May 12, 2020

Docketing Division

Public Utilities Commission of Ohio

180 East Broad Street

Columbus OH 43215

RE: *In the Matter of the Application of Suburban Natural Gas Company During the Declared State of Emergency and Related Matters: Motion for Suspension, Case No. 20-0664-GA-UNC,*

Dear Docketing Division:

Enclosed please find the Staff Recommendation in the Matter of the Application of Suburban Natural Gas Company for Approval of their Motion for Suspension or Modification in Case No. 20-0664-GA-UNC



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Barbara Bossart

Chief, Reliability and Service Analysis Division

Service Monitoring and Enforcement Department

Public Utilities Commission of Ohio

Enclosure

Cc: Parties of Record

**Suburban Natural Gas Company**

**Case No. 20-0664-GA-UNC**

**SUMMARY**

On March 12, 2020, the Public Utilities Commission of Ohio (Commission) issued an order, in accordance with the Executive Order 2020-01D[[1]](#footnote-2) (Executive Order) directing “all public utilities under its jurisdiction to review their service disconnection policies, practices, and tariff provisions and to promptly seek any necessary approval to suspend otherwise applicable requirements that may impose a service continuity hardship on residential and nonresidential customers or create unnecessary COVID-19 risks associated with social contact.”[[2]](#footnote-3)

On March 30, 2020, Suburban Natural Gas Company (Suburban or Company) filed an application proposing to suspend or modify certain policies and practices that may impose a service continuity hardship on residential and nonresidential customers or create unnecessary COVID-19 risks associated with social contact.

**STAFF REVIEW OF LIMITATIONS DUE TO SOCIAL CONTACT**

The Company is suspending all disconnections for residential and non-residential services effective March 12, 2020. The Company requests the Commission waive certain performance requirements such as average speed of answer, timing of reconnections and new-service installations, and other performance requirements and time deadlines during the state of emergency. Suburban also states that these limitations may require Suburban to forgo some actions required by rule, tariff provisions, or other policies and practices, such as meter reads, meter location, meter testing, service upgrades, etc. Suburban is requesting waivers of several administrative rules as set forth in the table below.

|  |  |  |  |
| --- | --- | --- | --- |
| Rule | Rule Description | Reason | Action |
| 4901:1-13-04(D) | Meter Test | Social Contact | Suburban will not be performing meter tests at customer’s request |
| 4901:1-13-04(G) | Meter Reading | Social Contact | Suburban will not be required to attempt to get an actual read every other month or be required to obtain an actual read once a year |
| 4901:1-13-05(A) | New Service Requests | Social Contact | Suburban will not be required to complete new service requests in 3 days for locations that do not require installation of service lines, or within 20 days for locations that require service lines |
| 4901:1-13-05(B) | Telephone Response | Service Continuity  And  Social Contact | Suburban’s customer service line answer times may exceed an average of 90 seconds due to increased volume or decreased staffing levels |
| 4901:1-13-05(C) | Scheduled Appointments with Customers | Social Contact | Suburban will not have to provide windows for appointments or reschedule for the next day if an appointment is missed |

**STAFF RECOMMENDATION REGARDING LIMITATIONS DUE TO SOCIAL CONTACT**

Staff does not object to the Company's limitations on field activities. Staff does not oppose the temporary waiver of administrative rules referenced above or related tariff requirements regarding in person meter reading or the suspension of the call center answer time requirement. Staff recommends that Suburban instruct willing customers how to provide a meter reading during the COVID-19 pandemic. Staff recommends the Company continue to track and report any missed guidelines under Ohio Admin.Code 4901:1-13-05.

**STAFF REVIEW OF SUSPENSION AND ADJUSTMENT OF DISCONNECTION AND RECONNECTION ACTIVITIES**

Suburban is requesting to alter the Company’s disconnection policies and practices to suspend disconnection during the COVID-19 emergency and is requesting waivers of several administrative rules as set forth in the table below.

|  |  |  |  |
| --- | --- | --- | --- |
| Rule | Rule Description | Reason | Action |
|  |  |  |  |
| 4901:1-13-08(C) | Disconnection of Small Commercial Customers | Service Continuity | Suburban will not disconnect customers during this emergency |
| 4901:1-18-03 | Disconnection of Residential Customers | Service Continuity | Suburban will not disconnect customers during this emergency |
| 4901:1-18-07(A) | Reconnection of Service | Service Continuity | Suburban may reconnect customers without receiving the default amounts needed under normal circumstances |
| 4901:1-18-07(B) | Reconnection of Service | Service Continuity | Suburban may waive proof of payment options to reconnect service |

**STAFF RECOMMENDATION REGARDING SUSPENSION AND ADJUSTMENT OF DISCONNECTION AND RECONNECTION ACTIVITIES**

Staff does not oppose the Company's suspension and adjustment of disconnection and reconnection activities by removing financial barriers to reconnection or continuity of service.

**STAFF REVIEW OF GAS PIPELINE SAFETY**

The Company is requesting suspension or modification of the following gas pipeline safety activities.

|  |  |  |  |
| --- | --- | --- | --- |
| Rule | Rule Description | Reason | Action |
| 4901:1-13-05(D) | Repairs of Service Line Leaks | Service Continuity | Suburban may not complete service line repairs to lines that have been shut off by the end of the next business day |
| 4901:1-16-04(I) | Remediation of Leaks | Social Contact | Suburban may prioritize leaks as they see fit during this time period |

**STAFF RECOMMENDATION REGARDING GAS PIPELINE SAFETY**

Staff does not oppose the extension of time to complete service line repairs, but the Company did not specify which requirements they wish waived regarding leak remediation. Staff does not believe that hazardous leaks identified in Ohio Admin.Code 4901:1-16-04(I)((1) should be waived. Staff, however, does believe that the requirements in Ohio Admin.Code 4901:1-16-04(2) and (3) regarding grade 2 leaks can be suspended. Staff, however, recommends that the Company continue to reevaluate the leaks every six months.

1. On March 9, 2020 the governor of Ohio signed Executive Order 2020-01D declaring a state of emergency in Ohio to protect the well-being of Ohioans from the dangerous effects of COVID-19. [↑](#footnote-ref-2)
2. *See In the Matter of the Proper Procedures and Process for the Commission’s Operations and Proceedings During the Declared State of Emergency and Related Matters*, Case No. 20-591-AU-UNC, Entry and Order dated March 12, 2020 at 1. [↑](#footnote-ref-3)