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March 16, 2011

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

Re: 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.*

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. Sonderman
Counsel for Ohio Cumberland Gas Company

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Review of)
Chapter 4901-1-13 of the Ohio Administrative) Case No. 11-0416-GA-WVR
Code)

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 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)(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 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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Ohio Cumberland Gas Company

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in

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