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In the Matter of the Application of the East Ohio Gas Company d/b/a Dominion East Ohio to File Revised Tariffs Extending Its Low Pilot Program.	))))	Case No. 10-200-GA-ATA

JOINT COMMENTS BY THE OFFICE OF THE OHIO CONSUMERS' COUNSEL, OHIO PARTNERS FOR AFFORDABLE ENERGY, THE NEIGHBORHOOD ENVIRONMENTAL COALITION, THE EMPOWERMENT CENTER OF GREATER CLEVELAND, CLEVELAND HOUSING NETWORK, THE CONSUMERS FOR FAIR UTILITY RATES, COMMUNITIES UNITED FOR ACTION, AND OHIO POVERTY LAW CENTER

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I. PROCEDURAL HISTORY

On October 15, 2008, the Public Utilities Commission of Ohio ("PUCO" or "Commission") issued its Opinion and Order ("O&O") in the Dominion East Ohio ("Dominion" or "Company") 2007 Rate Case ("2007 Rate Case"), Case No. 07-829-GA-AIR, et al. One of the issues in the rate case was the imposition of the Straight Fixed Variable ("SFV") rate design.[1] As part of the debate over the SFV rate design, the Office of the Ohio Consumers' Counsel ("OCC") and Ohio Partners for Affordable Energy ("OPAE"), the Neighborhood Environmental Coalition, the Empowerment Center of Greater Cleveland, the Cleveland Housing Network, the Consumers for Fair Utility Rates

[1] *In the Matter of the Application of the East Ohio Gas Company d/b/a Dominion East Ohio for Authority to Increase Rates for its Gas Distribution Service* ("Dominion Rate Case"), Case No. 07-829-GA-AIR, et al., Opinion and Order (October 15, 2008).

("Citizens Coalition"), (collectively "Consumer Joint Advocates")[2] opposed the SFV rate design, partly, because there was concern backed by record evidence that the SFV rate design would adversely impact low-use and low-income residential consumers. In recognition of the adverse impacts of moving to the SFV rate design on low-income residential consumers, the Commission directed Dominion to establish a one-year Pilot Program ("Pilot Program") designed to help low-income, low-use customers pay their bills.[3] In addition, the 2007 Rate Case Order stated "the Commission will evaluate the program for its effectiveness in addressing our concerns relative to the impact on low-use, low-income customers."[4] The Company filed tariffs in compliance with the Commission's directive effective March 13, 2009.[5]

On February 17, 2010, the Company filed revised tariffs requesting the Commission to authorize Dominion to extend the Pilot Program to allow the Commission and Staff time to complete the required evaluation.[6] On March 4, 2010, OCC filed its Motion to Intervene. On April 6, 2010, OPAE filed its Motion to Intervene.

On March 10, 2010, the Commission issued a Finding and Order stating:

> The Commission envisions that our review of the pilot program will include consideration of the results of staff's review of the pilot program. To that end, the Commission finds that, once staff has completed its review of the pilot program, it should file the results of its review in this docket. Upon the filing of staff's document, the Commission will establish a procedural process for consideration of the pilot program in this case.

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[2] The City of Cleveland participated as a Joint Consumer Advocate, but is not participating herein.

[3] Id. at 26-27.

[4] Id. at 26-27.

[5] Application at 1.

[6] Application at 1.

In compliance with the Commission's order, the Staff Report ("Staff Report") was filed on April 29, 2010.

On June 3, 2010, OCC, OPAE, and the Company filed Comments, and on June 17, 2010, OCC and the Company filed Reply Comments.

On September 15, 2010 the Commission issued an Entry in this proceeding directing Staff to supplement its previously filed staff report ("September 15 Entry"). The supplemental information required by the Commission is a comparison of the total annual bill incurred by customers consuming between 10 and 70 Mcf per year at 10 Mcf intervals under various scenarios.[7] On September 20, 2010, the Staff filed its supplemental report ("Supplemental Report"). The OCC, OPAE, Citizens Coalition, Communities United for Action ("CUFA") and Ohio Poverty Law Center ("OPLC") (collectively "Consumer Advocates") hereby file Comments to the Supplemental Report in accordance with the Commission's established procedural schedule.[8]

II. COMMENTS

In Dominion's 2007 Rate Case, Consumer Advocates argued that the SFV rate design has the effect of increasing the distribution cost per Mcf that a customer faces at lower consumption levels than at higher consumption levels.[9] As a result, such a rate design is inherently unfair to all low-usage customers and is particularly unfair to low-usage, low-income customers, who because of their limited means, likely live in smaller

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[7] September 15 Entry at 4.

[8] September 15 Entry at 5 (Comments due October 13, 2010 and Reply Comments due October 27, 2010).

[9] *In re 2007 Rate Case*, Staff Ex. No. 3B Puican Second Supplemental Testimony at Exhibit SEP-1A (August 25, 2008) (By way of example as usage increases the cost per Mcf decreases: 12 month usage of 5 Mcf Proposed Bill $167.25 Cost per Mcf = $33.45; 12 month usage of 100 Mcf Proposed Bill $362.72 Cost per Mcf = $3.6272; and 12 month usage of 5000 Mcf Proposed Bill $12,405.60 Cost per Mcf = $2.4811).

dwellings, such as apartments, and use less natural gas than homeowners with larger homes.[10] The Commission addressed Consumer Advocates' concern for the impact that the SFV rate design will have on Dominion's low-income customers by stating in its Opinion and Order:

> The Commission is concerned with the impact that the change in rate structure will have on some [Dominion] customers who are low-income, low-use customers. One of the major concerns raised by customers at the local hearings held in these matters was the effect a levelized rate design would have on low-use customers with low incomes. As a result, the Commission believes that some relief is warranted for this class of customers. In the Duke case, we approved a pilot program available to a specified number of eligible customers, in order to provide incentives for low-income customers to conserve and to avoid penalizing low-income customers who wish to stay off of programs such as PIPP. We emphasized in the Duke case that the implementation of the pilot program was important to our decision to adopt a levelized rate design in that case. Therefore, the Commission finds that [Dominion] should likewise implement a one-year low-income pilot program aimed at helping low-income, low-use customers pay their bills.[11]

Because of this concern, the Commission ordered Dominion's shareholders to fund a pilot program to assist its low-income residential customers faced with the onerous impacts of the SFV rate design by stating:

> As in the Duke case, the customers in the low-income pilot program shall be non-PIPP low-usage customers, verified at or below 175 percent of the poverty level. [Dominion's] program should provide a four-dollar, monthly discount to cushion much of the impact on qualifying customers. This pilot program should be made available one year to the first 5,000 eligible customers. * * *. Following the end of the pilot program, the Commission will evaluate the program

[10] *In re 2007 Rate Case*, OCC Application for Rehearing (November 14, 2008) at 14-15.

[11] *In re 2007 Rate Case*, Opinion and Order (October 15, 2008) at 26.

> for its effectiveness in addressing our concerns relative to the impact on low-use, low-income customers.[12]

The Company implemented the Pilot Program on or about March 13, 2009. Consumer Advocates argue that at a minimum the Pilot Program must continue at the current level of subscribers -- 5,000 customers --[13] funded by Dominion shareholders; however, because of the extensive benefits that Dominion derives from the SFV rate design, especially this past winter when the weather was mild, the Commission should order the Pilot Program be modified to provide a sum of money equivalent to serving 20,000 low-use low-income customers. That money derived from Dominion shareholders should be used to provide low-income customers with bill payment assistance funded by the Pilot Program's expanded dollars (e.g. $4.00 per customer per month x 20,000 customer x 12 months = $960,000). Using the dollars in this fashion will do far more to help consumers than providing an insufficient discount to a limited number of low-income customers. In the event that the Commission does not agree that a fuel fund is needed and is the best way to help customers, then the Commission should continue the discount funded to assist 20,000 customers.

A. The Staff's Supplemental Report Included The Decline Of The Natural Gas Commodity Price In Its Analysis.

The Staff filed its Supplemental Report and included the following comparative analysis of 1) bills calculated at Dominion's current rates and the rates in effect prior to the most recent rate case, and 2) bills calculated at the rates in effect prior to the most

[12] *In re 2007 Rate Case*, Opinion and Order (October 15, 2008) at 26-27.

[13] OPAE Comments at 6 (June 3, 2010) (OPAE advocated for the program eligibility to be expanded from 5,000 customers to 20,000 customers).

recent rate case and the rates that are due to take effect in October 2010. The Staff's concluded:

> Due to the significant reduction in gas prices since the rate case, the comparison shows a "breakeven" level of consumption at 31.76 Mcf per year. Above that consumption level, a customer's annual bill is actually lower than before the rate case.[14]

This statement by the Staff demonstrates that the analysis is flawed because of the significant impact that the declining natural gas commodity prices have had on customers' total bills. The Pilot Program became effective with bills rendered on or after March 13, 2009.[15] During the year in which the Pilot Program was initially offered the natural gas commodity market saw prices reach seven year lows.[16] The Commission should not use the impact that the declining natural gas commodity prices have had on the customers' total bill as justification for elimination or significant negative modification of the Pilot Program. It cannot be disputed that natural gas commodity prices are volatile and that just as easily as the prices have reached record low levels, they could suddenly increase. Because of the threat of future natural gas commodity price increases, the Commission should not consider eliminating or negatively modifying the Pilot Program.

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[14] Supplemental Report at 1.

[15] Entry (May 12, 2010) at 1.

[16] http://tonto.eia.doe.gov/oog/info/ngw/historical/2009/08 27/ngupdate.asp ("Natural gas prices at the Henry Hub fell below $3.00 for the first time since August 8, 2002, falling to $2.78 per MMbtu in trading on Friday, August 21[, 2009].").

B. Excluding the Impact Of Declining Natural Gas Commodity Prices Demonstrates How Onerous The SFV Rate Design Is On The Low-Use Customers.

The Commission should consider the impact of the SFV rate design absent the rate impact mitigation caused by the declining natural gas commodity prices. The below bill comparisons mirrors the Staff's comparisons in the Supplemental Report; however, the natural gas commodity costs have been excluded from the bill comparisons. Consumer Advocates' analysis is seen below:

CURENT ANNUAL BILL COMPARISON

Annual Usage (MCF)	Cumulative Percentage	Total Bill Pre-Rate Case	Total Bill Current	Delta Current	Percent Increase
10	0.66	$94.30	$234.69	$140.39	149%
20	1.89	$120.20	$261.42	$141.22	117%
30	4.32	$146.10	$288.15	$142.05	97%
40	9.10	$172.00	$314.88	$142.88	83%
50	17.08	$197.90	$341.61	$143.71	73%
60	28.16	$223.80	$368.34	$144.54	65%
70	40.90	$249.70	$395.07	$145.37	58%

PROJECTED ANNUAL BILL COMPARISON

Annual Usage (MCF)	Cumulative Percentage	Total Bill Pre-Rate Case	Total Bill Projected	Delta Projected	Percent Increase
10	0.66	$94.30	$258.10	$163.80	174%
20	1.89	$120.20	$280.88	$160.68	134%
30	4.32	$146.10	$303.66	$157.56	108%
40	9.10	$172.00	$326.44	$154.44	90%
50	17.08	$197.90	$349.22	$151.32	76%
60	28.16	$223.80	$372.00	$148.20	66%
70	40.90	$249.70	$394.78	$145.08	58%

An analysis comparing bills calculated at Dominion's current rates and the rates in effect prior to the most recent rate case shows the increases range from $140.39 (149%) to $145.37 (58%) for usage between 10 Mcf and 70 Mcf per year.

The same comparison of bills calculated at the rates in effect prior to the most recent rate case and the rates that are due to take effect in October 2010.shows the increases range from $163.80 (174%) to $145.08 (58%). This analysis demonstrates the onerous impact of the SFV rate design on low-use, low-income customers -- that gave rise to the need for the low income Pilot Program -- is not receding with time. With the delivery charge increase from $15.40 to $17.58 and the variable charge being eliminated altogether[17] there is a greater need for the Pilot Program -- not a lesser one. Therefore, the Commission should at a minimum order the continuation of the Pilot Program as it is currently structured, or if a change to the Pilot Program is contemplated, then the modification should include expansion of eligibility as argued below. The $4.00 monthly credit would assist consumers faced with such substantial increases.

The Staff's analysis below is distorted because it incorporates the lower natural gas commodity rate without recognizing that those rates could just as easily increase which would then magnify the need for the low income program:

> The information in Tables 1 and 2 demonstrates the impact of the decline in natural gas price in offsetting both the rate increase and the rate design change that occurred in the last rate case. At the time of that rate case the breakeven point for residential customers was calculated to be at approximately 100 Mcf per year. The decline in the gas commodity rate has reduced that breakeven consumption

[17] Staff Report (April 29, 2010) at 2.

> level to 31.76 Mcf based on current rates and to 44.47 Mcf based on rates effective October 2010.[18]

The decline in natural gas commodity rates skews the effectiveness of the Pilot Program. Therefore, it would be unreasonable for the Commission to make any decision resulting in the elimination or reduction in the Pilot Program because natural gas price volatility could later result in natural gas commodity price increases.

C. The Minimal Cost Of The Pilot Program Compared To The Benefit Of The SFV Rate Design Necessitates The Pilot Program's Expansion.

The Commission stated a concern with the impact that the change in rate structure will have on some DEO customers, and recognized that some relief is warranted for these customers. The Commission stated:

> In the Duke case, we approved a pilot program available to a specified number of eligible customers, in order to provide incentives for low-income customers to conserve and to avoid penalizing low-income customers who wish to stay off of programs such as PIPP. We emphasized in the Duke case that the implementation of the pilot program was important to our decision to adopt a levelized rate design in that case. Therefore, the Commission finds that DEO should likewise implement a one-year low-income pilot program aimed at helping low-income, low-use customers pay their bills.
>
> As in the Duke case, the customers in the low-income pilot program shall be non-PIPP low-usage customers, verified at or below 175 percent of the poverty level. DEO's program should provide a four-dollar, monthly discount to cushion much of the impact on qualifying customers. This pilot program should be made available one year to the first 5,000 eligible customers.[19]

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[18] Supplemental Report at 2.

[19] *In re Dominion Rate Case,* 07-829-GA-AIR, et al., Order at 26 (October 15, 2008).

The Commission failed to explain how DEO -- a company with almost 1.2 million residential customers or almost three times the number of residential customers that Duke has (approximately 378,000),[20] and with the well documented economic challenges in its service territory[21] -- should have such an important program that is one-half the size of Duke's.

Consumer Advocates' argument that the Commission should expand the Dominion Pilot Program to 20,000 participants. That expansion represents an increase to its present 5,000 customer level, and would roughly equate the Pilot Program to the low-income program that Duke Energy Ohio, Inc. ("Duke") was ordered to implement.[22] This argument is consistent with the argument raised by the Joint Consumer Advocates[23] in the 2007 Rate Case, and hereby continue their support for the underlying concerns that the Joint Consumer Advocates raised. Those concerns are that the Pilot Program as ordered by the Commission, for Dominion, is a smaller program than the pilot program ordered in the Duke rate case, despite the fact that Dominion is three times the size of Duke,[24] and the meager Pilot Program disregards the well documented economic problems in Dominion's service territory.[25]

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[20] http://www.puco.ohio.gov/emplibrary/files/util/utilitiesdeptreports/natlgascustchoiceenrollmentdec07.pdf (as of December 31, 2007 DEO had 1,129,559 residential customers and Duke had 378,281).

[21] *In re Dominion Rate Case,* Case No. 07-829-GA-AIR, et al., DEO Ex. No.1.1 (Murphy Direct Testimony) at 21-22 (September 13, 2007).

[22] OPAE Comments at 7.

[23] The Joint Consumer Advocates were comprised of OCC the City of Cleveland, OPAE, the Neighborhood Environmental Coalition, the Empowerment Center of Greater Cleveland, the Cleveland Housing Network, and the Consumers for Fair Utility Rates ("Citizens Coalition").

[24] OPAE Comments at 7.

[25] *In re 2007 Rate Case,* Joint Consumer Advocates Application for Rehearing (November 14, 2008) at 2.

But better than the Pilot Program, the Commission should consider using the funds -- $960,000[26] -- to establish a fuel fund for low-income bill payment assistance. To support the fact that Dominion's residential customers are facing significant challenges, Dominion recently filed an annual report of the service disconnections for non-payment ("Disconnection Report"). This report shows that between June, 2009 and May, 2010, Dominion disconnected 81,458 customers for non-payment.[27] These customers had unpaid bills totaling $56.8 million, an average or nearly $700.00 per customer. Furthermore, of the customers who were disconnected for non-payment, only 47,932 were reconnected, leaving 33,526 residential customers without gas service in Dominion's service territory.[28]

Finally, the costs of the current Pilot Program are relatively insignificant when compared to the benefits that Dominion derived from the SFV rate design. The cost of the Pilot Program to Dominion's shareholders as currently structured is approximately $240,000 per year.[29] However, this cost pales in comparison to the benefits that the SFV rate design provides Dominion and Dominion's shareholders. During Dominion's 2007 Rate Case Dominion argued that the SFV rate design was necessary in order to avoid a multitude of future rate cases.[30] To the extent that the SFV rate design enables Dominion to file fewer rate cases or to extend the time between cases, then the Company benefits from the million dollars in rate case expense that it avoids. When compared to the cost of

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[26] 20,000 customers x $4.00/month X 12 months = $960,000.

[27] *In the Matter of the Annual Report of Service Disconnections for Non-Payment Required by Section 4933.123, Revised Code,* Dominion Disconnection Report at 3 (September 23, 2010).

[28] Id.

[29] 5,000 customers x $4.00 discount per customer/month x 12 months per year = $240,000.

[30] *In re 2007 Rate Case*, Tr. Vol. II (Friscic) (August 6, 2008) at 269.

the low income program it is clear that the scale tips heavily in favor of Dominion. The other touted benefit from the SFV rate design -- addressing the problem of revenue erosion caused by declining average usage per customer,[31] an annual benefit estimated by Dominion to be $33.4 million,[32] again demonstrates the minimal cost of the pilot program compared to Dominion's benefits.

Therefore, the Commission should order the Pilot Program to be modified to serve 20,000 low-use low-income customers by requiring Dominion shareholders to provide low-income customers with bill payment assistance funded by the expanded Pilot Program dollars, or in the alternative, expanding the existing Pilot Program to provide credits to 20,000 low-income customers.

III. CONCLUSION

The Staff has conducted a supplemental analysis at a time in which natural gas commodity rates have reached seven year lows. However, as the above Consumer Advocates' analysis shows the need for the Pilot Program is not receding. Because the costs of the Pilot Program contrasted with the benefits that the SFV rate design has provided the Company and its shareholders the Commission should require Dominion shareholders to provide low-income customers with bill payment assistance funded by the expanded Pilot Program dollars, or in the alternative, expanding the existing Pilot Program to provide credits to 20,000 low-income customers.

[31] *In re 2007 Rate Case*, Dominion Ex. No. 1.0 (Murphy Direct Testimony) (September 13, 2007) at 41; See also Staff Ex. No. 3 (Puican Prefiled Testimony) (July 31, 2007) at 7.

[32] *In re 2007 Rate Case*, September 24, 2008 Oral Argument Dominion Presentation (October 8, 2008).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of these *Joint Comments by the Office of the Ohio Consumers' Counsel, Ohio Partners for Affordable Energy, the Neighborhood Environmental Coalition, the Empowerment Center of Greater Cleveland, the Cleveland Housing Network, the Consumers for Fair Utility Rates, Communities United for Action and Ohio Poverty Law Center* was served on the persons stated below via first class U.S. Mail, postage prepaid, this 13th day of October 2010.

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