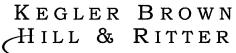
STEPHEN C. BARSOTTI STEPHEN C. BARSOTT MARY F. BRENNING JOHN P. BRODY ROBERT G. COHEN KENNETH R. COOKSON CATHRYN R. ENSIGN\*\* CATHRYN R. ENSIGN\*\* LAWRENCE F. FEHELEY LORIANN E. FUHRER DONALD W. GREGORY ALLEN L. HANDLAN PAUL R. HESS THOMAS W. HILL TIM JOCHIM CHARLES J. KEGLER TODD M. KEGLER TODD M. KEGLER RASHEEDA Z. KHAN DAVID M. McCARTY LARRY J. McCLATCHEY TRACI A. McGUIRE

JAMES J. PINGOR\*\* JEFFREY D. PORTER MARK R. REITZ PAUL D. RITTER, JR. RICHARD W. SCHUERMANN, JR. ROBERT G. SCHUER THOMAS J. SIGMUND S. MARTIJN STEGER GEOFFREY STERN JEFFREY W. STILTNER ROGER P. SUGARMAN KEVIN L. SYKES STEVE TUGEND ERIC B. TRAVERS TIMOTHY T. TULLIS STEPHANIE P. UNION CHRISTOPHER J. WEEER JAMES J. PINGOR\* CHRISTOPHER J. WEBER MELVIN D. WEINSTEIN NICHOLAS E. WILKES MICHAEL E. ZATEZALO



- A LEGAL PROFESSIONAL ASSOCIATION

DANIEL J. BENNETT KRISTY N. BRITSCH ERIN C. CLEARY ERIC D. DUFFEE BRENDAN P. FEHELEY KACIE N. FERGUSON KATHERINE C. FERGUSON MARGEAUX KIMBROUGH MICHAEL J. MADIGAN MICHAEL J. MADIGAN VINITA B. MEHRA REBECCA R. PRICE CHRISTY A. PRINCE JEFFREY D. ROBERTS JEREMIAH E. THOMAS MICHELLE H. WONG HALABI OF COUNSEL

LUIS M. ALCALDE RALPH E. BREITFELLER ROBERT D. MAROTTA TED M. McKINNISS\* RANDALL W. MIKES S. MICHAEL MILLER ANDREW J. SONDERMAN

\*Resident in Marion Office \*\*Resident in Cleveland Office

March 16, 2011

**Renée Jenkins** Secretary Public Utilities Commission of Ohio 180 East Broad Street Columbus, Ohio 43215-3973

> Case No. 11-0416-GA-WVR, Request of Ohio Cumberland Gas Company for Re: Waiver of the Commission's Rules 4901:1-13-11(B)(7) and 4901:1-13-11(B)(21) Pertaining to Dates of Service Covered by Customer Bill and Payments or Credits Applied, Respectively.

Dear Ms. Jenkins:

On March 14, a motion requesting waivers of the above-referenced rules was filed in Docket No. 11-1298-GA-WVR because the undersigned was unaware that Docket No. 11-0416-GA-WVR had been opened. Docket No. 11-1298-GA-WVR has been voided and the attached corrected Motion is submitted for filing in this docket.

Very truly yours,

andrew J. Londerman / KS

Andrew J. Sonderman Counsel for Ohio Cumberland Gas Company

4839-9391-3865, v. 1

## BEFORE

## THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Review of Chapter 4901-1-13 of the Ohio Administrative Code

Case No. 11-0416-GA-WVR

## Request of Ohio Cumberland Gas Company for Waiver of the Commission's Rules 4901:1-13-11(B)(7) and 4901:1-13-11(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 rewritten. 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)(21) 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 rewritten.

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,

<u>/s/ Andrew J. Sonderman</u> Andrew J. Sonderman (0008610) Kegler Brown Hill & Ritter LPA Capitol Square, Suite 1800 65 East State Street Columbus, Ohio 43215

Counsel for Ohio Cumberland Gas Company

4836-5653-4025, v. 1

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Case No(s). 11-0416-GA-WVR

Summary: Request Motion requesting waivers of certain rules electronically filed by Mr. Andrew J Sonderman on behalf of Ohio Cumberland Gas Company