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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Five-Year Review of       )  
Natural Gas Company Uncollectible       ) Case No. 08-1229-GA-COI  
Riders.       )

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**JOINT COMMENTS  
BY  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL,  
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. INTRODUCTION**

The Office of the Ohio Consumers' Counsel ("OCC"), Citizens Coalition,<sup>1</sup> Communities United for Action ("CUFA") and Ohio Poverty Law Center ("OPLC") (collectively "Consumer Advocates") submits these Initial Comments pursuant to the Attorney Examiner's November 3, 2010 and January 10, 2011 Entries and in response to the Public Utilities Commission of Ohio ("PUCO" or "Commission") request for comments concerning the Northstar Consulting Group ("Northstar") Audit Report ("Northstar Report") filed in this docket on December 9, 2010. Interested persons were provided the opportunity to file Comments and Reply Comments concerning the Audit Report by January 14, 2011 and February 11, 2011 respectively.<sup>2</sup> The Consumer Advocates appreciate the opportunity to provide comments on behalf of the approximate 3.1 million residential consumers served by Columbia Gas of Ohio, Inc. ("Columbia"), East Ohio Gas Company d/b/a Dominion East

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<sup>1</sup> Citizens Coalition is comprised of the Neighborhood Environmental Coalition, the Empowerment Center of Greater Cleveland, the Cleveland Housing Network, and the Consumers for Fair Utility Rates.

<sup>2</sup> Entry (November 3, 2010) at 4.

d/b/a Dominion East Ohio (“Dominion”), Vectren Energy Delivery of Ohio (“Vectren”), and Duke Energy Ohio (“Duke”).<sup>3</sup>

## II. PROCEDURAL HISTORY

On May 27, 2003, Columbia, Dominion, Vectren, Northeast Ohio Natural Gas Corp. (“Northeast”), and Oxford Natural Gas Company (“Oxford”) filed an Application (“Joint Application”), pursuant to R.C. 4929.11, which sought approval of an automatic mechanism to recover uncollectible expense (“UEX”).<sup>4</sup>

On August 8, 2003, OCC filed Comments opposing the Joint Application raising several issues for Commission consideration including the potential that 100 per cent automatic recovery of uncollectible expenses would reduce the utilities’ incentives to diligently manage credit and collection activities resulting in higher costs for customers.<sup>5</sup>

On December 17, 2003, the Commission issued its Finding and Order which ordered an investigation into the automatic adjustment mechanisms, including the impact of any changes to the companies’ credit and collection policies and procedures after the UEX was in effect for five years.<sup>6</sup>

On February 5, 2009, the PUCO Staff filed a report (“Staff Report”) concerning the five year review of the uncollectible riders. The Staff Report included a number of recommendations including

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<sup>3</sup> September 2010 Ohio Statistical Customer Account Receivable (“OSCAR”) Report.

<sup>4</sup> *In the Matter of the Joint Application of The East Ohio Gas Company d.b.a. Dominion East Ohio, Columbia Gas of Ohio Inc., Vectren Energy Delivery of Ohio, Northeast Ohio Natural Gas Corp., and Oxford Natural Gas Company for Approval of an Adjustment Mechanism to Recover Uncollectible Expenses*, Case No. 03-1127-GA-UNC, Application (May 27, 2003) at 1.

<sup>5</sup> *Id.* OCC Comments (August 8, 2003) at 2.

<sup>6</sup> *Id.* Finding and Order (December 17, 2003) at 15.

the extension of the UEX rider mechanism for an additional five years (without an additional Staff investigation) and an annual reporting requirement by the utilities.<sup>7</sup> On March 23, 2009, OCC filed Comments in which OCC noted that the Staff Report failed to discuss, review, analyze, or make any recommendations concerning the credit and collection practices and policies of the gas utilities.<sup>8</sup>

On August 19, 2009, the Commission issued a Finding and Order in which the PUCO ruled that a better understanding of the companies' credit and collection policies was necessary in order to determine the effectiveness of the policies in minimizing uncollectible expense. In the August 19, 2009 Finding and Order the Commission stated:

To assist the Commission with the evaluation of the companies' collection policies, practices, and performance, the Commission will issue the request for proposal (RFP) for consulting services attached to this entry. Our intention is to select a consultant to: audit, evaluate, and recommend improvements in the collection policies, practices, and performance of the four largest natural gas companies, Vectren, Dominion, Duke Energy Ohio (Duke), and Columbia; [1] evaluate whether these four companies' collection practices and policies are effective in minimizing uncollectible expense; [2] ascertain benchmarks to be used by the Commission to monitor the effectiveness of all Ohio natural gas companies' collection policies, practices, and performance; and [3] recommend "best practices" to be employed by natural gas companies in the state of Ohio to minimize uncollectible expense.<sup>9</sup>

On September 30, 2009, the Commission issued an Entry selecting Northstar to perform the audit of the credit and collection practices of the four major natural gas utilities in Ohio that have implemented UEX recovery mechanisms: Columbia, Dominion, Vectren and Duke.<sup>10</sup>

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<sup>7</sup> *In the Matter of the Five-Year Review of the Natural Gas Company Uncollectible Riders*, Case No. 08-1229-GA-COI, Staff Report (February 5, 2009) at 5.

<sup>8</sup> OCC Comments (March 23, 2009) at 4.

<sup>9</sup> Finding and Order (August 19, 2009) at 6.

<sup>10</sup> Entry (September 30, 2009) at 1.

On May 3, 2010, the Northstar Report was filed with the Commission, and specifically evaluated the credit and collection policies and practices of the Columbia, Dominion, Vectren and Duke.

On January 5, 2011, the OCC filed a Motion for a two-week Extension of the Deadline for Initial and Reply Comments and Request for Expedited Ruling. The Motion was granted by an Entry issued on January 10, 2010.

Consumer Advocates hereby file these Initial Comments (“Comments”) on the Northstar Report as provided for by the Commission’s November 3, 2010, and January 10, 2011 Entries.

### **III. RESERVATION OF RIGHTS.**

Rather than repeating arguments made in previous pleadings in this case, the OCC notes for the record that it served discovery on Columbia, Dominion, Vectren and Duke in an attempt to obtain substantive factual support for positions taken by OCC in this docket.<sup>11</sup> However, the Companies’ refusal to respond to discovery coupled with the PUCO’s failure to rule on OCC’s outstanding Motion to Compel Discovery has forced OCC to proceed with these Comments without data that the Companies have readily available. The Companies’ refusal to provide the data sought by OCC raises conjecture that such data would demonstrate that these Companies have failed to act in a reasonable manner in the pursuit of an ordinary business expense through their credit and collection practices and policies. Therefore, Consumer Advocates reserve the right to modify its stated positions in these Comments should this additional data come to light at a later date.

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<sup>11</sup> See OCC’s Motion to Compel (August 31, 2010) at Exhibits A, B, C and D (OCC’s Discovery requests are attached to the pleading).



In as much as the Companies did not respond to OCC discovery, OCC has largely relied upon the Ohio Statistical Accounts Receivable Report ("OSCAR") Report data.<sup>12</sup> OSCAR Reports are provided monthly by Columbia, Dominion, Duke, and Vectren to the PUCO Staff. These Comments demonstrate the value of the OSCAR Reports which should continue to be routinely provided to the OCC.

#### **IV. SUMMARY OF CONSUMER ADVOCATES RECOMMENDATIONS.**

Consumer Advocates propose the following recommendations intended to establish the best credit and collection practices:

- A. The Commission should adopt benchmarks (i.e. Limit UEX recovery to a percent of billed revenues) as a tool to assure the natural gas utilities are effectively managing their credit and collection policies and practices. (Comments at 15-16).
- B. The Commission should order another UEX review in 5 years (Comments at 12).
- C. The Commission should delay implementation of Northstar's recommendation to exclusively use credit scores for determining a customer's credit worthiness.

Furthermore, the Commission should assure that the Companies are not over-relying on deposits when addressing credit worthiness. The Companies should give their customers access to all options, and report, to the Commission, on a monthly basis in the OSCAR Report the number of customers who are demonstrating financial responsibility using each method. (Comments at 17-18).

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<sup>12</sup> *In the Matter 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, Entry of Rehearing, April 1, 2009, at 45-46.

- D. The Commission should require the utilities to file cost-benefit studies prior to implementing requirements for collecting mid-stream deposits. (Comments at 19-20).
- E. The Commission should require the utilities to adjust the level of the late payment fees to the extent that the implementation of mid-stream deposits mitigates the collection risk for the utility. (Comments at 20).
- F. The Commission should order the natural gas utilities to provide disconnection notices separate from the monthly billing statement. (Comments at 26-27).
- G. The Commission should order the natural gas utilities to offer extended payment plans on terms agreeable to customers. (Comments at 30-32).
- H. The Commission should require the utilities to disclose all available payment plans and to disclose the least cost option to the customer. (Comments at 32).
- I. The Commission should adopt the Northstar recommendation concerning the utilities filing reports with credit and collection information with the Commission. Consumer Advocates further suggest that such reports include information concerning the length of time that customers are without service and that the reports be filed quarterly. (Comments at 32-33).
- J. The Commission should require the utilities to adjust bill due dates to help customers who have fixed incomes better manage their utility payments. (Comments at 33).
- K. The Commission should require the utilities to annually file a meter reading plan. (Comments at 34).
- L. The Commission should evaluate the effect of the additional costs that customers incur to pay gas bills through credit cards and electronic payments to determine if these costs are affecting customer payment patterns. (Comments at 34-35).

- M. The Commission should evaluate if there are differences in the level of bad debt for choice customers compared to non-choice customers and if so, what actions can be taken to mitigate the difference. (Comment at 35-36).
- N. The Commission should order a review of the credit and collection policies and practices of the smaller local distribution companies in Ohio and adopt the best practices for implementation by the larger LDCs in Ohio. (Comments at 36-39).
- O. The Commission should disallow recovery of any bad debt expense that results from the Companies' customers who were not placed on payment plans as required pursuant to the Winter Reconnection Order. (Comment at 43).
- P. The Commission should not change the eligibility criteria for the Winter Reconnection Order as suggested by Northstar, but rather, ensure that the utilities are complying with the Order. (Comments 43-44)
- Q. The Commission should codify the temperature thresholds in the rules for weather based moratoriums and suspend disconnections when the extended weather forecast is projecting below freezing temperatures over the next five-days. (Comments at 45).
- R. The Commission should initiate a forum with all stakeholders to discuss the possibility for initiating additional conservation and weatherization programs. (Comments at 45-46).
- S. The Commission should help mitigate the effect of the reductions in LIHEAP funding and the potential increase in write-offs by encouraging all of the gas utilities to sponsor shareholder-funded community assistance programs. (Comments at 46-47).

## V. COMMENTS

### A. **The Northstar Report Demonstrates That These Four Companies' Collection Practices And Policies Are Not Effective In Minimizing Uncollectible Expense.**

The impetus for the investigation into the credit and collection policies of the gas utilities stems from Comments filed by OCC.<sup>13</sup> OCC has raised concerns with the structure and the fundamental unfairness of the UEX riders since the UEX recovery mechanisms were first proposed by the Joint Applicants. OCC asserted that the potential exists for the gas utilities to maximize shareholder value by reducing their collection costs because they are being held harmless for the affects of the resulting bad debt through the UEX recovery mechanism. It is difficult to identify any other industry or business that can cut costs related to bad debt collection -- thereby increasing its profit -- despite collecting less of the debt owed to it by customers. The Joint Applicants<sup>14</sup> responded to OCC's concern about the lack of incentives and the need for an investigation into their credit and collection practices and policies by stating:

OCC implies that approval of Application might somehow cause Applicants to relax their credit and collection efforts. But OCC ignores the fact that Applicants propose to collect through the rider only those amounts associated with final accounts. Thus, because there can be no disconnection unless the company has already **vigorously pursued collection efforts**, Applicants cannot collect through the rider any amounts associated with accounts on which there has not been such collection efforts.<sup>15</sup>

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<sup>13</sup> *In the Matter of the Joint Application of The East Ohio Gas Company d.b.a. Dominion East Ohio, Columbia Gas of Ohio Inc., Vectren Energy Delivery of Ohio, Northeast Ohio Natural Gas Corp., and Oxford Natural Gas Company for Approval of an Adjustment Mechanism to Recover Uncollectible Expenses*, Case No. 03-1127-GA-UNC, OCC Comments (August 8, 2003) at 2.

<sup>14</sup> Joint Applicants consist of Dominion, Vectren, Columbia and Duke.

<sup>15</sup> *In the Matter of the Joint Application of The East Ohio Gas Company d.b.a. Dominion East Ohio, Columbia Gas of Ohio Inc., Vectren Energy Delivery of Ohio, Northeast Ohio Natural Gas Corp., and Oxford Natural Gas Company for Approval of an Adjustment Mechanism to Recover Uncollectible Expenses*, Case No. 03-1127-GA-UNC, Joint Applicant Reply (August 19, 2003) at 7-8 (emphasis added).

The Northstar Report; however, disputes this claim while validating OCC's concerns by concluding:

**The use of 100 percent recovery riders, rather than bad debt recovery through base rates, also eliminates any risk of non-recovery for the utility. Together, these factors create the potential for higher total rates for customers.<sup>16</sup>**

The Northstar Report includes data and analysis that supports the above conclusion. Specifically, the UEX rider rates have not declined proportionate with the drop in natural gas prices and the warmer than normal weather patterns that were experienced in Ohio. In addition, there has been a significant increase in the number of service disconnections.<sup>17</sup> In other words, ratepayers are experiencing the worst of both worlds. First, because there has been a decline in natural gas commodity prices and there has been warmer than normal weather, these events should be resulting in the gas utilities experiencing uncollectible debt at the same, or potentially lower rate than was experienced prior to the approval of the UEX. After all, the utilities justified the UEX solely on the basis of volatile gas prices and unpredictable weather patterns. Second, the number of service disconnections are not an end-all measure of the reasonableness or the effectiveness of the utilities credit and collection program. These trends demonstrate that the guaranteed dollar-for-dollar recovery of uncollectible expense afford the utilities, through the UEX Riders, an opportunity not only to limit resources/costs, but also to profit from this action. This combination should convince the Commission to adopt the Northstar

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<sup>16</sup> Northstar Report at II-1. (Prior to Commission approval of the Joint Application, the gas utilities recovered uncollectible expenses as a component within their distribution rates.) (Emphasis added).

<sup>17</sup> According to the OSCAR Reports, for the 12 months ending in October 2010, there were 263,404 natural gas company disconnections including Duke Energy. For the 12 months ending October 2003, there were 172,969 natural gas disconnections including Duke Energy. The increase in service disconnections does not imply that the utilities are adequately managing credit and collection activities. In fact, the Northstar Report identifies major gaps in the gas utility credit and collection programs.

recommendations intending to improve the natural gas Companies' credit and collection policies and practices.<sup>18</sup>

The Northstar Report clearly demonstrates the inequity that can occur when good-paying customers are being held responsible for debt that is not being reasonably managed by the utility. This issue is especially pronounced in the natural gas industry where the utilities recover bad debt through both the UEX rider and the Percentage of Income Payment Plan ("PIPP") rider and are able to **effectively shift the collections risk from the utility to the customer.**<sup>19</sup> Because the credit and collection policies and practices of the gas utilities directly impact the level of the PIPP and UEX riders, Table 1 demonstrates the significant -- and increasing -- obligation that has been placed on an average residential customer in each of the natural gas utilities' service territories (assuming 95 Mcf annual usage and current prices). Between 2003 and 2010, the average residential customers in all four of the service territories served by Columbia, Dominion, Vectren, and Duke have experienced uncollectible debt increases between 1,849 percent and 206 percent.

These unprecedented increases occurred despite that fact that current natural gas commodity rates are significantly below the rates in 2006.<sup>20</sup> These increases also highlight OCC's concerns and further support the Northstar recommendations that will better balance the risk for bad debt account management between utility shareholders and customers.

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<sup>18</sup> OCC served data requests upon the individual Joint Applicants which would have fully documented this trend. The Joint Applicants refusal to provide this information is indicative of the veracity of this position.

<sup>19</sup> Northstar Report at VIII-1 (emphasis added).

<sup>20</sup> As seen in Table 3, Ohio Wellhead Prices were \$7.75 in 2006 and \$4.36 in 2009.

**Table1: Annual Cost of UEX Riders for Residential Customers**

	2003	2010	Percent Change
<b>Columbia Gas of Ohio</b>	\$4.68	\$14.30	206%
<b>Dominion East Ohio</b>	\$5.80	\$13.03	125%
<b>Duke Energy</b>	\$7.70	\$24.77	222%
<b>Vectren Energy Delivery</b>	\$3.63	\$12.86	254%

Table 2 provides a summary of the UEX rider rates that customers have been charged since the initial rate was removed from base rates through and including UEX rates that were in effect in 2010.

**Table 2: UEX Rider Rates**

	<b>Columbia</b>	<b>Dominion</b>	<b>Duke Energy</b>	<b>Vectren Energy</b>
<b>Initial Rate<sup>21</sup></b>	\$.0493	\$.0601 (East) \$.0782 (West)	\$.0810	\$.0382
<b>2004<sup>22</sup></b>	\$.2076	\$.1877	-	\$.1567
<b>2005<sup>23</sup></b>	\$.1338	\$.2531	-	\$.0923
<b>2006<sup>24</sup></b>	\$.2116	\$.2906	-	\$.1468
<b>2007<sup>25</sup></b>	\$.1631	\$.5674	-	\$.1882
<b>2008<sup>26</sup></b>	\$.2265	\$.4662	-	\$.1165
<b>2009<sup>27</sup></b>	\$.1866	\$.2133	-	\$.2115
<b>2010<sup>28</sup></b>	\$.1512	\$.1372	\$.2607	\$.1354

<sup>21</sup> Northstar Report, at II-7.

<sup>22</sup> Id.

<sup>23</sup> Id.

<sup>24</sup> See Attachment 1.

<sup>25</sup> Id.

<sup>26</sup> Id.

<sup>27</sup> Id.

<sup>28</sup> Id.

A comparison of the Ohio wellhead price by year and weather variances by year is provided in Table 3.

**Table 3: Ohio Wellhead Prices and Weather Summary**

	2003	2004	2005	2006	2007	2008	2009
<b>Ohio Wellhead Prices \$/MCF<sup>29</sup></b>	\$5.90	\$6.65	\$9.03	\$7.75	\$7.59	\$7.88	\$4.36
<b>Weather Variance</b>			-182 <sup>31</sup>	-872 <sup>32</sup>	-462 <sup>33</sup>	-97 <sup>34</sup>	-273 <sup>35</sup>

The significant drop in the natural gas commodity prices and warmer than normal weather patterns<sup>36</sup> - factors completely **outside** the Companies' control<sup>37</sup> -- rather than improvements in the natural gas companies' credit and collection policies and practices -- factors completely **within** the Companies' control, have played an important role in the declining UEX rates in 2010.

**B. The Northstar Report Proposes Benchmarks To Be Used By The Commission To Monitor The Effectiveness Of All Ohio Natural Gas Companies' Collection Policies, Practices, And Performance.**

Prior to selecting a consultant to review the credit and collection policies and practices of the gas utilities, the Commission articulated the requirements for the audit in a Request for Proposal

<sup>29</sup> Annual Ohio Natural Gas Wellhead Price, [www.eia.gov/dnav/ng/hist/na1140](http://www.eia.gov/dnav/ng/hist/na1140).

<sup>30</sup> The weather variance is based upon the sum of the number of heating degree days by year for Columbus, Cincinnati, Dayton, Toledo and Cleveland as an average for each year compared with the normal number of heating degree days for these five cities expressed as an average for the five cities. See Attachment 2.

<sup>31</sup> 2005 Weather Variance = 5640 - 5822 = -182.

<sup>32</sup> 2006 Weather Variance = 4959 - 5822 = -863.

<sup>33</sup> 2007 Weather Variance = 5360 - 5822 = -462.

<sup>34</sup> 2008 Weather Variance = 5725 - 5822 = -97.

<sup>35</sup> 2009 Weather Variance = 5549 - 5822 = -273.

<sup>36</sup> Annual Ohio Natural Gas Wellhead Price, [www.eia.gov/dnav/ng/hist/na1140](http://www.eia.gov/dnav/ng/hist/na1140).

<sup>37</sup> *In the Matter of the Joint Application of The East Ohio Gas Company d.b.a. Dominion East Ohio, Columbia Gas of Ohio Inc., Vectren Energy Delivery of Ohio, Northeast Ohio Natural Gas Corp., and Oxford Natural Gas Company for Approval of an Adjustment Mechanism to Recover Uncollectible Expenses*, Case No. 03-1127-GA-UNC Joint Application (May 7, 2003) at 2 (The Companies acknowledged this very fact.).



("RFP").<sup>38</sup> Specifically, the Commission required that the consultant:

Recommend an industry benchmark for uncollectible debt as a percentage of total revenue (or similar measure) based on the best practices of natural gas utilities in other states.<sup>39</sup>

The Commission stated its intent to use the Northstar Report as a tool to help create benchmarks that the Commission could then use to monitor the effectiveness of the utility collection practices in minimizing uncollectible expense.<sup>40</sup> Consumer Advocates support the development of benchmark standards for uncollectible debt and asserts that such benchmarks, if properly designed, could serve as an important tool towards ensuring that the utilities are actually and effectively managing their credit and collection activities instead of simply relying on the UEX Rider for collection.

The Northstar Report recommended a benchmark for Commission consideration that would have the effect of limiting the natural gas utility's recovery of bad debt expense. The Northstar Report recommends:

a range of 1.5 to 2.5 percent for non-PIPP bad debt expense (depending on the service territory) would represent a reasonable target; however, as the economy improves or gas prices increase, this range may no longer be appropriate.

Consumer Advocates concur that Northstar has presented a reasonable range for a benchmark for the Commission to implement that would give the utility a chance to recover a reasonable level of expense, but would also hold the utility accountable for failure to manage its debt account portfolio in a reasonable manner.

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<sup>38</sup> Finding and Order (August 19, 2009) at Request for Proposal No. S 09-CC-1 p. 2.

<sup>39</sup> Id.

<sup>40</sup> Finding and Order (August 19, 2009) at 6.

A comparison of the projected bad debt write off as provided in the annual gas utilities' UEX filings with the total revenues provided in the annual reports can be found in Table 4<sup>41</sup> which demonstrates the bad debt write-offs have grown substantially since the utilities were given the authority to recover bad debt through the UEX riders.

The level of the bad debt write-off is directly related to the effectiveness of the credit and collection policies and practices used by the utilities. It is noteworthy that, in 2003, when the recovery of bad debt was embedded in the base rates, the percentage of bad debt compared to total revenues was considerably less than it is now. The implementation of a maximum UEX recovery level based upon a percentage of total revenues (e.g. 1.5% to 2.5%) would provide an incentive for the natural gas utilities to focus efforts and company resources on the efficient management of its bad debt accounts instead of being able to sit back and collect the bad debts through the UEX Riders.

The Northstar Report looked at a modified benchmark approach that is being reviewed in Michigan. The Michigan Model is described in the Northstar Report as follows:

Michigan is moving towards adoption of a bad debt tracker mechanism for its utilities MichCon Gas has had a bad debt tracker account for several years that establishes a base level of bad debt in a rate case, with an annual up/down adjustment mechanism if actual bad debt differs from the adopted level. The MichCon program provided a 90/10 split both above and below the rate case level - if bad debt was higher than the adopted level, the company was only allowed to recover 90 percent of the difference through the tracker, and if it was low[er] than adopted, the company was able to retain 10 percent of the savings. The commission has nine rate cases open currently, all but one of which has proposed a similar bad debt tracker mechanism. In these open cases, the commission is moving towards an 80/20 split both above and below the level of bad debt set in the rate cases. The "target" bad debt level in the initial MichCon case was set as the average of the prior three years experience. The open rate cases are shortening the look-back period, but the actual period varies case by case. Bad

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<sup>41</sup> See Exhibit 1.

debt expenses for utilities in Michigan have doubled, and in some cases tripled, in the past few years, motivating the utilities to propose the tracker mechanism so they can obtain more rapid recovery of the increasing bad debt write-offs.<sup>42</sup>

### **C. Consumer Advocates Recommended Benchmark**

The Consumer Advocates support the establishment of a target level of between 1.5 and 2.5 percent of total write-offs compared to billed revenues, as recommended by Northstar.<sup>43</sup> For example, if the utility experiences greater than 2.5 percent write-offs, then the utility could recover the target level plus 80 percent of the write-offs in excess of the 2.5 percent target in year one. The recovery amount above the 2.5 percent target would then decrease during the subsequent four years. In year two, the Companies could recover 60 percent of the write-offs greater than the 2.5 percent target. In year three, the Companies could recover 40 percent of the write-offs greater than the 2.5 percent target. In year four, the Companies could recover 20 percent of the write-offs greater than the 2.5 percent target. Finally, in year five, the Companies could recover none of the write-offs greater than the 2.5 percent target. However, if during the next five years, the utility experiences write-offs of less than 2.5 percent of total billed revenues, then the utility could keep 10 percent of the savings experienced during any year during that five year period. The implementation of such a mechanism would place a reasonable limit on dollar-for-dollar recovery under the existing UEX recovery mechanisms, and would only reward the utility for credit and collection practices that resulted in minimizing write-offs. The Commission should consider scheduling another UEX review in five years.

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<sup>42</sup> Northstar Report at A-2.

<sup>43</sup> Northstar Report at I-18. See also VIII-2 (Discussion of the Michigan Model for bad debt trackers).

A benchmark system offers an additional benefit for the Commission to consider. The Objectives and Scope section of the RFP used by the Commission in this case included the following bullet listing the objectives of this audit: “[t]rain selected Commission Staff to perform similar audits in the future.”<sup>44</sup> The benchmark system provides the Staff with a manageable and efficient means of reviewing the recovery under the UEX riders. Finally, the benchmark also serves as a tool that limits the utility’s recovery, and puts the onus on the utility to implement the best credit and collection policies and practices designed to minimize write-offs.

**D. The Northstar Report Recommended “best practices” to be Employed by Natural Gas Companies in the State of Ohio to Minimize Uncollectible Expense.**

**1. Strategy and Organization.**

Consumer Advocates aver that much of the increase experienced in the UEX rates these past five years is a direct result of the business decisions that these Companies have made. Because the Companies get dollar for dollar recovery of this bad debt through a rider they have no incentive to invest the necessary capital in the reasonable effort to collect that very same bad debt. Much of OCC’s discovery requests that were directed to Columbia, Dominion, Vectren and Duke were geared to understanding the resources that these companies allocated to the collection of bad debt prior to the implementation of the UEX Riders and resources that are employed today. Because the requested information was not provided, and the PUCO did not rule on OCC’s Motion to Compel; therefore, OCC is not in a position to address this issue further, at this time.

The Commission should grant OCC’s Motion to Compel, and order the Companies to respond to OCC’s discovery; thus OCC reserves the right to supplement these Comments.

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<sup>44</sup> Finding and Order (August 19, 2009) at Request for Proposal No. S 09-CC-1 p. 3.

## 2. Deposits.

Northstar recommends that third-party credit scores be integrated in the assessment for when to require customers to pay a deposit.<sup>45</sup> While the use of “quick and inexpensive” credit checks are permitted by Ohio Adm. Code 4901:1-17-03, the preference of one means to demonstrate credit worthiness (e.g. payment of a deposit) over another (i.e. guarantor arrangement) is not supported by the rules and may not be in the public interest. While Consumer Advocates are not encouraging the increased imposition of security deposits, the gas utilities do need however, to comply with the creditworthiness requirements in Ohio Adm. Code 4901:1-17.

Deposits can be expensive and can hinder customers from obtaining access to essential utility services.<sup>46</sup> To the extent that customers are unable to afford deposits, the lack of access to essential utility service can threaten public health and safety.<sup>47</sup> In addition, Customers who do not have a credit score, or have a credit score that is based on a history of payments for non-utility services can be negatively impacted by having to pay a deposit. Furthermore, while Northstar prefers the use of third-party credit scores, Northstar did not demonstrate how reliance on credit scores -- and the requirement of a deposit -- are any more effective than any of the other alternative means that are available pursuant to the Commission rules for customers to demonstrate financial responsibility.<sup>48</sup>

Use of credit scores also raise another concern because credit scores are based on payment records for non-utility product purchases. Thus, the use of credit scores in determining when to assess

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<sup>45</sup> Northstar Report at IV-8 and IV-10.

<sup>46</sup> Ohio Adm. Code 4901:1-17-03 enables deposits to be calculated based on 130% of an average monthly residential natural gas bill.

<sup>47</sup> Access to Utility Service, 3.8.1, Page 100.

<sup>48</sup> Ohio Adm. Code 4901:1-17-02 provides for five alternative methods in which customers can demonstrate financial responsibility including the use of a financially responsible freeholder of property, creditworthiness with a similar utility, use of a guarantor, a quick and inexpensive credit check, or a deposit.

deposits can potentially undermine the utilities duty to provide service.<sup>49</sup> Payment history for non-utility goods and services are not necessarily representative of what the customer's payment history will be for utility service. When balancing a family budget, many customers will choose paying utility bills first to keep vital services and pay additional interest on credit card debt pushed further into the future.

Another consideration is that the use of credit scores can have a disparate impact on certain vulnerable customers.<sup>50</sup> Studies have shown that African-Americans and Latinos are more likely than whites to have lower credit scores and many minority customers lack the credit history that is needed to even generate a credit score.<sup>51</sup> Given the current levels of poverty in Ohio and the changing ethnic population in the state, the use of credit scores should be approached with considerably more diligence than what is recommended by Northstar. At a minimum, Consumer Advocates recommend that the Commission delay consideration of preferring the use of credit scores in determining when deposits are to be imposed until the credit rules prescribed in Ohio Adm. Code 4901:1-17 are reviewed again pursuant to the five year review required by the Joint Committee on Agency Rule Review. Consumer Advocates note that there are considerable differences in the collection practices of deposits between the utilities. As found later in the report, .2% of Dominion customers were assessed a deposit last year compared with 4.1% of Columbia customers, 4.5% of Vectren customers, and 14.4% of Duke customers.

Moreover, Northstar observed that Columbia and Vectren do not have the capability to assess mid-stream deposits as supported by rules and recommends that both evaluate the cost effectiveness of

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<sup>49</sup> Access to Utility Service, Regulated, National Consumer Law Center, Fourth Edition, 2008, Section 3.7.4.4 at 92.

<sup>50</sup> Id. at 93.

<sup>51</sup> Id.

implementing such changes in their billing systems.<sup>52</sup> However, Northstar did not evaluate the effectiveness of mid-stream deposits or the impact that collection of mid-stream deposits will have on the UEX rate and balance. While Consumer Advocates do not intend to reargue the merits of mid-stream deposits in this venue, there are several aspects of using mid-stream deposits that should be considered before requiring the utilities to implement collection of such deposits.

First, the utilities have long-claimed that the complexity of their billing systems and expense involved in modifying their billing systems to meet Commission requirements preclude such action.<sup>53</sup> In a recent case, the Commission gave the utilities almost a year and a half to implement changes in the percentage of payment levels and arrearage crediting provisions for low-income customers on the PIPP.<sup>54</sup> Implementation of mid term deposit requirements can be significant and include costs that the Companies already pass through to all ratepayers.<sup>55</sup> Therefore, before the Commission requires the Companies to assess mid-stream deposits, the Commission should conduct an investigation into the utility billing systems to better understand the costs associated with such requirements.

Second, to the extent that customers are unable to pay the mid-stream deposit, their natural gas service is placed at risk and the gas utilities forego revenues that are lost when service is disconnected. This is especially true for those customers who pay, but may be inclined (for whatever reason) to pay after the due date. To the extent that the overall risk for non-payment and permanent loss of revenues of natural gas service is low, the mid-stream deposit is not mitigating any real risk for the utility.<sup>56</sup> In

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<sup>52</sup> Northstar Report at I-9 and I-17.

<sup>53</sup> *In the Matter 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, Entry on Rehearing (April 1, 2009) at 40 (the Commission acknowledges the arguments of the gas utilities who are proposing an 18 month delay in implementation of requirements).

<sup>54</sup> *Id.* Second Entry on Rehearing, (June 3, 2009) at 2.

<sup>55</sup> Northstar Report, at I-9.

<sup>56</sup> Access to Utility Service, Section 3.8.3, at 101.

fact, the revenues that the utilities collect in late payment fees and charges may be more than sufficient to make the utilities whole.<sup>57</sup>

If the Commission considers ordering the utilities to implement mid-stream deposits, Consumer Advocates recommend that at a minimum, the Commission should first require the utilities to perform and file a cost-benefit study in this docket. The cost-benefit study should identify only those revenues that it expects to collect with a mid-stream deposit that it would otherwise be unable to collect without a mid-stream deposit. In addition, the utilities should only be collecting mid-stream deposits if they are able to demonstrate that they actually face a permanent collection risk. A slow or late paying customer does not necessarily pose a collection risk, and such customers compensate the Company through the assessed late fee. Therefore, to the extent the Company collects a mid-stream deposit, for the perceived collection risk, the utility should be required to reduce the level of the late payment charges to the extent that its collection risk is mitigated through the use of mid-stream deposit.

While the payment of deposits is one method in which the Commission rules allow customers to demonstrate financial responsibility, there are other methods prescribed in the rules.<sup>58</sup> The other methods also include demonstration that the customer is a financially responsible freeholder of property, creditworthiness with a similar utility, a credit check, or a guarantor.

For reporting purposes however, the gas utilities are only required to provide the number of deposits that are collected each month in the OSCAR Reports. Without knowing the number of accounts in which customers demonstrated financial responsibility using one of the other methods

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<sup>57</sup> The gas utilities are able to assess late payment charges at a rate of 1.5% on unpaid balances after the due date on the bill or 18% annually.

<sup>58</sup> Ohio Adm. Code 4901:1-17 Creditworthiness for Residential Utility Consumers.



prescribed in the rules, there is a lack of data that is needed to evaluate the effectiveness of the credit program.

Table 5 provides the number of deposits that were collected by the gas utilities during select years. The number of deposits collected in these four years indicate a declining trend for Columbia Gas and Dominion whereas Vectren and Duke have apparently increased reliance on security deposits. However, the ability to accurately evaluate the effectiveness of the risk mitigation by the utilities is limited because data is not available for the number of customers who demonstrate financial responsibility as a freeholder of property, creditworthiness with a similar utility, through credit check, or guarantor.

**Table 5: Number of Deposits Collected by Gas Utilities  
(2003, 2005, 2007, and 2009)<sup>59</sup>**

	<b>Columbia</b>	<b>Dominion</b>	<b>Vectren</b>	<b>Duke</b>
<b>2003</b>	86,963	37,090	N/A	30,964
<b>2005</b>	108,690	11,540	13,309	42,088
<b>2007</b>	69,748	12,514	13,405	54,337
<b>2009</b>	56,436	3,166	17,643	73,684

As part of the annual UEX filings, the Commission should require the Companies to demonstrate how they are using the credit worthiness tools that are provided in the Commission rules to reduce write-offs. Monthly OSCAR Reports should be expanded to include the methods and total number of customers who are using each method to demonstrate financial responsibility. The Commission should disallow recovery of any bad debt expense through the UEX Rider where the gas utilities are not adequately managing the credit and worthiness requirements pursuant to Commission rules.

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<sup>59</sup> See attachment 3.

Finally, the utilities should be required to mitigate, to the extent possible, the effect that initial deposits, as well as, mid-stream deposit will have on customers. In this regard, Consumer Advocates recommend that the deposits be billed in three equal installments rather than in a single payment.

### **3. Termination and Payment Arrangements.**

#### **a. Disconnection Issues.**

Disconnection should be a collection remedy of last resort, and evaluation of a company's credit and collection practices should include a determination as to how effectively and how aggressively the company uses alternative measures -- including extended payment arrangements -- to minimize the necessity for disconnection. Furthermore, these Comments should **NOT** be construed as a recommendation for the Companies to increase their disconnection activities. The Companies should dedicate corporate resources to earlier intervention, and liberalized/customized payment plans intended to give customers a realistic opportunity to address their utility obligation in a timely manner before the arrearage grows to unmanageable levels. It is apparent from the Northstar report that some companies offer no payment arrangements other than the minimal six-month plan<sup>60</sup> required by Ohio Adm.Code 4901:1-18. Companies have and should use the flexibility to go beyond that minimum six-month payment plan option.<sup>61</sup>

Disconnection notices should be accompanied by a clear and affirmative offer by the utility to implement a realistic and affordable extended payment plan. The more important criteria for evaluating credit and collection practices are early intervention in the collection process and clear and

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<sup>60</sup> In accordance with the latest amendments, this would now be 9 months instead of 6 months.

<sup>61</sup> This is discussed more extensively in the next section, "Payment Plan Issues."

consistent communications with customers are imperative. The following analysis demonstrates that these criteria have not been included in the Companies' credit and collection practices.

Disconnection practices are an integral component in the success of the utility collection activities and is a tool that must be diligently managed. However, the public interest is not served when the utilities are communicating inconsistent and arbitrary credit and collection policies to the public. The Commission should take steps to discourage collection policies that result in disconnection notices being provided with unrealistic shut-off dates (e.g. threatening shut off in 14 days when the Company knows that it does not intend to disconnect pursuant to the notice). After receiving multiple such notices, customers may mistakenly believe that natural gas service will not be disconnected. When the time finally arrives and the utility decides to take disconnection action, the arrearage is typically so great that the customer has little -- if any -- opportunity to maintain service. Effective credit and collection policies and practices include early and consistent intervention collection efforts.

Table 6 illustrates this point. Summary data including disconnections for select months and different measures of the level of delinquency customers experienced , as well as, Commission-ordered payment plans for each month, the number of disconnection notices rendered and the average amount of delinquency.

**Table 6: Disconnection and Arrearage Data  
(2003-2010)**

<b>Date</b>	<b>Disconnections<sup>62</sup></b>	<b>Average Disconnection Amount<sup>63</sup></b>	<b># Customer non-PIPP Payment Plan<sup>64</sup></b>	<b>Average Arrears 60 days<sup>65</sup></b>	<b>Disconnect Notices<sup>66</sup></b>	<b>Percent of Disconnects to Notice<sup>67</sup></b>	<b>Average Delinquent Amount<sup>68</sup></b>
<b>Mar. 2003</b>	10,422	\$565.29	72,116	\$629.06.94	245,977	4.2	\$399.691
<b>Sept. 2003</b>	21,321	512.72	83,662	511.66	225,215	9.5	322.86
<b>Mar. 2004</b>	33,542	185.43	82,670	736.44	381,914	5.1	326.155
<b>Sept. 2004</b>	19,602	652.58	67,116	622.54	186,858	10.5	367.47
<b>Mar. 2005</b>	9,692	559.23	85,096	836.70	345,317	2.8	393.86
<b>Sept. 2005</b>	10,689	961.90	73,872	697.31	183,861	5.8	434.14
<b>Mar. 2006</b>	11,291	664.40	97,767	922.51	396,376	2.8	479.99
<b>Sept. 2006</b>	21,164	734.27	99,788	745.36	217,184	9.7	396.51
<b>Mar. 2007</b>	11,052	795.42	85,036	957.02	381,355	2.9	469.34
<b>Sept. 2007</b>	20,395	1083.36	88,4287	778.21	195,410	10.4	402.50
<b>Mar. 2008</b>	10,270	525.24	92,945	1,009.32	370,949	2.8	465.40
<b>Sept. 2008</b>	23,636	653.93	82,476	870.783	208,524	11.3	423.88
<b>Mar 2009</b>	18,241	470.07	10,7492	1,118.90	393,427	4.6	490.02
<b>Sept. 2009</b>	25,907	418.53	90,188	910.43	205,710	12.6	339.45
<b>Mar. 2010</b>	17,972	397.26	96,539	1,066.43	337,542	5.3	391.11
<b>Sept. 2010</b>	24,970	\$495.47	63,005	\$1,028.82	217,187	11.5	\$388.68

The data presented in Table 6 demonstrates there is little correlation between the number of disconnections and the number of disconnection notices rendered in a given month -- as only

<sup>62</sup> See Attachment 4, Column 8.01 on OSCAR Report.

<sup>63</sup> See Attachment 4, Column 9.01 ÷ by Column 8.01 on OSCAR Report.

<sup>64</sup> See Attachment 4, Column 1.04 on OSCAR Report.

<sup>65</sup> See Attachment 4, Column 1.07 ÷ by Column 1.06.

<sup>66</sup> See Attachment 4, Column 10.01 on OSCAR Report.

<sup>67</sup> See Attachment 4, Column 8.01 ÷ by Column 10.1 (x 100).

<sup>68</sup> See Attachment 4, Column 10.02 ÷ by Column 10.01.

approximately between 2.8 percent – 12.6 percent of disconnection notices actually result in disconnections. While Consumer Advocates are concerned with even the smallest percentage level of disconnections, a greater concern lies with the significant number of notices that the Companies have sent customers with no intention to disconnect. This calls into question the effectiveness of the disconnection notices as a tool in helping customers avoid disconnection. In addition, the 140 percent increase in service disconnection<sup>69</sup> demonstrates the failure of the utilities to diligently manage the uncollectible accounts because during the same period of time the average arrearages for customers greater than sixty days past due have increased, 101 percent from September 2003 to September 2010.<sup>70</sup> Therefore, customers are experiencing the worst of both worlds – increased disconnections and increasing UEX Rider rates.

The Northstar Report appears to have reached the same conclusion albeit based on an evaluation of different data. The Northstar Report included a discussion of issues surrounding the utilities' disconnection practices that were not deemed to be considered a "best practice." Northstar observed delays in the disconnection practices beyond the time frames provided for in the Commission's rules.<sup>71</sup> Ohio Adm. Code 4901:1-18-06(A) provides for at least fourteen-day advance notice prior to disconnection of service for situations involving non-payment. Ohio Adm. Code 4901:1-18-04(A)(1) defines delinquency as when an unpaid previous balance for regulated service is not paid by the due date of the following bill. During the winter months, Ohio Adm. Code 4901:1-18(B)(1) requires an additional 10-day advance notice. Northstar observed circumstances in which the gas utility collection policies and practices would result in a resetting of the disconnection process

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<sup>69</sup>  $24,970 - 10,422 = 14,548$   $(14,548 \div 10,422) \times 100 = 140\%$ .

<sup>70</sup>  $\$1028.82 - \$11.66 = \$517.16$   $(\$17.16 \div \$11.66) \times 100 = 101\%\%$ .

<sup>71</sup> Northstar Report at Exhibit III-2.

every 60 days, thereby significantly extending the time frame for disconnection of otherwise delinquent accounts -- and likely increasing the amount owed by customers to even greater and more unmanageable levels.<sup>72</sup> Northstar's evaluation of Duke's performance, for example, is specifically critical of Duke's inability to address account delinquencies in a timely manner.<sup>73</sup>

The Northstar Report also identifies issues with Dominion's collection policies and practices, and determined that Dominion is not effective at managing its uncollectible accounts. Northstar added that Dominion does not have an effective collection strategy to guide its collection efforts.<sup>74</sup> This is especially noteworthy in light of the fact that Dominion UEX and PIPP Riders combined are a **staggering \$1.85 per Mcf.**<sup>75</sup> The Northstar Report affirmed a belief that Dominion is not intervening early enough in the collection process in order to help customers avoid loss of service, but instead, is allowing the arrearages to build to unmanageable 90-plus day arrears levels.<sup>76</sup> Even more remarkable, Dominion appears to have no rationale for their credit collection policies and practices. When asked, by Northstar, why the Company resets the termination clock each time a customer is billed, the Company responded "it was instructed to do so by the PUCO Staff."<sup>77</sup>

This issue reaches the core of a long standing concern by Consumer Advocates that disconnection notices should be provided separately from the bill.<sup>78</sup> Dominion and perhaps other gas utilities provide reminder notices on bills when certain delinquency dollar thresholds are not met and

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<sup>72</sup> Northstar Report at III-13 and III-19.

<sup>73</sup> Northstar Report at III-25.

<sup>74</sup> Northstar Report at III-19.

<sup>75</sup> See Attachment 1.

<sup>76</sup> Northstar Report at III-19.

<sup>77</sup> Northstar Report at III-19, (9).

<sup>78</sup> *In the Matter 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, Consumer Group Initial Comments (September 10, 2008) at 91.

no further action is taken on these accounts.<sup>79</sup> Reminder notices do not comply with the Commission standard for disconnection notices and may not include the information customers need to help avoid disconnection.<sup>80</sup>

The use of dollar thresholds in determining collection action may be appropriate. However, the thresholds should not be used as a reason for not pursuing collections. Early intervention by the utilities with a goal of working with customers to obtain delinquent payment can prove invaluable to reducing UEX costs.

The American Gas Association (AGA) recently produced a survey of arrearages and disconnection data of its members as shown in attachment 5.<sup>81</sup> The survey provided a geographical comparison of the changes that have occurred in arrearages and disconnection data over the last year for different regions in the country. Ohio is represented in the East North Central Region along with Wisconsin, Illinois, Indiana, and Michigan. Consumer Advocates compared arrearage and disconnection data that is provided by the gas utilities in the OSCAR reports for August, September, October 2009 with the same data set provided by the utilities in August, September, and October 2010. Table 7 provides a comparison of the 2009 to 2010 Ohio arrearage and disconnection data with the East North Central Region summary provided in the AGA survey.

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<sup>79</sup> Northstar Report at III-15.

<sup>80</sup> Ohio Adm. Code 4901:1-18-06(A)(5) specifies the content of disconnection notices including the requirement that a disconnection notice be prominently identified accordingly.

<sup>81</sup> American Gas Association Utility Customer Arrearage and Disconnect Survey (Fall 2010) Attached hereto as Attachment 5.

**Table 7: Comparison of Arrearage and Disconnection Data**

	<b>East North Central Region</b>	<b>Ohio (August – October 2009 Compared with October – August 2010)<sup>82</sup></b>
<b>Change in Dollar Amount of Customer Arrearages</b>	-18.2%	13.4% <sup>83</sup>
<b>Change in Number of Customers with Arrearages</b>	-8.3%	4.1% <sup>84</sup>
<b>Percent of Customers Currently in Arrears</b>	14.2%	17.9% <sup>85</sup>
<b>Change in Amount Owed By Disconnected Customers</b>	-22%	15.4% <sup>86</sup>
<b>Change in the Number of Disconnections</b>	-2.2%	-.5% <sup>87</sup>
<b>Customers Currently Disconnected</b>	5.1%	2.1% <sup>88</sup>

While the total customer arrearages dropped in the East North Central Region by -18.2 percent from 2009 to 2010, the average 60 day customer arrearages in Ohio grew by 13.4 percent for the period August – October 2009 compared with August – October 2010. In addition, while the number of customers who were in arrears by 30 days decreased by 8.3 percent for the East North Central Region, Ohio experienced a 4.1 percent increase in the total number of customers who were in arrears by at least 30 days and who received disconnection notices.

In the East North Central Region, 14.2 percent of the customers were in arrears at the time the survey was conducted. In Ohio, 17.9 percent of the natural gas customers were in arrears and receiving termination notices during the August to October 2010 time period. Concerning

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<sup>82</sup> See Attachment 6.

<sup>83</sup>  $\$1109 - \$978 = \$131 / \$978 \times 100 = 13.4\%$ .

<sup>84</sup>  $482,117 - 462,997 = 19,120 / 462,997 \times 100 = 4.1\%$ .

<sup>85</sup>  $482,117 / 2,687,839 = 17.9\%$ .

<sup>86</sup>  $\$643 - \$557 = 86 / 557 \times 100 = 15.4\%$ .

<sup>87</sup>  $55,766 - 56,054 = -288 / 56,054 \times 100 = -0.5\%$ .

<sup>88</sup>  $55,766 / 2,687,839 = 2.1\%$



disconnection data, the East North Central Region experienced a 2.2 percent reduction in the number of disconnections between 2009 and 2010. Ohio experienced a 0.5 percent reduction in disconnections.

The East North Central Region experienced a 22 percent reduction in the amount disconnected customers owed between the two years. Ohio natural gas customers who were disconnected realized a 15.4 percent increase in the amount owed. These statistics demonstrate that the Ohio Companies are not as effectively managing their credit and collection efforts as utilities in other states in Ohio's region. Consumer Advocates are not advocating for the Companies to more aggressively disconnect customers, but rather more diligently and selectively notice customers who are realistically subject to disconnection, as well as, proactively manage these accounts earlier in the collection process.

Northstar provided some comparative data of the bad debt recovery mechanisms in Pennsylvania, Kentucky, Indiana, and Michigan.<sup>89</sup> Pennsylvania, Indiana, and Kentucky recover generally recover bad debt through base rates; however, there are trends towards recovery through gas cost riders.<sup>90</sup> Pennsylvania also collects bad debt data as a percentage of total revenues and makes the information publicly available on their Commission website. Michigan provides for bad debt recovery through a UEX, but there are some incentives for the utilities to manage the bad debt.

#### **b. Payment Plan Issues.**

The Northstar Report does not evaluate the effectiveness of the extended payment plans that are required by the Commission or recommend improvements in the types of payment plans that may

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<sup>89</sup> Northstar Report at A-1.

<sup>90</sup> Northstar Report A-1.

help reduce UEX costs. The Commission rules require that the gas utilities offer a one-ninth, one-sixth, one-third, and budget payment plan for non-PIPP residential customers.<sup>91</sup> However, the gas utilities seem to be promoting primarily the one-sixth payment plan rather than allowing customers to choose from all of the available payment plan options.

For example, in January 2009, Columbia had 20,344 customers on the one-sixth payment plan.<sup>92</sup> By comparison, Columbia had only five customers on the one-ninth payment plan, and 1,534 customers on the one-third payment plan. This level of participation is appalling in light of the fact that Columbia negotiated the right to offer the one-ninth payment plan in October 2008 (well ahead of the implementation date in the rules) in exchange for approval to lengthen the amount of time it had to reconnect services.<sup>93</sup> The only conclusion that can be reached from this analysis is that Columbia is not offering payment plans that are tailored to help customers avoid delinquency. Columbia is merely doing the bare minimum to comply with its interpretation of the Commission rules. The impact of Columbia's actions on its UEX is that if the one-sixth payment plan is not the most effective payment plan to help customers avoid disconnection, then Columbia write-offs increase and these costs are passed to all customers through the UEX. To amplify this even more, in January 2009, Columbia had 883 customers on a basic extended payment plan (a few days extension of the due date) and three customers on a more customized generic payment plan.

Northstar noted that prior to 2004 Vectren offered more customized payment plans for

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<sup>91</sup> Ohio Adm. Code 4901:1-18-05(B).

<sup>92</sup> Northstar Report at V-20.

<sup>93</sup> *In the Matter 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, Application by Columbia Gas of Ohio, Inc. for a Waiver (August 25, 2009) at 9.

customers.<sup>94</sup> However, through a Stipulation with Staff,<sup>95</sup> the Company reduced the number of customized plans and instead began only offering the Commission-ordered payment plans. Perhaps this explains why approximately 68 per cent of the Commission-ordered plans Vectren entered into in 2009 were broken. In developing best practices, Consumer Advocates have hoped that the Northstar Report would provide a more comprehensive evaluation into the effectiveness of different payment plans and options. Not only are ineffective payment plans counter-productive in reducing UEX costs, the payment plans are not helping customers avoid disconnection and all the additional associated costs.

Table 8 shows the number of customers who were disconnected for non-payment during October for each year since 2003 and the average amount owed when services were disconnected.

**Table 8: Ten Year Summary of Disconnections for Customers on Extended Payment Plans<sup>96</sup>  
(October, 2001-2010)**

	<b>Disconnections</b>	<b>Extended Payment Plan Disconnections*</b>	<b>Average Amount Owed On Payment Plan When Disconnected*<sup>97</sup></b>	<b>Percent of Disconnects<sup>98</sup></b>
<b>2001</b>	16,517	6,340	\$635.83	38.4%
<b>2002</b>	22,2461	9,880	527.11	44.4%
<b>2003</b>	20,564	8,379	494.66	40.7%
<b>2004</b>	13,386	2,630	1,015.94	19.6%
<b>2005</b>	12,218	1,374	511.04	11.2%
<b>2006</b>	14,106	3,015	801.09	21.4%
<b>2007</b>	13,817	1,575	848.33	11.4%
<b>2008</b>	19,9524	5,405	688.67	27.1%
<b>2009</b>	18,331	4,806	583.80	26.2%
<b>2010</b>	20,564	4,879	\$576.97	23.7%

\* Excludes Columbia Gas Data that has not been provided for over a decade even though it is required to provide the data to Staff on a monthly basis.

<sup>94</sup> Northstar Report at V-40.

<sup>95</sup> Northstar Report at V-40.

<sup>96</sup> See Attachment 7 for disconnections and extended payment plan Disconnections data 2001 through 2010.

<sup>97</sup> Column 9.03 ÷ Column 8.03.

<sup>98</sup> Column 8.03 ÷ Column 8.01.

In addition, Table 8 demonstrates that a high percentage of customers on the Commission-ordered payment plans are still being disconnected. In addition, the high amounts that are owed when disconnection occurs reflect how unaffordable and inadequate the payment plans are.

Consumer Advocates recommend that the gas utilities that have a UEX be required to offer extended payment plans on terms that are more agreeable to customers. The installment payment amount should be no more than \$50 per month plus current charges (including budget payments). The utilities should be required to offer customers that are behind in payment the option of each of the Commission-ordered payment plans and the custom payment plan and to disclose the plan with the least out of pocket expense to enter the plan. Monthly reports should be provided to Staff and the OCC reflecting the number of customers on each of the Commission-ordered extended payment plans (including the custom payment plan), the number of disconnects on each plan, and the dollars owed at the time of the disconnection. Northstar recommended that the gas utilities file quarterly or annual reports providing specific information on collection activities and the effectiveness of these activities.<sup>99</sup> Specifically, Northstar recommends that the utilities report bad debt as a percentage of total billings, the delinquency aging of accounts, the net write-off and recoveries, and the PIPP arrearages.

In addition, Northstar recommends that the utilities report the number of bankruptcies, number of PIPP customers, and number of delinquent customers. Finally, Northstar recommends that the utilities report on the number of deposits, number of bills sent, number of delinquent accounts, number of accounts eligible for notice, number of notices sent, number of customers eligible for disconnection following notice, number of payment arrangements made and number broken by type, number of accounts scheduled for termination and the number actually terminated, and the number

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<sup>99</sup> Northstar Report at VIII-3.

collected. Consumer Advocates support the Northstar recommendation; however, Consumer Advocates propose that the recommended reporting requirements also include reconnection data including the number of accounts reconnected within 1 day, 7 days, 30 days, 90 days, and after 90 days. The Commission should require the reports to be filed quarterly.

Finally, the utilities should be required to offer adjusted due dates to help customers avoid being routinely delayed in paying natural gas bills. Adjusted due dates can help customers who are on fixed incomes better manage their monthly budget by coinciding the due date on their natural gas bill to routinely be a few days after the date in which they receive retirement checks or other regular assistance income.

#### **4. Recovery Activities.**

Consumer Advocates aver that much of the increase experienced in the UEX rates these past five years is a direct result of the business decisions that these Companies have made. Because the Companies get dollar for dollar recovery of its bad debt through a rider they have no incentive to invest the necessary capital in the reasonable effort to seek recovery of bad debt that has been written off. Much of OCC's discovery requests that were directed to Columbia, Dominion, Vectren and Duke were geared to understanding the resources that these companies allocated to the collection of bad debt prior to the implementation of the UEX Riders and resources that are employed today. Because those discovery requests were not answered, the PUCO did not rule on OCC's Motion to Compel, and Northstar did not perform such an analysis: thus OCC does not have data to support its theory. Therefore, OCC neither agrees nor disagrees with Northstar's findings in this area. Because the requested information was not provided, Consumer Advocates are not in a position to address this issue further, at this time.

The Commission should grant OCC's Motion to Compel, and order the Companies to respond to OCC's discovery, thus Consumer Advocates reserve the right to supplement these Comments.

## 5. Meter Reading, Billing and Payments.

According to the Northstar Report, over 10,100 meters have not been read on an annual basis by the gas companies as required by the Commission rules.<sup>100</sup> Ohio Adm. Code 4901:1-13-04 requires that all natural gas meters be read on at least an annual basis by the gas utilities.<sup>101</sup> Consumer Advocates are troubled that despite the length of time the gas utilities have had to perform annual meter reads and the large investment made in Automatic Meter Reading equipment, there continues to be approximately 9,924 meters that are not being actually read on an annual basis.<sup>102</sup>

Northstar also implies that the gas utilities have a requirement to annually file a meter reading plan with the Commission. While OCC has advocated that the meter reading plans be annually filed, the actual requirement is for the gas utilities to provide copies of the meter reading plan to the PUCO Staff. While the meter reading plans can probably be obtained through public record requests, an annual filing requirement would certainly lead to more public openness and transparency.<sup>103</sup>

Northstar summarized the different methods available to customers to pay natural gas bills which included payments by cash, check, credit or debit card, e-check, and gift certificates.<sup>104</sup> However, Northstar did not review the additional costs that can be associated with payments made through authorized agents, credit cards, and via other electronic means. For customers who do not have a checking account, the cost for paying gas bills at authorized agents is \$0.86. The cost of

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<sup>100</sup> Northstar Report at VII-5 indicates 6,000 meters for Columbia, VII-9 indicates 3,000 meters for Dominion, VII-13 indicates 800 for Duke Energy, and VII-16 indicates 324 for Vectren.

<sup>101</sup> Ohio Admin Code 4901:1-13-04(G)(1).

<sup>102</sup> Northstar Report at VII-5 (states that 6,000 Columbia meters were not read). See also, Northstar Report at VII-9 (states that 2,200 Dominion meters were not read for more than 12 months.) See also, Northstar Report, at VII (states that approximately 800 Duke meters were not read for more than 12 months.) See also, Northstar Report at VII-16 (stated that 324 Vectren meters were not read for more than 12 months.).

<sup>103</sup> In the next rules review, the Commission should amend Ohio Adm. Code 4901:1-13-04(G)(1)(a) to require annual filings of the meter reading plans.

<sup>104</sup> Northstar Report at VII-3.

money orders to be mailed to the company can cost several dollars. The cost for paying via credit card or electronic check varies depending upon the Company anywhere between \$3.95 and \$6.95.<sup>105</sup> For Columbia, approximately half the payments made on a monthly basis are made by US Mail and the other half using the methods explained above.<sup>106</sup> For Vectren, approximately 60 per cent of the payments are received via US Mail and the balance of payments received used other methods.<sup>107</sup> The gas utilities have generally closed all of their bill payment centers that were at one time available to make utility payments at no cost to the customer, and most of the remaining bill payment methods add additional costs to customers.

Consumer Advocates are concerned that the additional costs for paying utility bills may hinder a customer's ability to make timely payments and thus potentially impact the UEX. An evaluation of these costs are needed to determine if the potential exists to lower the costs for paying bills and if this can increase bill payments.

**E. Additional Areas Of Concern That Warrant Commission Consideration In The Development of "Best Practices" to be Employed by Natural Gas Companies in the State of Ohio to Minimize Uncollectible Expense**

- 1. The Northstar Report notes that the LDC's are at risk for bad debt related to choice customers, but fails to recommend any ways in which this risk can be mitigated.**

The Northstar Report noted that the Ohio gas utilities are at risk for the bad debt associated with customers who participate in the gas choice programs. However, Northstar did not investigate if there are differences in the level of debt associated with choice customers compared with the debt patterns of other customers.<sup>108</sup> This could have a significant impact in Ohio where approximately 2

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<sup>105</sup> Level of the fee is determined by the third part provider and is not widely publicized; nor have the fees been subject to review or approval.

<sup>106</sup> Northstar Report at VII-6.

<sup>107</sup> Northstar Report at VII-17.

<sup>108</sup> Northstar Report at I-4.

million customers are served through choice suppliers or various Standard Choice Offers (“SCO”) or Standard Service Offers (“SSO”).<sup>109</sup> Since the gas utilities generally perform the billing and purchase the accounts receivables of the competitive retail natural gas (“CRNG”) suppliers of natural gas, any associated third-party bad debt is included in the UEX riders. To the extent that the rates being charged by the CRNG suppliers are higher than the rates being charged by the incumbent gas utility, the uncollectible debt write-off could be higher than it otherwise would be.

Therefore, the Commission should evaluate if there are differences in the level of bad debt for choice customers compared to non-choice customers and if so, what actions can be taken to mitigate the difference.

**2. Credit and collection policies and practices of the smaller LDC’s appear to be more effective than the policies and practices of the larger LDC’s.**

The Northstar Report was limited to a review of the credit and collection practices and policies of the four largest natural gas companies.<sup>110</sup> However, by Entry dated September 1, 2010, the Commission ordered all energy companies subject to Revised Code 4933.123 to file annual reports of service disconnections for non-payment with the Commission and the OCC by October 1, 2010.<sup>111</sup> The reports address disconnections for the twelve month period between June 1, 2009 and May 30, 2010. While Northstar did not look specifically at the credit and collection policies and practices of the smaller gas utilities in the state, Consumer Advocates reviewed the disconnection reports filed by the small and large gas utilities to evaluate differences that might impact the uncollectible riders.

Table 9 compares the average disconnect amount, the average amount that was owed on final bills, the average arrearage greater than 60 days, and the percentage of residential customers that were

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<sup>109</sup> <http://www.puco.ohio.gov/emplibrary/files/util/UtilitiesDeptReports/Sept2010%20Gas%20Choice.pdf>.

<sup>110</sup> Finding and Order (August 19, 2009) at 6.

<sup>111</sup> *In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code*, Case No. 10-1222-GE-UNC, Entry (September 1, 2010) at 2.



assessed a security deposit. The statistics relating to this comparison is very enlightening. The smaller LDCs -- even those with a UEX Rider -- are demonstrating much better credit and collection results. It would appear that the credit and collection policies and practices of the smaller LDCs are better than the larger LDCs. The Commission should order a review of the credit and collection policies of the smaller LDCs to find the best practices that should ultimately be implemented by the larger LDCs.

The average disconnect amount for the small LDC's is \$417 compared to an average disconnect amount of \$608 for the 4 largest gas utilities. The average amount owed for customers who received final notices for disconnection of the small gas utilities was \$193 compared to \$363 for the larger gas utilities. The average arrearage for accounts that were more than 60 days old was \$155 for the smaller gas utilities and \$1,020 for the larger gas utilities. Duke claimed that it does not track the number of accounts in arrears by more than 60 days,<sup>112</sup> even though Revised Code 4933.123 has required Duke to track such data since 1986.<sup>113</sup> Rather than limit the development of best credit and collection practices to just the large gas utilities, the Commission should also consider the credit and collection policies of the smaller gas utilities who seem to be doing a much better job in managing collections.

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<sup>112</sup> *In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code* Case No. 10-1222-GE-UNC, Duke Report (October 7, 2010) at 2.

<sup>113</sup> R.C. 4933.123(B)(3) (Effective December 23, 1986, requires the utilities to report the total number of residential customer accounts in arrears by more than sixty days and the total dollar amount of such arrearages.

**Table 9: Comparison of the Arrearage Statistics for Ohio LDC's  
(More than 1000 Customers)<sup>114</sup>**

Company <sup>115</sup>	Average Disconnect Amount <sup>116</sup>	Average Amount on Final Notice <sup>117</sup>	Average Arrearages (> 60 days) <sup>118</sup>	% Customers Assessed Security Deposit <sup>119</sup>
Orwell*	\$622	\$246	\$74	0.5
Arlington	425	142	112	4.2
Piedmont	437	191	114	4.5
Ohio Gas*	437	191	114	10.0
NEONG*	320	292	155	4.7
KNG	493	206	183	9.5
Suburban*	245	165	188	3.0
Sheldon	358	111	303	5.8
<i>Average of Small LDC's</i>	<i>\$417</i>	<i>\$193</i>	<i>\$155</i>	
Columbia*	525	411	557	4.1
VEDO*	624	263	666	4.5
Duke*	586	315	Not Reported	14.4
DEO*	698	462	1,838	0.2
<i>Average of Large LDC's</i>	<i>\$608</i>	<i>\$366</i>	<i>\$1,020**</i>	

\* Company collects bad debt expense through a UEX Rider

\*\* Average for Columbia, VEDO, and DEO since Duke did not report the data

As shown in Table 9, there are considerable differences in the criteria used to assess security deposits. As a percentage of total number of customers, Ohio Gas has required security deposits from approximately 10% of its customers; whereas, Dominion imposed deposits on .2% of its customers.

<sup>114</sup> See Attachment 8.

<sup>115</sup> The utilities that are included within this table filed reports with the PUCO. However, reports were not filed by Eastern Natural Gas, Ohio Cumberland, Ohio Valley Gas Company, Glenwood Energy, Pike Natural Gas, Southeastern Natural Gas, and Waterville Gas Company.

<sup>116</sup> Total dollar amount of unpaid bills of disconnected customers ÷ by the total number of disconnections.

<sup>117</sup> Total dollar amount of unpaid bills that are part of a final notice ÷ by the total number of final notices.

<sup>118</sup> Total dollar amount of arrearages that are more than sixty days ÷ by the total number of residential accounts in arrears by more than sixty days.

<sup>119</sup> Total number of deposits received from residential customers ÷ by the total number of residential customers x 100.

While Consumer Advocates are not encouraging the imposition of security deposits, the gas utilities do need to assure that they are in compliance with the creditworthiness requirements in Ohio Adm. Code 4901:1-17. In addition, the Commission should disallow the recovery of any Duke uncollectible expense until such time as Duke complies with the reporting requirements in Ohio Revised Code 4933.123.<sup>120</sup> These reporting requirements are not onerous; therefore, the Commission should follow-up with all of the utilities that should have filed the annual reports and ensure that the reports are filed.<sup>121</sup> Compliance with the law should be a prerequisite to any recovery of any additional UEX expenses.

**3. The Northstar Report should have balanced the needs for adequate consumer protections in recommending enhancements in credit and collection policies and practices.**

**a. Winter Reconnection Order**

Northstar recommended that the annual Winter Reconnection Order (“WRO”)<sup>122</sup> be limited to income eligible customers only and that a tiered payment amount be initiated based on income

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<sup>120</sup> R.C. 4933.123 (B) Annually, on or before the thirtieth day of June, each energy company shall file a written report on service disconnections for nonpayment with the public utilities commission and the consumers’ counsel. The report shall include the following information for the twelve-month period ending on the preceding thirty-first day of May, by month:

- (1) Total number of service disconnections for nonpayment and the total dollar amount of unpaid bills represented by such disconnections;
- (2) Total number of final notices of actual disconnection issued for service disconnections for nonpayment and the total dollar amount of unpaid bills represented by such notices;
- (3) Total number of residential customer accounts in arrears by more than sixty days and the total dollar amount of such arrearages;
- (4) Total number of security deposits received from residential customers and the total dollar amount of such deposits;
- (5) Total number of service reconnections;
- (6) Total number of residential customers.

<sup>121</sup> The Commission may consider the imposition of civil forfeitures under R.C. 4905.54.

<sup>122</sup> For the last twenty five years, the Commission using its emergency statutory authority has issued a winter reconnect order that prescribes special procedures for having services reconnected or to avoid disconnection during the winter months.

level.<sup>123</sup> Northstar acknowledges the importance of consumer protections like the winter reconnect order in helping customers avoid loss of natural gas service or to have services restored in the winter; however, Northstar is concerned that the WRO may enable customers “to game the system”.<sup>124</sup> Northstar provided no analytical or anecdotal evidence that customers are gaming system and in fact, the entire premise for Northstar’s conclusion is that:

A portion of the customers availing themselves of the moratoriums may have adequate financial resources to pay their bill.<sup>125</sup>

The Winter Reconnection Order requires further examination and significant public input prior to implementation by the Commission.

The WRO enables customers who either have a disconnection notice or have already lost natural gas service to pay an amount not to exceed \$175 plus a reconnection charge that may not exceed \$36 to prevent disconnection or to have services restored.<sup>126</sup> The WRO requires customers to enroll in a payment plan to reconcile the difference between the actual balance and the \$175 payment.<sup>127</sup> Furthermore, the WRO is explicit that customers can enroll in one of the standard extended payment plans described earlier (1/3<sup>rd</sup>, 1/6<sup>th</sup>, 1/9<sup>th</sup>), PIPP if income-eligible, or another more customized payment plan that may be more effective in helping customers maintain service:

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<sup>123</sup> Northstar Report at VIII-9.

<sup>124</sup> Northstar Report, at VIII-7.

<sup>125</sup> Northstar Report at VIII-7.

<sup>126</sup> *In the Matter of the Commission's Consideration of Solutions Concerning the Disconnection of Gas and Electric Service in Winter Emergencies*, Case No. 10-1336-GE-UNC Finding and Order (September 22, 2010) at 2.

<sup>127</sup> *Id.* at 3.

A plan offered by the gas or electric distribution company, whichever is the most appropriate for the customer, provided, of course, that the customer will ultimately be able to maintain service.<sup>128</sup>

Consumer Advocates are concerned that the gas utilities are only offering the extended payment plans that are explicitly required by the Commission, and are not offering the more customized plans that could help customers maintain essential natural gas service, reduce disconnections, and prevent subsequent write-offs.

Northstar reported that Columbia may not be enrolling customers in extended payment plans at the time the winter reconnect order is being used to avoid disconnection.<sup>129</sup> However, Consumer Advocates are concerned that this may not just be an issue with Columbia. Based upon data that OCC reviewed that was provided pursuant to the Special Data Request identified in the WRO that was issued for the 2007/2008 heating season.<sup>130</sup> Table 10 provides a summary of the number of customers that used the WRO to avoid disconnection or re-establish service during this winter heating season<sup>131</sup>

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<sup>128</sup> Id. at 1.

<sup>129</sup> Northstar Report at V-21.

<sup>130</sup> *In the Matter of the Investigation into Long-term Solutions Concerning Disconnection of Gas and Electric Service in Winter Emergencies*, Case No. 07-938-GE-UNC, Entry (September 5, 2007) at 10.

<sup>131</sup> Data was provided to OCC by the PUCO Staff as part of a public records request in Case No. 08-723-GE-ORD.

**Table 10: Winter Reconnection Order Data Summary 2007/2008<sup>132</sup>**

	<b>Number of WRO Users</b>	<b>Number of PIPP Customers</b>	<b>Number on 1/3<sup>rd</sup> or 1/6<sup>th</sup> Payment Plan</b>	<b>Number not on Payment Plan</b>	<b>New Enrollment on PIPP</b>	<b>New 1/3<sup>rd</sup> or 1/6<sup>th</sup> Payment Plans</b>	<b>Number Where Payment Plan was not Provided</b>
<b>Electric</b>	158,574	85,043	15,733	57,733	10,564	49,603	0
<b>Gas</b>	155,554	32,216	4,462	118,876	6,036	33,930	78,910 <sup>133</sup>
<b>Duke</b>	33,716	10,570	761	22,385	399	17,408	4,578 <sup>134</sup>
<b>Total</b>	347,844	127,829	21,021	198,994	16,999	100,941	83,488

Table 10 demonstrates that of the 347,844 gas and electric customers who used the WRO in 2007/2008, approximately 43 per cent were either on PIPP or one of the Commission-ordered extended payment plans when the WRO was used. For the 32,216 gas PIPP customers or 4,462 gas customers who were on the 1/3<sup>rd</sup> or 1/6<sup>th</sup> plan, a payment of up to \$175 was required, and then the customers would either resume making PIPP payments or enter a extended payment plan.

More instructive; however, is observing the other 118,876 gas customers who were not on a payment plan when the WRO was used. Of these customers, 6,036 enrolled on PIPP and 33,930 enrolled on a 1/3<sup>rd</sup> or 1/6<sup>th</sup> payment plan when they used the WRO. The remaining 78,910 customers who used the WRO but were not enrolled on PIPP or a 1/3<sup>rd</sup> or 1/6<sup>th</sup> payment plan, in violation of the WRO.

The electric utilities (who coincidentally do not have uncollectible debt trackers), do a better job in managing credit and collection activities for customers who use the WRO. The gas utilities

<sup>132</sup> See Attachment 9.

<sup>133</sup>  $118,876 - (33,930 + 6,036) = 78,910$ .

<sup>134</sup>  $22,385 - (17,408 + 399) = 4,578$ .

should be more diligent in ensuring that customers who use the WRO are also on either PIPP or another extended payment plan as required by the Commission's WRO.

Northstar made the same observation for yet another heating season that not all customers who are using the Winter Reconnect Order are actually enrolling on PIPP or another payment plan.<sup>135</sup> For the 2008 – 2009 winter heating season, 17 percent of the Dominion customers who used the WRO, 26 percent of the Vectren customers who used the WRO, and 26 percent of the Duke customers who used the WRO were not enrolled on PIPP or another plan when the WRO was used.<sup>136</sup> The Northstar Report excluded Columbia data from Exhibit V-2 because Columbia has apparently had experienced problems that affected the accuracy of the data.

Going forward, Consumer Advocates recommend that the Commission disallow recovery of any uncollectible expense in the UEX riders where the gas utilities used the WRO to either prevent disconnection or to reconnect services without also enrolling the customer on a payment plan, as is required under the WRO. In addition, Consumer Advocates recommend that the Commission enforce the reporting requirements within the WRO and order Columbia Gas to file corrected data for each of the last five winter heating seasons.

Finally, Consumer Advocates oppose the Northstar recommendation to make any further changes in the WRO at this time. The data as reflected in Table 10 indicates that the WRO is working fine if the gas utilities would enroll customers in a payment plan at the time the WRO is used. Less than three per cent of the natural gas customers who used the WRO were on a non-PIPP payment plan at the time the WRO was used as required by the Commission. This factor alone suggests that customers are not gamming the system. In addition, the changes made in the PIPP Plus rules

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<sup>135</sup> Northstar Report at V-7.

<sup>136</sup> Id. at Exhibit V-2, p V-9.

concerning making missed PIPP payments and the criteria for obtaining arrearage credits are expected to reduce the number of PIPP Plus customers who are using the WRO.<sup>137</sup> These changes to PIPP Plus should be given an opportunity to operate in order to determine whether the new rules demonstrably affect customer payment behavior, which is, to at least some degree, their intent.

#### **b. Moratoriums**

The Northstar Report recommended that the Commission consider eliminating mandatory winter moratoriums.<sup>138</sup> Northstar reasoned that the gas companies maintain internal disconnection policies to suspend disconnections when temperatures are below 20 degrees and these internal policies mitigate the need for state mandated moratoriums. However, OCC and other consumer groups argued for such a moratorium in a recent credit and disconnection rule-making case before the Commission.<sup>139</sup> One of the primary reasons for the temperature-sensitive moratoriums is to protect consumer health and welfare during times where economic conditions in the state, high fuel costs, or expectations of dangerously cold weather are needed.

The 2007 moratorium was in fact precipitated by a letter from Governor Ted Strickland to the PUCO as a result of the loss of life in an Ohio family during exceptionally cold weather when the family did not have electric service.<sup>140</sup> The avoidance of such tragic loss of life should not be relegated to discretionary internal weather moratorium policies of the gas companies that ultimately could be modified or terminated without Commission review.

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<sup>137</sup> Ohio Admin. Code 4901:1-18-13 and 4901:1-18-14.

<sup>138</sup> Northstar Report at VIII-9.

<sup>139</sup> *In the Matter 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 Consumer Group's Initial Comments (September 10, 2008) at 16.

<sup>140</sup> *In the Matter of the Investigation into Long-Term Solutions Concerning Disconnection of Gas and Electric Service in Winter Emergencies*, Case No. 07-938-GE-UNC, Letter from Governor Strickland (December 20, 2007).



Northstar refers to the difference in the number of shut-offs ordered compared to the shut-offs executed in the winter months as reason for not mandating winter moratoriums.<sup>141</sup> Northstar claims that there was a moratorium in the winter of 2008/ 2009,<sup>142</sup> however, weather had no impact because there were over 21,000 natural gas and Duke (gas and electric customer) disconnections made between November 1, 2008 and March 30, 2009.<sup>143</sup> Even for the winter of 2007/ 2008 where there was an income-based moratorium on disconnections,<sup>144</sup> 15,965 natural gas disconnections occurred between January 1, 2008 and March 2008.<sup>145</sup> Weather had very little impact on the gas utilities abilities to shut-off service. Columbia cited weather as being the reason why 3 percent of the shut-offs were not completed in 2009; however, weather moratoriums had no impact on the remaining 97 percent of shutoffs.<sup>146</sup> Therefore, it is disingenuous to claim that the Company internal weather moratoriums are a reasonable surrogate for temperature-sensitive moratoriums that may be ordered. The Commission should not eliminate consideration of winter moratoriums and in fact, should codify in the rules that services will not be disconnected when temperatures fall below freezing.

**c. Conservation Incentives**

Northstar observed that PIPP customer usage tends to be higher than non-PIPP usage.<sup>147</sup> According to information DEO provided Northstar, PIPP usage can be between 125 and 130 MCF per year compared with approximately 99 MCF for non-PIPP residential customers. An impact evaluation of the Home Weatherization Assistance Program (HWAP) indicates that PIPP customers

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<sup>141</sup> Northstar Report at VIII-8.

<sup>142</sup> Id. at VIII-7.

<sup>143</sup> OSCAR Reports.

<sup>144</sup> Northstar Report at VIII-7.

<sup>145</sup> OSCAR Reports.

<sup>146</sup> Northstar Report at V-18.

<sup>147</sup> Id. at VIII-4.

tend to use about 20 percent more energy than non-PIPP customers.<sup>148</sup> However, the reasons for this difference in usage patterns was related to the housing stock, number of household members, age of household members, and income based demographics. Because the reduction in PIPP usage can help reduce customer bills and potential collection write-offs, Consumer Advocates recommend that the Commission initiate a forum for stakeholders to discuss different ideas to create more conservation incentives. The Staff previously proposed a conservation incentive program where PIPP customers could receive additional arrearage credits by reducing usage.<sup>149</sup> While the Commission decided not to implement the Staff proposal because of the complexity, a combination of incentives such as credits towards arrearages and the lowering of monthly payments may be appropriate to encourage additional conservation.

#### **d. Community Assistance Funding**

Northstar mentioned that the Duke Energy offers three community assistance programs including a deferred payment plan, a partnership with Consumer Credit Counseling Services (“CCCS”), and the HeatShare program that provides assistance through Salvation Army.<sup>150</sup> Columbia also has three different assistance programs that result in negotiated fuel funds being made available to assist low-income customers pay utility bills.<sup>151</sup> While Consumer Advocates understand that Dominion has a partnership with Salvation Army to provide low-income assistance, there is no mention of the program within the Northstar Report. In addition, there is no mention of Vectren involvement in community assistance programs.

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<sup>148</sup> Ohio Home Weatherization Assistance Program Impact Evaluation, Quantec (July 2006).

<sup>149</sup> *In the Matter 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, Entry (June 25, 2008) at 43.

<sup>150</sup> Northstar Report at V-34.

<sup>151</sup> *Id.* at V-14. Columbia has a third assistance program which will be available for the next three winter heating seasons that can provide assistance for consumers up to 200% of the federal poverty level.

The American Gas Association (“AGA”) has noted that programs that help low-income households pay their energy bills are more critical than ever.<sup>152</sup> AGA summarized that \$5.8 billion was made available in 2007 for energy assistance for low-income. With the projected cuts in Ohio Low Income Home Energy Assistance Program (“LIHEAP”) funding, more assistance is needed from various resources to help makeup the short-fall.

Since additional community assistance programs can help reduce the overall write-offs, Consumer Advocates support the different initiatives of the gas utilities and would appreciate an evaluation of the programs. Consumer Advocates believe such an evaluation could lead to the implementation of additional utility sponsorship and promotion of community assistance programs statewide, as well as, additional weatherization funding.

## **VI. CONCLUSION**

Consumer Advocates appreciate the opportunity to provide these Comments concerning the Northstar evaluation of the credit and collection policies and practices of the gas utilities. Northstar provided a useful evaluation that generally supports the concerns that Consumer Advocates have conveyed about the automatic recovery rider for collection of bad debt expense. OCC’s ability to Comment was hampered by the Companies’ refusal to respond to discovery, and the Commission’s failure to rule on OCC’s Motion to Compel. Consumer Advocates have nevertheless determined that the Companies’ credit and collection policies have effectively shifted the collection risk from the utility to the customer.

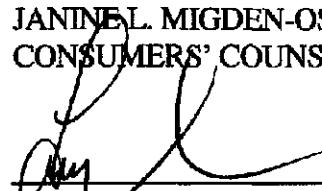
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<sup>152</sup> AGA, *Energy Analysis, LIHEAP and Energy Efficiency Programs are Essential to help at-risk, Low-income Consumers Cope with Increasing Energy Costs* (December 17, 2008) at <http://www.aga.org/SiteCollectionDocuments/ResearchStats/Studies/Consumers%20n%20Demand/0812EA04.pdf>

The UEX Rider is a very generous recovery mechanism, that has been abused by the natural gas Companies reviewed by Northstar. One reason OCC opposed the initial approval of the UEX Riders -- concern that it would adversely impact the diligence with which the Companies would pursue collections -- has proven to be legitimate. The Companies have pulled back from managing the uncollectible accounts over the past five years, and it shows in the statistics that Consumer Advocates have assembled in the various tables that Consumer Advocates have included in the Comments. The Commission should; therefore, implement the recommendations made by Consumer Advocates to improve the Companies' credit and collection policies and practices.

Respectfully submitted,

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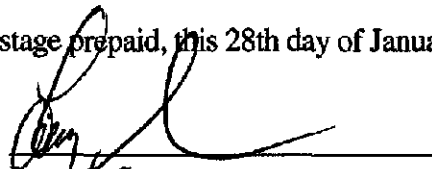
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## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the *Initial Comments by the Consumer Advocates* was provided to the persons listed below via first class U.S. Mail, postage prepaid, this 28th day of January 2011.

  
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# Exhibit 1

**Table 4: Bad Debt Write-off as a Percentage<sup>1</sup> of Total Revenues  
(in Millions \$)**

	2003	2004	2005	2006	2007	2008	2009
--	------	------	------	------	------	------	------

**Dominion**

<b>Bad Debt Write off</b>	\$16.6 <sup>2</sup>	\$30.8 <sup>3</sup>	\$43.1 <sup>4</sup>	\$52.7 <sup>5</sup>	\$63.9 <sup>6</sup>	\$63.8 <sup>7</sup>	\$63.1 <sup>8</sup>
<b>Revenues</b>	\$1,036 <sup>9</sup>	\$1,117 <sup>10</sup>	\$1,364 <sup>11</sup>	\$1,197 <sup>12</sup>	\$1,022 <sup>13</sup>	\$1,252 <sup>14</sup>	\$877 <sup>15</sup>
<b>Percent</b>	1.6	2.8	3.2	4.4	5.9	5.1	7.2

**Columbia**

<b>Bad Debt Write off</b>	\$14.9 <sup>16</sup>	\$26.6 <sup>17</sup>	\$43.8 <sup>18</sup>	\$51.6 <sup>19</sup>	\$61.4 <sup>20</sup>	\$64.4 <sup>21</sup>	\$74.9 <sup>22</sup>
<b>Revenues</b>	\$1,282 <sup>23</sup>	\$1,205 <sup>24</sup>	\$1,525 <sup>25</sup>	\$1,441 <sup>26</sup>	\$1,415 <sup>27</sup>	\$1,578 <sup>28</sup>	\$1,194 <sup>29</sup>
<b>Percent</b>	1.2	2.2	2.9	3.6	4.3	4.1	6.3

**Vectren**

<b>Bad Debt Write off</b>	-	-	-	\$11.3 <sup>30</sup>	\$10.9 <sup>31</sup>	\$7.6 <sup>32</sup>	\$9.4 <sup>33</sup>
<b>Revenues</b>				\$361 <sup>34</sup>	\$374 <sup>35</sup>	\$408 <sup>36</sup>	\$291 <sup>37</sup>
<b>Percent</b>				3.1	2.9	1.8	3.2

**Duke**

<b>Bad Debt Write off</b>	-	-	-	-	-	-	\$8.5 <sup>38</sup>
<b>Revenues</b>							\$528 <sup>39</sup>
<b>Percent</b>							1.6

<sup>1</sup> Percentages shown in the table are calculated as follows: Bad Debt Write-off ÷ Total Revenues x 100.

<sup>2</sup> Total sales of 276,014,743 MCF in the 2003 East Ohio Gas Annual Report ÷ \$.0601 (the Uncollectible Debt Component in Rates).

<sup>3</sup> *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case No. 04-570-GA-UEx, Application (April 16, 2004) at Attachment 1.

<sup>4</sup> *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case No. 05-672-GA-UEx, Application (May 20, 2005) at Attachment 1, Page 2 of 2.

<sup>5</sup> *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of an Adjustment to its Uncollectible Expense Rider Rate* 06-729-GA-UEx, Application (May 24, 2006) at Attachment 1, Page 2 of 2.

<sup>6</sup> *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case No. 07-659-GA-UEx, Application (May 30, 2007) at Attachment 1, Page 2 of 2.



<sup>7</sup> *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case No. 08-655-GA-UEx, Application, (May 30, 2008) Attachment 1, Page 2 of 2.

<sup>8</sup> *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case No. 09-457GA-UEx, Application (May 29, 2009) at Attachment 1, Page 2 of 2.

<sup>9</sup> Annual Report, The East Ohio Gas Company, For the Year Ending 12-31-2003,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2003/Gas%20and%20Pipeline/East%20Ohio%20Gas%20Company,%20The%20%202003.pdf>.

<sup>10</sup> Annual Report, The East Ohio Gas Company, For the Year Ending 12-31-2004,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2004/Gas%20and%20Pipeline/East%20Ohio%20Gas%20Company,%20The%20%202004.pdf>.

<sup>11</sup> Annual Report, The East Ohio Gas Company, For the Year Ending 12-31-2005,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2005/Gas%20and%20Pipeline/East%20Ohio%20Gas%20Company,%20The%202005.pdf>.

<sup>12</sup> Annual Report, The East Ohio Gas Company, For the Year Ending 12-31-2006,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2006/Gas%20and%20Pipeline/East%20Ohio%20Gas%20Company,%20The%202006.pdf>.

<sup>13</sup> Annual Report, The East Ohio Gas Company, For the Year Ending 12-31-2007,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2007/Gas%20and%20Pipeline/East%20Ohio%20Gas%20Company,%20The%202007.pdf>.

<sup>14</sup> Annual Report, The East Ohio Gas Company, For the Year Ending 12-31-2008,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2008/Gas%20and%20Pipeline/East%20Ohio%20Gas%20Company,%20The%202008.pdf>.

<sup>15</sup> Annual Report, The East Ohio Gas Company, For the Year Ending 12-31-2008,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2009/Gas%20and%20Pipeline%20%2010-0002-GA-RPT/East%20Ohio%20Gas%20Company%202009.pdf>.

<sup>16</sup> Total sales of 302,598,649 MCF in the 2003 Columbia Gas Annual Report ÷ \$.0493 (the Uncollectible Debt Component in Rates).

<sup>17</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case 04-1520-GA-UEx, Application (October 1, 2004) at 7.

<sup>18</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case 05-597-GA-UEx, Application (May 2, 2005) at Attachment 1, Sheet 2 of 4.

<sup>19</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case 06-649-GA-UEx, Application (May 3, 2006) at Attachment 1, Sheet 1 of 3.

<sup>19</sup> Annual Report 2004, Columbia Gas of Ohio,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2004/Gas%20and%20Pipeline/Columbia%20Gas%20of%20Ohio,%20Inc.%202004.pdf>

<sup>20</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case 07-499-GA-UEx, Application (April 27, 2007) at Attachment 1, Sheet 1 of 3.

<sup>21</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case 08-564-GA-UEx, Application (May 1, 2008,) at Attachment 1, Sheet 1 of 3.

<sup>22</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case 09-372-GA-UEx, Application (April 30, 2009) at Attachment 1, Sheet 1 of 3.

<sup>23</sup> Annual Report 2003, Columbia Gas of Ohio,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2004/Gas%20and%20Pipeline/Columbia%20Gas%20of%20Ohio,%20Inc.%202003.pdf>

<sup>24</sup> Annual Report 2004, Columbia Gas of Ohio,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2004/Gas%20and%20Pipeline/Columbia%20Gas%20of%20Ohio,%20Inc.%202004.pdf>.

<sup>25</sup> Annual Report 2005, Columbia Gas of Ohio,  
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<sup>26</sup> Annual Report 2006, Columbia Gas of Ohio,  
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<sup>27</sup> Annual Report 2007, Columbia Gas of Ohio,  
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<sup>28</sup> Annual Report 2008, Columbia Gas of Ohio,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2008/Gas%20and%20Pipeline/Columbia%20Gas%20of%20Ohio%202008.pdf>.

<sup>29</sup> Annual Report, 2009,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2009/Gas%20and%20Pipeline%20%2010-0002-GA-RPT/Columbia%20Gas%20of%20Ohio%202009.pdf>.

<sup>30</sup> *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case 06-755-GA-UEx, Application (May 31, 2006) at Attachment 1, Page 1 of 2.

<sup>31</sup> *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case 07-658-GA-UEx, Application (May 30, 2007) at Attachment 1, Page 1 of 2.

<sup>32</sup> *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case 08-653-GA-UEx, Application (May 29, 2008) at Attachment 1, Page 1 of 2.

<sup>33</sup> *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval of an Adjustment to its Uncollectible Expense Rider Rate*, Case 09-456-GA-UEx, Application (May 29, 2009 at Attachment 1, Page 1 of 2).

<sup>34</sup> Annual Report 2006 Vectren Energy Delivery of Ohio,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2006/Gas%20and%20Pipeline/Vectren%20Energy%20Delivery%20of%20Ohio%20Inc%202006.pdf>.

<sup>35</sup> Annual Report 2007, Vectren Energy Delivery of Ohio,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2007/Gas%20and%20Pipeline/Vectren%20Energy%20Delivery%20of%20Ohio%20Inc%202007.pdf>.

<sup>36</sup> Annual Report 2008, Vectren Energy Delivery of Ohio,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2008/Gas%20and%20Pipeline/Vectren%20Energy%20Delivery%20of%20Ohio%20Inc%202008.pdf>.

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<sup>37</sup> Annual Report, 2009, Vectren Energy Delivery of Ohio,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2009/Gas%20and%20Pipeline%20%2010-0002-GA-RPT/Vectren%20Energy%20Delivery%20of%20Ohio%20Inc%202009.pdf>.

<sup>38</sup> *In the Matter of the Application of Duke Energy Ohio, Inc. for Approval of an Uncollectible Expense Rider*, Case No. 09-773-GA-UEx, Direct Testimony (September 3, 2009) at SSB-1, Page 1.

<sup>39</sup> Annual Report 2009, Duke Energy Ohio Supplemental Report,  
<http://www.puco.ohio.gov/emplibrary/files/docketing/AnnualReports/2009/Gas%20and%20Pipeline%20%2010-0002-GA-RPT/Duke%20Energy%20Ohio%20Sup%202009.pdf>.

# Attachment 1

**UEx Rider Impact  
95 MCF Annual Usage  
2003 - 2010**

<b>Year</b>	<b>Company</b>	<b>Case Number</b>	<b>UEx Rider Rate MCF</b>	<b>Annual Bill Impact</b>
2003 <sup>1</sup>	Columbia	Base Rate	\$0.0493	\$4.68
	Dominion	Base Rate	0.0601	\$5.80
	Vectren	Base Rate	0.0382	\$3.63
	Duke	Base Rate	0.0810	\$7.70
2010	Columbia	10-0578-GA-UEx	\$0.15120	\$14.36
	Dominion	10-0319-GA-UEx	0.13720	\$13.03
	Vectren	10-0320-GA-UEx	0.13540	\$12.86
	Duke	10-0726-GA-UEx	0.26073	\$24.76

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<sup>1</sup> Northstar Report, Exhibit II-4.

# Attachment 2

## Normal and Average Heating Degree Days Ohio For Select Ohio Cities

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[illegible][illegible]



# Attachment 3

**Security Deposits Collected by  
Columbia, Dominion, Vectren, and Duke  
2003/ 2005/ 2007/ 2009**

<b>Year</b>	<b>Month</b>	<b>Column 10.03 Columbia Total Number of Security Deposits Collected</b>	<b>Column 10.03 Dominion Total Number of Security Deposits Collected</b>	<b>Column 10.03 Vectren Total Number of Security Deposits Collected</b>	<b>Column 10.03 Duke Total Number of Security Deposits Collected</b>
2003	Jan	8,855	1,834	N/A	2,035
	Feb	8,388	1,736	N/A	1,989
	Mar	7,796	2,297	N/A	N/A
	April	7,567	3,084	N/A	2,706
	May	7,707	4,258	N/A	3,017
	June	8,774	3,607	N/A	3,199
	July	8,938	3,170	N/A	3,214
	Aug	9,171	3,382	N/A	3,329
	Sept.	1,951	3,366	N/A	3,670
	Oct	6,552	4,814	N/A	3,247
	Nov	1,467	2,981	N/A	2,374
	Dec	<u>9,797</u>	<u>2,561</u>	<u>N/A</u>	<u>2,204</u>
	<b>Total</b>	<b>86,963</b>	<b>37090</b>		<b>30,984</b>
2005	Jan	11,842	907	719	2,895
	Feb	9,978	1,114	913	2,561
	Mar	8,068	1,210	910	2,180
	April	6,316	952	867	3,644
	May	6,947	996	1,238	4,045
	June	7,664	945	1,246	3,878
	July	7,553	950	1,381	4,010
	Aug	9,139	1,157	1,857	4,724
	Sept.	8,803	1,100	1,667	N/A
	Oct	10,930	N/A	1,477	5,772
	Nov	11,122	1,228	685	4,683
	Dec	<u>10,328</u>	<u>981</u>	<u>349</u>	<u>3,696</u>
	<b>Total</b>	<b>108,690</b>	<b>11,540</b>	<b>13,309</b>	<b>42,088</b>
2007	Jan	2,704	991	984	4,223
	Feb	9,733	935	898	3,483
	Mar	7,466	853	873	3,484
	April	7,210	702	1,013	3,698
	May	7,017	818	1,314	4,346
	June	6,787	801	1,427	4,589
	July	7,749	860	1,427	5,888
	Aug	8,785	1,074	1,652	5,317
	Sept.	7,975	962	1,560	5,229
	Oct	2,064	1,802	N/A	5,856
	Nov	1,455	1,802	1,314	4,542
	Dec	<u>803</u>	<u>914</u>	<u>943</u>	<u>3,682</u>
	<b>Total</b>	<b>69,748</b>	<b>12,514</b>	<b>13,405</b>	<b>54,337</b>

**Security Deposits Collected by  
Columbia, Dominion, Vectren, and Duke  
2003/ 2005/ 2007/ 2009**

<b><u>Year</u></b>	<b><u>Month</u></b>	<b><u>Column 10.03 Columbia Total Number of Security Deposits Collected</u></b>	<b><u>Column 10.03 Dominion Total Number of Security Deposits Collected</u></b>	<b><u>Column 10.03 Vectren Total Number of Security Deposits Collected</u></b>	<b><u>Column 10.03 Duke Total Number of Security Deposits Collected</u></b>
2009	Jan	2,129	234	1,008	3,937
	Feb	589	280	1,062	3,674
	Mar	9,080	278	999	4,156
	April	8,713	272	1,197	4,659
	May	9,053	261	1,467	5,923
	June	1,940	282	1,890	7,112
	July	3,517	284	1,987	7,739
	Aug	4,500	264	1,987	7,332
	Sept.	6,067	239	2,019	8,254
	Oct	692	270	1,814	8,317
	Nov	254	258	1,160	6,538
	Dec	<u>9,902</u>	<u>244</u>	<u>1,053</u>	<u>6,043</u>
	<b>Total</b>	<b>56,436</b>	<b>3,166</b>	<b>17,643</b>	<b>73,684</b>

# Attachment 4

**Disconnection and Arrearage Data<sup>1</sup>**  
**Columbia, Dominion, Vectren, and Duke**  
**March and September 2003 - 2010**

<u>Month</u>	<u>Year</u>	<u>Company</u>	<u>Column</u> 1.04 <u>Number of</u> <u>Accounts on</u> <u>1/3 or 1/6</u> <u>Payment Plan</u>	<u>Column</u> 1.06 <u>Number of</u> <u>Accounts 60</u> <u>Day +</u> <u>Arrears</u>	<u>Column</u> 1.07 <u>Amount of 60+</u> <u>Day Accounts</u>	<u>Column</u> 8.01 <u>Residential</u> <u>Disconnects</u>	<u>Column</u> 9.01 <u>Amount of</u> <u>Disconnects</u>	<u>Column</u> 10.01 <u>Number of</u> <u>Disconnect</u> <u>Notices</u>	<u>Column</u> 10.02 <u>Amount of</u> <u>Disconnect</u> <u>Notices</u>
March	2003	Columbia	33,729	151,712	\$62,534,267.00	4,344	\$3,184,393.00	89,221	\$31,538,828.00
		Dominion	18,991	174,709	185,601,459.49	4,057	1,729,697.29	129,969	61,008,178.04
		Vectren	19,396	116,414	30,434,703.10	2,021	977,503.81	26,787	5,768,766.82
		Duke	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Total	72,116	442,835	\$278,570,429.10	10,422	\$5,891,594.10	245,977	\$98,315,772.86
			=====	=====	=====	=====	=====	=====	=====
September	2003	Columbia	49,761	363,976	\$104,670,823.00	9,097	\$6,757,218.00	61,058	\$17,260,710.00
		Dominion	8,093	170,893	194,796,661.56	4,636	2,172,483.76	82,348	45,775,430.75
		Vectren	17,174	79,483	24,652,821056	3,632	1,150,808.19	46,606	8,699,611.01
		Duke	8,634	42,204	11,813,620.00	3,956	851,153.63	35,203	976,831.40
		Total	83,662	656,556	\$335,933,926.12	21,321	\$10,931,663.58	225,215	\$72,712,583.16
			=====	=====	=====	=====	=====	=====	=====
March	2004	Columbia	36,012	229,663	\$100,165,079.00	4,893	\$3,298,580.00	98,853	\$37,768,600.00
		Dominion	23,362	187,546	231,717,020.88	5,230	2,404,968.01	152,156	81,563,370.45
		Vectren	7,878	9,808 <sup>2</sup>	100,750	18,627	44,642.19	102,100	4,514,343.60
		Duke	15,418	45,459	15,965,171.34	4,792	471,599.40	28,805	718,379.39
		Total	82,670	563,418	\$347,857,079.22	33,542	\$6,219,789.60	381,914	\$124,564,693.05
			=====	=====	=====	=====	=====	=====	=====

<sup>1</sup> Data Provided to Staff and OCC Per Monthly OSCAR Report

<sup>2</sup> The data is Column 1.06 and 1.07 were reversed in the original spreadsheet provided by the Staff.

		Column 1.04 Number of Accounts on 1/3 or 1/6	Column 1.06 Number of Accounts 60 Day + Arrears	Column 1.07 Amount of 60+ Day Accounts	Column 8.01 Residential Disconnects	Column 9.01 Amount of Disconnects	Column 10.01 Number of Disconnect Notices	Column 10.02 Amount of Disconnect Notices	
Month	Year	Company	Payment Plan	Arrears	Day Accounts	Disconnects	Amount of Disconnects	Number of Disconnect Notices	
September	2004	Columbia	39,873	337,032	\$108,179,490.00	8,744	\$7,732,871.00	48,951	
		Dominion	18,025	177,564	231,411,457.51	5,692	4,649,403.22	81,029	
		Vectren	1,698	18,276	7,079,174.72	339	123,888.23	16,507	
		Duke	<u>7,520</u>	<u>43,751</u>	<u>12,302,113.99</u>	<u>4,827</u>	<u>285,788.62</u>	<u>40,371</u>	
		Total	67,116	576,623	\$358,972,236.02	19,602	\$12,791,951.07	186,858	
			=====	=====	=====	=====	=====	=====	
March	2005	Columbia	38,777	226,749	\$110,454,501.00	3,872	\$3,012,676.00	110,510	
		Dominion	28,071	190,626	267,082,171.88	1,721	1,863,816.93.20	150,578	
		Vectren	6,623	16,442	7,330,239.39	167	128,017.20	50,735	
		Duke	<u>11,625</u>	<u>44,926</u>	<u>15,698,143.39</u>	<u>3,932</u>	<u>415,959.56</u>	<u>33,494</u>	
		Total	85,096	478,743	\$400,565,055.66	9,692	\$5,420,469.69	345,317	
			=====	=====	=====	=====	=====	=====	
September	2005	Columbia	41,773	398,688	\$140,406,545.00	8,612	\$6,806,421.00	68,001	
		Dominion	28,879	189,603	275,139,072.40	1,776	3,390,440.63	98,278	
		Vectren	3,220	19,398	8,203,787.58	301	84,878.63	17,582	
		Duke							
		Total	73,872	607,689	\$423,749,404.98	10,689	\$10,281,740.26	183,861	
			=====	=====	=====	=====	=====	=====	
March	2006	Columbia	43,004	273,971	\$141,987,573.00	5,373	\$4,466,863.00	133,285	
		Dominion	31,325	205,036	333,393,739.20	715	2,026,801.42	184,839	
		Vectren	9,492	17,765	10,067,804.60	139	106,462.49	44,713	
		Duke	<u>13,946</u>	<u>46,435</u>	<u>15,667,012.00</u>	<u>5,064</u>	<u>901,624.53</u>	<u>33,539</u>	
		Total	97,767	543,207	\$501,116,128.60	11,291	\$7,501,751.44	396,376	
			=====	=====	=====	=====	=====	=====	

<u>Month</u>	<u>Year</u>	<u>Company</u>	Column 1.04	Column 1.06	Column 1.07	Column 8.01	Column 9.01	Column 10.01	Column 10.02
			Number of Accounts on 1/3 or 1/6 Payment Plan	Number of Accounts 60 Day + Arrears	Amount of 60+ Day Accounts	Residential Disconnects	Amount of Disconnects	Number of Disconnect Notices	Amount of Disconnect Notices
September	2006	Columbia	34,674	435,300	\$175,702,745.00	8,405	\$8,547,544.00	62,656	\$26215519.00
		Dominion	53,994	205,903	331,193,443.40	7,397	6,416,022.00	90,865	50156832.17
		Vecuren	4,197	20,949	10,355,321.47	418	141,344.89	21,287	8820244.90
		Duke	<u>6,923</u>	<u>51,306</u>	<u>14,533,949.76</u>	<u>4,944</u>	<u>435,218.92</u>	<u>42,376</u>	<u>922,253.41</u>
		Total	99,788	713,458	\$531,785,459.63	21,164	\$15,540,129.81	217,184	\$86,114,849.48
March	2007	Columbia	29,445	310,519	\$167,677,899.00	4,442	\$4,159,316.00	115,578	\$49,551,887.00
		Dominion	32,862	197,481	350,022,762.70	2,550	4,132,391.30	186,028	11,1209,800.00
		Vecuren	10,084	15,870	10,293,059.44	118	97,717.79	50,788	1,804,1781.61
		Duke	<u>12,645</u>	<u>46,425</u>	<u>17,788,941.95</u>	<u>3,942</u>	<u>401,587.30</u>	<u>28,961</u>	<u>182,435.04</u>
		Total	85,036	570,295	\$545,782,663.09	11,052	\$8,791,01212	381,355	\$178,985,903.65
September	2007	Columbia	37,281	430,579	\$184,267,082.00	10,130	\$13,424,503.00	41,353	\$20,558,479.00
		Dominion	36,665	202,465	336,937,354.20	6,266	8,251,180.62	86,463	47,914,680.08
		Vecuren	4,986	22,485	12,352,901.14	237	80,820.39	21,606	9,661,727.27
		Duke	<u>8,496</u>	<u>57,291</u>	<u>21,166,122.49</u>	<u>3,762</u>	<u>338,633.67</u>	<u>45,988</u>	<u>516,962.32</u>
		Total	87,428	712,820	\$554,723,459.83	20,395	\$22,095,137.68	195,410	\$78,651,848.67
March	2008	Columbia	37,569	323,623	\$187,301,123.00	4,598	\$2,674,882.00	104,440	\$51,705,012.00
		Dominion	29,978	206,393	384,563,561.80	1,607	2,031,811.62	175,452	97,245,113.26
		Vecuren	9,887	18,348	12,773,235.24	109	55,092.69	57,082	23,351,668.92
		Duke	<u>15,511</u>	<u>56,223</u>	<u>25,582,830.03</u>	<u>3,956</u>	<u>632,456.41</u>	<u>33,975</u>	<u>338,341.62</u>
		Total	92,945	604,587	\$610,220,750.07	10,270	\$5,394,242.72	370,949	\$172,640,135.80

<u>Month</u>	<u>Year</u>	<u>Company</u>	Column 1.04	Column 1.06	Column 1.07	Column 8.01	Column 9.01	Column 0.01	Column 10.02
			Number of Accounts on 1/3 or 1/6 Payment Plan	Number of Accounts 60 Day + ARREARS	Amount of 60+ Day Accounts	Residential Disconnects	Amount of Disconnects	Number of Disconnect Notices	Amount Disconnect Notices
September	2008	Columbia	38,405	41,897	\$200,475,316.00	10,565	\$6,900,849	46,589	\$29,598,600.00
		Dominion	30,225	196,924	370,639,644.87	9,578	8,027,166.98	91,218	47,193,699.39
		Vectren	5,164	25,746	14,936,329.94	353	134,301.15	17,745	11,212,674.16
		Duke	<u>8,682</u>	<u>66,132</u>	<u>30,271,974.98</u>	<u>3,140</u>	<u>394,000.43</u>	<u>52,972</u>	<u>383,179.56</u>
		Total	82,476	707,779	\$616,323,265.79	23,636	\$15,456,317.56	208,524	\$88,388,153.11
March	2009	Columbia	41,083	338,656	\$212,340,183.00	7,900	\$5,244,766.00	117,729	\$55,932,973.00
		Dominion	39,569	217,887	453,421,315.05	2,992	2,857,204.58	184,112	109,891,185.10
		Vectren	10,107	19,830	15,657,002.48	101	91,587.05	56,450	26,591,568.94
		Duke	<u>16,733</u>	<u>61,861</u>	<u>32,699,001.82</u>	<u>7,248</u>	<u>380,990.96</u>	<u>35,136</u>	<u>371,539.00</u>
		Total	107,492	638,234	\$714,117,502.35	18,241	\$8,574,548.59	393,427	\$192,787,266.04
September	2009	Columbia	35,206	399,154	\$201,512,068.00	9,762	\$5,089,310.00	40,207	\$16,494,533.00
		Dominion	43,246	217,715	394,955,689.05	8,609	5,503,377.25	92,248	44,207,127.95
		Vectren	3,471	17,943	12,106,414.07	315	147,597.17	20,029	8,645,050.02
		Duke	<u>8,265</u>	<u>56,659</u>	<u>20,959,823.92</u>	<u>7,221</u>	<u>102,592.18</u>	<u>53,226</u>	<u>48,177,993.09</u>
		Total	90,188	691,471	\$629,533,995.04	25,907	\$10,842,876.60	205,710	\$69,828,490
March	2010	Columbia	19,059	321,404	\$205,170,680.00	7,303	\$3,938,029.00	72,887	\$28,167,906.00
		Dominion	53,286	244,299	434,678,551.49	3,750	2,847,203.68	174,011	82,022,416.12
		Vectren	7,764	14,246	12,847,821.08	238	235,927.57	53,045	20,948,865.61
		Duke	<u>16,430</u>	<u>52,860</u>	<u>22,152,161.76</u>	<u>6,681</u>	<u>118,354.68</u>	<u>37,599</u>	<u>877,413.09</u>
		Total	96,539	632,809	\$674,849,214.33	17,972	\$7,139,514.93	337,542	\$132,016,600.82



<u>Month</u>	<u>Year</u>	<u>Company</u>	Column 1.04	Column 1.06	Column 1.07	Column 8.01	Column 9.01	Column 10.01	Column 10.02
			Number of Accounts on 1/3 or 1/6 Payment Plan	Number of Accounts 60 Day + Arrears	Amount of 60+ Day Accounts	Residential Disconnects	Amount of Disconnects	Number of Disconnect Notices	Amount Disconnect Notices
September	2010	Columbia	18,839	297,155	\$173,118,112.00	9,696	\$6,754,368.00	51,062	\$28,580,567.00
		Dominion	32,984	206,242	387,795,593.19	6,206	3,877,721.72	84,310	43,270,419.89
		Veeva	3,113	17,239	12,537,512.35	1,473	770,063.49	21,813	12,169,540.56
		Duke	8,069	59,420	23,320,096.46	7,595	969,623.49	60,002	395,537.57
		Total	63,005	580,056	\$596,771,314.00	24,970	\$12,371,776.70	217,187	\$84,416,065.02

# Attachment 5



## Utility Customer Arrearage and Disconnect Survey

Fall 2010

Based on a survey of AGA members, more customers are able to stay current on their bills and fewer customers had to be disconnected from utility service compared to last year. Nationally, the sample shows that:

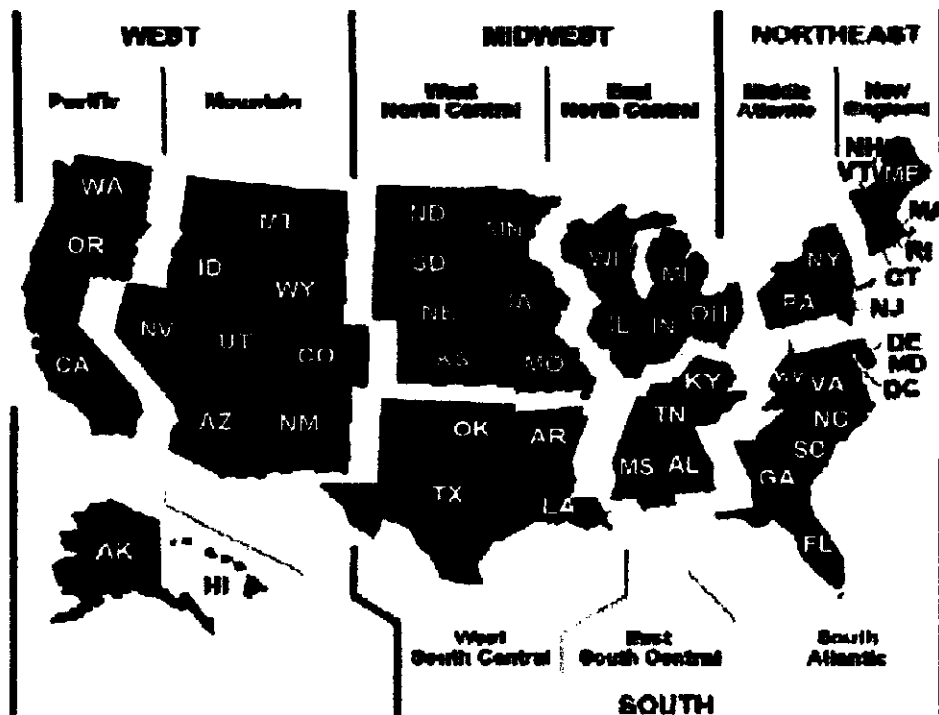
- the number of customers in arrears fell slightly more than two percent
- the total dollar amount of customer arrearages fell more than six percent
- the number of customers disconnected fell almost three percent
- the total dollar amount of past due bills of disconnected customers fell almost nine percent

However, many customers are still having trouble paying their utility bills. Almost 14 percent of utility customers of surveyed utilities are at least 30 days late in paying their bills and four percent are disconnected from utility service due to the inability to pay these bills. Regional and national survey results are presented in the table below. Numbers represent survey responses only.

### Results of Fall 2010 AGA Survey on Arrearages and Disconnects

Census Region	Arrearages			Disconnects		
	Change in Dollar Amount	Change in Number of Customers	Percent of Total	Change in Dollar Amount	Change in Number of Customers	Percent of Total
New England	-21.2%	-5.1%	20.3%	58.6%	40.3%	3.6%
Middle Atlantic	0.3%	1.8%	21.9%	-8.6%	-6.1%	3.2%
East North Central	-18.2%	-8.3%	14.2%	-22.0%	-2.2%	5.1%
West North Central	7.9%	-0.9%	15.2%	-5.2%	-7.2%	5.4%
South Atlantic	2.2%	2.6%	10.6%	35.0%	3.1%	3.9%
East South Central	-29.0%	8.7%	27.4%	-32.4%	-2.8%	5.8%
West South Central	-21.3%	-1.4%	15.2%	22.2%	-2.2%	4.9%
Mountain	-20.1%	-1.8%	0.7%	-7.4%	8.1%	2.9%
Pacific	13.1%	-1.9%	0.9%	-18.6%	-5.6%	2.7%
Total US	-6.3%	-2.2%	13.9%	-8.9%	-2.5%	4.1%

Notes: Based on utility responses to AGA survey. Survey sample represents 52 million utility customers, 40 million of which are natural gas customers (the others are electric customers from combination gas and electric utilities), representing 61 percent of all U.S. gas utility customers. "Arrears" is defined as 30 or more days late.



Source: U.S. Dept. of Energy [http://www.eia.doe.gov/emeu/cbecs/census\\_maps.html](http://www.eia.doe.gov/emeu/cbecs/census_maps.html)



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# Attachment 6

### Disconnection and Arrearage Comparison Data August – October 2009 with August – October 2010

2010 Month	Company <sup>1</sup>	Column 1.01 Number of Customers (Average)	Column 1.06 Number of Customers in Arrears > 60 days	Column 1.07 Amount of > 60 day Arrears	Column 8.01 Number of Residential Disconnects	Column 9.01 Amount of Disconnects	Column 10.01 Number of Termination Notices	Column 10.02 Amount of Notices
Aug - Oct	Columbia	1,259,969	889,284	\$526,050,449.00	30,218	\$21,009,738.79	145,196	\$76,860,774.44
	Dominion	1,092,191	620,848	\$1,175,087,013.26	20,431	\$12,581,669.18	261,820	\$132,378,565.34
	Eastern	5,980	26	\$2,554.97	69	\$7,191.28	1,056	\$98,333.06
	Natural							
	Ohio Gas	41,363	7,160	\$1,553,817.61	396	\$41,750.57	6,601	\$678,203.69
	Pike Natural	5,936	30	\$3,100.62	57	\$8,785.01	949	\$92,541.31
	Gas							
	Vecren	282,400	53,541	\$38,917,937.09	4,595	\$1,888,131.59	66,495	\$37,763,119.02
	Total	2,687,839	1,570,889	\$1,741,614,872.55	55,766	\$35,537,266.42	482,117	\$247,871,536.86
Average > 60 Day				\$1,109				
Arrearage <sup>2</sup>								
Average						\$643		
Disconnection Amount <sup>3</sup>								
Average								
Delinquent Amount on Notice <sup>4</sup>								\$514

<sup>1</sup> Companies that provide monthly OSCAR Report data to the PUCO.

<sup>2</sup> Column 1.07 divided by Column 1.06.

<sup>3</sup> Column 9.01 divided by Column 8.01.

<sup>4</sup> Column 10.02 divided by Column 10.01

**Disconnection and Arrearage Comparison Data**  
**August – October 2009 with August – October 2010**

<u>2009</u> <u>Month</u>	<u>Company</u> <sup>5</sup>	Column 1.01 Number of Customers (Average)	Column 1.06 Number of Customers in Arrears > 60 days	Column 1.07 Amount of > 60 day Arrears	Column 8.01 Number of Residential Disconnects	Column 9.01 Amount of Disconnects	Column 10.01 Number of Termination Notices	Column 10.02 Amount of Notices
Aug - Oct	Columbia	1,267,579	1,173,064	\$610,479,008.00	29,163	\$15,213,488.50	112,903	\$47,462,790.00
	Dominion	1,098,695	658,884	\$1,204,360,354.54	23,385	\$15,568,054.30	282,332	\$134,412,732.73
	Eastern Natural	6,008	30	\$5,122.57	89	\$11,545.22	1,230	\$415,619.03
	Ohio Gas	41,181	9,062	\$1,757,165.28	684	\$54,122.04	6,462	\$712,879.90
	Pike Natural Gas	5,767	32	\$3,959.71	119	\$22,553.51	1,155	\$366,933.63
	Vectren	283,068	56,036	\$38,341,707.87	2,614	\$342,445.31	58,915	\$26,131,917.54
	<b>Total</b>	<b>2,702,298</b>	<b>1,897,108</b>	<b>\$1,854,947,317.97</b>	<b>56,054</b>	<b>\$31,212,208.88</b>	<b>462,997</b>	<b>\$209,502,872.83</b>
	<b>Average &gt; 60 Day Arrearage</b>			<b>\$978</b>				
	<b>Average Disconnection Amount</b>					<b>\$557</b>		
	<b>Average Delinquent Amount on Notice</b>							<b>\$452</b>

<sup>5</sup> Companies that provide monthly OSCAR Report data to the PUCO

**Disconnection and Arrearage Comparison Data  
August – October 2009 with August – October 2010**

<b>Definition</b>	<b>Company</b>	<b>August-10</b>	<b>September-10</b>	<b>October-10</b>
<b>1.01 Number of Residential Customers</b>	Columbia	1,263,974	1,259,226	1,256,708
	Dominion	1,088,586	1,089,945	1,098,043
	Eastern Natural Gas	5,967	5,971	6,003
	Ohio Gas	41,025	41,316	41,748
	Pike Natural Gas	5,943	5,915	5,949
	Vectren	281,745	281,631	283,823
<b>1.06 Residential Accounts in Arrears &gt; 60 days</b>	Columbia	310,292	297,155	281,837
	Dominion	213,967	206,242	200,639
	Eastern Natural Gas	9	7	10
	Ohio Gas	4,646	1,445	1,069
	Pike Natural Gas	7	9	14
	Vectren	19,420	17,239	16,882
<b>1.07 Total Amount of Arrears &gt; 60 days</b>	Columbia	\$183,693,869.00	\$173,118,112.00	\$169,238,468.00
	Dominion	\$399,593,608.43	\$387,795,593.19	\$387,697,811.64
	Eastern Natural Gas	\$1,023.13	\$743.89	\$787.95
	Ohio Gas	\$632,123.08	\$460,355.58	\$461,338.95
	Pike Natural Gas	\$668.47	\$850.81	\$1,581.34
	Vectren	\$13,577,001.70	\$12,537,512.35	\$12,803,423.04
<b>8.01 Total Number of Disconnections</b>	Columbia	11,329	9,696	9,193
	Dominion	11,658	6,206	2,567
	Eastern Natural Gas	29	31	9
	Ohio Gas	289	167	171
	Pike Natural Gas	33	13	11
	Vectren	2,100	1,473	1,022



**Disconnection and Arrearage Comparison Data  
August – October 2009 with August – October 2010**

<b>Definition</b>	<b>Company</b>	<b>August-10</b>	<b>September-10</b>	<b>October-10</b>
<b>9.01 Total Amount of Disconnections</b>	Columbia	\$7,550,718.94	\$6,754,367.52	\$6,704,652.33
	Dominion	\$5,959,861.08	\$3,877,721.72	\$2,744,086.38
	Eastern Natural Gas	\$2,662.57	\$3,881.17	\$647.54
	Ohio Gas	\$24,248.87	\$11,193.82	\$6,307.88
	Pike Natural Gas	\$6,117.65	\$1,559.03	\$1,108.33
	Vectren	\$1,008,530.65	\$439,800.47	\$439,800.47
<b>10.01 Number of Termination Notices</b>	Columbia	50,986	51,062	43,148
	Dominion	93,566	84,310	83,944
	Eastern Natural Gas	396	338	322
	Ohio Gas	2,292	2,159	2,150
	Pike Natural Gas	355	306	288
	Vectren	24,504	21,813	20,178
<b>10.02 Total Amount of Termination Notices</b>	Columbia	\$ 26,710,907.61	\$ 28,580,566.81	\$ 21,569,300.02
	Dominion	\$ 45,964,671.55	\$ 43,270,419.89	\$ 43,143,473.90
	Eastern Natural Gas	\$ 37,415.01	\$ 32,174.16	\$ 28,743.89
	Ohio Gas	\$ 256,849.70	\$ 222,040.68	\$ 199,313.31
	Pike Natural Gas	\$ 34,957.66	\$ 30,874.35	\$ 26,709.30
	Vectren	\$ 14,265,891.80	\$ 12,169,540.56	\$ 11,327,686.66

**Disconnection and Arrearage Comparison Data  
August – October 2009 with August – October 2010**

<b>Definition</b>	<b>Company</b>	<b>August-09</b>	<b>September-09</b>	<b>October-09</b>
<b>1.01 Number of Residential Customers</b>	Columbia	1,272,230	1,266,747	1,263,760
	Dominion	1,094,368	1,095,710	1,106,009
	Eastern Natural Gas	5,982	6,009	6,033
	Ohio Gas	40,858	41,053	41,633
	Pike Natural Gas	5,765	5,762	5,773
	Vectren	281,956	281,742	285,505
<b>1.06 Residential Accounts in Arrears &gt; 60 days</b>	Columbia	390,006	399,154	383,904
	Dominion	228,729	217,715	212,440
	Eastern Natural Gas	12	8	10
	Ohio Gas	5,643	2,238	1,181
	Pike Natural Gas	10	10	12
	Vectren	20,283	17,943	17,810
<b>1.07 Total Amount of Arrears &gt; 60 days</b>	Columbia	\$212,807,114	\$201,512,068	\$196,159,826
	Dominion	\$ 412,918,761.34	\$ 394,955,689.05	\$ 396,485,904.15
	Eastern Natural Gas	2,886.97	1,393.32	842.28
	Ohio Gas	771429.22	491319.44	494416.62
	Pike Natural Gas	1,046.02	1,247.59	1,666.10
	Vectren	13397182.31	12106414.07	12838111.49
<b>8.01 Total Number of Disconnections</b>	Columbia	11,550	9,762	7,851
	Dominion	10,677	8,609	4,099
	Eastern Natural Gas	34	34	21
	Ohio Gas	289	194	201
	Pike Natural Gas	47	44	28
	Vectren	2,293	315	6

**Disconnection and Arrearage Comparison Data  
August – October 2009 with August – October 2010**

<b>9.01 Total Amount of Disconnections</b>	Columbia	\$6,380,919	\$5,089,310	\$3,743,260
	Dominion	\$ 7,038,371.00	\$ 5,503,377.25	\$ 3,026,306.05
	Eastern Natural Gas	5,805.75	3,917.82	1,821.65
	Ohio Gas	30,553.42	11,549.99	12,018.63
	Pike Natural Gas	12,,870.34	7,141.38	2,541.79
	Vectren	191,253.58	147,597.17	3,594.56
<b>10.01 Number of Termination Notices</b>	Columbia	41,425	40,207	31,271
	Dominion	99,026	92,248	91,058
	Eastern Natural Gas	444	416	370
	Ohio Gas	2,324	2,184	1,954
	Pike Natural Gas	420	401	334
	Vectren	22,344	20,029	16,542
<b>10.02 Total Amount of Termination Notices</b>	Columbia	\$17,905,628	\$16,494,533	\$13,062,628.44
	Dominion	\$ 45,831,340.06	\$ 44,207,127.95	\$ 44,374,264.72
	Eastern Natural Gas	169,145.80	148,951.80	97,521.43
	Ohio Gas	301,161.39	231,425.02	180,293.49
	Pike Natural Gas	180,146.43	124,746.70	62,040.50
	Vectren	102,455,98.58	86,450,50.02	72,412,68.94

# Attachment 7

**Disconnection and Arrearage Data  
Columbia, Dominion, Vectren, and Duke  
October OSCAR Report Data 2001 – 2010**

<b>Year</b>	<b>Company</b>	<b>Column 8.01 Residential Disconnects</b>	<b>Column 8.03 Customers on Payment Plan Disconnects</b>	<b>Column 9.03 Amount Owed by Column 8.03 Customers</b>
2010	Columbia	9,193	NA	NA
	Dominion	2,567	1,663	\$1,894,849.83
	Vectren	1,022	119	\$64,043.33
	Duke	<u>7,782</u>	<u>3,097</u>	<u>\$856,124.44</u>
	<b>Total</b>	<b>20,564</b>	<b>4,879</b>	<b>\$2,815,017.60</b>
2009	Columbia	7,851	NA	NA
	Dominion	4,099	3,061	\$2,536,793.84
	Vectren	6	2	\$1,789.22
	Duke	<u>6,375</u>	<u>1,743</u>	<u>\$267,169.96</u>
	<b>Total</b>	<b>18,331</b>	<b>4,806</b>	<b>\$2,805,753.02</b>
2008	Columbia	8,565	NA	NA
	Dominion	4,620	3,328	\$2,979,018.54
	Vectren	110	6	\$2,594.21
	Duke	<u>6,657</u>	<u>2,071</u>	<u>\$740,664.36</u>
	<b>Total</b>	<b>19,952</b>	<b>5,405</b>	<b>\$3,722,277.11</b>
2007	Columbia	9,021	NA	NA
	Dominion	394	317	\$434,712.42
	Vectren		NA	NA
	Duke	<u>4,402</u>	<u>1,258</u>	<u>\$901,415.20</u>
	<b>Total</b>	<b>13,817</b>	<b>1,575</b>	<b>\$1,336,127.62</b>
2006	Columbia	6,774	NA	NA
	Dominion	1,605	1,391	\$1,445,592.27
	Vectren	227	20	\$9,789.68
	Duke	<u>5,500</u>	<u>1,604</u>	<u>\$959,912.78</u>
	<b>Total</b>	<b>14,106</b>	<b>3,015</b>	<b>\$2,415,294.73</b>
2005	Columbia	7,129	NA	NA
	Dominion	NA	NA	NA
	Vectren	62	2	\$326.95
	Duke	<u>5,027</u>	<u>1,372</u>	<u>\$701,839.29</u>
	<b>Total</b>	<b>12,218</b>	<b>1,374</b>	<b>\$702,166.24</b>

**Disconnection and Arrearage Data  
Columbia, Dominion, Vectren, and Duke  
October OSCAR Report Data 2001 – 2010**

<u>Year</u>	<u>Company</u>	<b>Column 8.01 <u>Residential Disconnects</u></b>	<b>Column 8.03 <u>Customers on Payment Plan Disconnects</u></b>	<b>Column 9.03 <u>Amount Owed by Column 8.03 Customers</u></b>
2004	Columbia	7,910	NA	NA
	Dominion	1,385	1,269	\$1,979,054.29
	Vectren	111	7	\$4,324.90
	Duke	<u>3,980</u>	<u>1,354</u>	<u>\$688,532.84</u>
	<b>Total</b>	<b>13,386</b>	<b>2,630</b>	<b>\$2,671,912.03</b>
2003	Columbia	7,102	NA	NA
	Dominion	9,200	6,822	\$3,431,692.12
	Vectren	NA	NA	NA
	Duke	<u>4,262</u>	<u>1,557</u>	<u>\$713,073.86</u>
	<b>Total</b>	<b>20,564</b>	<b>8,379</b>	<b>\$4,144,765.98</b>
2002	Columbia	5,799	NA	NA
	Dominion	8,920	7,838	\$4,263,353.00
	Vectren	3,258	566	\$224,240.00
	Duke	<u>4,269</u>	<u>1,476</u>	<u>\$720,301.88</u>
	<b>Total</b>	<b>22,246</b>	<b>9,880</b>	<b>\$5,207,894.88</b>
2001	Columbia	4,677	NA	NA
	Dominion	4,158	3,616	\$3,413,572.52
	Vectren	2,833	608	\$251,011.58
	Duke	<u>4,849</u>	<u>2,116</u>	<u>\$366,563.85</u>
	<b>Total</b>	<b>16,517</b>	<b>6,340</b>	<b>\$4,031,147.95</b>

# Attachment 8

**Arrearage Statistics Ohio Gas Utilities  
Orwell Natural Gas<sup>1</sup>  
(June 1, 2009 – May 31, 2010)**

<u>Month</u>	<u>Number of Disconnects</u>	<u>Dollar Amount Disconnects</u>	<u>Number of Final Notices</u>	<u>Dollar Amount of Final Notices</u>	<u>Accounts with Arrears &gt; 60 days</u>	<u>Dollar Amount of Arrears &gt; 60 day</u>	<u>Number Deposits Collected</u>	<u>Dollar Amount Deposits Collected</u>	<u>Number of Reconnects</u>	<u>Number Residential Customers</u>
June	18	\$9,982	249	\$63,268	618	\$69,725				6,286
July	7	2,055	140	29,919	679	82,915				6,326
August	11	4,201	157	27,874	571	73,901				6,644
September	4	1,651	122	16,350	648	77,001				6,683
October	4	526	95	14,180	596	63,345				6,728
November	1	1,929	71	16,012	648	53,390				6,784
December	0	0	153	15,023	713	49,116				6,925
January	1	193	108	22,812	746	40,825				6,950
February	1	2,021	124	38,013	780	41,736				6,980
March	1	1,521	118	54,243	973	42,679				6,993
April	18	15,339	89	35,384	990	49,000				7,010
May	19	13,569	210	69,731	884	56,206				7,025
<b>Totals</b>	<b>85</b>	<b>\$52,987</b>	<b>1,636</b>	<b>\$402,809</b>	<b>8,846</b>	<b>\$699,839</b>			<b>37</b>	
Av. Disconnect Dollars		\$622								
Av. Final Notice Dollars				\$246						
Av. Dollar Amount Arrears > 60 Days						\$79.11				
Av. Deposit \$ Residential Customers										6,778

<sup>1</sup> In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code., Case 10-1222-GE-UNC, Annual Report, October 6, 2010



**Arrearage Statistics Ohio Gas Utilities**  
**Arlington Gas<sup>2</sup>**  
**(June 1, 2009 – May 31, 2010)**

<u>Month</u>	<u>Number of Disconnects</u>	<u>Dollar Amount Disconnects</u>	<u>Number of Final Notices</u>	<u>Dollar Amount of Final Notices</u>	<u>Accounts with Arrears &gt; 60 days</u>	<u>Dollar Amount of Arrears &gt; 60 day</u>	<u>Number Deposits Collected</u>	<u>Dollar Amount Deposits Collected</u>	<u>Number of Reconnects</u>	<u>Number Residential Customers</u>
June	5	\$1,547	144	\$18,729	89	\$14,978	4	\$424	0	1,525
July	0	0	0	0	74	13,069	1	96	0	1,509
August	3	723	64	7,869	111	12,302	5	584	0	1,494
September	0	0	51	3,062	72	7,146	10	1,117	2	1,496
October	0	0	36	1,974	59	4,837	14	1,390	2	1,501
November	0	0	0	0	70	5,491	8	833	1	1,521
December	0	0	29	1,839	54	2,305	4	514	2	1,523
January	0	0	100	9,191	69	4,712	6	593	0	1,518
February	0	0	113	14,500	50	4,683	3	401	0	1,515
March	1	939	142	26,753	62	5,867	5	805	0	1,515
April	8	3,453	150	31,256	61	7,755	2	117	0	1,518
May	2	1,406	160	25,680	70	10,813	2	279	0	1,517
<b>Totals</b>	<b>19</b>	<b>\$8,068</b>	<b>989</b>	<b>\$140,853</b>	<b>841</b>	<b>\$93,958</b>	<b>64</b>	<b>\$7,153</b>	<b>7</b>	
Av. Disconnect Dollars		\$425								
Av. Final Notice Dollars					\$142					
Av. Dollar Amount Arrears > 60 Days						\$112				
Av. Deposit \$ Residential Customers								\$112		1,513

<sup>2</sup> In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code., Case 10-1222-GE-UNC, Annual Report, October 13, 2010

**Arrearage Statistics Ohio Gas Utilities  
Piedmont<sup>3</sup>  
(June 1, 2009 – May 31, 2010)**

<u>Month</u>	<u>Number of Disconnects</u>	<u>Dollar Amount Disconnects</u>	<u>Number of Final Notices</u>	<u>Dollar Amount of Final Notices</u>	<u>Accounts with Arrears &gt; 60 days</u>	<u>Dollar Amount of &gt; 60 day Arrears</u>	<u>Number Deposits Collected</u>	<u>Dollar Amount Deposits Collected</u>	<u>Number of Reconnects</u>	<u>Number Residential Customers</u>
June	10	\$2,182	155	\$22,996	67	\$9,809	3	\$295	0	1,495
July	9	6,909	47	4,459	51	11,055	4	280	1	1,499
August	2	396	51	6,010	40	11,624	1	77	2	1,497
September	0	0	44	4,737	39	7,659	6	692	3	1,497
October	1	694	40	4,436	45	4,821	13	811	9	1,504
November	0	0	94	12,875	63	4,220	14	1,301	9	1,502
December	0	0	116	15,997	50	3,375	6	1,608	4	1,511
January	0	0	91	12,986	52	3,371	2	260	3	1,516
February	0	0	111	30,775	37	2,507	5	327	1	1,514
March	0	0	190	56,496	102	16,359	4	280	2	1,517
April	1	324	165	42,002	94	4,102	5	328	1	1,521
May	<u>5</u>	<u>1,742</u>	<u>156</u>	<u>27,444</u>	<u>67</u>	<u>1,885</u>	<u>5</u>	<u>372</u>	<u>0</u>	<u>1,521</u>
Totals	28	\$12,247	1,260	\$241,213	707	\$80787	68	\$6,631	35	
Av. Disconnect Dollars		\$437								
Av. Final Notice Dollars				\$191						
Av. Dollar Amount Arrears > 60 Days						\$114				
Av. Deposit \$ Residential Customers								\$98		1,508

<sup>3</sup> In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code., Case 10-1222-GE-UNC, Annual Report, September 24, 2010

**Arrearage Statistics Ohio Gas Utilities**  
**Ohio Gas<sup>4</sup>**  
**(June 1, 2009 – May 31, 2010)**

<u>Month</u>	<u>Number of Disconnects</u>	<u>Dollar Amount Disconnects</u>	<u>Number of Final Notices</u>	<u>Dollar Amount of Final Notices</u>	<u>Accounts with Arrears &gt; 60 days</u>	<u>Dollar Amount of &gt; 60 day Arrears</u>	<u>Number Deposits Collected</u>	<u>Dollar Amount Deposits Collected</u>	<u>Number of Reconnects</u>	<u>Number Residential Customers</u>
June	829	\$197,138	2,877	\$580,016	9,820	\$1,665,683	415	\$46,659	479	41,025
July	354	46,430	2,260	318,138	8,946	1,218,858	342	38,004	310	40,694
August	289	30,553	2,324	301,161	5,643	771,429	311	34,496	242	40,656
September	194	11,550	2,184	231,426	2,238	491,319	267	29,674	180	41,053
October	201	12,019	1,954	180,293	1,181	494,417	268	29,561	221	41,633
November	63	4,189	2,529	279,390	1,252	551,645	285	31,372	110	42,043
December	24	6,371	2,968	421,388	1,011	522,991	323	35,195	16	42,313
January	66	33,946	3,307	524,699	935	493,752	380	41,285	35	42,352
February	84	31,591	3,671	750,914	913	506,341	420	45,980	54	42,378
March	230	75,077	3,357	861,061	9,033	762,237	469	51,212	132	42,200
April	330	96,008	3,451	809,969	6,855	1,264,010	443	46,866	187	41,895
May	<u>553</u>	<u>127,454</u>	<u>3,420</u>	<u>765,926</u>	<u>8,741</u>	<u>1,513,445</u>	<u>411</u>	<u>45,466</u>	<u>358</u>	<u>41,592</u>
Totals	3,217	\$672,326	34,302	\$6,024,381	56,568	\$10,256,127	4,334	\$475,770	2,324	
Av. Disconnect Dollars		\$209								
Av. Final Notice Dollars						\$176				
Av. Dollar Amount Arrears > 60 Days						\$181				
Av. Deposit \$ Residential Customers								\$110		41,653

<sup>4</sup> In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code., Case 10-1222-GE-UNC, Annual Report, September 28, 2010

**Arrearage Statistics Ohio Gas Utilities  
Northeast Ohio Natural Gas<sup>5</sup>  
(June 1, 2009 – May 31, 2010)**

<u>Month</u>	<u>Number of Disconnects</u>	<u>Dollar Amount Disconnects</u>	<u>Number of Final Notices</u>	<u>Dollar Amount of Final Notices</u>	<u>Accounts with Arrears &gt; 60 days</u>	<u>Dollar Amount of Arrears &gt; 60 day</u>	<u>Number Deposits Collected</u>	<u>Dollar Amount Deposits Collected</u>	<u>Number of Reconnects</u>	<u>Number Residential Customers</u>
June	131	\$36,102	446	\$118,667	422	\$73,934	68	\$6,625	67	13,431
July	63	31,136	322	85,674	298	52,176	46	4,535	45	13,431
August	32	9,479	167	36,589	193	29,053	48	4,800	46	13,488
September	17	6,149	128	44,584	490	138,568	59	5,835	47	13,570
October	19	11,310	184	40,245	12	2,985	76	7,600	126	13,173
November	5	785	47	20,894	157	16,651	56	5,600	39	13,361
December	2	238	106	51,286	436	43,435	47	4,700	44	13,459
January	5	3,807	166	65,194	454	52,218	26	2,600	19	13,563
February	13	4,962	163	58,035	570	83,637	38	4,200	21	13,598
March	30	18,749	388	152,017	1,483	306,975	49	4,835	26	13,606
April	155	44,650	677	173,859	1,272	175,079	50	5,000	39	13,575
May	<u>116</u>	<u>21,287</u>	<u>501</u>	<u>80,531</u>	<u>1,222</u>	<u>113,648</u>	<u>74</u>	<u>7,265</u>	<u>92</u>	<u>13,476</u>
<b>Totals</b>	<b>588</b>	<b>\$188,654</b>	<b>3,295</b>	<b>\$927,575</b>	<b>7,009</b>	<b>\$1,088,359</b>	<b>637</b>	<b>\$63,595</b>	<b>616</b>	
Av. Disconnect Dollars		\$321								
Av. Final Notice Dollars				\$282						
Av. Dollar Amount Arrears > 60 Days						\$155				
Av. Deposit \$ Residential Customers								\$100		13,479

<sup>5</sup> In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code, Case 10-1222-GE-UNC, Annual Report (October 6, 2010).

**Arrearage Statistics Ohio Gas Utilities  
KNG<sup>6</sup>  
(June 1, 2009 – May 31, 2010)**

<u>Month</u>	<u>Number of Disconnects</u>	<u>Dollar Amount Disconnects</u>	<u>Number of Final Notices</u>	<u>Dollar Amount of Final Notices</u>	<u>Accounts with Arrears &gt; 60 days</u>	<u>Dollar Amount of Arrears</u>	<u>Number Deposits Collected</u>	<u>Dollar Amount Deposits Collected</u>	<u>Number of Reconnects</u>	<u>Number Residential Customers</u>
June	1	\$202	5	\$544	8	\$843	12	\$1,200	1	1,008
July	1	94	6	375	8	614	8	800	1	1,010
August	2	82	6	647	9	795	12	1,200	2	1,011
September	1	157	9	1,028	9	1,436	10	1,000	1	1,011
October	0	0	8	944	11	1,596	1	100	0	1,011
November	0	0	12	1,507	15	1,835	6	600	0	1,015
December	0	0	11	1,685	18	2,008	9	900	0	1,016
January	0	0	13	2,281	21	2,970	11	1,100	0	1,024
February	0	0	12	2,843	21	3,128	4	400	0	1,029
March	0	0	8	3,762	10	4,252	12	1,200	0	1,030
April	4	4,439	9	4,925	13	5,235	9	900	0	1,032
May	<u>2</u>	<u>455</u>	<u>7</u>	<u>1,297</u>	<u>11</u>	<u>3,497</u>	<u>3</u>	<u>300</u>	<u>2</u>	<u>1,033</u>
Totals	11	\$5,429	106	\$21,838	154	\$28,209	97	\$9,700	7	
Av. Disconnect Dollars		\$493								
Av. Final Notice Dollars						\$206				
Av. Dollar Amount Arrears > 60 Days						\$183				
Av. Deposit \$ Residential Customers								\$100		1,019

<sup>6</sup> In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code, Case 10-1222-GE-UNC, Annual Report (September 27, 2010).

**Arrearage Statistics Ohio Gas Utilities  
Suburban Gas<sup>7</sup>  
(June 1, 2009 – May 31, 2010)**

<u>Month</u>	<u>Number of Disconnects</u>	<u>Dollar Amount Disconnects</u>	<u>Number of Final Notices</u>	<u>Dollar Amount of Final Notices</u>	<u>Accounts with Arrears &gt; 60 days</u>	<u>Dollar Amount of Arrears &gt; 60 day</u>	<u>Number Deposits Collected</u>	<u>Dollar Amount Deposits Collected</u>	<u>Number of Reconnects</u>	<u>Number Residential Customers</u>
June	118	\$24,149	1,045	\$185,847	881	\$108,150	49	\$5,568	73	14,565
July	70	13,911	455	73,120	880	211,241	89	12,385	53	14,545
August	26	37,794	372	63,413	880	207,843	41	4,990	20	14,544
September	40	5,765	756	37,353	881	206,902	35	4,113	38	14,562
October	18	2,529	217	30,779	885	191,664	20	2,267	77	14,626
November	2	240	126	16,710	893	185,997	29	3,476	25	14,767
December	5	598	77	15,460	897	124,748	35	4,164	19	14,832
January	15	2,783	254	48,444	900	120,695	8	1,066	7	14,880
February	14	3,624	322	57,550	900	120,956	23	2,688	10	14,875
March	52	11,539	608	142,044	903	130,153	24	2,463	18	14,932
April	57	12,366	658	119,401	903	141,163	63	7,390	20	14,929
May	<u>181</u>	<u>31,405</u>	<u>1,210</u>	<u>217,591</u>	<u>902</u>	<u>157,726</u>	<u>31</u>	<u>3,240</u>	<u>127</u>	<u>14,904</u>
Totals	598	\$146,703	6,100	\$1,007,712	10,705	\$2,007,238	447	\$53,810	487	
Av. Disconnect Dollars		\$245								
Av. Final Notice Dollars				\$165						
Av. Dollar Amount Arrears > 60 Days						\$188				
Av. Deposit \$ Residential Customers								\$120		14,747

<sup>7</sup> In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code, Case 10-1222-GE-UNC, Annual Report (September 29, 2010).

**Arrearage Statistics Ohio Gas Utilities  
Sheldon<sup>8</sup>  
(June 1, 2009 – May 31, 2010)**

<u>Month</u>	<u>Number of Disconnects</u>	<u>Dollar Amount Disconnects</u>	<u>Number of Final Notices</u>	<u>Dollar Amount of Final Notices</u>	<u>Accounts with Arrears &gt; 60 days</u>	<u>Dollar Amount of &gt; 60 day Arrears</u>	<u>Number Deposits Collected</u>	<u>Dollar Amount Deposits Collected</u>	<u>Number of Reconnects</u>	<u>Number Residential Customers</u>
June	23	\$5,294	139	\$13,968	13	\$5,168	2	\$274	2	1,082
July	8	2,547	105	7,477	25	3,812	2	163	3	1,060
August	5	4,022	55	3,455	17	4,924	5	678	0	1,054
September	6	233	45	2,677	9	671	5	505	2	1,053
October	2	73	43	2,300	27	7,670	10	966	24	1,097
November	1	44	45	2,019	17	3,308	9	790	13	1,123
December	3	752	33	2,067	17	3,671	8	1,064	8	1,133
January	8	3,592	50	5,065	2	1,385	1	71	7	1,140
February	2	1,387	57	9,165	5	4,552	10	1,350	1	1,140
March	13	8,318	69	14,820	17	8,693	4	532	5	1,138
April	31	11,648	73	12,288	22	7,606	6	804	3	1,131
May	<u>19</u>	<u>5,369</u>	<u>153</u>	<u>20,885</u>	<u>33</u>	<u>10,446</u>	<u>2</u>	<u>281</u>	<u>5</u>	<u>1,100</u>
<b>Totals</b>	<b>121</b>	<b>\$43,279</b>	<b>867</b>	<b>\$96,186</b>	<b>204</b>	<b>\$61,906</b>	<b>64</b>	<b>\$7,478</b>	<b>73</b>	
Av. Disconnect Dollars		\$358								
Av. Final Notice Dollars				\$111						
Av. Dollar Amount Arrears > 60 Days						\$303				
Av. Deposit \$ Residential Customers								\$117		1,104

<sup>8</sup> In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code, Case 10-1222-GE-UNC, Annual Report (September 29, 2010).

**Arrearage Statistics Ohio Gas Utilities  
Columbia Gas of Ohio<sup>9</sup>  
(June 1, 2009 – May 31, 2010)**

<u>Month</u>	<u>Number of Disconnects</u>	<u>Dollar Amount Disconnects</u>	<u>Number of Final Notices</u>	<u>Dollar Amount of Final Notices</u>	<u>Accounts with Arrears &gt; 60 days</u>	<u>Dollar Amount of &gt; 60 day Arrears</u>	<u>Number Deposits Collected</u>	<u>Dollar Amount Deposits Collected</u>	<u>Number of Reconnects</u>	<u>Number Residential Customers</u>
June	15,638	\$8,912,895	62,182	\$27,396,641	374,838	\$231,057,663	1,940	\$737,768	6,533	1,293,346
July	14,281	7,827,915	44,805	19,932,181	387,806	223,183,217	3,517	862,030	5,677	1,281,392
August	11,550	6,380,919	41,425	17,905,628	390,006	212,807,114	4,500	926,483	6,237	1,272,230
September	9,762	5,089,310	40,207	16,494,533	399,154	201,512,068	6,067	1,008,948	7,022	1,266,747
October	7,851	3,743,260	31,271	13,062,628	383,904	196,159,826	692	1,362,281	11,113	1,263,760
November	3,400	1,596,191	33,722	14,127,684	388,410	205,167,296	254	1,182,538	10,084	1,263,549
December	2,386	1,009,332	42,913	18,589,050	380,181	207,928,153	9,902	1,140,830	6,257	1,263,357
January	2,663	1,491,813	58,569	24,168,559	347,904	200,959,162	8,998	1,067,821	2,829	1,273,282
February	3,568	1,941,913	63,848	26,027,468	315,219	200,489,539	8,722	1,065,225	3,039	1,283,558
March	7,303	3,938,029	72,857	28,167,906	321,404	205,170,680	6,149	844,416	4,064	1,286,917
April	10,631	5,346,896	67,045	25,394,316	299,596	104,394,117	1,813	579,560	4,476	1,288,026
May	<u>13,442</u>	<u>6,500,846</u>	<u>66,739</u>	<u>25,821,983</u>	<u>311,933</u>	<u>206,912,123</u>	<u>142</u>	<u>466,266</u>	<u>6,026</u>	<u>1,285,057</u>
Totals	102,475	\$53,779,319	625,613	\$257,088,577	4,300,355	\$2,395,740,958	52,696	\$11,244,166	73,357	
Av. Disconnect Dollars		\$525								
Av. Final Notice Dollars				\$411						
Av. Dollar Amount of Arrears > 60 Days						\$557				
Av. Deposit \$ Residential Customers								\$213		1,276,768

<sup>9</sup> In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code, Case 10-1222-GE-UNC, Annual Report (September 21, 2010).



**Arrearage Statistics Ohio Gas Utilities  
Vectren Energy Delivery of Ohio<sup>10</sup>  
(June 1, 2009 – May 31, 2010)**

<u>Month</u>	<u>Number of Disconnects</u>	<u>Dollar Amount Disconnects</u>	<u>Number of Final Notices</u>	<u>Dollar Amount of Final Notices</u>	<u>Accounts with Arrears &gt; 60 days</u>		<u>Number Deposits Collected</u>	<u>Dollar Amount Deposits Collected</u>	<u>Number of Reconnects</u>	<u>Number Residential Customers</u>
					<u>Arrears</u>	<u>Amount of &gt; 60 day Arrears</u>				
July	3,612	2,159,234	27,455	8,131,935	64,982	44,315,991	1,284	125,221	1,035	283,194
August	2,402	1,240,182	22,845	5,682,663	64,262	42,473,187	1,290	123,856	925	281,937
September	1,534	378,152	20,809	4,803,379	57,955	38,647,408	1,408	138,285	897	281,646
October	99	19,369	18,550	4,388,235	57,954	36,235,216	1,264	127,495	1,956	285,395
November	58	16,503	24,155	6,119,090	56,152	35,530,917	688	666,909	1,262	287,832
December	204	117,769	37,002	7,694,953	54,647	35,492,741	669	64,610	806	290,022
January	588	371,028	44,149	9,433,178	52,607	34,284,815	618	54,031	416	290,550
February	484	370,009	54,160	14,719,239	50,821	34,443,352	868	71,822	324	290,909
March	1,597	1,541,384	58,152	16,868,103	49,034	32,703,945	988	85,513	530	289,977
April	2,455	1,737,992	52,130	14,818,213	54,258	38,874,582	1,208	101,903	696	288,068
May	2,215	1,115,681	49,610	12,675,699	60,994	42,748,314	1,506	132,586	808	286,530
<b>Totals</b>	<b>18,766</b>	<b>\$11,703,679</b>	<b>445,409</b>	<b>\$116,927,107</b>	<b>691,140</b>	<b>\$460,512,475</b>	<b>12,911</b>	<b>\$1,204,643</b>	<b>10,509</b>	
Av. Disconnect Dollars		\$624								
Av. Final Notice Dollars				\$263						
Av. Dollar Amount of Arrears > 60 Days						\$666				
Av. Deposit \$ Residential Customers							\$93			286,797

<sup>10</sup> In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code, Case 10-1222-GE-UNC, Annual Report (October 1, 2010).

**Arrearage Statistics Ohio Gas Utilities  
Duke Energy Ohio, Inc.<sup>11</sup>  
(June 1, 2009 – May 31, 2010)**

<u>Month</u>	<u>Number of Disconnects</u>	<u>Dollar Amount Disconnects</u>	<u>Number of Final Notices</u>	<u>Dollar Amount of Final Notices</u>	<u>Accounts with Arrears &gt; 60 days</u>	<u>Dollar Amount of &gt; 60 day Arrears</u>	<u>Number Deposits Collected</u>	<u>Dollar Amount Deposits Collected</u>	<u>Number of Reconnects</u>	<u>Number Residential Customers</u>
June	7,984	\$501,404	51,506	\$17,238,231	N/A	\$45,981,416	7,112	\$840,561	4,969	587,283
July	6,762	4,370,589	49,764	15,300,961	N/A	39,591,804	7,739	901,883	4,740	584,089
August	5,537	3,287,668	44,849	13,007,853	N/A	36,971,264	7,332	836,057	3,909	584,694
September	6,867	3,563,389	53,570	15,463,644	N/A	35,421,522	8,254	928,184	4,579	579,195
October	6,062	3,314,370	42,564	12,396,743	N/A	34,746,587	8,317	916,950	5,763	576,510
November	6,454	3,764,233	39,972	12,367,045	N/A	34,454,482	6,538	686,493	5,682	578,050
December	4,353	2,405,667	38,342	11,317,693	N/A	30,835,153	6,043	571,863	3,966	574,694
January	3,831	2,170,958	29,347	9,564,539	N/A	29,960,726	5,904	530,506	3,166	553,748
February	3,531	2,067,710	31,443	9,562,149	N/A	31,934,790	6,132	544,480	2,787	572,414
March	6,307	4,128,087	36,824	12,126,725	N/A	36,525,770	6,416	525,715	4,608	569,550
April	6,066	3,549,684	62,429	21,773,826	N/A	39,805,000	6,033	512,616	3,857	562,484
May	<u>5,879</u>	<u>3,168,177</u>	<u>50,338</u>	<u>17,139,691</u>	<u>N/A</u>	<u>46,251,226</u>	<u>7,033</u>	<u>594,112</u>	<u>3,733</u>	<u>566,638</u>
Totals	69,643	\$40,805,336	530,948	\$167,259,100		\$442,479,740	82,853	\$8,389,420	51,755	
Av. Disconnect Dollars		\$586								
Av. Final Notice Dollars										
Av. Dollar Amount of Arrears > 60 Days										
Av. Deposit \$ Residential Customers									\$101	574,112

<sup>11</sup> In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code, Case 10-1222-GE-UNC, Annual Report (October 8, 2010).

**Arrearage Statistics Ohio Gas Utilities**  
**Dominion East Ohio Gas<sup>12</sup>**  
**(June 1, 2009 – May 31, 2010)**

<u>Month</u>	<u>Number of Disconnects</u>	<u>Dollar Amount Disconnects</u>	<u>Number of Final Notices</u>	<u>Dollar Amount of Final Notices</u>	<u>Accounts with Arrears &gt; 60 days</u>	<u>Dollar Amount of &gt; 60 day Arrears</u>	<u>Number Deposits Collected</u>	<u>Dollar Amount Deposits Collected</u>	<u>Number of Reconnects</u>	<u>Number Residential Customers</u>
June	14,884	\$12,472,441	126,969	\$62,322,875	249,450	\$457,580,895	282	\$37,223	5,632	1,102,958
July	13,890	9,389,298	113,899	54,058,633	239,152	434,894,125	284	38,519	5,412	1,097,317
August	10,677	7,038,371	99,026	45,831,341	228,729	412,918,761	264	33,579	4,836	1,094,368
September	8,609	5,503,377	92,248	44,207,128	217,715	394,955,689	239	31,268	4,917	1,095,710
October	4,099	3,026,306	91,058	44,374,265	212,440	396,485,904	270	36,183	7,474	1,106,009
November	851	654,887	90,120	42,290,422	211,818	399,405,990	258	32,840	3,811	1,112,695
December	200	200,090	107,741	48,118,685	212,689	400,869,871	245	31,829	2,084	1,117,099
January	458	423,755	124,633	51,354,665	217,185	399,746,834	169	20,998	657	1,118,717
February	364	335,298	147,814	63,311,834	227,718	413,004,885	215	28,495	462	1,119,520
March	3,750	2,847,204	174,011	82,022,416	224,299	434,678,551	156	18,604	2,016	1,116,694
April	5,580	4,492,412	152,884	71,237,222	253,295	449,983,424	152	16,874	2,090	1,112,434
May	<u>18,066</u>	<u>10,438,956</u>	<u>118,215</u>	<u>55,060,228</u>	<u>246,945</u>	<u>445,925,454</u>	<u>155</u>	<u>18,565</u>	<u>8,532</u>	<u>1,103,562</u>
<b>Totals</b>	<b>81,428</b>	<b>\$56,822,395</b>	<b>1,438,618</b>	<b>\$664,189,714</b>	<b>2,741,435</b>	<b>\$5,040,450,383</b>	<b>2,689</b>	<b>\$344,977</b>	<b>47,923</b>	<b>1,108,090</b>
<b>Av. Disconnect Dollars</b>		<b>\$698</b>								
<b>Av. Final Notice Dollars</b>				<b>\$462</b>						
<b>Av. Dollar Amount of Arrears &gt; 60 Days</b>						<b>\$1,839</b>				
<b>Av. Deposit \$ Residential Customers</b>								<b>\$128</b>		

<sup>12</sup> In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by Section 4933.123, Revised Code., Case 10-1222-GE-UNC, Annual Report (September 23, 2010).



# Attachment 9

**PUCO Special Data Request  
Electric Light, Natural Gas, and Duke  
Column Definition**

**SPECIAL DATA REQUEST**

Gas, natural gas, and electric light companies under the jurisdiction of the Public Utilities Commission of Ohio should forward the following information to the attention of, Tonja D. Stewart, Public Utilities Commission of Ohio, 180 E. Broad Street, Columbus, Ohio 43215-3793:

Column 01)	Total number of residential customers who avoided disconnection, or re-established service using special reconnect procedures;
Column 02)	Of those in Column one, only those customers that used special reconnect procedures to avoid disconnection;
Column 03)	Of those in Column one, the number on PIP;
Column 04)	Of those in Column one, the number on one-third plan or one-sixth plan prior to disconnect;
Column 05)	Of those in Column one, the number not on a payment plan prior to disconnect;
Column 06)	Of those in Column one, only those who signed up for PIP at the time of reconnect or disconnection avoidance, excluding customers already on PIP;
Column 07)	Of those in Column one, only those who signed up for the one-third or one-sixth payment plan at the time of reconnect or disconnection avoidance;
Column 08)	Total dollar amount that would have been required for reconnection of customers in Column one absent the special reconnect procedures;
Column 09)	Of the customers reconnected in Column one, the number disconnected for one week or less;
Column 10)	Of the customers reconnected in Column one, the number disconnected for more than one week but less than 30 days;
Column 11)	Of the customers reconnected in Column one, the number disconnected for 30 days but less than 90 days; and
Column 12)	Of the customers reconnected in Column one, the number disconnected for 90 days or more.

**PUCO Special Data Request  
Electric Light, Natural Gas, and Duke Summary  
October 2007 – April 2008**

	<u>Col. 1</u>	<u>Col. 2</u>	<u>Col. 3</u>	<u>Col. 4</u>	<u>Col. 5</u>	<u>Col. 6</u>	<u>Col. 7</u>	<u>Col. 8</u>	<u>Col. 9</u>	<u>Col. 10</u>	<u>Col. 11</u>	<u>Col. 12</u>
<b>Electric</b>	158,574	142,071	85,043	15,798	57,733	10,584	49,603	\$36,595,664.00	11,082	502	315	4,604
<b>Gas</b>	155,554	115,294	32,216	4,462	118,876	6,036	33,930	\$80,103,430.26	17,465	4,348	5,912	12,535
<b><u>Duke</u></b>	<u>33,716</u>	<u>26,792</u>	<u>10,570</u>	<u>761</u>	<u>22,385</u>	<u>399</u>	<u>17,408</u>	<u>\$12,667,990.00</u>	<u>5,811</u>	<u>490</u>	<u>622</u>	<u>1</u>
<b>Total</b>	<b>347,844</b>	<b>284,157</b>	<b>127,829</b>	<b>21,021</b>	<b>198,994</b>	<b>16,999</b>	<b>100,941</b>	<b>\$129,367,084.26</b>	<b>34,358</b>	<b>5,340</b>	<b>6,849</b>	<b>17,140</b>

	<u>Col. 1</u>	<u>Col. 2</u>	<u>Col. 3</u>	<u>Col. 4</u>	<u>Col. 5</u>	<u>Col. 6</u>	<u>Col. 7</u>	<u>Col. 8</u>	<u>Col. 9</u>	<u>Col. 10</u>	<u>Col. 11</u>	<u>Col. 12</u>
CGO	78,700	48,854	165	2,602	75,933	0	4,507	\$27,802,890.52	14,244	3,544	3,723	8,335
DEOG	65,902	59,678	29,287	206	36,409	5,622	24,434	\$46,637,857.88	2,317	458	1,313	2,136
ENG	168	82	76	0	92	14	40	\$55,386.58	49	10	17	10
KNG	3	2	0	1	2	0	2	\$1,181.47	0	0	0	1
OG	968	383	123	32	813	229	478	\$571,271.75	85	21	24	455
Pied.	802	789	2	5	795	4	5	\$100,630.63	6	0	0	7
PNG	116	65	52	0	64	57	2	\$21,141.33	6	6	39	0
Suburban	299	170	4	34	261	6	277	\$150,608.42	30	5	11	83
Vec.	8,596	5,271	2,507	1,582	4,507	104	4,185	\$4,762,461.68	728	304	785	1,508
Total	155,554	115,294	32,216	4,462	118,876	6,036	33,930	\$80,103,430.26	17,465	4,348	5,912	12,535



**PUCO Special Data Request  
Electric Light Companies Under PUCO Jurisdiction  
October 2007 – April 2008**

	<u>Col. 1</u>	<u>Col. 2</u>	<u>Col. 3</u>	<u>Col. 4</u>	<u>Col. 5</u>	<u>Col. 6</u>	<u>Col. 7</u>	<u>Col. 8</u>	<u>Col. 9</u>	<u>Col. 10</u>	<u>Col. 11</u>	<u>Col. 12</u>
<b>CEI</b>	21,294	20,248	16,336	1,243	3,715	1,143	2,592	\$3,814,015.00	659	104	86	197
<b>CSP</b>	40,069	32,295	13,155	261	26,653	1,243	21,139	\$13,801,084.00	5,654	7	5	2,108
<b>DP&amp;L</b>	21,349	19,444	7,530	10,046	3,773	3,716	8,100	\$817,016.00	972	72	77	784
<b>OE</b>	40,668	36,876	29,601	2,868	8,199	2,743	5,511	\$8,464,511.00	1,249	159	91	293
<b>OP</b>	20,561	17,336	7,852	210	12,499	1,035	10,040	\$5,831,674.00	2,028	94	2	1,101
<b>TE</b>	14,633	13,872	10,569	1,170	2,894	684	2,221	\$3,867,364.00	520	66	54	121
<b>Total</b>	<b>158,574</b>	<b>142,071</b>	<b>85,043</b>	<b>15,798</b>	<b>57,733</b>	<b>10,564</b>	<b>49,603</b>	<b>\$36,595,664.00</b>	<b>11,082</b>	<b>502</b>	<b>315</b>	<b>4,604</b>

[illegible]