

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application 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)

Case No. 08-723-AU-ORD

SUPPLEMENT TO MOTION FOR WAIVER AND EXEMPTION BY
NORTHEAST OHIO NATURAL GAS CORPORATION AND
MEMORANDUM IN SUPPORT

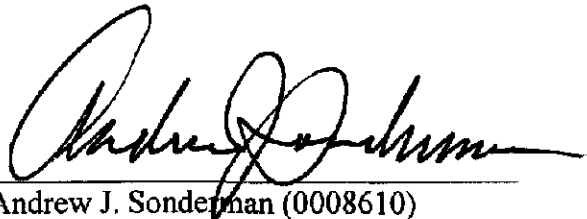
Northeast Ohio Natural Gas Corporation ("NEO" or "Movant") hereby respectfully supplements its Motion filed with the Commission on May 13, 2010 to add to the requested relief therein the following additional relief pursuant to Ohio Administrative Code 4901-1-12(A):

1. Waiver of the requirement of Rule 4901:1-18-15(D) that NEO shall include the PIPP customer's anniversary date on each monthly bill; and
2. Any and all bill formatting changes relating to the change in the name of the PIPP Program to "PIPP Plus".

A Memorandum in Support of this Motion is attached.

Respectfully submitted,

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MEMORANDUM IN SUPPORT

In support of the foregoing Motion, Northeast Ohio Natural Gas Corporation states the following:

In its May 13, 2010 Motion for Waiver and Exemption and Memorandum in Support in this proceeding NEO proposed an annual arrearage crediting mechanism for its PIPP customers in lieu of the monthly arrearage crediting required under Chapter 4901:1-18 as amended. NEO further proposed that it be exempted entirely from participation in the Graduated PIPP program for those who leave the PIPP program either voluntarily or involuntarily. Finally, it sought waiver of any bill format change requirements related to the PIPP monthly arrearage crediting and new Graduate PIPP programs in the event its Motion for waiver and exemption from participating in those programs were to be denied.

After consultation with the Commission's Staff, NEO notes that the cost of any bill formatting changes relating to the PIPP program will be disproportionately expensive when compared to the potential benefit to PIPP customers. These specifically include the

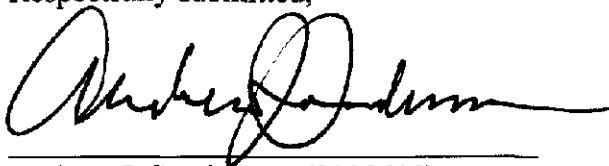
requirement in Rule 4901:1-18-15(D) that PIPP customers' anniversary dates must be included on their monthly statements. In addition, NEO understands that the program going forward is to be called "PIPP Plus" and that utilities are to reflect this name change on its monthly statements. The Company believes that the addition of the word "Plus" to "PIPP" will not add any helpful information to PIPP customers who are accustomed to the current name. NEO submits that the necessary programming changes will be costly and that its proposed modified PIPP arrearage crediting program will work effectively and transparently without them

CONCLUSION

For these reasons, good cause has been demonstrated and Northeast Ohio Natural Gas Corporation respectfully requests:

1. Waiver of the requirement of Rule 4901:1-18-15(D) that NEO shall include the PIPP customer's anniversary date on each monthly bill; and
2. Any and all bill formatting changes relating to the "PIPP Plus" Program.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion and Memorandum in Support was served upon the following parties of record electronically where indicated or by U.S. first class mail this 15th day of June 2010.

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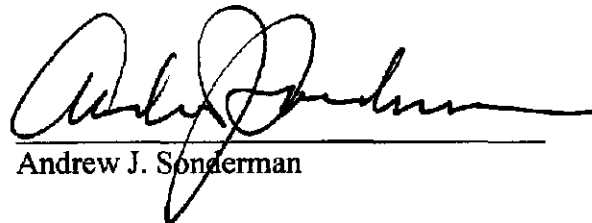
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