

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Suburban)
Natural Gas Company for Approval of an) Case No. 20-416-GA-PIP
Adjustment to Its Percentage of Income)
Payment Plan Rider.)

**AMMENDED APPLICATION OF SUBURBAN NATURAL GAS COMPANY
FOR APPROVAL OF AN AJUSTMENT TO ITS
PERCENTAGE OF INCOME PAYMENT PLAN RIDER**

Suburban Natural Gas Company (Suburban) hereby requests approval of the Public Utilities Commission of Ohio (Commission) for authority to modify its Percentage of Income Payment Plan (PIPP) Rider. Specifically, Suburban requests authority to modify Section V, Eighth Revised Sheet No. 6, of its Tariff, Gas Service Interim, Emergency and Temporary Percentage of Income Payment Plan Tariff Schedule Rider to reflect an adjusted credit of \$0.0394786 per Mcf, which is a change of more than ten (10) percent. In support of this request, Suburban states as follows:

1. Suburban is a public utility and a natural gas company providing service to customers in Ohio and is subject to the jurisdiction of this Commission under R.C. 4905.02 and R.C. 4905.03.
2. By this Application, and consistent with the Orders of the Commission authorizing Suburban's PIPP Rider,¹ Suburban proposes to increase its PIPP Rider by \$0.0627425 per Mcf, which will result in a credit to the customer of \$0.0394786 per Mcf. A copy

¹ See In the Matter of the Application of Suburban Natural Gas Company for an Increase in Rates and Charges, Case No. 07-689-GA-AIR, Entry (April 16, 2008); see also In the Matter of the Percentage of Income Payment Plan Rider of Suburban Natural Gas Company and Related Matters, Case No. 18-416-GA-PIP, Opinion and Order (January 16, 2019) (approving Suburban's current PIPP Rider rate).

of the proposed PIPP Rider, Section V, Ninth Revised Tariff Sheet No. 6, is attached as Exhibit 1 to this Amended Application, in both proposed and redlined forms. Calculations supporting the modified rate are attached as Exhibit 2.

3. In accordance with the procedure recommended in the direct testimony of the Commission Staff in Case Nos. 88-1115-GA-PIP, et al., and the procedure established by Entry dated June 25, 1993 in Case No. 93-1000-EL-EFR, Suburban may implement the proposed PIPP Rider on July 16, 2020, on a bills rendered basis, absent action by the Commission.

The credit of \$0.0394786 per Mcf is just and reasonable for the PIPP Rider and should be approved by the Commission or allowed to be implemented by Suburban absent Commission action as described above.

WHEREFORE, Suburban respectfully requests that the Commission approve a decrease of its PIPP Rider to the rate set forth in the revised Tariff sheet contained in Exhibit 1 of this Application.

Respectfully submitted,

/s/ David L. Pemberton

David L. Pemberton (0032135) (Counsel of Record)

Suburban Natural Gas Company

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Suburban Natural Gas Company
Cygnet, Ohio

SECTION V
Ninth Revised Sheet No. 6
Cancels and Supersedes
Eighth Revised Sheet No. 6

**GAS SERVICE
INTERIM, EMERGENCY, AND TEMPORARY
PIP PLAN TARIFF SCHEDULE RIDER**

APPLICABLE:

To sales of all customers.

PIP PLAN TARIFF BASE RATE RIDER:

A PIP Plan base rate rider of \$0.0394786 per Mcf will apply to all tariff volumes of applicable customers.

This rider is updated annually, including reconciliation for any over- or under-collections. The PIPP Rider may also include customer refunds if the Commission or the Supreme Court of Ohio determines, as a result of the Commission's biennial audit of the rider, that Suburban's PIPP Rider was unlawful or unreasonable or included imprudent amounts.

Issued: _____, 2020

EFFECTIVE: _____, 2020

Filed pursuant to the Opinion and Order
of The Public Utilities Commission of Ohio in
Case No. 08-947-GA-ABN, dated June 29, 2011
and under authority of Case No. 20-416-GA-PIP

ISSUED BY D. JOSEPH PEMBERTON, PRESIDENT

Suburban Natural Gas Company
Cygnet, Ohio

SECTION V
Ninth Revised Sheet No. 6
Cancels and Supersedes
Eighth Revised Sheet of No. 6

**GAS SERVICE
INTERIM, EMERGENCY, AND TEMPORARY
PIP PLAN TARIFF SCHEDULE RIDER**

APPLICABLE:

To sales of all customers.

PIP PLAN TARIFF BASE RATE RIDER:

A PIP Plan base rate rider of \$0.0394786 per Mcf will apply to all tariff volumes of applicable customers.

This rider is updated annually, including reconciliation for any over- or under-collections. The PIPP Rider may also include customer refunds if the Commission or the Supreme Court of Ohio determines, as a result of the Commission's biennial audit of the rider, that Suburban's PIPP Rider was unlawful or unreasonable or included imprudent amounts.

Issued: _____, 2020

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Filed pursuant to the Opinion and Order
of The Public Utilities Commission of Ohio in
Case No. 08-947-GA-ABN, dated June 29, 2011
and under authority of Case No. 20-416-GA-PIP

ISSUED BY D. JOSEPH PEMBERTON, PRESIDENT

**SUBURBAN NATURAL GAS COMPANY
CALCULATION OF RECOMMENDED PIPP RIDER RATE
2019**

| Line No. | | | |
|----------|--|----|------------------|
| 1 | Balance of Deferred PIPP at December 31, 2019 | \$ | (103,595) |
| 2 | Recovery over 1 Year | \$ | (103,595) |
| 3 | Billed Volumes Subject to PIPP Rider 1/19 Thru 12/19 | | 2,009,850 MCF |
| 4 | Deferred PIPP Balance Rate (line 2 / line 3) | \$ | (0.0515436) /MCF |
| 5 | Transfer from PIPP A/R to PIPP Deferred | \$ | 24,249 |
| 6 | Monthly Average | \$ | 2,020.75 |
| 7 | Annual Average (line 6 x 12) | \$ | 24,249 |
| 8 | Annual Average Rate (line 7 / line 3) | | 0.0120651 /MCF |
| 9 | Deferred PIP Balance Rate (line 4) | \$ | (0.0515436) /MCF |
| 10 | Annual Average Rate (line 8) | | 0.0120651 /MCF |
| 11 | Total Recommended Rate (line 9 + line 10) | | (0.0394786) /MCF |
| 12 | Current Rate | | (0.1022211) /MCF |
| 13 | Change in Rate (line 11 – line 12) | \$ | 0.0627425 |
| 14 | Percentage Change (line 13 / line 12) | | -61.38% |

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Suburban)
Natural Gas Company for Approval of an) Case No. 20-316-GA-UEx
Adjustment to Its Uncollectible Expense Rider)

**APPLICATION OF SUBURBAN NATURAL GAS COMPANY FOR APPROVAL
OF AN ADJUSTMENT TO ITS UNCOLLECTIBLE EXPENSE RIDER**

Suburban Natural Gas Company (Suburban) hereby submits its annual Uncollectible Expense Rider Report and Application (Application) to modify its Uncollectible Expense Rider (UEX Rider). Suburban respectfully requests approval of the proposed adjustment. In support of this Application, Suburban states as follows:

1. On August 3, 2007, Suburban filed an Application to Increase Rates, which, among other things, sought the Public Utilities Commission of Ohio's (Commission) approval to implement an UEX Rider. In an Opinion and Order issued on March 19, 2008,¹ the Commission approved Suburban's Application to Increase Rates and authorized Suburban to implement an UEX Rider.
2. On May 22, 2009, Suburban applied for an increase in its UEX rider from \$.07012727 per Mcf to \$.08641518. In an Entry issued on July 23, 2009, Suburban filed tariffs consistent with the Entry, which became effective on August 26, 2009.² Subsequent adjustments have been approved on an annual basis.³

¹ *In the Matter of Suburban Natural Gas Company for Authority to Increase its Rates and Charges in Certain Areas of its Territory, Case No. 07-689-GA-AIR, Opinion and Order at 5 (March 19, 2008).*

² *In the Matter of Suburban Natural Gas Company for Approval of an Adjustment to its Uncollectible Expense Rider, Case No. 09-438-GA-UEx, Entry at 5 (July 23, 2009).*

³ *See, e.g., In the Matter of the Application of Suburban Natural Gas Company for Approval of an Adjustment to Its Uncollectible Expense Rider, Case No. 18-316-GA-UEx, Finding and Order (January 23, 2019).*

3. The Suburban UEX Rider, as set forth in Ninth Revised Tariff Sheet No. 2A, states that "Suburban shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten (10) percent is needed to adjust for prior period over- or under-collections."⁴
4. Suburban proposes to increase the UEX Rider by \$0.03276 per Mcf, which will result in a charge to the customer of \$0.0188024 per Mcf. A copy of the proposed UEX Rider, Section V, Eleventh Revised Tariff Sheet No. 2A is attached as Attachment 1 to this Application, in both proposed and redline forms. The rate is comprised of (1) the balance of deferred uncollectible accounts expense net of recoveries as of December 31, 2019, and (2) the actual bad debt write-offs for the year 2019. The calculation of the revised rate is shown in Attachment 2.
5. The charge to the customer of \$0.0188024 per Mcf amounts to an increase of the UEX Rider of greater than 10 percent from the previous period.

The charge of \$0.0188024 per Mcf is just and reasonable for the UEX Rider and should be approved by the Commission.

⁴ In the Matter of the Application of Suburban Natural Gas Company for Approval of an Adjustment to its Uncollectable Expense Rate Rider, Case No. 18-0316-GA-UEx, Filing of Ninth Revised Sheet No. 2A (January 23, 2019).

WHEREFORE, Suburban respectfully requests that the Commission approve an increase in the UEX Rider to the rate set forth in the revised tariff sheet contained in Attachment I of this Application.

/s/ David L. Pemberton
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Suburban Natural Gas Company
Cygnet, Ohio

Attachment 1
Page 1 of 2
SECTION V
Eleventh Revised Sheet No. 2A
Cancels
Tenth Revised Sheet No. 2A

UNCOLLECTABLE EXPENSE RIDER

APPLICABLE:

To all customers.

UNCOLLECTABLE EXPENSE RIDER:

A charge of \$0.0188024 per Mcf shall be applied to all volumes for service rendered to those customers responsible for paying the Uncollectible Expense Rider. Suburban shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten (10) percent is needed to adjust for prior period over- or under-collections.

This rider is updated annually, including reconciliation for any over- or under-collections. The Uncollectible Expense Rider may also include customer refunds if the Commission or the Supreme Court of Ohio determines, as a result of the Commission's biennial audit of the rider, that Suburban's Uncollectible Expense Rider was unlawful or unreasonable or included Imprudent amounts.

Issued: _____, 2020

EFFECTIVE: _____, 2020

Filed pursuant to an Entry of the Public Utilities Commission of Ohio in
Case No. 07-689-GA-AIR, dated March 19, 2008; and the
Finding and Order in Case No. 20-316-GA-UEx, dated _____, 2020

ISSUED BY D. JOSEPH PEMBERTON, PRESIDENT

Suburban Natural Gas Company
Cygnet, Ohio

SECTION V
Eleventh Revised Sheet No. 2A
Cancels
Tenth Revised Sheet No. 2A

UNCOLLECTABLE EXPENSE RIDER

APPLICABLE:

To all customers.

UNCOLLECTABLE EXPENSE RIDER:

A charge of \$0.0188024 per Mcf shall be applied to all volumes for service rendered to those customers responsible for paying the Uncollectible Expense Rider. Suburban shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten (10) percent is needed to adjust for prior period over or under-collections.

This rider is updated annually, including reconciliation for any over or under-collections. The Uncollectible Expense Rider may also include customer refunds if the Commission or the Supreme Court of Ohio determines, as a result of the Commission's biennial audit of the rider, that Suburban's Uncollectible Expense Rider was unlawful or unreasonable or included Imprudent amounts.

Issued: _____, 2020

EFFECTIVE: _____, 2020

Filed pursuant to an Entry of the Public Utilities Commission of Ohio in
Case No. 07-689-GA-AIR, dated March 19, 2008; and the
Finding and Order in Case No. 20-316-GA-UEX, dated _____, 2020

ISSUED BY D. JOSEPH PEMBERTON, PRESIDENT

**SUBURBAN NATURAL GAS COMPANY
BAD DEBT TRACKER
2019**

| Line No. | | | |
|----------|--|------------|------------------------------|
| 1 | Actual Annual Sales | | 2,009,850 MCF |
| 2 | Actual Bad Debt Deferral as of: | 12/31/2019 | \$ 14,349 |
| 3 | Recovery Period | | <u>1 Year</u> |
| 4 | Recovery Amount (Line 2 / Line 3) | | <u>14,349</u> |
| 5 | Recovery Rate (Line 4 / Line 1) | | \$ 0.00713934 per MCF |
| 6 | Actual Annual Bad Debt Write-Off | | <u>23,441</u> |
| 7 | Recovery Rate (Line 6 / Line 1) | | \$ 0.01166306 per MCF |
| 8 | Total Bad Debt Tracker (Line 5 + Line 7) | | <u>\$ 0.01880240 per MCF</u> |
| 9 | Tracker Rate Approved | | \$ (0.01387506) per MCF |
| 10 | Change (Line 8 - Line 9) | | \$ 0.03267746 |
| 11 | Percent Change (Line 10 / Line 9) | | 236% |

**SUBURBAN NATURAL GAS COMPANY
CASE NO. 20-316-GA-UEx
UNCOLLECTIBLE ACCOUNTS EXPENSE RIDER
2019**

| | January | February | March | April | May | June | July | August | September | October | November | December |
|-------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|------------|------------|----------|
| 1 Balance - Beginning of Month | \$ (52,692) | \$ (53,754) | \$ (41,587) | \$ (29,429) | \$ (22,366) | \$ (18,923) | \$ (14,908) | \$ (14,207) | \$ (14,378) | \$ (1,947) | \$ (2,099) | \$ (859) |
| 2 Bad Debts Written Off | | | 3,395 | | | 2,604 | | | 12,039 | | | 12,175 |
| 3 Recovery - Base Rates | | | | | | | | | | | | |
| 4 Recovery - Bad Debt Ride | 1,050 | (13,027) | (10,050) | (7,439) | (3,809) | (1,971) | (1,176) | (516) | (550) | (580) | (1,866) | (3,666) |
| 5 Recovery - Other | 12 | 860 | 1,287 | 376 | 366 | 560 | 475 | 687 | 158 | 732 | 626 | 633 |
| 6 Incremental Bad Debts (2-(3+4+5)) | (1,062) | 12,167 | 12,158 | 7,063 | 3,443 | 4,015 | 701 | (171) | 12,431 | (152) | 1,240 | 15,208 |
| 7 Balance Subtotal (1 + 6) | (53,754) | (41,587) | (29,429) | (22,366) | (18,923) | (14,908) | (14,207) | (14,378) | (1,947) | (2,099) | (859) | 14,349 |
| 8 Carrying Charges | | | | | | | | | | | | |
| 9 Balance - End of Month (7 + 8) | \$ (53,754) | \$ (41,587) | \$ (29,429) | \$ (22,366) | \$ (18,923) | \$ (14,908) | \$ (14,207) | \$ (14,378) | \$ (1,947) | \$ (2,099) | \$ (859) | 14,349 |