

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Request of Ohio Cumberland)
Gas Company for Waiver of the Commission's)
Rules 4901:1-13-11(B)(7) and 4901:1-13-) Case No. 11- 1298-GA-WVR
11(B)(21) Pertaining to Dates of Service Covered)
by Customer Bill and Payments or Credits)
Applied, Respectively)

Ohio Cumberland Gas Company, by and through counsel, respectfully requests waivers of certain rules included in Chapter 4901:1-13, Ohio Administrative Code, as follows:

1. Rule 4901-1-13-11(B)(7) requires that the dates of service period covered by the bill be displayed on the monthly bill. Ohio Cumberland meters are read over a five day period every month using a minimum of five field personnel. Ohio Cumberland's billing cards list the last day of the month, which is normally the final day the meters are read. The residential accounting program being used by Ohio Cumberland can use only one final ending date for the billing period. Because five reading dates are used, a payment made after the reading date but before the end-of-month are posted to the following month, with the result that the balance due appearing on the billing card will not reflect such payment or credit. To correct this issue would be expensive and place a financial burden on Ohio Cumberland to have the residential accounting program re-written. Ohio Cumberland proposes to supply this information at the customer's request from the archived meter reading documents.
2. Rule 4901-1-13-1 (B)(20) requires that the bill is to include any payments or credits applied to the account during the current billing period. Even though the individual payments and credits/debits received are not listed, the previous balance is listed on our billing card. This amount reflects the payments, credits and debits applied to the account. To correct this issue would be expensive and place a financial burden on Ohio Cumberland to have the residential accounting program re-written.

3. The requested waivers will not result in customers failing to receive accurate bills for service rendered. Ohio Cumberland is willing to supply this information at the customer's request. Ohio Cumberland's personnel provide expeditious, personal service to its customers both by telephone and in person.

WHEREFORE, Ohio Cumberland submits that good cause having been shown for the requested waivers, the waivers should be granted.

Respectfully submitted,

/s/ Andrew J. Sonderman
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Summary: Request for Waiver of Certain Rules electronically filed by Mr. Andrew J
Sonderman on behalf of Ohio Cumberland Gas Company