

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Annual Applica-)
tion of Columbia Gas of Ohio, Inc. for) Case No. 19-1940-GA-RDR
an Adjustment to Rider IRP and Rider)
DSM Rates.)

**MOTION OF COLUMBIA GAS OF OHIO, INC.,
TO BIFURCATE THE PROCEEDING AND
TO AMEND THE PROCEDURAL SCHEDULE**

Pursuant to Ohio Adm.Code 4901-1-12(A) and 4901-1-13(A), Columbia Gas of Ohio, Inc. ("Columbia") respectfully requests that the Commission revise the procedural schedule set forth in the March 30, 2020 Entry in this proceeding. Columbia requests that the Commission bifurcate its consideration of the Rider IRP and the Rider DSM. Columbia requests that the Commission approve the Rider IRP rates, as is recommended by Staff in its Comments, to allow Columbia to place the new rates in effect by unit 1 of May 2020 billing. For purposes of this motion, and if the motion is granted, no party to this proceeding contests the proposed Rider IRP rates.

Columbia further requests an additional pleading process for the Rider DSM consideration. No party to this case objects to existing Rider DSM rate of \$0.1957 per Mcf continuing until the Commission issues its final decision in this proceeding, at which time, Columbia will reflect in its rider reconciliation in next year's filing the over or under collection due to the delay in implementing the Commission-approved rate from May 1 to the effective date of the ultimately approved Rider DSM rate. A memorandum in support of this motion is attached.

Respectfully submitted,

COLUMBIA GAS OF OHIO, INC.

By: /s/ Joseph M. Clark

Joseph M. Clark

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MEMORANDUM IN SUPPORT

On February 28, 2020, Columbia filed its application to adjust its Riders IRP and Rider DSM to recover costs for calendar year 2019. On March 6, 2020, the Commission issued an entry setting forth a procedural schedule in this proceeding. On March 20, several parties to this proceeding filed comments. Staff conducted an audit of both Rider IRP and Rider DSM, and recommended the approval of Columbia's proposed Rider IRP and Rider DSM rates.¹ The Office of the Ohio Consumers' Counsel ("OCC") and Suburban Natural Gas Company ("Suburban") filed comments challenging certain aspects of Columbia's DSM program. On March 26, 2020, Columbia filed a motion to extend the March 6, 2020 procedural schedule by one week. On March 30, 2020, the Commission granted in part and denied in part Columbia's motion to extend the procedural schedule.

The parties to this proceeding have engaged in settlement negotiations, but have been unable to file a Statement of No Issues by March 27, 2020. Recognizing the effect of the Governor's Executive Order 2020-01D declaring a statement of emergency in Ohio to protect the well-being of Ohioians from COVID-19 and the Director of Health's March 22, 2020 Stay At Home Order, Columbia is requesting to bifurcate this case and to amend the procedural schedule. First, as is noted by the comments filed in this case, no party has opposed the proposed Rider IRP rates adjustment. Staff recommended approval of the proposed Rider IRP rates in its Comments. Columbia, therefore, recommends that the Commission approve Columbia's proposed Rider IRP rates to allow Columbia to implement these rates by unit 1 of May 2020 billing.

Columbia likewise recommends a modification to the procedural schedule to address the Rider DSM adjustment and other DSM programmatic issues raised by the intervenors in this proceeding. In lieu of the procedural schedule set forth on March 30, 2020, Columbia recommends the following procedural schedule:

April 20 – Deadline for the parties and Staff to file expert testimony and all other evidence

May 4 – Deadline for Columbia, parties, and Staff to file briefs

¹ See Staff Comments and Recommendations at 10-11, 13.

All parties to this proceeding have agreed to no additional discovery in this case, to waive cross examination of witnesses, and to waive the right to file motions to strike expert testimony filed on April 20, 2020. The parties agree to file expert testimony, discovery, and all other evidence that will be relied upon by April 20, 2020. All parties do not object to this procedural schedule as is proposed above. Further, this would allow the case to proceed without an in-person hearing, consistent with the governor's repeated directives for social distancing and the Director of Health's March 22, 2020 Stay At Home Order. This procedural schedule would also allow the parties of this proceeding to have due process during this state emergency. Finally, if the Commission adopts this procedural schedule, all parties have agreed that Columbia's existing Rider DSM rate of \$0.1957 per Mcf would remain in place until the Commission issues a final opinion and order concerning the Rider DSM rate.

This motion is also timely. Columbia is filing this motion in advance of the relevant deadlines in the March 30, 2020 Entry and Columbia has not received any objections to this motion from the parties.

Finally, Columbia will not enter into a stipulation in this case if this motion is granted by the Commission.

For all of these reasons, as permitted Ohio Adm.Code 4901-1-12(A) and 4901-1-13(A), Columbia respectfully requests that this Commission bifurcate the issues in this proceeding and adjust the procedural schedule.

Respectfully submitted,

COLUMBIA GAS OF OHIO, INC.

By: /s/ Joseph M. Clark

Joseph M. Clark

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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 31st day of March, 2020, upon the parties listed below.

/s/ Joseph M. Clark

Joseph M. Clark

**Attorney for
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Case No(s). 19-1940-GA-RDR

Summary: Motion to Bifurcate the Proceeding and to Amend the Procedural Schedule and Memorandum in Support electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.