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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Commission's Review)
Of Chapter 4901:1-13 of the Ohio) Case No. 09-326-GA-ORD
Administrative Code.)

REPLY COMMENTS OF OHIO GAS COMPANY

I. INTRODUCTION

By entry dated April 22, 2009, the Public Utilities Commission of Ohio ("Commission") issued Staff's proposed modifications to the rules in Chapter 4901:1-13 of the Ohio Administrative Code. Several parties including Ohio Gas Company ("Ohio Gas") filed initial comments on May 22, 2009. Ohio Gas respectfully submits its reply comments for the Commission's consideration.

II. REPLY COMMENTS

A. GENERAL COMMENTS

In May 2005, the Commission issued an Entry that started the lengthy process that created the minimum gas service standard ("MGSS") rules in Rule 4901:1-13, Ohio Administrative Code, which had not existed prior to the initiation of Case No. 05-602-GA-ORD. The new MGSS rules did not become effective until December 2006, after serious input by many parties with diverse interests and four rehearing entries by the Commission. Given that it has only been two-and-a-half years after the initial process that created the MGSS rules, most comments filed on the limited proposed Staff changes focused on the Staff recommended changes and a few other areas where improvements may be made. However, the Office of the Ohio Consumers' Counsel's

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("OCC") comments were so extensive that they included an entire chapter of the Ohio Administrative Code that is not even up for Commission review until November 2011. Accordingly, all of Ohio Gas's reply comments address OCC's comments.

First, OCC spends over ten pages requesting modifications to various provisions in Rule 4901:1-34, Ohio Administrative Code. That rule is not subject to Commission review in this case. Any consideration of OCC's proposed modifications would be unreasonable, unlawful and violate due process as no notice was provided that Rule 4901:1-34, Ohio Administrative Code, may be subject to change in this case. For these reasons, Ohio Gas does not address OCC's proposed changes. However, Ohio Gas's failure to respond should not be considered agreement with OCC's requests.

Second, OCC also raises a number of issues that it has previously and recently raised and extensively argued in other cases. Specifically, OCC simply reiterated its previous arguments on alternative bill formats including large print, Braille, and second language formats. Ohio Gas does not believe that OCC has raised any new issues that have not already been addressed and rejected by the Commission in other cases. Further, OCC failed to demonstrate that there have been any circumstantial changes that would warrant a reversal of the Commission's prior decisions on this issue. Accordingly, Ohio Gas does not substantively address OCC's arguments, but urges the Commission to deny them for the same reasons upon which it based its prior denial.

Third, Ohio Gas is confused by the comments throughout OCC's initial comments that request modifications to the rules that would significantly increase costs to customers to implement with little support, demonstration, or even assertion of benefits to customers, while at the same time, OCC raises concerns about current

economic conditions and utility bill impacts on residential customers. For example, OCC indicates that customers benefit from actual monthly meter reads and recognizes that the rules require local distribution companies (“LDCs”) to make a reasonable attempt to actually read the meter every other month. Further, OCC recognizes that several LDCs are in the process of installing Automatic Meter Reading (“AMR”) equipment throughout service territories to actually read every meter every month. Nonetheless, OCC proposes two unnecessary and costly rule/process changes in an apparent attempt to ensure actual meter reads. First, OCC requests that LDCs installing AMR equipment be required to divert resources from that process in order to develop implementation plans to establish when the AMR goals will be met. It is not clear what benefits customers will derive from such a plan. Additionally, OCC requests that LDCs be required to read meters on evenings and weekends because it “may be the most convenient time for some customers to provide the company access to read meters.” OCC Comments at 11. OCC does not elaborate on whether evening and weekend meter reads should be upon customer request or all of the time for every customer. Apparently, OCC believes that customers would find the potentially increased convenience for some customers with inside meters or otherwise outweighs the increased costs for all customers associated with extended hours, overtime, and possibly new employees. However, Ohio Gas does not believe that the customers in its service territory would agree, particularly given the current economic conditions to which OCC refers.

The Commission should carefully weigh any recommendations to modify the rules in a way that may increase costs to customers and should deny requests that add little to no customer value while increasing costs.

Finally, OCC cites to Section 4911.16, Revised Code, for support of its request to modify the MGSS rules generally to require that "OCC should be included in the distribution of reports, complaints or other information provided to the Commission which is compiled in conjunction with the MGSS rules." OCC Comments at 2. While Ohio Gas is supportive of fair and reasonable administrative processes, OCC's request is overly broad, beyond the scope of Section 4911.16, Revised Code, and unreasonably shifts cost burdens to LDCs. OCC has not identified any problems associated with the current rules or the processes in place to distribute information or for OCC to obtain information from the Commission. Additionally, while Section 4911.16, Revised Code, states that OCC shall have access to information, it does not require that LDCs provide copies to OCC. It is OCC's responsibility as the statutory representative of residential customers to obtain the information it believes is necessary to carry out its duties. While Ohio Gas routinely works with OCC to informally provide information and complies with service requirements, LDCs are under no obligation or duty to provide OCC with everything it may provide to the Commission. The Commission should deny OCC's request.

B. Rule 4901:1-13-01 - Definitions

Ohio Gas addressed the fact that the proposed definition of "bona fide dispute" is overly broad in its initial comments. OCC requests that the definition be expanded to include complaints registered with OCC's Consumer Services Department. OCC

Comments at 3. There are many reasons a customer may contact the Commission or OCC to complain that do not rise to the level of a bona fide dispute that should stay a pending disconnection or permit customers to avoid paying their bills. For example, many customers contact LDCs or the Commission simply to complain that their bills are too high. Accordingly, the definition of “bona fide dispute” should not be so broad that whether a customer contacts OCC or the Commission, registering any complaint meets the definition.

OCC also proposes a revision to the definition of “consumer” that only creates confusion. OCC’s proposed change would make it difficult for someone to read the definition and determine whether they meet it. For example, it is unclear under OCC’s proposed definition whether a person who is a guarantor but is not an end user and does not have a contract with the LDC but does have a responsibility to pay is a consumer. OCC’s request to modify the definition should be denied.

OCC proposes a new definition for “tampering.” While Ohio Gas does not necessarily disagree that a definition could be included in the Rules, OCC’s proposed definition is too narrow. Ohio Gas proposes the following definition if the Commission determines that a definition of “tampering” is necessary.

“Tampering” means to interfere with, damage, or by-pass any utility property, including but not limited to meters, with the intent to impede the correct registration of a meter or the proper function of the property.

C. 4901:1-13-03 – Record Retention

It is not clear to Ohio Gas what OCC is trying to accomplish with its proposed change to this rule. First, OCC states that a fixed three-year record retention schedule is inconsistent with current rules that establish shorter periods. OCC Comments at 5.

OCC's argument ignores the clause in Rule 4901:1-13-03(C), Ohio Administrative Code, that states, "Unless otherwise specified in this chapter...". Thus, if there are shorter retention requirements in the Chapter, this rule does not apply. However, OCC then states that due to its unsupported claim that electronic data storage costs have "dropped considerably," LDCs should be required to maintain all records for at least three years or more. OCC Comments at 5-6. Again, OCC's requested rule revision is confusing and does not add anything to the rules. Accordingly, it should be denied.

D. 4901:1-13-04 – Metering

1. 4901:1-13-04(C) – Access to the Meter

OCC seeks a revision to limit a LDC's access to its metering equipment such that the LDC may only obtain access, among other reasons, to determine that the installation of the metering equipment is in compliance with Ohio law or the Commission's rules. OCC's proposed limitation ignores the fact that LDCs are subject to federal pipeline safety requirements as well as State requirements. Accordingly, OCC's request should be denied.

2. 4901:1-13-04(D) – Meter Testing

OCC proposes changes to the meter testing rule that are redundant, costly, or do not make sense. First, OCC proposes to permit customers to request a meter test once every three years without cost. While Ohio Gas does not necessarily oppose this request, OCC also proposes to require LDCs to provide notice of the free meter test "through periodic bill inserts and through an annual notice on the bill." OCC Comments at 9. OCC fails to address the costs associated with adding language to bills and working another insert into the already full bill insert schedule. Ohio Gas believes the

notice requirement proposed by OCC should be denied. Ohio Gas and other LDCs can inform customers of the opportunity to have meters tested upon notice by the customer that they believe there may be a problem with the meter accuracy. If OCC believes additional information is necessary, it is free to advertise meter testing opportunities.

Upon a discovery of an inaccurate meter, OCC proposes to require LDCs to factor into its calculation of any overcharge "weather, changes in household size, changes in appliances, or other changes that were made in the energy profile of the dwelling." OCC Comments at 10. Such a requirement would be impractical at best and impossible at worst. OCC's request should be denied.

Finally, OCC's requests to modify Rules 4901:1-13-04(D)(2) and (4), Ohio Administrative Code, are unnecessary and do not add anything to the rules or value to customers. OCC's request to modify Rule 4901:1-13-04(D)(5)(a), Ohio Administrative Code, simply does not make sense.

3. 4901:1-13-04(G) – Meter Reading

As noted above, OCC's request to require LDCs to develop AMR implementation plans is unnecessary, will divert resources from accomplishing AMR goals, and will add an administrative hurdle that will slow the process down. OCC's request should be denied.

Additionally, OCC requests that the Commission require LDCs to perform actual meter reads every month when AMR installations in a specific geographic area of a LDC service territory are completed in accordance with the AMR implementation plan approved by the Commission. OCC Comments at 13. It is not clear to Ohio Gas how this proposal could be implemented, monitored and administrated by the LDCs and the

Commission. Like the AMR implementation plan, it is simply too expensive and impractical without any clear benefit. Accordingly, OCC's request should be denied.

OCC notes that LDCs must submit meter reading plans to the director of the Commission's Service Monitoring and Enforcement Department. OCC requests that the plans be "publicly filed and subject to comment." OCC Comments at 11. Ohio Gas believes the process already embedded in the rules sufficiently protects customers. Customers always have the opportunity to file a complaint alleging that a LDC failed to read the meter at least once in a 12-month period. OCC has not identified any problems associated with the current process. Further, it is not clear what "subject to comment" means. OCC does not identify any process for its proposed comment requirement and simply permitting OCC to comment on LDCs' meter reading plans does not provide customers any additional protections or value. Accordingly, OCC's request should be denied.

Ohio Gas has already noted that OCC's request to require evening and weekend meter reads is unsupported, not cost-beneficial and unreasonable. OCC's request should be denied.

OCC points out that Rule 4901:1-13-04(G)(3), Ohio Administrative Code, "appears to deny residential customers the opportunity for longer-term payment plans." OCC Comments at 12. While this is not a new rule, Ohio Gas agrees that there is some confusion and overlap between Rules 4901:1-13-04(G)(2) and (3), Ohio Administrative Code. However, Columbia Gas of Ohio, Inc. ("Columbia") succinctly and comprehensively addressed this issue in its initial comments. Columbia Comments at

4-7. Ohio Gas urges the Commission to adopt the recommendations made by Columbia, which will resolve OCC's concerns as well.

OCC assumes incorrectly and without any basis that there are "expectations that customers should assume responsibility for seventy days of inaccuracy in metered usage when service is initiated...". OCC Comments at 12. OCC indicates that a more "appropriate balance between consumer protection and helping utilities control costs" would be to require LDCs to actually read meters to initiate or terminate service if the meter was not read in the preceding seven days. OCC Comments at 13. OCC ignores the fact that customers do not have to assume responsibility for estimated read inaccuracy because LDCs must inform customers of their right to have an actual meter read and must actually read the meters upon customer request at service initiation or termination. The balance struck in the rules is reasonable and, thus, OCC's request should be denied.

Finally, OCC requests that the Commission "allow the natural gas company the opportunity to recover from a landlord the costs incurred in enforcing reasonable meter access when the landlord is denying access." OCC Comments at 13. While Ohio Gas does not disagree that there may be situations where the landlord and not the customer controls access to the meter, Ohio Gas believes it is beyond the Commission's jurisdiction to enforce collections by LDCs from a person who is neither a customer nor a consumer and with whom the LDC has no contractual or other relationship. A statutory change may be required to accomplish OCC's request.

E. 4901:1-13-05 – Minimum Customer Service

1. 4901:1-13-05(A) -- Service Initiation

OCC proposes that the timeframe within which LDCs must complete initiations of new service that do not require installation of pipeline be completed within two business days from November 1 through March 31. OCC Comments at 16. Without providing any examples, OCC asserts that there are many reasons why customers may not be able to provide five days advance notice of the date that service needs to be initiated. OCC Comments at 17. The winter heating season is the time of year when there are the most requests to have service that has been disconnected for nonpayment reconnected. Despite OCC's assertion, because of safety concerns, reconnections where customers are occupying the premises should take priority over new service initiations. While Ohio Gas strives to initiate service as quickly as possible at all times, the rules strike an appropriate balance that should not be changed. OCC's request should be denied.

Without explanation, OCC also requests to insert "because of customer pipeline problems," into Rule 4901:1-13-05(A)(4), Ohio Administrative Code, apparently to identify that LDCs are excused from meeting the timelines therein if the failure to complete the requested service installation is beyond the LDC's control. However, OCC's language will only cause confusion and, thus, should be denied.

2. 4901:1-13-05(C) – Scheduled Appointments

OCC states that there are no penalties for an LDC's failure to meet scheduled appointments and requests that the Commission require LDCs to credit customers the monthly customer service charge for the month in which the LDC fails to make a scheduled appointment. OCC Comments at 18, 20. Ohio Gas understands the inconvenience for residential customers associated with scheduling appointments for

utility service and strives to make every scheduled appointment or provide enough notice so that customers are not inconvenienced. However, OCC's request to penalize LDCs for the failure to meet scheduled appointments is unreasonable. First, OCC's recommendation does not account for emergency situations where LDC staff may be diverted from scheduled appointments to address immediate safety concerns. Second, the Commission has the power to enforce its rules and orders and, pursuant to Section 4905.61, Revised Code, may even order treble damages. Moreover, OCC or any customer may file a complaint. Thus, there are already adequate remedies available to residential customers. Finally, OCC's proposed penalty amount is unreasonable and unbalanced. Accordingly, OCC's request should be denied.

3. 4901:1-13-05(E)(3) – Repairs

Ohio Gas addressed its concerns regarding Staff's proposed rule that would require LDCs to complete repairs that require shutoff of service by the end of the next day after the service has been shut off. OCC's request to shorten the repair time to the same day is unreasonable as a minimum standard and should be denied.

F. 4901:1-13-06 – Customer Rights and Obligations

OCC requests that the existence of the written summary of customer rights and obligations be communicated periodically through bill inserts, that LDCs be required to make it available via their website, and that OCC should be provided an advance copy of the summary "to ensure that information is being clearly and consistently communicated to residential consumers." OCC Comments at 21-22. While Ohio Gas does not object to placing the summary of customer rights and obligations on its website, because OCC fails to address the costs associated with adding language to

bills and working another insert into the already full bill insert schedule, the Commission should deny OCC's request for the bill insert and language reminders. Also, because LDCs do not have any obligation to modify the rights and obligations summary upon OCC's request, it is not clear how providing OCC with an advanced copy would ensure that the information is being clearly and consistently communicated to customers.

OCC also requests that the Commission require that the rights and obligations summary include information on choice programs including, "the enrollment process, aggregation, and terms that are included in choice contracts, etc." Ohio Gas does not believe it is reasonable for the Commission to require LDCs to market for competitive retail natural gas service ("CRNGS") providers. Further, Ohio Gas does not have any information on the terms that may be included in a CRNGS contract. Accordingly, OCC's request should be denied.

G. 4901:1-13-07 Employee Identification

Ohio Gas agrees with OCC that LDC employees should be clearly and distinctly identifiable by customers. However, there are many instances, such as an outside meter reading, where an LDC employee may be accessing the premises when customers are not home or are on the premise for such a short time that the customer is not even aware that the LDC employee is on the premises. OCC's request to delete the "upon request" language from the rule would require LDC employees to notify customers every time they need to cross a yard or read a meter. Ohio Gas does not believe that was the intent of the rule or OCC's request. Further, identifying himself/herself, providing photo identification, and stating the reason for the visit for every meter read or other nonintrusive and mundane task will exponentially increase the

time and cost associated with those tasks. Moreover, Ohio Gas does not believe that customers want to be disturbed every time their meter is read. The rules already strike a reasonable balance between customer safety and LDC costs and, thus, OCC's request should be denied.

H. 4901:1-13-09 -- Fraud, Tampering, and Theft

OCC requests that the Commission require antitheft and anti-tampering plans to include the requirement that LDCs notify the customers who are accused of tampering and/or theft of service, and provide them with an opportunity to respond to the accusations prior to termination of service, unless such tampering or theft of service has created an unsafe condition. OCC also requests that such plans must be provided to OCC and the Ohio State Legal Services Association for comment. OCC Comments at 24.

OCC's requests should be denied. First, a requirement that an LDC employee confront a thief to accuse him of theft is downright dangerous. The Commission should refuse to subject LDC employees to such unreasonable conditions. If OCC's request is approved, either LDCs will not have any employees or they will have to significantly increase salaries and safety equipment to account for the increased risks involved in complying with this proposed rule.

Additionally, because LDCs do not have any obligation to modify the plans, it is not clear what providing OCC and OSLSA with copies would accomplish.

OCC also states that because of the potentially sensitive nature of allegations of fraud, an accused customer should have the "right to communicate directly with the department that is handling the inquiry and not through the general call center." OCC

Comments at 25. First, Ohio Gas does not have a separate department. Nonetheless, there is no way for a customer to communicate directly with anyone other than first contacting the general call center. Thus, OCC's request would simply require an added step that would slow the process of resolving issues down. OCC's request should be denied.

I. 4901:1-13-11 – Billing and Payments

1. Billing Cycles

While Ohio Gas understands OCC's urge to help customers manage budgets, OCC's request to mandate a 28 to 31 day billing period window is simply not practical or cost effective in some instances where billing cycles fall on holidays. OCC's request should be denied.

2. PIPP Bills

OCC states that in the Entry on Rehearing in the recent case in which the Commission significantly modified the Percentage of Income Payment Plan ("PIPP") program, the Commission "granted Consumer Group's request for rehearing for the purposes of determining the type of information that will be available for PIPP customers on the bill." OCC Comments at 27. As a result of OCC's description of the Commission's Entry on Rehearing in a separate case, OCC requests that an annual PIPP account summary be required and that the rules require LDCs to include numerous new items on PIPP bills. OCC Comments at 28.

OCC's description of the Entry on Rehearing is exaggerated. The Commission actually stated (in Case No. 08-723-AU-ORD):

The Consumer Groups' additional language regarding an annual statement of the customer's PIPP account was recommended in the initial

comments. At that time, the Commission considered this recommendation and determined that much of the information being requested is already available either on the monthly natural gas bill or in the information provided to PIPP customers at enrollment or reverification. Upon reconsideration of the issue, the Commission will leave open this issue for further consideration as we work through implementation issues.

In other words, the Commission did not grant OCC's request to require an annual PIPP account statement, it left the issue open for further consideration after there is some experience with the new programs once they have been implemented. On June 3, 2009, in the same case, the Commission issued an Entry noting that the rules adopted therein would become effective on November 1, 2010. Accordingly, now is not the appropriate time to require an annual statement and OCC's request should be denied.

Additionally, the information that OCC requests be added to PIPP bills is extensive and the changes requested would be extremely costly to implement. Ohio Gas believes that the information OCC requests be required on every PIPP bill is information that PIPP customers already have or could obtain upon request or is not appropriate for a bill format. For example, usage data compared with average residential usage, tips for conservation and available weatherization assistance are not conducive to a monthly bill. OCC's request should be denied.

3. Historical Usage Data

OCC's request that bills indicate whether there was an actual or estimated meter read is redundant of Rule 4901:1-13-11(B)(12), Ohio Administrative Code, and should be denied.

OCC also requests that "residential consumers shall be directed to the OCC website for the *Comparing Your Energy Choices* analysis." OCC Comments at 29. It is

not clear how LDCs should direct customers to OCC's website or whether OCC's request is limited to LDCs with choice programs. Nonetheless, it is inappropriate for LDCs to be required to advertise OCC programs. OCC's request should be denied.

4. 4901:1-13-11(C) – Late Payment Fees

OCC proposes to require LDCs to charge late fees only if the customer payment is not received by the time the next bill is generated on the basis that some LDCs may grant customers the additional reprieve from the rules. While some LDCs may have the ability to alter the timing of late payments, such an extension is not feasible without cost for Ohio Gas. Moreover, OCC's proposed extension raises the minimum standard to the most lenient option available. While the Commission may encourage LDCs to do what they can to help customers in these difficult economic times, it should not elevate the minimum standards to a timeframe beyond the date upon which LDCs have notified customers that a late fee would be incurred. It is misleading, confusing and costly. OCC's request should be denied.

5. Payment Posting

OCC requests that LDCs be required to post payments made by check or money order through the mail, by check over the telephone, by credit card, or electronically, to customer accounts immediately "upon receipt by the gas or natural gas company." OCC Comments at 35. While it appears to have been OCC's intention to reduce the time by which the payments are posted to less than two business days, the actual language may do the opposite. For example, should customers pay online, there may be instances where the bank or other service provider does not send the payment to the LDC until some time after two business days. The rule clearly encourages LDCs to post

payments as quickly as possible by using the word "immediately." The two business days serves as a reasonable maximum timeframe by which the payment must be posted. Accordingly, OCC's request should be denied.

OCC also requests that the rule regarding electronic billing prohibit any fees for electronic payments and require that electronic payments be posted immediately, despite OCC's request to have electronic payments posted upon receipt of the company in the prior rule. Irrespective of the inconsistency of OCC's requests, Ohio Gas wants to make clear that it does not have the ability to accept electronic payments without using a third party vendor and should it be prohibited from charging customers the fees associated with this option, Ohio Gas can no longer offer electronic payments as a payment option. Because Ohio Gas believes that this is an option that customers want, OCC's request should be denied.

J. 4901:1-13-12 – Consumer Safeguards and Information

OCC requests that LDCs be required to provide copies of all informational, promotional and educational materials generated for use by residential customers to OCC and that OCC shall have the right to request modifications prior to distribution. OCC Comments at 37. Ohio Gas has already noted that LDCs have no obligation to provide OCC copies of any materials. Moreover, while Ohio Gas strives to work cooperatively with OCC, OCC's request to review and seek modifications to every educational, informational or promotional pamphlet exceeds anything contemplated in Revised Code Chapter 4911 and should be denied.

III. CONCLUSION

For the reasons discussed above, Ohio Gas requests that the Commission deny OCC's requested modifications to the rules and incorporate Ohio Gas's suggestions into the proposed rules.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Reply Comments of Ohio Gas Company* was served upon the following parties of record this 8th day of June, 2009, by regular United State Mail, postage prepaid.



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