-16(D)	Graduate PIPP Plus Enrollment	Service Continuity
4901:1-18-17(A)	PIPP and Graduate PIPP Termination	Service Continuity
4901:1-18-17(B)	PIPP and Graduate PIPP Termination	Service Continuity

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**3/18/2020 4:48:36 PM**

**in**

**Case No(s). 20-0637-GA-UNC**

Summary: Motion to Suspend Procedures and Processes During the Declared State of Emergency and Related Matters and Memorandum in Support electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.