

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission’s Re-	)	Case Nos.
view of Ohio Adm.Code Chapters	)	17-1843-EL-ORD
4901:1-21, 4901:1-23, 4901:1-24, 4901:1-	)	17-1844-EL-ORD
27, 4901:1-28, 4901:1-29, 4901:1-30,	)	17-1862-EL-ORD
4901:1-31, 4901:1-32, 4901:1-33, And	)	17-1845-GA-ORD
4901:1-34 Regarding Rules Governing	)	17-1846-GA-ORD
Competitive Retail Electric Service and	)	17-1847-GA-ORD
Competitive Retail Natural Gas Service.	)	17-1848-GA-ORD
	)	17-1849-GA-ORD
	)	17-1850-GA-ORD
	)	17-1851-GA-ORD
	)	17-1852-GA-ORD

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**REPLY COMMENTS OF  
COLUMBIA GAS OF OHIO, INC.**

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Pursuant to the Commission’s September 8, 2021 Entry in the above-referenced dockets, Columbia Gas of Ohio, Inc. (“Columbia”) is submitting these Reply Comments for the Commission’s consideration. On October 8, 2021, the Retail Energy Supply Association (“RESA”) filed Initial Comments. Columbia presents its Reply Comments to offer certain practical issues for the Commission’s consideration related to RESA’s suggested amendments to the Ohio Administrative Code.

**Ohio Adm.Code 4901:1-29-06(E)(1) – RESA Initial Comment (B)(1).**

The CRNG Supplier rules require a successful audio third-party verification (“TPV”) to complete an enrollment of a customer who is solicited telephonically. In its Initial Comments, RESA recommended that the Commission should continue the waiver it previously granted to the TPV requirement when a customer is enrolled telephonically as a result of the customer calling into a CRNG Supplier.<sup>1</sup> Similar to its arguments made in Case No. 18-382-GE-WVR, Columbia requests that if rule this adopted regarding TPVs, that the Commission still ensure that all

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<sup>1</sup> RESA Initial Comments at 3 – 5.

CRNG Suppliers must provide TPVs to natural gas companies, including Columbia, upon request pursuant to Ohio Adm.Code 4901:1-29-06(D)(6)(b)(v). In Case No. 18-382-GE-WVR, Direct Energy Business, LLC and Direct Energy Services, LLC was “happy to honor Columbia’s request.”<sup>2</sup>

Similarly, Columbia reaffirms this request in this proceeding should the Commission consider extending this waiver or incorporating such a change into the rule.

**Ohio Adm.Code 4901:1-29-06(D)(5)(b), 4901:1-29-06(E)(1)(h)(ii), and 4901:1-29-06(F)(2)(b)(ii), and 4901:1-29-11(E) – RESA Initial Comment (C)(1)**

RESA recommended amending the CRNG Supplier rules rescission period from seven business days to seven calendar days.<sup>3</sup> While Columbia appreciates the request for consistency with the CRES rules, the company is concerned with making such a change. Specifically, Columbia’s call center is closed on Saturdays and Sundays, and, in the event a customer requested a rescission on a weekend, such a request could not be received on time.

Therefore, Columbia requests that the seven business day limitation remain in place in the CRNG Supplier rules to allow customers the ability to contact Columbia telephonically.

**Ohio Adm.Code 4901:1-29-06(M) – RESA Initial Comment (D)**

RESA requested to remove the requirement that the CRNG Supplier redirect rescinding customers to the natural gas utility to complete the rescission. Instead, RESA requests that the CRNG Supplier contact the utility to effectuate a rescission.<sup>4</sup> While this change may seem simplistic, Columbia anticipates two hurdles with this proposal. First, a CRNG Supplier does not have the authority to make changes to a customer’s account if the CRNG Supplier were to call the call center to complete the rescission. Instead, the CRNG Supplier would not have the ability to complete the rescission over the phone. Second, Columbia currently does not have an electronic process to drop a customers during the rescission period.

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<sup>2</sup> See Case No. 18-382-GA-WVR, Direct Reply Comments (August 22, 2019) at 1.

<sup>3</sup> RESA Initial Comments at 7 – 9.

<sup>4</sup> RESA Initial Comments at 10 – 11.

Therefore, the only way a rescission could be processed would be to call the call center, which has its own issues as previously described.

### **Ohio Adm.Code 4901:1-28-01(E) – RESA Initial Comment (F)**

RESA recommended that the Commission remove the time limitations on governmental aggregation programs.<sup>5</sup> Such governmental aggregation programs are limited to a “period of not less than one year and no more than two years.”<sup>6</sup>

In Case No. 12-925-GA-ORD, the Commission adopted the time limitation requirement regarding government aggregation programs. The Commission explained its rationale for such a change:

Although the Commission strives to further this statutory goal throughout the changes to this chapter, the Commission notes that R.C. 4929.02 also provides that state policy serves to “[p]romote the availability of unbundled and comparable natural gas services and goods that provide wholesale and retail consumers with the supplier, price, terms, conditions, and quality options they elect to meet their respective needs.” Consequently, the Commission finds that, in furtherance of maintaining quality options for consumers and discouraging seasonal products that may undercut these options, a new definition should be added to this rule as Paragraph (G), providing that: “‘Governmental aggregation program’ means the aggregation program established by the governmental aggregator with a fixed aggregation term, which shall be a period of not less than one year and no more than two years.” The Commission notes that this addition parallels the corresponding rule in the CRES Rules Case, Ohio Adm.Code 4901:1-21-01(T). Further, the Commission notes that references to this newly defined term have been added in this chapter to Ohio Adm.Code 4901:1-28-04(A)(7) and 4901:1-28-04(B).<sup>7</sup>

Similar to the seasonality described by the Commission, in Columbia’s experience, governmental aggregators return customers to the natural gas company

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<sup>5</sup> RESA Initial Comments at 13 – 15.

<sup>6</sup> Ohio Adm.Code 4901:1-28-01(E).

<sup>7</sup> *In the Matter of the Commission’s Review of its Rules for Competitive Retail Natural Gas Service Contained in Chapters 4901:1-27 through 4901:1-34 of the Ohio Administrative Code*, Case No. 12-925-GA-ORD (December 18, 2013) at 18.

at the beginning of winter heating season. Such a sudden change then forces Columbia to reallocate its customers to the SCO Suppliers, adding unexpected load and demand on the system. By requiring a full year or more for government aggregation, Columbia has not experienced these seasonality issues. Therefore, Columbia recommends that the definition of governmental aggregation remain unchanged.

### **Time Frame to Implement Commission Changes**

Finally, Columbia respectfully requests that the Commission consider a one-year delay in the implementation of any rule change in its final Finding and Order in these dockets. Many of the suggested changes advocated by the parties to these proceedings would require substantial IT changes if they are to be implemented. A one-year delay in implementation would reduce any undue burden on Columbia.

Respectfully submitted by,

**COLUMBIA GAS OF OHIO, INC.**

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## CERTIFICATE OF SERVICE

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

**Commission of Ohio Docketing Information System on**

**10/22/2021 4:10:09 PM**

**in**

**Case No(s). 17-1843-EL-ORD, 17-1844-EL-ORD, 17-1862-EL-ORD, 17-1845-GA-ORD, 17-1846-GA-OR**

Summary: Reply Comments of Columbia Gas of Ohio, Inc. electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.