

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Transition Plan of)	
Columbia Gas of Ohio, Inc. to Sus-)	Case No. 20-0637-GA-UNC
pend Certain Procedures and Process)	
During the COVID-19 State of Emer-)	
gency and Related Matters.)	

**TRANSITION PLAN OF
COLUMBIA GAS OF OHIO, INC.**

Pursuant to the March 12, 2020 and March 13, 2020 Entries in Case No. 20-591-AU-UNC and pursuant to the May 20, 2020 Finding and Order in Case No. 20-637-GA-UNC, Columbia Gas of Ohio, Inc. ("Columbia") files this Transition Plan to transition out of Columbia's rule suspensions filed on March 18, 2020 and May 11, 2020 in Case No. 20-637-GA-UNC. In support of its Transition Plan, and after consultation with Staff, Columbia states:

1. Columbia is a natural gas company within the meaning of R.C. 4905.03(E), and, as such, is a public utility subject to the jurisdiction of the Commission.

2. Columbia filed two Motions to Suspend in Case No. 20-637-GA-UNC on March 18, 2020 and May 11, 2020, respectively. Columbia's motions requested suspension of the rules listed therein that related to disconnection which 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 suspended any corresponding tariff requirements as described further in said Motions.

3. Columbia also requested 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.

4. Columbia has acquired the proper personal protective equipment (“PPE”) for all of its employees working in the field and with customers, and Columbia is requiring contractors to wear appropriate PPE. Columbia’s policies and procedures for both employees and contractors for customer interaction and field work complies with all applicable guidelines issued by the Ohio Department of Health and the Governor’s Office, including the Ohio Director of Public Health’s April 30, 2020 Stay Safe Ohio Order, as amended by a subsequent order on May 20, 2020 (“Stay Safe Order”), and the Governor’s Responsible RestartOhio protocols.

5. Columbia now sets forth its transition plan to resume compliance with the rules contained in Columbia’s Motions to Suspend.

- a. Effective June 1, 2020, Columbia will resume meter testing upon a customer’s request pursuant to Ohio Adm.Code 4901:1-13-04(D).
- b. Effective June 15, 2020, Columbia will resume compliance with new service requests, telephonic response, and scheduled customer appointments pursuant to Ohio Adm.Code 4901:1-13-05.
- c. Effective June 1, 2020, Columbia will resume compliance with repairs of service line leaks pursuant to Ohio Adm.Code 4901:1-13-05(D).
- d. Effective June 17, 2020, Columbia will resume full compliance with the rules outlining the reconnection of small commercial customers and reconnection of residential customers pursuant to Ohio Adm.Code 4901:1-13-08(E) and 4901:1-18-07.
- e. Effective June 17, 2020, Columbia will resume compliance with remediating grade 2 leaks pursuant to Ohio Adm.Code 4901:1-16-04(I).
- f. Effective with Unit 1 of August billing (July 29, 2020), Columbia will resume the Percentage of Income Payment Plan (“PIPP”) Program and Graduate PIPP Program as it had prior to the COVID-19 pandemic pursuant to Ohio Adm.Code 4901:1-18-12, 4901:1-18-16, and 4901:1-18-17. Columbia anticipates filing another motion to suspend these PIPP rules to July 29, 2020, while this proceeding is pending.

6. Columbia further sets forth its transition plan to resume certain other activities not addressed in the Motions to Suspend in the manner set forth below.

- a. Effective with Unit 1 of June billing (May 29, 2020), Columbia will issue termination notices for nonpayment on customer bills. In the month of June, Columbia will utilize its collectors to reach out to customers to inform them of bill payment assistance options. Columbia will not disconnect customers for nonpayment before July 29, 2020.
- b. Columbia will continue to issue termination notices for nonpayment on customer bills in July. In the month of July, Columbia will resume collections activity and will visit these premises to attempt to collect delinquent accounts. Columbia will not disconnect customers for nonpayment before July 29, 2020.
- c. Effective with Unit 1 of July billing (June 28, 2020) and Unit 1 of August billing (July 29, 2020), Columbia will offer customers an on-bill election to Columbia's 1/9 payment plan to allow customers an extended period of time to repay arrearages incurred on their accounts. Columbia will continue to work with both residential and commercial customers to establish agreeable payment plans.

7. Finally, Columbia sets forth its transition plan to resume activities, pursuant to paragraph 54 of the Commission's May 20, 2020 Finding and Order in Case No. 20-637-GA-UNC, in the manner set forth below.

- a. Effective with Unit 1 of August billing (July 29, 2020), Columbia will begin to disconnect customers for nonpayment. Columbia will also resume collecting late fees from customers and collecting reconnect fees and arrearages from customers prior to reconnecting service. Columbia will waive reconnecting residential and small commercial customer deposits until November 1, 2020.
- b. Effective July 13, 2020, Columbia will resume in-person, actual meter reading inside customer premises pursuant to Ohio Adm.Code 4901:1-13-04(G).¹

¹ *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*, Case No. 20-591-AU-UNC, Entry (March 20, 2020) at ¶ 9.

- c. Effective on July 13, 2020, pursuant to the paragraph 20 of the Commission's May 20, 2020 Finding and Order in Case No. 20-637-GA-UNC, Columbia will resume its energy efficiency programs. Columbia will work with its contractors to resume in-home energy efficiency audits and weatherization programs after the effective date.
- d. Effective on July 13, 2020, Columbia will resume inside inspections for leakage and atmospheric corrosion of meters and related appurtenances. For customers who do not permit Columbia inside access to its facilities, Columbia will leave a disconnection notice with the premise. Columbia will further send additional correspondence to these customers noticing a disconnection for lack of access to Columbia's equipment and property. Columbia will not, at that time, disconnect these customers for lack of access.
- e. Effective with Unit 1 of August 2020 billing (July 29, 2020), Columbia will resume disconnections for lack of access to its equipment, including for inside atmospheric and leakage inspections. Recognizing the backlog and delay with inside inspections, and the subsequent delay of disconnection for lack of access, Columbia requests that the Commission provide Columbia until March 31, 2021 to catch-up, and come into current compliance with the requirements related to "in-premise inspections not prompted by an identified safety-related concern."²

² *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*, Case No. 20-591-AU-UNC, Entry (March 20, 2020) at ¶ 10.

For the reasons stated above, Columbia respectfully requests that the Commission approve this transition plan.

Respectfully submitted by,

COLUMBIA GAS OF OHIO, INC.

/s/ Joseph M. Clark

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.

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 29th day of May, 2020, upon the parties listed below.

/s/ Joseph M. Clark

Joseph M. Clark

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

Ohio Partners for Affordable Energy

rdove@keglerbrown.com

Ohio Consumers' Counsel

angela.obrien@occ.ohio.gov

amy.botschner.obrien@occ.ohio.gov

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/29/2020 4:03:50 PM

in

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

Summary: Notification and Transition Plan of Columbia Gas of Ohio, Inc. electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.