

SUBURBAN NATURAL GAS COMPANY
Established 1882



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August 1, 2020

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

Re: In the Matter of the Application of Suburban Natural Gas Company To
Suspend Or Modify Certain Procedures and Process During the COVID-19
State of Emergency and Related Matters Case No. 20-664-GA-UNC
Supplemental Finding And Order Entered in the Journal on July 29, 2020

Dear Commissioners:

I am writing this letter to clarify an apparent misunderstanding of actions taken by our company's customer service director with regard to the removal of several PIPP customers from the PIPP payment plan for failure to re-verify their eligibility or be current on their anniversary date as required by the Commission's Percentage of Income Payment Plan ("PIPP"). Five customers were involved, four of whom were removed for failure to re-verify and one of whom was removed for failure to be current on his anniversary date. Three of these customers were removed in April, 2020 and two were removed in May, 2020. None of these customers was removed subsequent to the Commission Finding And Order entered in the Journal on June 3, 2020 when this issue was first addressed in the subject proceeding and none of them was disconnected.

In its June 3, 2020 Finding And Order, the issue of whether PIPP participants should be dropped from the PIPP program if their reverification is disrupted during the COVID-19 emergency was raised for the first time by the Office of the Ohio Consumers Council ("OCC") (See ¶ 25, pg. 7). The Commission addressed this issue at ¶ 32, pg. 11 of the June 3, 2020 Finding And Order by specifying that during the emergency, or until otherwise specified by the Commission, PIPP participants should not be removed or dropped from the program for failure to timely re-verify eligibility, and added, or for failure to comply with program requirements as of the customer's anniversary date and Suburban has not done so despite the Commission Statement at ¶ 21, pg. 7 that Suburban has continued to remove PIPP customers from PIPP program for failure to re-verify or be current on the anniversary dates pursuant to Ohio Adm. Code 4901:1-18-15 (D). As that paragraph itself indicates, all of the incidents discussed occurred in April or May, 2020, and were not in violation of any order of the Commission in this case. On the contrary, prior to the Commission's June 3, 2020 Finding And Order, Suburban's customer

service director was not only permitted but required to remove those customers from the PIPP payment plan.

Suburban was organized in 1882 and was incorporated under Ohio Law in 1927 as The Consumers Natural Gas Company. In 1988, its name was changed to Suburban Natural Gas Company. Prior to 1974, when the undersigned became regulatory counsel, Suburban operated under the Home Rule provisions of the Ohio Constitution. Since 1974, Suburban has operated under the rate and service provisions of Title 49 of the Ohio Revised Code and the rules and regulations of this Commission. Suburban has never been the subject of an investigation or a civil or criminal complaint by or before the Commission. On the contrary, it has endeavored to operate in full compliance with the relevant statutes and rules and regulations of the Commission including those involved or promulgated by the Commission in the subject case.

Suburban takes seriously the Commission's allegation that Suburban violated the Commission's orders in this case and, its March 12, 2020 order by removing PIPP customers from the PIPP program during the initial stage of the COVID-19 crisis, and its threat to assess monetary forfeitures under R.C. 4905.54 (see ¶ 28, pg. 10). The March 12, 2020 entry dealt with Suburban's disconnection procedures. As indicated above, none of Suburban's PIPP participants was or has been disconnected. Their removal from the PIPP payment plan did not, therefore, impose a service continuity hardship on these customers.

It would be appreciated if the Commission would retain a copy of this letter in the subject docket to correct the record in this case.

Respectfully Submitted,

David L. Pemberton

David L. Pemberton

Chairman & General Counsel

DP/sp

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Case No(s). 20-0664-GA-UNC

Summary: Correspondence Response from Suburban Natural Gas Company: David L. Pemberton, Chairman & General Counsel to PUCO Commissioners regarding: The Matter of the Application of Suburban Natural Gas Company to Suspend or Modify Certain Procedures & Process During the COVID-19 State of Emergency & Related Matters Case No 20-664-GA-UNC Supplemental Finding & Order Entered in the Journal on July 29, 2020. electronically filed by Ms. Sally A Phillips on behalf of Suburban Natural Gas Company and Pemberton, David Lawrence Mr. and Pemberton, David Joseph Mr. and Bojko, Kimberly W Ms. and Ms. Teresa Mogon