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WELTMAN, WEINBERG & REIS CO., L.P.A.

ATTORNEYS AT LAW



ANDREW J. SONDERMAN

Attorney at Law

614.857.4383

Fax 614.233.6826

asonderman@weltman.com

BROOKLYN HTS., OH

216.739.5100

CHICAGO, IL

312.782.9676

CINCINNATI, OH

513.723.2200

CLEVELAND, OH

216.685.1000

COLUMBUS, OH

614.228.7272

DETROIT, MI

248.362.6100

GROVE CITY, OH

614.801.2600

PHILADELPHIA, PA

215.599.1500

PITTSBURGH, PA

412.434.7955

March 13, 2009

Renée J. Jenkins, Secretary
Docketing Division
Public Utilities Commission of Ohio
13th Floor
180 E. Broad Street
Columbus, Ohio 43215

PUCO

2009 MAR 13 PM 4:01

RECEIVED-DOCKETING DIV

Re: Case No. 08-1229-GA-COI: In the Matter of the Five-Year Review of
Natural Gas Company Uncollectible Riders

Dear Ms. Jenkins:

Enclosed please find an original and 15 copies of the Comments of Waterville Gas & Oil Company to the Staff Report filed on February 5, 2009 in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Andrew J. Sonderman'.

Andrew J. Sonderman

AJS/ml

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Five-Year Review of)
Natural Gas Company Uncollectible Riders.) Case No. 08-1229-GA-COI

COMMENTS OF WATERVILLE GAS & OIL COMPANY

By Entry on February 25, 2009, the Attorney Examiner invited comments on the recommendations submitted by the Staff Report filed in this docket on February 5, 2009. Tariff PUCO No. 12 of Waterville Gas & Oil Company ("Waterville") includes an Uncollectible Expense Rider, issued and effective as of November 21, 2007, pursuant to authority granted by the Commission in its Opinion in Order on November 20, 2007 in Case No. 07-0194-GA-AIR.

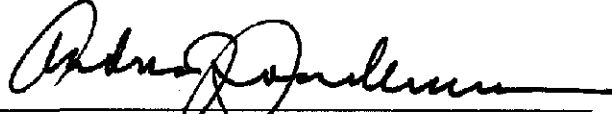
At page 5 of the Staff Report appear its "Staff Recommendations". These included recommendations that the uncollectible rider mechanism be continued for an additional period not to exceed five years without a subsequent staff investigation; and that "the Companies" file annual reports for each calendar year no later than the subsequent January 31, and setting forth the information to be reported.

Although "the Companies" was defined at page 1 of the Staff Report to include The East Ohio Gas Company, Columbia Gas of Ohio, Inc., Vectren Energy Delivery of Ohio, and Northeast Ohio Natural Gas Corporation, Waterville has been informed through counsel that the reporting requirement is intended to apply to all natural gas companies whose tariffs include uncollectible expense riders.

Waterville has no objection to filing an annual report as recommended in the Staff Report. Moreover, Waterville believes the categories of information to be provided are not objectionable as recommended

Waterville's only concern is with the proposed due date for the annual report, i.e., no later than January 31 of the next year. Waterville requests that this due date be moved back to ensure that sufficient time is allowed for it to collect and organize the requested data. Waterville recommends that the deadline for it to submit its annual reports be revised to no later than March 30 of each subsequent year.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew J. Sonderman", written over a horizontal line.

Andrew J. Sonderman (0008610)
Weltman, Weinberg & Reis Co., LPA
175 South 3rd Street, Suite 900
Columbus, Ohio 43215
614.857.4383 (telephone)
614.233.6826 (fax)
asonderman@weltman.com

Counsel for Waterville Gas & Oil Company