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PUCO

Deloitte & Touche LLP
155 East Broad Street
Columbus, OH 43215-3611
USA

Tel: +1 614 221 1000
Fax: +1 614 229 4647
www.deloitte.com

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

The Board of Directors
Columbia Gas of Ohio, Inc.
Columbus, OH 43215

OB-564-GA-UEX

We have performed the procedures enumerated below, which were agreed to by Columbia Gas of Ohio, Inc. (the "Company") and provided to the Public Utility Commission of Ohio (the "PUCO") and the Ohio Consumers' Counsel (the "OCC") solely to assist you in evaluating the Company's evaluation of the recovery of uncollectible customer accounts receivable through a bad debt recovery mechanism as described in the Public Utility Commission of Ohio Case No. 03-1127-GA-UNC. The Company's management is responsible for compliance with the bad debt recovery mechanism. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures that we performed and our findings are as follows:

Uncollectible Customer Accounts Receivable Recovery Mechanism

- a) We obtained from Company management, and proved the mathematical accuracy of the accounting schedules summarizing bad debt tracker activity by month and supporting schedules for the following items from January 1, 2007 to December 31, 2007 and noted no differences.
1. Bad debt charge offs for the period from January 1, 2007 thru December 31, 2007, of \$65,355,256.
 2. Recovery of bad debt for the period from January 1, 2007 thru December 31, 2007, of \$32,109,639.
 3. Other recoveries for the period from January 1, 2007 thru December 31, 2007, of \$42,588,975.
 4. Carrying charges for the period from January 1, 2007 thru December 31, 2007, of \$506,952.
- b) We compared bad debt charge offs from the schedule obtained in a)1. above to Distributed Information System ("DIS"), Gas Accounting System ("GMB/GAS"), and Transportation Next Generation ("GTS") reports and noted no differences. We noted that eligible charge-offs used in the calculations relate only to the following accounts: Small General Service ("SGS"), General Service ("GS"), Murphy General Service ("MGS"), Small General Transportation Service ("SGTS"), General Transportation Service ("GTS"), Full Requirements Small General

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Transportation Service ("FRSGTS") and Full Requirements General Transportation Service ("FRGTS").

- c) We randomly selected three months of data included in the schedules obtained in a)2. above and performed the following procedures:
 - 1. We compared sales, CHOICE® and transportation volumes to appropriate DIS, GMB/GAS, and GTS reports and noted that such eligible volumes relate only to SGS, GS, MGS, SGTS, GTS, FRMGTS, FRSGTS, and FRGTS accounts for the months of March 2007, August 2007, and November 2007 and noted no differences.
 - 2. We compared the bad debt recovery rates for the Company with those permitted by the PUCO, as outlined in Case No. 05-597-GA-UEX and Case No. 06-649-GA-UEX, and determined that the rates have been applied to eligible volumes for the months of March 2007, August 2007, and November 2007.
- d) We compare bad debt charge offs, bad debts recovered in base rates, and other recoveries per the schedules obtained in b) and c) above to the schedule obtained in a) above for the months selected in c).
 - 1. We selected three charge offs for each month and obtained the customer billing history from DIS. We documented the dates and transactions up to and including the charge off of the customer's outstanding balance.
 - 2. We selected three recoveries for each month and obtained the customer history from DIS. We documented the dates and transactions up to and including the recovery of the customer's outstanding balance. We documented the GL account(s) to which third party fees, if any, are recorded.
- e) We obtained supporting documentation for the interest rate utilized by the Company to calculate the monthly carrying charges for the months of March 2007, August 2007, and November 2007.
- f) We recalculated carrying cost calculations for the months of March 2007, August 2007, and November 2007 and noted no differences.
- g) We recalculated the gross receipts tax component of the rider billings for the months of March 2007, August 2007, and November 2007 and noted no differences.

Accounts Receivable Regulatory Asset Balance

- a) We obtained the Accounts Receivable Regulatory Asset balance from general ledger account 1823499 at December 31, 2007.
- b) We recalculated amounts and calculations used in support of the Accounts Receivable Regulatory Asset balance deferred as of December 31, 2007 and noted no differences.
- c) We agreed the amortization rate of the regulatory asset established in case 01-3278-GA-AAM to the PUCO Order 03-1127-GA-UNC.
- d) We selected 3 months and obtained the corresponding monthly voucher OPR-02-401. We noted that the total charge-offs per the voucher equal to the deferrals to the Accounts Receivable

Regulatory Asset and the PIPP regulatory asset for the months of March 2007, August 2007, and November 2007.

We were not engaged to, and did not, conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the management of the Company, the PUCO, and the OCC and is not intended to be, and should not be, used by anyone other than these specified parties.

DeBitt; Touche LLP

November 20, 2008