

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of)
Columbia Gas of Ohio, Inc. for Approval)
of Tariffs to Recover Through An)
Automatic Adjustment Clause Costs)
Associated with the Establishment of an)
Infrastructure Replacement Program)
and for Approval of Certain Accounting)
Treatment)**

Case No. 07-478-GA-UNC

**COMMENTS OF UTILITY SERVICE PARTNERS, INC. RELATING
TO PROPOSED TARIFFS OF COLUMBIA GAS OF OHIO, INC.**

Columbia Gas of Ohio, Inc. ("Columbia") filed proposed tariffs in this case on June 6, 2008, although it did not serve the parties with the proposed tariff until June 9, 2008. The Commission made it clear in its Entry on Rehearing that the tariff would take effect no earlier than June 18, 2008.

Utility Service Partners, Inc. ("USP") submits these Comments to the Commission pointing out where the proposed tariffs are not consistent with the Commission's April 9, 2008 Opinion and Order and June 4, 2008 Entry on Rehearing and urges the Commission to direct Columbia to re-submit revised tariffs before approval.

- I. The date that Columbia assumes financial responsibility for repair and replacement of all Hazardous Customer Service Line Leaks and for repair or replacement of Natural Gas Risers prone to failure is incorrect.**

At Original Sheet No. 6b of its proposed tariff, Subsection (k) Company Rights and Responsibilities, Columbia used April 9, 2008 as the date for its assumption of financial responsibility. This statement is contrary to the June 4, 2008 Entry on Rehearing. The Commission stated that the effective date of the tariff would be no earlier than June 18, 2008.

The tariff should be revised to indicate that Columbia's assumption of financial responsibility over hazardous customer service lines will begin on the effective date of the tariff. With respect to the transfer of the repair or replacement of risers and related hazardous customer service lines to Columbia, the effective date should also be the effective date of the tariff, with the proviso that the customer has the right to repair or replace a prone-to-failure riser and related hazardous customer service line before Columbia acts and has the right to seek reimbursement.

This correction is important because Columbia's authority to assume responsibility for the hazardous customer service lines stems from the tariff language. Columbia should not be allowed to circumvent the Commission's direction by inserting an April 9 date in its tariff as the effective date for the transfer of responsibility for hazardous service lines. The tariffs are to be effective when the Commission approves the tariffs and the final tariffs are filed and the transfer of responsibility should occur simultaneously on that date. Original Sheet No. 6b should be revised accordingly.

II. Conclusion

The Commission should direct Columbia to revise its tariffs in accordance with these comments so that if and when the Commission approves the tariffs, they will be consistent with both the April 9, 2008 Opinion and Order and the June 4, 2008 Entry on Rehearing.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Comments of Utility Service Partners, Inc. was served upon the following persons by electronic mail and by first class U.S. mail, postage prepaid this 19th day of June, 2008:

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Summary: Comments Comments of Utility Service Partners, Inc. Relating to Proposed Tariffs of Columbia Gas of OH, Inc. electronically filed by Stephen M Howard on behalf of Utility Service Partners, Inc.