



**Public Utilities  
Commission**

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September 30, 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., for Approval to Change Accounting Methods, Case No. 14-1615-GA-AAM.*

Dear Docketing Division:

Enclosed please find the Staff's Review and Recommendation regarding the compliance filing made by Columbia Gas of Ohio, Inc., Case No. 14-1615-GA-AAM.

A handwritten signature in black ink, appearing to read 'DL', written over a horizontal line.

David Liphtratt  
Chief, Accounting & Finance Division  
Public Utilities Commission of Ohio

Enclosure

Cc: Parties of Record

**Columbia Gas of Ohio, Inc.**  
**Case No. 14-1615-GA-AAM**

**SUMMARY:**

By Finding and Order dated December 17, 2014 (Order), the Commission approved Columbia Gas of Ohio Inc.'s (Columbia or Company) application in the above reference case to establish a regulatory asset to defer up to \$15 million annually to increase customer safety through the Pipeline Safety Program (PSP). The Commission's Order required Columbia to file an annual report for its PSP by June 1 each year. The report was to include annual and cumulative PSP expenses, monthly expenditures for each PSP component on an annual basis, and an audit report prepared by the Company's external auditor regarding the accuracy of Columbia's accounting for PSP expenditures. The report was to also include items such as the PSP's progress toward reducing risks to Columbia's system, the result of ongoing and future investigations, any mid-term adjustments to PSP projects or programs, and the Company's effort towards identifying inefficiencies and implementing cost savings measures. The carrying charge rate shall be determined annually based on Columbia's embedded debt-only interest rate.

By Opinion and Order dated August 26, 2016, the Commission approved Columbia's application in Case No. 16-552-GA-AAM to increase the PSP by \$10 million for a total of \$25 million. The incremental \$10 million of deferral authority would have a fixed three percent per annum rate to be used exclusively to accelerate implementation of its Damage Prevention Technology Initiative (DPTI) through December 23, 2023.

On May 29, 2020, Columbia filed its annual report for the PSP detailing expenses deferred for calendar year 2019. Pursuant to the Commission's Order, Staff has 90 days to file a report regarding the proposed PSP deferrals. On September 15, 2020 a Motion was filed for an extension of time. Staff requested the due date be September 30, 2020.

**STAFF REVIEW AND RECOMMENDATION:**

Staff has reviewed Columbia's annual report and accompanying attachments that were filed in this case and has no objection to the information contained in the report. As a result, Staff recommends that the Commission accept Columbia's annual report as filed. However, as noted in Staff Comments filed in this case and acknowledged in the Commission's Order, Staff's lack of objection to Columbia's Annual Report should not be construed as support for future recovery of the PSP deferrals. Staff expressly reserves the right to challenge recovery of the deferrals in any future recovery proceeding.

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**9/30/2020 9:48:27 AM**

**in**

**Case No(s). 14-1615-GA-AAM**

Summary: Staff Review and Recommendation regarding the compliance filing made by Columbia Gas of Ohio, Inc. electronically filed by Zee Molter on behalf of PUCO Staff