

FILE

OHIO CUMBERLAND GAS COMPANY

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RECEIVED-DOCKETING DIV

2009 SEP 17 PM 12:26

PUCO

September 15, 2009

Public Utilities Commission of Ohio
Attn: Docketing Division
180 East Broad Street
Columbus, Ohio 43266

(723)
RE: Case No. 08-7233-AU-ORD
Application for Waiver


Dear Sir or Madam:

Enclosed are eleven (11) copies of the Application for Waiver by Ohio Cumberland Gas Company and a self addressed-stamped envelop. Please date stamp and return one (1) copy to our office as verification that the Waiver was received in your office.

We have also mailed one (1) copy of this waiver to the Office of the Ohio Consumers' Counsel as of this date.

If you have any questions, please contact me at (740) 392-2941 or at OCGC@OhioCumberlandGas.com.

Sincerely,



Debra Epler
Office Manager

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Technician SM Date Processed SEP 17 2009

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

RECEIVED-DOCKETING DIV

2009 SEP 17 PM 12: 26

In the matter of the Commission's)
Approval of Waiver for Chapter 4901:1-19)
Pertaining to Approval of a Waiver of the)
Percentage of Income Payment Plan)
For Ohio Cumberland Gas Company)

Case No. 08-723-AU-ORD

PUCO

**APPLICATION FOR OHIO CUMBERLAND GAS COMPANY
FOR A WAIVER**

Ohio Cumberland Gas Company ("Cumberland"), the applicant in this proceeding, is a small natural gas company providing service to seventeen hundred and nine customers (1,709) in the state of Ohio, of which five (5) customers are affected by this application.

Cumberland submits this waiver to Chapter 4901:1-19 of the Ohio Administrative Code, for approval of an alternative payment plan. Exhibit A, identifying the specific customer information, is attached to this application and is incorporated herein.

Cumberland request the Commission to consider the facts and proposals set forth in this application for waiver and to approve the requested changes in the current alternative payment program.

Respectfully Submitted,



Mark R. Ramser
President

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the matter of the Commission's)	
Approval of Waiver for Chapter 4901:1-19)	
Pertaining to Approval of a Waiver of the)	Case No. 08-723-AU-ORD
Percentage of Income Payment Plan)	
For Ohio Cumberland Gas Company)	

**APPLICATION OF OHIO CUMBERLAND GAS COMPANY
FOR A WAIVER**

A. INTRODUCTION

Pursuant to Rules 4901:1-19 Alternative Rate Plan; Exemptions of the Ohio Administrative Code (O.A.C.), Ohio Cumberland Gas Company ("Cumberland") submits this Application for a Waiver of certain requirements in Chapters 4901:1-19 pertaining to the Percentage of Income Payment Plan (PIPP). In particular, Case No. 08-723-AU-ORD, which will go into effect November 1, 2010, states that the Commission waives the requirements of adopted Rules 4901:18-12 through 4901:18-17 for gas and natural gas utility companies that do not have a PIPP rider and have fewer than 15,000 customers. It is also stated:

"As for small gas and natural gas utility companies, defined as those companies with less than 15,000 customers, the Commission will continue its long standing practice of not requiring them to offer the PIPP program. However, the Commission does expect these companies to continue to work with their customers to help the customer retain utility service, just as the companies do today."

B. ARGUMENT

Cumberland seeks to eliminate the Percentage of Income Payment Plan that is now offered to customers. Whether the Percentage of Income Payment Plan was once required of all regulated natural gas utility companies, or Cumberland misunderstood the original mandate in 1983 to include all natural gas companies regardless of size, or voluntarily provided this program to its customers starting at the conception of this program, Cumberland is now requesting a waiver of this alternate payment program.

Pursuant to Case No. 08-723-AU-ORD, effective November 1, 2010, Cumberland would not be required to offer the PIPP program, Incentive programs for PIPP or the Graduate PIPP program.

Cumberland believes that implementing a change at an earlier date will assist in the transition of the rules and dramatically assist current Percentage of Income Payment Plan customers by offering a significantly longer period to repay the current arrearages, than if the program is terminated on November 1, 2010.

Cumberland is proposing to eliminate the PIPP program effective November 1, 2009, and incorporate the following program:

1. Ohio Cumberland will eliminate the current PIPP program offered by our company; however, we do not feel it prudent to discontinue the PIPP program without a transition period for those customers already on the PIPP program. Therefore, current PIPP customers would be grand-fathered into a special repayment program in which Cumberland would work with individual customers to pay off the current arrearage over the course of the next twenty-two (22) months (November 1, 2009 through August 31, 2011), thus making them eligible for the 2011-2012 Budget Plan.

2. No new or existing customers will be accepted into the PIPP program as of November 1, 2009. Cumberland will continue to work with customers requesting a payment plan to establish a mutually acceptable plan that will benefit the customer in an effort to continue service. Our goal would be to provide customers a payment plan to pay the winter usage before August 31, 2010, thus making them eligible for the upcoming Budget Plan. Ohio Cumberland has found the following plans most acceptable to our customers, and would continue these plans:

1/3 Payment Plan	At inception of plan, account balance is divided into 3 equal payments. Month 1 Customer pays 1/3 of original account balance Month 2-3 Customer pays 1/3 of original account balance plus current usage.
1/6 Payment Plan	At inception of plan, account balance is divided into 6 equal payments. Month 1 Customer pays 1/6 of original account balance Month 2-6 Customer pays 1/6 of original account balance plus current usage.
1/9 Payment Plan	At inception of plan, account balance is divided into 9 equal payments. Month 1 Customer pays 1/9 of original account balance Month 2-9 Customer pays 1/9 of original account balance plus current usage.
Personalized Payment Plan	At inception of plan, Company works with customer to establish a mutually acceptable plan that the customer can manage within their economic limitation, i.e., weekly payments, the Budget payment plus an arrearage payment, etc. We find the customer is more likely to continue to make payments if they had a part in the decision process.

3. Cumberland will continue to accept the Regular Home Energy Assistance Program vouchers to assist customers with their winter heating bills.
4. Cumberland will continue the Winter Reconnect Order as prescribed by the Commission to re-establish service during the winter heating season.
5. Cumberland will continue to notify customers of government assistance programs and assistance programs provided locally.

C. CONCLUSION

Cumberland respectfully requests that this Commission grant Cumberland's Application for a Waiver and permit Cumberland to implement the above revisions effective November 1, 2009.

Respectively submitted by:

Mark R. Ramser, President
Ohio Cumberland Gas Company
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Mount Vernon, Ohio 43050
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OCCG@OhioCumberlandGas.com

APPENDIX A

Ohio Cumberland Gas Company PIPP Customers as of September 10, 2009

Identification	Service On Date	Applied PIPP	PIPP Amt	Arrears at Application	Current Arrears	Comments
Cust. A	01/28/04	11/03/08	\$64.00	\$222.80	\$454.66	Shut Off - no payment since 04/27/2009
Cust. B	01/03/06	11/14/08	\$64.00	\$780.55	\$891.12	Past Due 1 PIPP payment
Cust. C	02/29/08	03/27/09	\$86.00	\$720.54	\$551.53	Past Due 1 PIPP payment
Cust. D	12/16/08	12/15/08	\$91.00	\$1,243.96	\$1,799.95	Previous customer - moved back on system w/ past due balance
Cust. E	10/20/95	01/31/06	\$64.00	\$480.59	\$2,039.61	