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February 19, 2010

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

RECEIVED-DOCKETING DIV
2010 FEB 19 PM 5:15
PUCO

Re: Case No. 08-723-AU-ORD, In the Matter of the Commission's Review of the Commission's Review of Chapters 4901:1-17 and 4901:1-18, and Rules 4901:1-5-07, 4901:1-10-22, 4901:1-13-11, 4901:1-15-17, 4901:1-21-14, and 4901:1-29-12 of the Ohio Administrative Code: Supplement to Notification by Waterville Gas & Oil Company

Dear Ms. Jenkins:

Waterville Gas & Oil Company has no PIPP customers served under Commission-approved rates and has no PIPP Rider in its tariff. The Company does have PIPP customers served pursuant to municipal ordinance rates enacted by the Village of Waterville.

As noted in my letter filed on February 5, 2010, Waterville Gas & Oil Company prospectively intends to follow the Commission's long standing practice of not requiring natural gas companies such as Waterville Gas & Oil Company who have fewer than 15,000 customers and no PIPP Rider to offer the PIPP Program. Waterville intends to continue to offer the PIPP program to current municipal ordinance PIPP customers. These current "grandfathered" PIPP customers shall continue to be served under Rule 4901:1-18-04 currently in effect prior to the amendments to Rules 4901:1-17 and 4901:1-18 that will be effective November 1, 2010.

At Staff's request, submitted herewith are the notices Waterville Gas & Oil Company proposes to send to customers currently enrolled in PIPP, and to customers not currently enrolled, as well as a copy of its Residential Credit and Collection Policy indicating that

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Renée J. Jenkins, Secretary

February 5, 2010

Page 2 of 2

Rule 4901:1-18-04 currently in effect until November 1, 2010 will continue to be attached to the Policy for reference of grandfathered PIPP customers.

Please contact the undersigned if any additional information with respect to this notification is needed.

Very truly yours,

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

Andrew J. Sonderman

Counsel for

Waterville Gas & Oil Company

Attachment

AJS

NOTICE TO PERCENTAGE OF INCOME PAYMENT PLAN CUSTOMER

February __, 2010

Dear Customer:

Waterville Gas & Oil Company is continuing to provide service to you under the Percentage of Income Payment Plan currently in effect as of the date of this notice pursuant to Ohio Administrative Code Rule 4901:1-18-04(B). To continue participating in the Percentage of Payment Income Plan, you must comply with all of the following requirements:

1. You must re-verify eligibility annually or sooner when there is a change in household size or income;
2. You must continue to make the required monthly PIPP payment of 10 percent of household income and not be disconnected for non-payment;
3. You must apply for all the public energy assistance for which you are eligible. Customers can contact the Ohio Department of Development at 1-800-282-0880 or <http://energyhelp.ohio.gov> to get a HEAP application; and
4. You must apply for all weatherization programs for which you are eligible.

If you do NOT meet these requirements, you will no longer qualify to participate in the Percentage of Income Payment Plan and you cannot re-qualify later.

Waterville Gas & Oil Company will continue to offer extended payment plans even if you no longer qualify for the Percentage of Income Payment Plan. These include the available Public Utilities Commission of Ohio-approved extended payment options of the one-sixth payment plan, the one-ninth payment plan effective November 1, 2010 and the one-third payment plan available during the winter heating season. Please contact a Customer Service Representative at 1-(419) 878-4972 if you have any questions.

NOTICE TO CUSTOMERS NOT CURRENTLY ENROLLED IN
PERCENTAGE OF INCOME PAYMENT PLAN

February __, 2010

Dear Customer:

Pursuant to Order of the Public Utilities Commission of Ohio, Waterville Gas & Oil Company is terminating its Percentage of Income Payment Plan (PIPP) Program to Customers who are not currently enrolled in PIPP effective as of the date of this notice.

Waterville Gas & Oil Company will continue to offer extended payment plans. These include the available Public Utilities Commission of Ohio-approved extended payment options of the one-sixth payment plan, the one-ninth payment plan effective November 1, 2010 and the one-third payment plan available during the winter heating season. Please contact a Customer Service Representative at 1- (419) 878-4972 if you have any questions.

The Waterville Gas & Oil Company
Residential Credit and Collections Policy
January 15, 2010

Residential Credit Policy and Procedure Overview

Waterville Gas & Oil Company ("Company") has established residential credit procedures following the rules of the Public Utilities Commission of Ohio set forth in Ohio Administrative Code, Chapter 4910:1-17. These procedures are administered in a nondiscriminatory manner without regard to race, color, religion, gender, national origin, age, handicap or disability and without regard to the collective credit reputation of the area in which the residential applicant or customer lives. These credit procedures are available to applicants and customers on request.

The Company follows the requirements of the rules of the Public Utilities Commission of Ohio as set forth in the Ohio Administrative Code with respect to the Establishment of Credit for Residential Service including the following rules currently in effect which are attached hereto:

1. Rule 4901:1-17-03, "Establishment of Credit"
2. Rule 4901:1-17-03, "Appendix Guarantor Agreement"
3. Rule 4901:1-17-04, "Deposit to Reestablish Creditworthiness"
4. Rule 4901:1-17-05, "Deposit Administration Provisions"
5. Rule 4901:1-17-06, "Refund of Deposit and Release of Guarantor"
6. Rule 4901:1-17-07, "Record of Deposit"
7. Rule 4901:1-17-08, "Applicant and/or Customer Rights"

The Company follows the requirements of the rules of the Public Utilities Commission of Ohio as set forth in Chapter 4901:1-18 of the Ohio Administrative Code with respect to Termination of Service including the following rules currently in effect which are attached hereto:

1. Rule 4901:1-18-02, "General Provisions"
2. Rule 4901:1-18-03, "Delinquent Bills"
3. Rule 4901:1-18-04, "Extended Payment Plans and Responsibilities"
4. Rule 4901:1-18-05, "Disconnection Procedures for Natural Gas and Electric Companies"
5. Rule 4901:1-18-06, "Reconnection of Service"
6. Rule 4901:1-18-07, "Landlord-Tenant Provisions"

In Case No. 08-723-AU-ORD, the Commission adopted changes to the Residential Credit and Disconnect Rules in Chapters 4901:1-17 and 4901:1-18, respectively, of the Ohio Administrative Code. In an entry on June 3, 2009 in that case, the

Commission postponed the effective date of those changes to November 1, 2010. **The Company will follow the amended rules effective as of that date except that the Company does not offer the Percentage of Income Payment Plan ("PIPP") to residential customers. The Amended Rules will be substituted for the currently effective rules as attachments to this Residential Credit and Collections Policy and Procedure when they become effective on November 1, 2010.**

The Percentage of Income Payment Plan Rules do not apply as a result of the Commission's reaffirmation in Case No. 08-723-AU-ORD of its long-standing policy that natural gas utilities with fewer than 15,000 customers that have no PIPP customers currently and no PIPP Rider are not required to offer PIPP (See Entry on Rehearing, p. 45). The Company has, however, agreed to continue to offer PIPP to those customers who were on the PIPP program and who continue to maintain their eligibility. Residential Customers who were enrolled in PIPP as of [notice date to customers] will continue to participate in the pre-amendment PIPP program under Rule 4901:1-1-18-04(B) (effective generally until November 1, 2010); a copy of Rule 4901:1-18-04(B) as it pertains to grandfathered PIPP customers is attached hereto.

Because the Company does not offer PIPP, references to PIPP in currently effective or amended Rule 4901:1-18-05 "Extended Payment Plans and Responsibilities", and the requirements stated in Amended Rule 4901:1-18-12 "Percentage of Income Payment Plan Program Eligibility for Gas Utility Service", Amended Rule 4901:1-18-13 "Payment Requirements for Percentage of Income Payment Plan Customers", Amended Rule 4901-18-14 "Incentive Programs for Percentage of Income Payment Plan and Graduate Percentage of Income Payment Plan Customers", Amended Rule 4901:1-18-05 "General Percentage of Income Payment Plan Provisions", and Amended Rule 4901:1-18-17, "Removal From or Termination of Customer Participation in the Percentage of Income Payment Plan" do not apply to the Company and are not (and will not in the future be) included in this Residential Credit and Collections Policy.

Collections Policy and Procedure Overview

The Company follows the procedures described herein in attempting to recover past due amounts owed by customers. These procedures are administered in a uniform, nondiscriminatory manner throughout the Company's service area, and are consistent with the rules set forth in Chapter 4901:1-18, Ohio Administrative Code, and the Company's tariff. See the attached Rules contained in Chapter 4901:1-18, attached hereto governing Delinquent Bills, Extended Payment Plans and Responsibilities, Disconnection of Service, Reconnection of Service and Landlord-Tenant Provisions

Under the Company's tariff, bills for residential natural gas service are due fourteen days from the postmarked date on the bill and are deemed to be past due if payment is not received in the Company's office by the fifteenth day from the postmark of the bill. A late payment charge of 5 percent of the customer's current monthly bill is applied to the customer account when the account is deemed past due.

Disconnection notices are provided as required by the Commission's attached rule "Disconnection Procedures for Electric, Gas and Natural Gas Utilities".¹ Customers are advised of the medical certification program in cases where there is a medical problem.

The Company offers extended payment plans agreeable to the customer and the Company. If the customer does not offer acceptable payment terms, the Company advises the customer of the available PUCO extended payment options of the one-sixth plan, the one-ninth plan effective November 1, 2010 and the one-third plan available during the winter heating season. See attached rule "Extended Payment Plans and Responsibilities". Budget payment plans are offered to customers with no arrearages once per year in August. The Company's uniform practice is to work with all customers to maintain service depending on the individual circumstances. However, if satisfactory terms cannot be reached to maintain service, the Company will disconnect the service for non-payment.

The Company takes a final meter reading when a customer moves or is disconnected for non-payment, a fraudulent act, tampering or at the request of the customer and sends the customer a final bill for all accumulated charges. In cases of a fraudulent act or tampering this bill includes estimated charges for the unauthorized service usage and any charges for damages to the Company's property resulting from the fraudulent act or tampering. Payment is due fourteen days from the postmarked date on the bill. Collection is pursued on a timely basis. The Company sends a Collection Letter to final billed customers with unpaid balances within thirty days of the due date of the final bill. If the customer does not respond by the date given in the letter and the bill is \$100.00 or more, the Company files against the customer in small claims court. After judgment is granted, the court notifies the credit bureaus of the judgment.

In Case No., 07-194-GA-AIR The Commission approved an Uncollectible Expense Rider for the Company. The rider rate can be adjusted annually on application by the Company if uncollectible expense is undercollected or overcollected by ten percent or more. The Company carries the amount billed through the bad debt rider as a liability on its books and offsets bad debt as they are written off against the liability.

The Company adds the unpaid account balance of a final billed customer's account to its Uncollectible Expense Rider sixty days following a final billed customer's last payment. Any payments received thereafter are applied immediately to the Company's Uncollectible Expense Rider.

¹ By Finding and Order entered on [insert date] in Case No. 09-1970-GA-UNC, the Company was authorized to immediately employ regular mail for the 10 day notice winter disconnect notice as will be permitted generally pursuant to amended Rule 4901:1-18-06(B) which will be effective on November 1, 2010.