

**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 EXTEND SUSPENSION  
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 the 20-591-AU-UNC docket and pursuant to the Transition Plan filed on May 29, 2020, Columbia Gas of Ohio, Inc. ("Columbia") hereby requests that the Public Utilities Commission of Ohio ("Commission") grant Columbia a continued suspension of the rules and orders identified herein until July 28, 2020. Columbia's current rule suspension expires on June 16, 2020.

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, 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 the 20-591-AU-UNC 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 (such as the original Motion in this docket) 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 filed a Motion to Suspend on March 18, 2020, which was automatically approved for thirty days. The Commission, by Finding and Order dated April 8, 2020 in the *COVID-19 Emergency Docket*, extended this rule suspension by an additional 30 days. On May 11, 2020, Columbia filed a Motion to Extend the rule suspensions for another 30 days. Columbia's rule suspensions, therefore, expire on June 16, 2020.

---

<sup>1</sup> *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 at 3 (March 12, 2020) (hereinafter "*COVID-19 Emergency Docket*").

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

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

<sup>4</sup> *COVID-19 Emergency Docket*, Entry at 3 (March 13, 2020).

Columbia hereby files this Motion to Extend certain rule suspensions for an additional 42 days to July 28, 2020. Specifically, Columbia is requesting the continued rule waiver of the PIPP Program rules to ensure PIPP customers can avoid being dropped from the PIPP Program through June and July billing. These rules are as follows:

<b>Rule</b>	<b>Rule Name</b>	<b>Service Continuity or Social Contact</b>
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

The rules identified above are consistent with the rules Columbia identified in its Transition Plan filed on May 29, 2020. And, as noted in Columbia's Transition Plan, Columbia had stopped requiring the payment of all outstanding arrearages from customers prior to reconnecting service. This practice has applied to PIPP Plan customers during the pandemic. And, effective with Unit 1 of August billing (July 29, 2020), Columbia will also resume collecting late fees from customers and collecting reconnect fees and arrearages from customers prior to reconnecting service.

Finally, Columbia intends for this motion to be its last motion to suspend the Commission's rules, and to return to the full operation of the PIPP Program with Unit 1 of August billing (July 29, 2020).

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

/s/ Joseph M. Clark

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.**

## 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 12th day of June, 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**

**6/12/2020 1:36:58 PM**

**in**

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

Summary: Motion to Extend Suspension and Memorandum in Support of Columbia Gas of Ohio, Inc. electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.