



**Public Utilities
Commission**

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April 29, 2020

Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus OH 43215

RE: *In the Matter of the Application of Columbia Gas of Ohio, Inc. During the Declared State of Emergency and Related Matters: Motion for Suspension, Case Nos. 20-0637-GA-UNC,*

Dear Docketing Division:

Enclosed please find the Staff Recommendation in the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of their Motion for Suspension or Modification in Case Nos. 20-0637-GA-UNC

Barbara Bossart

Barbara Bossart
Chief, Reliability and Service Analysis Division
Service Monitoring and Enforcement Department
Public Utilities Commission of Ohio

Enclosure
Cc: Parties of Record

Columbia Gas of Ohio, Inc.
Case No. 20-0637-GA-UNC

SUMMARY

On March 12, 2020, the Public Utilities Commission of Ohio (Commission) initiated Case No. 20-591-AU-UNC, *In the Matter of the Proper Procedures and Process for the Commission's Operations and Proceedings During the Declared State of Emergency and Related Matters*, (State of Emergency Proceeding) and issued an Entry that, due to the declaration of a state of emergency, "directs all public utilities under its jurisdiction to review their service disconnection policies, practices, and tariff provisions and to promptly seek any necessary approval to suspend otherwise applicable requirements that may impose a service continuity hardship on residential and nonresidential customers or create unnecessary COVID-19 risks associated with social contact."

On March 18, 2020, Columbia Gas of Ohio, Inc. (Columbia or Company) filed an application proposing to suspend or modify certain policies and practices that may impose a service continuity hardship on residential and nonresidential customers or create unnecessary COVID-19 risks associated with social contact.

STAFF REVIEW OF LIMITATIONS ON ACTIVITIES DUE TO SOCIAL CONTACT

The Company is requesting to limit unnecessary social contact between Columbia personnel, Columbia contractors, Columbia customers, and the general public. The Company requests suspension of home energy audits and energy efficiency programs such as WarmChoice. Columbia has requested to suspend or limit the following administrative rules for this purpose:

<u>Rule</u>	<u>Rule Name</u>	<u>Reason</u>	<u>Action</u>
4901:1-13-04(D)	Meter Test at Customer's Request	Social Contact	Columbia will not be performing meter tests at the customer's request
4901:1-13-04(G)	Meter Reading	Social Contact	Columbia will not be required to attempt to get an actual read every other month or be required to obtain an actual read once a year
4901:1-13-05(A)	New Service Requests	Social Contact	Columbia will not be required to complete new service requests in 3 days for locations that do not require installation of service lines, or within 20 days for locations that require service lines
4901:1-13-05(C)	Scheduled Appointments with Customers	Social Contact	Columbia will not have to provide windows for appointments or reschedule for the next day

4901:1-13-05(D)	Repairs of Service Lines Leaks	Social Contact	Columbia will not have to complete service line repairs to lines that have been shut off by the end of the next business day
4901:1-13-08(E)	Disconnection of master metered premises	Social Contact	Columbia will not disconnect master metered premises
4901:1-18-07(A)	Reconnection of Service	Social Contact	Columbia will not require the payment of the delinquent amount on the disconnection notice to reconnect service
4901:1-18-07(B)	Reconnection of Service	Social Contact	Columbia will not guarantee the reconnection of service on the same day as payment is rendered

STAFF RECOMMENDATION REGARDING LIMITATIONS ON ACTIVITIES DUE TO SOCIAL CONTACT

Staff has no objections to the Company's limitations on these activities. Staff does not oppose the temporary waiver of administrative rules referenced above or related tariff requirements regarding in person meter reading. Staff recommends that for customers who request an initial or final meter reading, Columbia should request and instruct willing customers how to provide a meter reading during the COVID-19 pandemic. In addition, Staff recommends in situations where the customer resides at the premises and gas service is needed Columbia should reconnect or connect services as soon as practical. Staff does not oppose the temporary waiver of timeframes for new service requests or scheduled appointments; however, Staff would like the company to continue to track and report any missed guidelines under Ohio Adm.Code 4901:1-13-05. Staff does not oppose the temporary suspension of energy efficiency programs that involve work in customer's homes during this emergency.

STAFF REVIEW OF SUSPENSION AND ADJUSTMENT OF DISCONNECTION AND RECONNECTION ACTIVITIES

The Company's application proposes to alter the Company's disconnection policies and practices and suspend disconnection during the COVID-19 emergency. In addition, the Company is deferring or eliminating certain fees to encourage reconnection or continuity of service. Finally, the Company is requesting waivers of several administrative rules as set forth in the table below.

<u>Rule</u>	<u>Rule Description</u>	<u>Reason</u>	<u>Action</u>
4901:1-13-05(B)	Telephone Response	Service Continuity	Customer service line answer times may exceed an average of 90 seconds

4901:1-18-07(C)	Reconnection of Service	Service Continuity	Columbia will waive the collection charge for reconnection of service
4901:1-18-12(C)	PIPP Eligibility	Service Continuity	Requirements may be waived for enrolling in PIPP
4901:1-18-12(D)	PIPP Reverification of Eligibility	Service Continuity	Reverification requirements are postponed
4901:1-18-16(D)	Graduate PIPP Plus Enrollment	Service Continuity	Customers will not be removed from PIPP+ for missed payments during this time
4901:1-18-17(A)	PIPP and Graduate PIPP Termination	Service Continuity	Customers are not being removed from PIPP+ at this time
4901:1-18-17(B)	PIPP and Graduate PIPP Termination	Service Continuity	Customers are not being removed from PIPP+ for failure to reverify

Staff does not oppose the temporary waiver of administrative rules referenced above or related tariff requirements.

STAFF RECOMMENDATION REGARDING SUSPENSION AND ADJUSTMENT OF DISCONNECTION AND RECONNECTION ACTIVITIES

Staff has no objections to the Company's suspension and adjustment of disconnection and reconnection activities by removing financial barriers to reconnection or continuity of service such as reconnection fees or the suspension of the call center answer time requirement.

In addition, Staff is not opposed to suspending the removal of Percentage of Income Payment Plan (PIPP) and Graduate PIPP Plus customers at the anniversary date because some customers may not be able to maintain eligibility by remaining current on their PIPP Plus payments, or be able to satisfy the reverification requirements.

STAFF REVIEW OF GAS PIPELINE SAFETY CODE

The Company requests approval to suspend or modify certain gas pipeline safety activities. The repairs at issue would require disconnection of service and consequent entry into homes to inspect and re-light appliances.

<u>Rule</u>	<u>Rule Description</u>	<u>Reason</u>	<u>Action</u>
4901:1-16-04(I)	Remediation of Leaks	Service Continuity	Columbia may prioritize leaks as they see fit during this time

STAFF RECOMMENDATION REGARDING GAS PIPELINE SAFETY

Staff opposes a complete waiver of Ohio Adm.Code 4901:1-16-04(I). Specifically, Staff recommends the Commission deny the Company's request for a waiver Ohio Adm.Code 4901:1-16-04(I)(1) regarding the remediation of hazardous leaks. Staff does not object to the waiver of the provisions of Ohio Adm.Code 4901:1-16-04(I)(2) regarding the timeframe for repairs, however, staff recommends the reevaluation of grade two leaks every six months should remain in force.

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

Summary: Staff Review and Recommendation in the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of their Motion for Suspension or Modification electronically filed by Zee Molter on behalf of PUCO Staff