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August 18, 2009

Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

Re: Case Nos. 08-723-AU-ORD

Dear Commissioners:

Based on conversations with Commission Staff regarding Ohio Gas Company's ("Ohio Gas") May 27, 2009 waiver request, Ohio Gas submits the following clarification to its waiver request. Ohio Gas respectfully requests the Commission approve its waiver request, as submitted on May 27, 2009, with the following clarification.

To be eligible for an arrearage credit, a Percentage of Income Payment Plan ("PIPP") customer must meet all of the following three requirements:

- The PIPP customer must have been an active PIPP customer for the previous 12 month period of August 1st through July 31st.
- The PIPP customer must have made a minimum number of payments during this timeframe of 9 payments.
- The PIPP customer must have paid a minimum of 75% of their payment obligation.

A PIPP customer who qualifies under the above criteria will have 75% of his/her accounts receivable balance credited from his/her account balance. To further clarify, whatever percentage the PIPP customer pays above the 75% will be credited off at the same percentage paid (i.e. a customer who pays 100% will have their entire arrearage credited).

The following example below is illustrative of how the arrearage crediting would work:

Example of 9 payments with 75% paid: A PIPP customer's obligation is \$100 a month or \$1,200 a year. They make 9 payments totaling \$900. Current total arrearage amount is \$2,800.

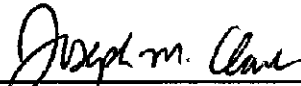
Percent of obligation paid is \$900/\$1,200 or 75%. Total arrears \$2,800 x 75% or \$2,100 would be credited to the customer's arrears reducing arrears (account balance) owed to \$700.

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Finally, Ohio Gas notes that its clarification removes the requirement that a PIPP customer be active at the same location for 12 months. Ohio Gas will implement a program that will enable it to track and grant the appropriate arrearage credits for PIPP customers that have been active for the 12 month period regardless of whether the customer remained at the same location during the 12 month period.

Thank you for your attention to this matter.

Very truly yours,



Joseph M. Clark
Attorney for Ohio Gas Company

JMC:ss

cc: Parties of Record