



November 1, 2023

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

RE: *In the Matter of the Application of Northeast Ohio Natural Gas Corp. for Approval to Amend Transportation Imbalance Procedures, Case No. 22-960-GA-ATA*

Dear Docketing Division:

Enclosed please find the Staff's Review and Recommendation regarding the application filed by Northeast Ohio Natural Gas Corp., for approval to amend transportation imbalance procedures.

Respectfully submitted,

A handwritten signature in black ink that reads "Adam Burns".

Adam Burns
Natural Gas Manager, Accounting and Finance
Public Utilities Commission of Ohio

Enclosure
cc: Parties of Record

Commissioners

Daniel R. Conway
Dennis P. Deters
Lawrence K. Friedman
John D. Williams

180 East Broad Street
Columbus, OH 43215 U.S.A.

800 | 686 7826
puco.ohio.gov

Northeast Ohio Natural Gas Corp.
Case No. 22-960-GA-ATA

SUMMARY:

On October 18, 2022, Northeast Ohio Natural Gas Corp. (NEO or Company) filed an application seeking to amend its transportation imbalance procedures. In its application, NEO seeks to amend its transportation imbalance procedures to mirror the tariff changes made as a result of the applications filed in Case No. 21-803-GA-ATR and Case No. 21-1186-PL-ATA by Northern Industrial Energy Development, Inc. (NIED) and approved by the Public Utilities Commission of Ohio (Commission) on July 27, 2022. In its application, NEO stated that NIED's new tariffs made significant changes to the imbalance process, and these changes would make NEO responsible for imbalances caused by NEO's customers, including suppliers operating on NEO's system. In accordance with NEO's application, the proposed tariffs match the imbalance rules established by NIED, and standardizing the imbalance rules between NEO and NIED will ensure that end-users have one set of rules to comply with and ensure that any imbalance costs are properly allocated to the party which caused the cost.

In the Commission-approved Case Nos. 21-803-GA-ATR and 21-1186-GA-ATA, NIED purchased assets formerly owned by Cobra Pipeline Company, Ltd. (Cobra). As part of the Cobra purchase, NIED adopted the tariffs that currently serve NEO. NIED's new tariffs changed how NEO would be charged for customer imbalances. Under the Cobra tariffs that NEO was serviced by, NEO was not financially responsible for imbalances. In its application, NEO stated that NIED's tariffs require NEO to be responsible for imbalances caused by NEO's customers including suppliers on NEO's system. Therefore, NEO proposed tariff revisions to match the imbalance rules established by NIED, which standardizes the imbalance rules for both NEO and NIED. According to NEO's application, the tariff changes to the imbalance rules ensure that end-users of gas have only one set of rules to comply with. Additionally, the tariff changes ensure that any imbalance costs are properly allocated to the party which caused the cost and are not subsidized by GCR customers.

STAFF RECOMMENDATION:

Staff reviewed the application filed by NEO to amend its tariff and recommends the approval of the application.

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in

Case No(s). 22-0960-GA-ATA

Summary: Staff Review and Recommendation regarding the application filed by Northeast Ohio Natural Gas Corp., for approval to amend transportation imbalance procedures electronically filed by Zee Molter on behalf of PUCO Staff.