

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Columbia Gas of Ohio, Inc. for Ap-) Case No. 21-0321-GA-UEx
proval of an Adjustment to its Uncol-)
lectible Expense Rider Rate.)

**APPLICATION OF
COLUMBIA GAS OF OHIO, INC.**

Columbia Gas of Ohio, Inc. ("Columbia"), hereby submits its annual Uncollectible Expense Rider Report, and also requests approval to increase its Uncollectible Expense Rider rate. In support of its Application, Columbia states as follows:

1. By Finding and Order dated December 17, 2003 (the "December 17 Order"), in Case No. 03-1127-GA-UNC, the Commission approved, in concept, an Uncollectible Expense Rider for Columbia and several other natural gas companies.

2. Pursuant to the December 17 Order, Columbia is required to file an annual report each May that identifies the amounts recovered, deferred and, as applicable, amortized pursuant to the Uncollectible Expense Rider. Attached hereto as Attachment 1 is Columbia's annual Uncollectible Expense Rider Report.

3. By Entry dated April 7, 2004, in Case No. 03-2572-GA-ATA, the Commission approved Columbia's initial Uncollectible Expense Rider rate. However, the December 17 Order further provided utilities with the opportunity to adjust their Uncollectible Expense Rider rates. Pursuant to Columbia's Uncollectible Expense Rider tariffs,¹ Columbia shall request "approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections."

¹ See Section V, Twentieth Revised Sheet No. 29, for customers served under rate schedules SGS and GS; Section VI, Twelfth Revised Sheet No. 69, for customers served under rate schedules SGTs and GTs; and Section VII, Nineteenth Revised Sheet No. 29, Page 9 of 11, for customers served through Columbia's CHOICE Program. All tariff sheets include identical billing rates and adjustment provisions.

4. On April 10, 2020, Columbia filed an Application for Approval of an Adjustment to its Uncollectible Expense Rider in Case No. 20-0321-GA-UEX. This filing proposed the establishment of a revised Uncollectible Expense Rider rate of \$0.0644 per Mcf by Finding and Order dated May 20, 2020, the Commission approved the amended application and revised Uncollectible Expense Rider rate to \$0.0644 per Mcf.

5. Attachment 2 shows the impact per Mcf of the projected over-collection of bad-debt expense to be experienced by Columbia during the period June 2020 through May 2021. On May 31, 2021, Columbia projects it will have an over-collected balance of \$2,657,309. Without accounting for any projected changes in the bad debt balance, a decrease of \$.0148 per Mcf would be required to pass back this prior period over-collection. Therefore, Columbia proposes to increase its current Uncollectible Expense Rider by \$0.0080 per Mcf in order that it may properly match its projected bad-debt experience with recoveries during the period twelve months ending May 31, 2022.

6. Columbia believes it is reasonable to consider the prospective application of the Uncollectible Expense Rider in the development of the appropriate Uncollectible Expense Rider rate because it better matches expenses with recoveries. The computation of the Uncollectible Expense Rider rate based on the collection year: (1) properly matches recoveries with expenses; (2) is consistent with the method approved by the Commission in Case No. 19-0321-GA-UEX for determining Columbia's current Uncollectible Expense Tracker rate; and (3) in the aggregate, cannot result in over-collection of costs due to the annual true-up program requirements. For this reason, Columbia, therefore, proposes to increase its Uncollectible Expense Rider rate from \$0.0644 to \$0.0724 per Mcf. The rate is comprised of: (1) Columbia's projected deferred uncollectible expenses at May 31, 2021; and (2) Columbia's estimated uncollectible accounts expense for the twelve-month period ending May 31, 2022. The calculation of the proposed Uncollectible Expense Rider rate is shown on Attachment 4.

7. The resulting Uncollectible Expense Rider rate of \$0.0724 per Mcf is just and reasonable and Columbia requests that the Commission expeditiously approve the proposed rate. Clean copies of the proposed tariff sheets and scored current tariff sheets are attached hereto as Attachment 5.

WHEREFORE, Columbia respectfully requests that the Commission approve the proposed Uncollectible Expense Rider rate proposed herein.

Respectfully submitted by,

COLUMBIA GAS OF OHIO, INC.

/s/ John R. Ryan

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Attorneys for

COLUMBIA GAS OF OHIO, INC.

ATTACHMENT 1

Columbia Gas of Ohio, Inc.
Uncollectible Expense Rider Report

Line No.		Calendar Year 2020 Actual Balances											
		January	February	March	April	May	June	July	August	September	October	November	December
1	Balance - Beginning of Month	5,617,619.40	3,323,667.16	1,170,742.57	(414,230.05)	(1,042,526.22)	(1,327,296.56)	(1,527,553.29)	(1,587,219.34)	(1,446,576.44)	(1,249,210.54)	(1,249,193.55)	(446,927.77)
2	Bad Debts Written Off	1,597,647.14	1,340,646.12	1,725,699.72	1,724,394.19	1,498,791.11	860,182.37	834,673.14	833,619.32	992,138.99	1,426,274.81	2,805,477.39	2,467,279.59
3	Amortization of 2001 Deferral	-	-	-	-	-	-	-	-	-	-	-	-
4	Recovery - Base Rates	-	-	-	-	-	-	-	-	-	-	-	-
5	Consultant Fees	-	-	-	-	-	-	-	-	-	-	-	-
6	Recovery - Bad Debt Rider	(2,429,465.06)	(2,375,110.93)	(2,050,388.90)	(1,364,734.70)	(984,970.99)	(367,157.68)	(228,707.83)	(210,973.44)	(234,151.58)	(362,233.29)	(744,146.30)	(1,461,585.89)
7	Recovery - Other	(1,468,134.36)	(1,120,943.82)	(1,260,761.25)	(987,154.88)	(798,235.04)	(693,138.68)	(665,475.63)	(481,851.30)	(560,486.73)	(1,063,899.62)	(1,258,895.71)	(1,329,517.02)
8	Incremental Bad Debt (2)+(3)+(4)+(5)+(6)+(7)	(2,299,952.28)	(2,155,408.63)	(1,585,450.43)	(627,495.39)	(284,414.92)	(200,113.99)	(59,510.32)	140,794.58	197,500.68	141.90	802,435.38	(323,823.32)
9	Balance Subtotal (1) + (8)	3,317,667.12	1,168,258.53	(414,707.86)	(1,041,725.44)	(1,326,941.14)	(1,527,410.55)	(1,587,063.61)	(1,446,424.76)	(1,249,075.76)	(1,249,068.64)	(446,758.17)	(770,751.09)
10	Carrying Charges [[(1)+(9)]/2]x(12) (a)	6,000.04	2,484.03	477.81	(800.78)	(355.42)	(142.74)	(155.73)	(151.68)	(134.78)	(124.91)	(169.60)	(121.77)
11	Balance - End of Month (9)+(10)	3,323,667.16	1,170,742.57	(414,230.05)	(1,042,526.22)	(1,327,296.56)	(1,527,553)	(1,587,219)	(1,446,576)	(1,249,211)	(1,249,194)	(446,928)	(770,872.86)
12	Monthly Pool Rates	0.17%	0.14%	0.16%	0.11%	0.03%	0.01%	0.01%	0.01%	0.01%	0.01%	0.02%	0.02%

(a) Interest on undercollections are reduced to reflect federal tax benefit. Carrying Charges equals [[(1)+(9)]/2]x(12)]x(1-tax rate).

Columbia Gas of Ohio, Inc.
Uncollectible Expense Rider Report
Calendar Year 2021 Actual

Line No.		January	Actual February	March
1	Balance - Beginning of Month	(770,873)	(2,039,611)	(3,843,466)
2	Bad Debts Written Off	1,853,251	1,539,660	1,568,754
3	Amortization of 2001 Deferral	-	-	-
4	Recovery - Base Rates			
5	Consultant Fees			
6	Recovery - Bad Debt Rider	(2,049,957)	(2,236,194)	(1,705,068)
7	Recovery - Other	(1,071,752)	(1,107,027)	(1,216,210)
8	Incremental Bad Debt (2)+(3)+(4)+(5)+(6)+(7)	(1,268,457)	(1,803,561)	(1,352,524)
9	Balance Subtotal (1) + (8)	(2,039,330)	(3,843,172)	(5,195,990)
10	Carrying Charges $[(1)+(9)]/2 \times (12)$ (a)	(281)	(294)	(452)
11	Balance - End of Month (9)+(10)	(2,039,611)	(3,843,466)	(5,196,442)
12	Monthly Pool Rates	0.02%	0.01%	0.01%

(a) Interest on undercollections are reduced to reflect federal tax benefit. Carrying Charges equals $[(1)+(9)]/2 \times (12) \times (1 - \text{tax rate})$.

NISOURCE INC. AND SUBSIDIARIES
OPERATING COMPANIES MONEY POOL RATES
January 2020 Through March 2021

MONTH	DAYS	AVERAGE DAILY BALANCES			MONTHLY INTEREST ACCRUALS			MONTHLY RATES *		
		S-T DEBT \$	INVESTMENT \$	COMPOSITE \$	S-T DEBT \$	INVESTMENT \$	COMPOSITE \$	S-T DEBT %	INVEST %	COMPOSITE %
JAN 2020	31	394,645,161.29	29,537,094.68	424,182,255.97	661,011.39	77,653.94	738,665.33	1.97%	3.10%	2.05%
FEB	28	355,103,448.28	775,051.15	355,878,499.43	511,220.28	901.59	512,121.87	1.81%	1.46%	1.81%
MAR	31	574,662,161.29	25,564,806.47	600,226,967.76	941,190.37	18,785.71	959,976.08	1.93%	0.87%	1.88%
APR	30	463,199,666.67	447,919,950.92	911,119,617.59	932,061.12	53,947.99	986,009.11	2.45%	0.15%	1.32%
MAY	31	34,003,193.55	285,489,743.44	319,492,936.99	76,716.58	33,918.18	110,634.76	2.66%	0.14%	0.41%
JUN	30	0.00	216,634,916.92	216,634,916.92	0.00	28,668.93	28,668.93	0.00%	0.16%	0.16%
JUL	31	19,354,838.71	103,839,258.02	123,194,096.73	5,083.33	8,795.11	13,878.44	0.31%	0.10%	0.13%
AUG	31	80,483,870.97	412,590,831.07	493,074,702.04	20,547.22	34,911.02	55,458.24	0.30%	0.10%	0.13%
SEP	30	232,000,000.00	357,106,824.20	589,106,824.20	46,606.94	14,635.51	61,242.45	0.24%	0.05%	0.13%
OCT	31	292,548,387.10	269,766,881.77	562,315,268.87	58,149.44	11,390.37	69,539.81	0.23%	0.05%	0.15%
NOV	30	412,833,333.33	105,601,664.12	518,434,997.45	89,101.39	4,362.10	93,463.49	0.26%	0.05%	0.22%
DEC	31	480,258,064.52	102,161,570.60	582,419,635.12	111,343.61	4,326.51	115,670.12	0.27%	0.05%	0.23%
JAN 2021	31	434,064,516.13	81,645,830.60	515,710,346.73	85,498.48	3,442.49	88,940.97	0.23%	0.05%	0.20%
FEB	28	425,714,285.71	80,607,699.17	506,321,984.88	64,093.05	2,897.28	66,990.33	0.20%	0.05%	0.17%
MAR	31	559,790,322.58	150,048,610.96	709,838,933.54	91,748.06	4,042.34	95,790.40	0.19%	0.03%	0.16%

ATTACHMENT 2

Columbia Gas of Ohio, Inc.
Uncollectible Expense Rider Report
Based on Historic Balance @ March 31, 2021

Line No.	Description	Amount
1	Deferred Uncollectible Accounts Expense Balance As of May 31, 2021	(2,657,309)
2	Projected Volumes Twelve Months Ending May 31, 2022	179,020,091
3	Under(Over) Recovery of Uncollectible Expense TME May 31, 2021 per Mcf (Line 1 / Line 2)	(0.0148)

ATTACHMENT 3

Columbia Gas of Ohio, Inc.
Uncollectible Expense Rider Calculation

Line No.	Projection through May 31, 2022													
	April	May	June	July	August	September	October	November	December	January	February	March	April	May
1	Balance - Beginning of Month	(5,196,442)	(4,674,513)	(2,657,309)	734,117	4,494,261	8,258,060	11,128,000	11,198,978	9,058,278	8,822,269	8,955,502	9,176,360	11,072,406
2	Bad Debts Written Off	1,720,202	2,610,314	3,391,553	3,759,863	3,763,114	2,868,934	69,780	(2,141,753)	(236,969)	132,280	219,979	660,126	1,233,813
3	Amortization of 2001 Deferral	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Recovery - Base Rates	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Recovery - Bad Debt Rider	(1,197,624)	(592,612)	-	-	-	-	-	-	-	-	-	-	-
6	Recovery - Other	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Incremental Bad Debt (2)+(3)+(4)+(5)+(6)	522,578	2,017,702	3,391,553	3,759,863	3,763,114	2,868,934	69,780	(2,141,753)	(236,969)	132,280	219,979	660,126	1,233,813
8	Balance Subtotal (1) + (7)	(4,673,864)	(2,656,811)	734,244	4,493,980	8,257,375	11,126,993	11,197,780	9,057,225	8,821,309	8,954,548	9,175,481	9,836,486	11,071,319
9	Carrying Charges [((1)+(8))/2]x(11) (a)	(649)	(498)	(126)	281	684	1,007	1,198	1,052	960	954	879	1,021	1,086
10	Balance - End of Month (8)+(9)	(4,674,513)	(2,657,309)	734,117	4,494,261	8,258,060	11,128,000	11,198,978	9,058,278	8,822,269	8,955,502	9,176,360	9,837,506	11,072,406
11	Monthly Pool Rates	0.01%	0.01%	0.01%	0.01%	0.01%	0.01%	0.01%	0.01%	0.01%	0.01%	0.01%	0.01%	0.01%
12	Balance - End of Month May 2022 (Line 10)													12,945,940
13	Balance - End of Month May 2021 (Line 10)													(2,657,309)
14	Incremental Bad Debt June 2021 - May 2022 (Line 12 - Line 13)													15,603,249

(a) Interest on undercollections are reduced to reflect federal tax benefit. Carrying Charges equals [(((1)+(9))/2)x(12)]x(1-tax rate).

ATTACHMENT 4

Columbia Gas of Ohio, Inc.
Uncollectible Expense Rider Calculation

Line No.	Description	Amount \$
1	Incremental Net Charge Offs for TME May 31, 2022 (Attachment 3 line 14)	15,603,249
2	Projected Volumes TME May 31, 2022	179,020,091
3	Projected Rate Impact of Under(Over) TME May 31, 2022 (Line 1 / Line 2)	0.0872
4	Plus: Under(Over) Recovery of Uncollectible Expense TME May 31, 2021 per Mcf (Attachment 2, Line 3)	<u>(0.0148)</u>
5	Proposed Rate per Mcf Effective Unit 1 June 2021 (Line 3 + Line 4)	\$ 0.0724

Columbia Gas of Ohio, Inc.
Projected Bad-Debt Recovery @ Current Rates

Attachment 4
Sheet 2 of 2

	Throughput	Current Rate	Revenue
Apr	18,596,649.0	0.0644	1,197,624
May	9,202,044.2	0.0644	592,612
Jun	4,831,402.0	-	-
Jul	3,339,203.5	-	-
Aug	3,170,962.9	-	-
Sep	3,263,056.1	-	-
Oct	5,101,812.5	-	-
Nov	12,355,374.9	-	-
Dec	24,380,905.9	-	-
Jan	33,252,543.3	-	-
Feb	33,578,972.4	-	-
Mar	27,867,037.7	-	-
Apr	18,665,891.6	-	-
May	9,212,928.1	-	-
Total	179,020,091		-

ATTACHMENT 5

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

UNCOLLECTIBLE EXPENSE RIDER

APPLICABLE:

To all customers served under rate schedules SGS and GS.

UNCOLLECTIBLE EXPENSE RIDER:

A charge of \$0.07~~24~~⁶⁴ per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider.

RECONCILIATION ADJUSTMENT:

This Rider is subject to reconciliation or adjustment, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of uncollectible expense upon which the rate was calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.

Filed in accordance with Public Utilities Commission of Ohio Entry dated ~~May 20, 2020 in Case No. 20-0321-GA-UEX.~~

Issued: ~~May 26, 2020~~

Effective: With meter readings on or ~~May 29, 2020~~

Issued By

~~Vincent A. Parisi~~^{Daniel A. Creekmur}, President

No. 69

COLUMBIA GAS OF OHIO, INC

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

UNCOLLECTIBLE EXPENSE RIDER

APPLICABLE

To all customers served under rate schedules SGTS and GTS.

UNCOLLECTIBLE EXPENSE RIDER

A charge of \$0.07~~24~~~~64~~ per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider.

RECONCILIATION ADJUSTMENT:

This Rider is subject to reconciliation or adjustment, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of uncollectible expense upon which the rate was calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.

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Effective: With meter readings on or after ~~May 29, 2020~~

Issued By

~~Vincent A. Parisi~~~~Daniel A. Creekmur~~, President

SECTION VII

PART 29 - BILLING ADJUSTMENTS

UNCOLLECTIBLE EXPENSE RIDER

29.18 Applicability

To all customers served under rate schedules FRSGTS and FRGTS.

29.19 UNCOLLECTIBLE EXPENSE RIDER

A charge of \$0.0724644 per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider.

29.20 RECONCILIATION ADJUSTMENT

This Rider is subject to reconciliation or adjustment, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of uncollectible expense upon which the rate was calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.

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**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

UNCOLLECTIBLE EXPENSE RIDER

APPLICABLE:

To all customers served under rate schedules SGS and GS.

UNCOLLECTIBLE EXPENSE RIDER:

A charge of \$0.0724 per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider.

RECONCILIATION ADJUSTMENT:

This Rider is subject to reconciliation or adjustment, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of uncollectible expense upon which the rate was calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.

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Effective: With meter readings on or

COLUMBIA GAS OF OHIO, INC

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

UNCOLLECTIBLE EXPENSE RIDER

APPLICABLE

To all customers served under rate schedules SGTS and GTS.

UNCOLLECTIBLE EXPENSE RIDER

A charge of \$0.0724 per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider.

RECONCILIATION ADJUSTMENT:

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Vincent A. Parisi, President

Effective: With meter readings on or after

SECTION VII
PART 29 - BILLING ADJUSTMENTS

UNCOLLECTIBLE EXPENSE RIDER

29.18 Applicability

To all customers served under rate schedules FRSGTS and FRGTS.

29.19 UNCOLLECTIBLE EXPENSE RIDER

A charge of \$0.0724 per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider.

29.20 RECONCILIATION ADJUSTMENT

This Rider is subject to reconciliation or adjustment, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of uncollectible expense upon which the rate was calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.

Filed in accordance with Public Utilities Commission of Ohio Entry dated

Issued:

Effective: With meter readings on or after

Issued By
Vincent A. Parisi, President

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in

Case No(s). 21-0321-GA-UEX

Summary: Application Application for Approval of an Adjustment to the Uncollectible Expense Rider Rate electronically filed by Mr. John R Ryan on behalf of Columbia Gas of Ohio