274 E. Front Street, P.O. Box 130 Cygnet, Ohio 43413-0130 (419) 655-2345

2626 Lewis Center Road Lewis Center, Ohio 43035-9206 (740) 548-2450

June 1, 2020

THIS FILING (DATED JUNE 1, 2020) IS BEING FILED TO REPLACE THE FILING SUBMITTED ON MAY 29, 2020 FOR CASE NO. 20-316-GA-UEX (APPLICATION OF SUBURBAN NATURAL GAS COMPANY FOR APPROVAL OF AN ADJUSTMENT TO ITS UNCOLLECTIBLE EXPENSE RIDER), AS THE ORIGINAL FILING CONTAINED ERRORS.

THIS NEW FILING FOR CASE NO. 20-316-GA-UEX SUPERSEDES ALL OTHER FILINGS FOR THIS CASE.

Sincerely,

Sally Phillips Corporate Secretary Suburban Natural Gas Company 2626 Lewis Center Road Lewis Center, Ohio 43035 Telephone: (740) 548-2450

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 COLLECTIBLE 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, 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 \$0.7012727 per 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).

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 undercollections."
- 4. Suburban proposes to increase the UEX Rider by \$0.03268 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 ten (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 Uncollectible 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 1 of this Application.

/s/ David L. Pemberton

David L. Pemberton (0032135) (Counsel of Record) Suburban Natural Gas Company 2626 Lewis Center Road Lewis Center, Ohio 43035 Telephone: (740) 548-2450

mwest@sngco.com

(willing to accept service by email)

Suburban Natural Gas Company Cygnet, Ohio

SECTION V

Ninth Tenth Eleventh Revised Sheet No. 2A

Cancels

Eighth Ninth Tenth Revised Sheet No. 2A

UNCOLLECTIBLE EXPENSE RIDER

APPLICABLE:

To all customers.

UNCOLLECTIBLE EXPENSE RIDER:

A charge of \$0.0.03117388 \$0.01387506 \$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.

lssued: _	, 2018 2019 2020	EFFECTIVE:	, 2018-2019 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. 18-19 20-316-GA-UEX, dated , 2018 2019 2020

ISSUED BY ANDREW J. SONDERMAN D. JOSEPH PEMBERTON, PRESIDENT

Suburban Natural Gas Company Cygnet, Ohio Attachment 1
Page 2 of 2
SECTION V
Eleventh Revised Sheet No. 2A
Cancels
Tenth Revised Sheet No. 2A

UNCOLLECTIBLE EXPENSE RIDER

APPLICABLE:

To all customers.

UNCOLLECTIBLE 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

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	\$ 1 4,349							
3	Recovery Period	<u>1</u> Year							
4	Recovery Amount (Line 2 / Line 3)	14,349							
5	Recovery Rate (Line 4 / Line 1)	\$ 0.00713934 per MCF							
6	Actual Annual Bad Debt Write-Off	23,441							
7	Recovery Rate (Line 6 / Line 1)	\$ 0.01166306 per MCF							
8	Total Bad Debt Tracker (Line 5 + Line 7)	\$ 0.01880240 per MCF							
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 December	February	March	April	May	June	July A	August Se	ptember	October No	ovember	
1 Balance - Beginning of Month	\$ (52	2,692) \$ (53,	754) \$ (41,5	587) \$ (29,4)	29) \$ (22,36	66) \$ (18,923	3) \$ (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) \$ (4	11,587) \$ (2	9,429) \$ (22	2,366) \$ (18,	,923) \$ (14,9	908) \$ (14,2	07) \$ (14,378)) \$ (1,947)	\$ (2,099)	\$ (859)	14,349	