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Chief of Docketing
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

February 25, 2011

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

Dear friends:

We are enclosing our Reply Comments for the above referenced case, filed on behalf of the Citizens Coalition.

We are also faxing this. Please file it today. We are mailing by regular overnight express mail. Other parties are being served by email and/or regular mail. We have also enclosed an envelope addressed back to us. Please time-stamp one of the enclosed copies and return this to us.

Let us know of any problems.

Thank you.

Very truly yours,

JOSEPH P. MEISSNER, 0022366
ATTORNEY AT LAW

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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

RECEIVED-DOCKETING DIV
2011 FEB 28 AM 9:31
PUCO

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

**REPLY COMMENTS
BY
THE NEIGHBORHOOD ENVIRONMENTAL COALITION,
THE EMPOWERMENT CENTER OF GREATER CLEVELAND,
CLEVELAND HOUSING NETWORK,
THE CONSUMERS FOR FAIR UTILITY RATES,
AND
UNITED CLEVELANDERS AGAINST POVERTY**

The Citizens Coalition is signing on to the Joint Comments being filed through the Offices of the Consumers Counsel. The Coalition fully agrees with all those comments and urges the PUCO to adopt these. We are also filing these additional Reply Comments which the Coalition asks the PUCO to consider in any decision it renders in this proceeding. We also anticipate that this case docket may continue to stay open for coming years and thus the Coalition requests that its Reply Comments be used in future activities in this case.

COMMENT 1: Much in the original NorthStar Report and even in the comments filed by the utility companies centers upon numbers of disconnections. NorthStar even seems to judge a company's credit and collection policies and activities by the number of customers who are terminated. This is almost like the "body count" mentality which unfortunately came to dominate American thinking in the War in Viet Nam. A disconnection should not be counted as some kind of victory or achievement. Actually a disconnection represents a defeat and a failure. (The Coalition leaves out disconnections based on people moving, or somebody dying, or similar kinds of understandable situations.)

The goal should be to avoid disconnections, to retain customers, to collect on bills, and to promote the economic health of the company while also reducing the rate burdens upon customers—especially low-income families—as much as possible.

COMMENT 2 Everyone realizes how serious are the economic problems which confront all Ohioans. During the past two years all of us have experienced economic hardships which are the worst since the Great Depression. We do not have to review how many people are unemployed, how many jobs have been lost, how many houses are in foreclosure, and how much family incomes have dropped. This is all compounded by the particular economic problems of our region which is served by DEO. Some of this is mentioned in various filings in this proceeding and in the NorthStar Report. But the Citizens Coalition do not believe that the full impact of all this has been taken into account either by NorthStar or by the utility companies. The Citizens Coalition is concerned that this may not be the proper time to make substantial changes in collection procedures and policies.

COMMENT 3: Everyone is in favor of an effective credit and collection process.

But Utilities must become more customer friendly from the standpoint of working out payment plans. The utilities must not be so quick to disconnect families but instead they must work with customers. The NorthStar report and the Utility Companies' Initial Comments, in the view of the Citizens Coalition, failed to emphasize this goal as much as they should have.

COMMENT 4: Member groups of the Citizens Coalition have been involved with the gas utility companies and the PUCO for decades on such programs as the Percentage of Income Payment Plan (PIPP). This program is basically intended to help low-income families so they can obtain and retain needed utility service. In fact, Coalition members were originally involved in advocating for and establishing the PIPP program in the early 1980's. The Coalition has also been involved in various efforts to improve PIPP which has included resolving the arrearage problem. This also includes the recent effort to amend and improve PIPP into what is now Termed "PIPP Plus."

The Coalition does not want to see this case turned into a fruitless and divisive exercise of "bashing" PIPP. We all recognize that PIPP is not an Entitlement Program. It is more akin to an insurance plan much like Workers Compensation and Unemployment Compensation. All customers--including low-income customers and families-- pay into PIPP through the rider. When bad economic times hit a family, PIPP is available to insure that the customer and her(his) family can still retain crucial and vital utility services. Life and health are thus protected by PIPP. Thus, just as injured workers through Workers' Comp or laid-off workers through Unemployment Compensation can find some assistance, so low-income

customers can find help through PIPP. Note also that under PIPP the low-income families must pay into PIPP every month in order to be protected by PIPP from disconnection.

The Coalition offers these remarks so that in efforts to improve collection activities, all of us still retain the broader perspective of the need for and advantages of PIPP. This program has done much good for Ohio families as well as for the Utility companies and even our State of Ohio. We must insure that we do not undermine PIPP in our efforts to improve a company's credit and collection activities.

COMMENT 5: The Coalition does want to focus on Dominion East Ohio in this particular comment. Over several decades, the Coalition has generally found that DEO is a good utility company which is concerned about its customers. The Company has had and continues to sponsor various programs to help customers and the general community. Member groups of the Citizens Coalition have worked on various projects and programs with DEO. According to the Initial Comments of the East Ohio Gas company DBA Dominion East Ohio, filed January 28, 2011, the Citizens Coalition understands that in 2011 DEO is reviewing all of its collection and credit practices as well as holding a Credit Summit for its management team.

DEO's comments also suggest that the Company is open to involving its customers and community groups in this effort. The Coalition willingly offers its help and cooperation in this effort. Our groups and their staffs have many worthwhile recommendations which can help both the Company and its customers. For example, the Citizens Coalition recommends that DEO needs to simplify its billing statements and clarify the timeframes for expected response. The Coalition has specific suggestions and recommendations which the Coalition would like to share with DEO and its staff.

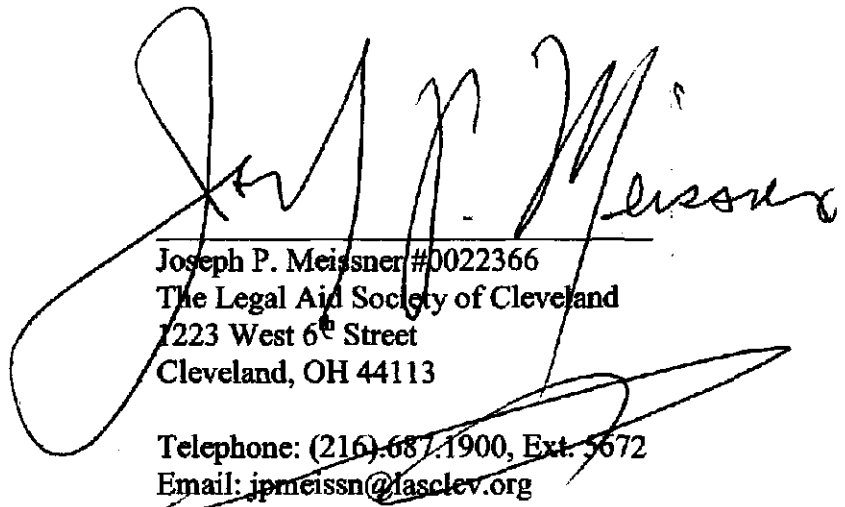
COMMENT 6: DEO and the other utilities should consider ways in which community groups can help in the collection process. Two years ago, DEO established a cooperative program with various community agencies. Some \$1.2 million in funds were provided by DEO for the year. These were used by the community agencies to help low-income families when all other resources had been exhausted. The community groups used these funds as a way of working with individual families who had bill problems. A customer in danger of being disconnected would be provided a small amount of funds while at the same time the customer was encouraged to find other funds to match either all or some of the small amount.

This cooperative one-on-one approach prevented a costly disconnection for DEO, saved service for a needy family, and even brought in some additional revenue through the matches which otherwise might never have been received by DEO.

The Citizens Coalition is suggesting that DEO—as well as other utilities—should adopt this approach again so that customers requiring assistance could work out reasonable payments. DEO would provide a modest sum—as recommended by the Citizens Coalition—of \$2 million a year to be distributed through community agencies. These agencies would work one-on-one with customers, setting up workable payment arrangements while encouraging these customers to provide matching payments. Such a policy and program would avoid disconnections that serve nobody's best interests. (When one considers how much money is lost annually in disconnections and must be made up through the riders, a sum of \$2 million for this individualized customer-oriented program is not that much.)

Conclusion: The Citizens Coalition requests that the PUCO as well as the utilities consider and adopt the recommendations the Coalition has provided in these Reply Comments.

Respectfully submitted,

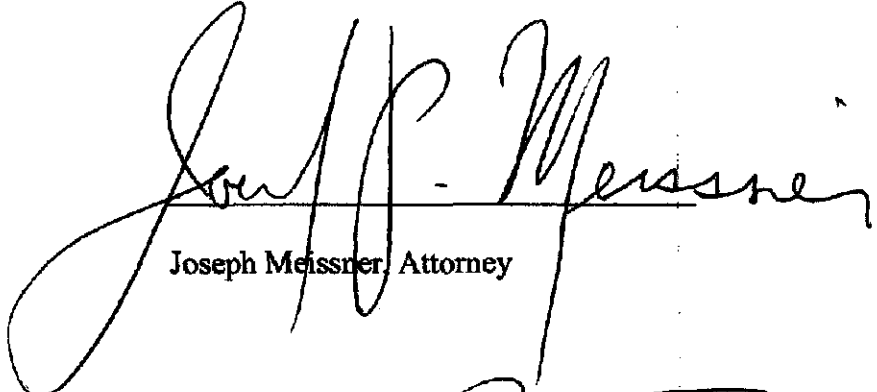


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and
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Greater Cleveland

CERTIFICATE OF SERVICE

I hereby certify that a copy of these Reply Comments were served by email, or by First Class Mail, postage prepaid, on this ____ 25th ____ day of ____ February ____, 2011.


Joseph Meissner, Attorney

