

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of Application of
Suburban Natural Gas Company for
An Adjustment to the Infrastructure
Replacement Program Rider

Case No. 14-~~1006~~-GA-RDR

PRE-FILING NOTICE OF SUBURBAN NATURAL GAS COMPANY

Pursuant to the Commission's September 15, 2009 *Finding and Order* in Case No. 09-573-GA-RDR, Suburban Natural Gas Company ("Suburban") hereby gives notice that Suburban intends to file an application for approval of an adjustment to Suburban's Infrastructure Replacement Program Rider ("Rider IRP") at the Public Utilities Commission of Ohio ("Commission"). Attached to this Pre-Filing Notice are the following exhibits:

- Exhibit 1: A statement of Notice of Intent to file an adjustment to Rider IRP which includes the service area to be included in the application and dates of the proposed test year.
- Exhibit 2: A listing of municipalities included in the application along with the names and addresses to the mayors and legislative authorities to whom notices of intent to file were sent.
- Exhibit 3: The proposed tariff schedules that are intended to replace or add to current tariff schedules.
- Exhibit 4: A copy of the letter sent to mayors and legislative authorities of municipalities listed in Exhibit 2 of the Pre-Filing Notice.
- Exhibit 5: Schedules to the Rider IRP Pre-Filing Notice.

Respectfully submitted,

SUBURBAN NATURAL GAS COMPANY

By: 

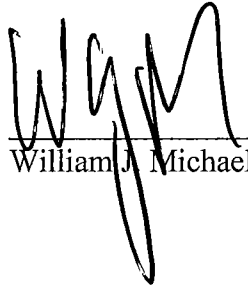
WILLIAM J. MICHAEL (0070921)
Attorney for Suburban Natural Gas Company
2626 Lewis Center Road
Lewis Center, OH 43035-9206
E-mail: bmichael@sngco.com
Telephone: (740) 548-2450

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Pre-Filing Notice was served upon the following parties of record or as a courtesy, via U.S. Mail, postage prepaid, on May 30, 2014.

Thomas G. Lindgren
Werner L. Margard
Attorney General
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

Doris E. McCarter, Division Chief
Capital Recovery and Financial Analysis
Utilities Department
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215



William J. Michael

NOTICE OF INTENT TO FILE

This document constitutes Suburban Natural Gas Company's ("Suburban") Notice of Intent to file an adjustment to its Rider IRP rates.

SERVICE AREA INCLUDED

The entire gas service area of Suburban will be included in the application for an adjustment of Rider IRP.

TEST YEAR

Test Year – Twelve (12) months ended June 30, 2014.

LISTING OF MUNICIPALITIES INCLUDED IN THE APPLICATION

MAYORS FOR 2014

Mayor Nancy Myers
Village of Cygnet
PO Box 190
Cygnet, OH 43413
Home: 419-655-2483
Office: 419-655-2715
nmyers@wcnet.org

Mayor Todd Buehrer
Village of Tontogany
PO Box 238
Tontogany, OH 43565
419-823-9013
tontoganyvillage@frontier.com

Mayor Gene Cox
Village of Jerry City
PO Box 298
Jerry City, OH 43437
Village: 419-655-3811

Mayor Richard A. Edwards
City of Bowling Green
304 North Church St.
Bowling Green, OH 43402
419-354-6204
bgcity@bgohio.org

Ms. Penny Getz, Trustee Chairman
Middleton Township
216 E. Greenwood Dr.
Haskins, OH 43525
419-823-1480
middletonclerk@midohio.rwcbc.com

Mayor Paul Gies
Village of Haskins
PO Box 182
Haskins, OH 43525
419-823-1911
www.haskinsvillage.org

Mayor Jason Worthen
Village of Weston
PO Box 354
Weston, OH 43569
419-669-3224
www.westonohio.org

Mayor Marjory Obermyer
Village of Grand Rapids
PO Box 309
Grand Rapids, OH 43522
gr.mayor@verizon.net

Mayor Dean Dawson
Village of McClure
PO Box 340
McClure, OH 43534

2014 VILLAGE CLERKS/FISCAL OFFICERS

Ms. Karen Hannah, Clerk-Treasurer
Village of Cygnet
PO Box 82
Cygnet, OH 43413
419-655-2715

Mr. Ryan Harnishfeger, Fiscal Officer
Village of Tontogany
PO Box 238
Tontogany, OH 43565

Ms. Tamara Stubbins, Fiscal Officer
Village of Jerry City
PO Box 298
Jerry City, OH 43437
419-655-3811

Ms. Kay Scherreik, Clerk of Council
City of Bowling Green
304 N. Church St.
Bowling Green, OH 43402
kay.scherreik@bgohio.org
419-354-6206

Ms. Laurie Limes, Fiscal Officer
Middleton Township
15228 Crosscreek Rd.
Bowling Green, OH 43402
419-823-1480
middletonclerk@midohio.rwcbe.com

Ms. Lisa Heft, Clerk
Village of Haskins
PO Box 182
Haskins, OH 43525
419-823-1911
www.haskinsvillage.org

Ms. Sarah Schroeder, Fiscal Officer
Village of Weston
PO Box 354
Weston, OH 43569
419-669-3224
sschroeder@westonohio.org

Ms. Kristel Joseph, Fiscal Officer
Village of Grand Rapids
PO Box 309
Grand Rapids, OH 43522
419-832-5305
www.grandrapidsohio.com

Ms. Lisa Heft
Village of McClure
145 S. Haley St.
McClure, OH 43534
419-748-8592

EXHIBIT 3A

PROPOSED TARIFF SHEET

Suburban Natural Gas Company
Cygnet, Ohio

SECTION V
Sixth Revised Sheet No. 2B
Cancels and Supersedes
Fifth Revised Sheet No. 2B

INFRASTRUCTURE REPLACEMENT PROGRAM RIDER

APPLICABILITY:

Applicable to all customers.

DESCRIPTION:

An additional charge per month per account, regardless of gas consumed, to recover costs associated with Suburban's riser inventory and identification process; customer notification and education; the replacement of customer-owned Natural Gas Risers identified in the November 24, 2006 Report by the Staff of the Public Utilities Commission of Ohio in Case No. 05-463-GA-COI as prone to failure and repair or replacement of service lines as specified in the Company's IRP Plan filed with the Public Utilities Commission of Ohio. This Rider shall be calculated annually pursuant to a Notice filed no later than May 31 of each year based on nine months of actual data and three months of estimated data for the reporting year. The filing shall be updated by no later than August 31 of the same year to reflect the use of actual reporting year data. Such adjustments to the Rider will become effective with bills rendered on November 1 of each year.

RATE:

\$.64 per Month

ISSUED: _____, 2014 EFFECTIVE: _____, 2014

Filed pursuant to the Opinion and Order of the Public Utilities
Commission of Ohio in Case No. 14-1006-GA-RDR dated _____, 2014

ISSUED BY DAVID L. PEMBERTON, JR., PRESIDENT

EXHIBIT 3B

CHANGES TO CURRENT TARIFF SHEET

Suburban Natural Gas Company
Cygnet, Ohio

SECTION V
~~Fifth-Sixth~~ Revised Sheet No. 2B
Cancels and Supersedes
~~Fourth-Fifth~~ Revised Sheet No. 2B

INFRASTRUCTURE REPLACEMENT PROGRAM RIDER

APPLICABILITY:

Applicable to all customers.

DESCRIPTION:

An additional charge per month per account, regardless of gas consumed, to recover costs associated with Suburban's riser inventory and identification process; customer notification and education; the replacement of customer-owned Natural Gas Risers identified in the November 24, 2006 Report by the Staff of the Public Utilities Commission of Ohio in Case No. 05-463-GA-COI as prone to failure and repair or replacement of service lines as specified in the Company's IRP Plan filed with the Public Utilities Commission of Ohio. This Rider shall be calculated annually pursuant to a Notice filed no later than May 31 of each year based on nine months of actual data and three months of estimated data for the reporting year. The filing shall be updated by no later than August 31 of the same year to reflect the use of actual reporting year data. Such adjustments to the Rider will become effective with bills rendered on November 1 of each year.

RATE:

~~\$.73.64~~ per Month

ISSUED: ~~December 12, 2013~~, 2014
~~12, 2013~~, 2014

EFFECTIVE: ~~December~~

Filed pursuant to the Opinion and Order of the Public Utilities
Commission of Ohio in Case No. ~~13-123414-1006~~-GA-RDR dated ~~December 11,~~
2013, 2014

ISSUED BY DAVID L. PEMBERTON, JR., PRESIDENT

EXHIBIT 3C

CURRENT TARIFF SHEET

Suburban Natural Gas Company
Cygnet, Ohio

SECTION V
Fifth Revised Sheet No. 2B
Cancels and Supersedes
Fourth Revised Sheet No. 2B

INFRASTRUCTURE REPLACEMENT PROGRAM RIDER

APPLICABILITY:

Applicable to all customers.

DESCRIPTION:

An additional charge per month per account, regardless of gas consumed, to recover costs associated with Suburban's riser inventory and identification process; customer notification and education; the replacement of customer-owned Natural Gas Risers identified in the November 24, 2006 Report by the Staff of the Public Utilities Commission of Ohio in Case No. 05-463-GA-COI as prone to failure and repair or replacement of service lines as specified in the Company's IRP Plan filed with the Public Utilities Commission of Ohio. This Rider shall be calculated annually pursuant to a Notice filed no later than May 31 of each year based on nine months of actual data and three months of estimated data for the reporting year. The filing shall be updated by no later than August 31 of the same year to reflect the use of actual reporting year data. Such adjustments to the Rider will become effective with bills rendered on November 1 of each year.

RATE:

\$.73 per Month

ISSUED: December 12, 2013

EFFECTIVE: December 12, 2013

Filed pursuant to the Opinion and Order of the Public Utilities
Commission of Ohio in Case No. 13-1231-GA-RDR dated December 11, 2013

ISSUED BY DAVID L. PEMBERTON, JR., PRESIDENT

EXHIBIT 4

SAMPLE OF THE LETTER SENT TO MAYORS
AND LEGISLATIVE AUTHORITIES LISTED IN EXHIBIT 2

SUBURBAN NATURAL GAS COMPANY
ESTABLISHED 1882



211 FRONT STREET, P.O. BOX 130
CYGNET, OHIO 43413-0130
(419) 655-2345

2626 LEWIS CENTER ROAD
LEWIS CENTER, OHIO 43085-9200
(740) 548-2450

DAVID L. PEMBERTON, JR.
PRESIDENT

May 30, 2014

Mayor Nancy Myers
Village of Cygnet
PO Box 190
Cygnet, OH 43413

Re: Application of the Suburban Natural Gas Company for an Adjustment to Rider IRP

Dear Mayor Myers:

This letter is to inform you that Suburban Natural Gas Company ("Suburban") intends to file an application for an adjustment to its Infrastructure Replacement Program Rider ("Rider IRP") with the Public Utilities Commission of Ohio ("PUCO"). The application will propose to decrease Suburban's Rider IRP from \$.73 per month to \$.64 per month.

Under its Infrastructure Replacement Program, Suburban is replacing prone to fail risers in Suburban's service territory over an accelerated time period. Suburban is also assuming the responsibility associated with the repair, replacement, and maintenance of customer service lines. In an Opinion and Order dated March 19, 2008 in *In the Matter of Application of Suburban Natural Gas Company for Authority to Increase Its Rates and Charges in Certain Areas of its Service Territory*, Case No. 07-689-GA-AIR, the PUCO approved a rider for the recovery of costs associated with the Infrastructure Replacement Program.

The proposed Rider IRP is subject to change by the PUCO. Although this letter is a formal notice to you, we also have representatives available to discuss our Rider IRP proposal. If you have any questions about our Rider IRP proposal, please call us at 419-655-2345 and we will respond to your inquiries.

Cordially,

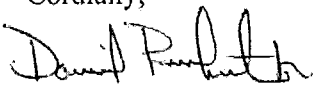

David L. Pemberton, Jr.
President

EXHIBIT 5

SCHEDULES TO RIDER IRP PRE-FILING NOTICE

Suburban Natural Gas Company
Infrastructure Replacement Program and Rider
Replacement of Service Lines and Risers - Combined Effect
For the period July 2013 to June 2014 (9 months actual 3 months budgeted)

EXHIBIT 5 – Schedule 1

Account	Account Description	Actual July 2013 Month 46	Actual Aug 2013 Month 47	Actual Sept 2013 Month 48	Actual Oct 2013 Month 49	Actual Nov 2013 Month 50	Actual Dec 2013 Month 51	Actual Jan 2014 Month 52	Actual Feb 2014 Month 53	Actual Mar 2014 Month 54	Estimated Apr 2014 Month 55	Estimated May 2014 Month 56	Estimated June 2014 Month 57
38060	IRP Service Lines			\$ 500		\$ 3,028	\$ 1,000			\$ 1,000		\$ 1,500	\$ 1,500
38070	IRP Risers	\$ 939			\$ 69								
Total		\$ 939	\$ -	\$ 500	\$ 69	\$ 3,028	\$ 1,000	\$ -	\$ -	\$ 1,000	\$ -	\$ 1,500	\$ 1,500

[illegible]

Suburban Natural Gas Company
Infrastructure Replacement Program and Rider
Replacement of Service Lines and Risers - Combined Effect
For the period July 2013 to June 2014 (9 months actual 3 months budgeted)

EXHIBIT 5 – Schedule 1 *Con't.*[illegible]

Suburban Natural Gas Company
Infrastructure Replacement Program and Rider
Replacement of Service Lines and Risers - Combined Effect
For the period July 2013 to June 2014 (9 months actual 3 months projected)

Account	Account Description	Actual July 2013 Month 46	Actual Aug 2013 Month 47	Actual Sept 2013 Month 48	Actual Oct 2013 Month 49	Actual Nov 2013 Month 50	Actual Dec 2013 Month 51	Actual Jan 2014 Month 52	Actual Feb 2014 Month 53	Actual Mar 2014 Month 54	Estimated Apr 2014 Month 55	Estimated May 2014 Month 56	Estimated June 2014 Month 57
	Forty-Second Month Expenditure	\$ 0.35	\$ 0.35	\$ 0.35	\$ 0.35	\$ 0.35	\$ 0.35	\$ 0.35	\$ 0.35	\$ 0.35	\$ 0.35	\$ 0.35	\$ 0.35
	Forty-Third Month Expenditure	\$ 6.14	\$ 6.14	\$ 6.14	\$ 6.14	\$ 6.14	\$ 6.14	\$ 6.14	\$ 6.14	\$ 6.14	\$ 6.14	\$ 6.14	\$ 6.14
	Forty-Fourth Month Expenditure	\$ 1.88	\$ 1.88	\$ 1.88	\$ 1.88	\$ 1.88	\$ 1.88	\$ 1.88	\$ 1.88	\$ 1.88	\$ 1.88	\$ 1.88	\$ 1.88
	Forty-Fifth Month Expenditure	\$ 0.87	\$ 0.87	\$ 0.87	\$ 0.87	\$ 0.87	\$ 0.87	\$ 0.87	\$ 0.87	\$ 0.87	\$ 0.87	\$ 0.87	\$ 0.87
	Forty-Sixth Month Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Forty-Seventh Month Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Forty-Eighth Month Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Forty-Ninth Month Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fiftieth Month Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fifty-First Month Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fifty-Second Month Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fifty-Third Month Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fifty-Fourth Month Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fifty-Fifth Month Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fifty-Sixth Month Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fifty-Seventh Month Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fifty-Eighth Month Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

Return on Equity (based upon approved 8.97% from rate case)

	\$ 2,354.49	\$ 2,349.93	\$ 2,347.24	\$ 2,342.94	\$ 2,349.70	\$ 2,348.86	\$ 2,339.69	\$ 2,344.27	\$ 2,338.84	\$ 2,334.24	\$ 2,335.26	\$ 2,336.26
Total Amount to Be Recovered through Rider	\$ 10,155.59	\$ 10,137.53	\$ 10,123.17	\$ 10,066.50	\$ 10,088.08	\$ 9,986.41	\$ 9,921.94	\$ 9,964.76	\$ 9,910.99	\$ 9,517.79	\$ 9,216.65	\$ 8,853.95
Total Amount that Was Billed through Rider to Customers	\$ 7,937.80	\$ 7,955.48	\$ 7,992.92	\$ 7,991.36	\$ 8,039.72	\$ 8,067.04	\$ 8,087.04	\$ 11,363.39	\$ 11,381.43	\$ 11,404.06	\$ 11,404.06	\$ 11,404.06
Net Over/Under recovered at 6/30/13												\$ 12,119.88
Net Over/Under recovered at 6/30/14	\$ 2,217.79	\$ 2,182.05	\$ 2,130.25	\$ 2,075.14	\$ 2,048.36	\$ 1,899.37	\$ 1,464.60	\$ (1,398.63)	\$ (1,470.44)	\$ (1,886.27)	\$ (2,187.41)	\$ (2,550.11)
Year 6 Total Amount to Be Recovered through Rider												\$ 106,247.00
Revised Amount to Be Recovered through Rider												\$ 119,962.40
Estimated Number of Customers												15,580
Projected Revised Rate												\$ 0.64

Suburban Natural Gas Company
Infrastructure Replacement Program and Rider
Cost of Debt Calculation

For the period July 2013 to June 2014 (9 months actual 3 months projected)

	Actual July 2013 Month 46	Actual Aug 2013 Month 47	Actual Sept 2013 Month 48	Actual Oct 2013 Month 49	Actual Nov 2013 Month 50	Actual Dec 2013 Month 51	Actual Jan 2014 Month 52	Actual Feb 2014 Month 53	Actual Mar 2014 Month 54	Estimated Apr 2014 Month 55	Estimated May 2014 Month 56	Estimated June 2014 Month 57
Beginning Balance	\$ 177,263.80	\$ 170,888.10	\$ 164,033.12	\$ 157,428.13	\$ 150,602.33	\$ 145,295.01	\$ 138,949.95	\$ 132,194.48	\$ 125,443.18	\$ 119,215.83	\$ 112,487.14	\$ 106,884.13
Amount Borrowed	\$ 469.50	\$ -	\$ 250.00	\$ 34.39	\$ 1,514.00	\$ 500.00	\$ -	\$ -	\$ 500.00	\$ -	\$ 750.00	\$ 750.00
Amount Repaid (collected through rider - 1 mo. lag)	\$ 6,845.20	\$ 6,854.98	\$ 6,854.98	\$ 6,860.19	\$ 6,821.33	\$ 6,845.05	\$ 6,755.47	\$ 6,751.30	\$ 6,727.35	\$ 6,728.69	\$ 6,353.01	\$ 6,060.23
Ending Balance	\$ 170,888.10	\$ 164,033.12	\$ 157,428.13	\$ 150,602.33	\$ 145,295.01	\$ 138,949.95	\$ 132,194.48	\$ 125,443.18	\$ 119,215.83	\$ 112,487.14	\$ 106,884.13	\$ 101,573.90
Cost of Debt Per LOC	2.365%	2.365%	2.332%	2.330%	2.318%	2.319%	2.320%	2.309%	2.305%	2.305%	2.305%	2.305%
Interest to be Recovered	\$ 336.79	\$ 323.28	\$ 305.94	\$ 292.38	\$ 280.66	\$ 268.49	\$ 255.60	\$ 241.32	\$ 228.94	\$ 216.02	\$ 205.26	\$ 195.06

EXHIBIT 5 – Schedule 3

Suburban Natural Gas Company
Infrastructure Replacement Program and Rider
Rate of Return
For the period July 2013 to June 2014 (9 months actual 3 months projected)

	Actual July 2013 Month 46	Actual Aug 2013 Month 47	Actual Sept 2013 Month 48	Actual Oct 2013 Month 49	Actual Nov 2013 Month 50	Actual Dec 2013 Month 51	Actual Jan 2014 Month 52	Actual Feb 2014 Month 53	Actual Mar 2014 Month 54	Estimated Apr 2014 Month 55	Estimated May 2014 Month 56	Estimated June 2014 Month 57
Beginning Balance	\$ 315,120.30	\$ 314,981.33	\$ 314,372.00	\$ 314,012.67	\$ 313,437.26	\$ 314,341.41	\$ 314,228.74	\$ 313,615.16	\$ 313,001.57	\$ 312,887.98	\$ 312,273.47	\$ 312,408.95
Amount Expended	\$ 469.50	\$ -	\$ 250.00	\$ 34.39	\$ 1,514.00	\$ 500.00	\$ -	\$ -	\$ 500.00	\$ -	\$ 750.00	\$ 750.00
Amount Repaid (collected through rider - 1 yr. lag)	\$ 608.46	\$ 609.33	\$ 609.33	\$ 609.79	\$ 609.86	\$ 612.66	\$ 613.59	\$ 613.59	\$ 613.59	\$ 614.51	\$ 614.51	\$ 615.90
Ending Balance	\$ 314,981.33	\$ 314,372.00	\$ 314,012.67	\$ 313,437.26	\$ 314,341.41	\$ 314,228.74	\$ 313,615.16	\$ 313,001.57	\$ 312,887.98	\$ 312,273.47	\$ 312,408.95	\$ 312,543.05
Allowable Rate of Return	8.970%	8.970%	8.970%	8.970%	8.970%	8.970%	8.970%	8.970%	8.970%	8.970%	8.970%	8.970%
Return on Equity	\$ 2,354.49	\$ 2,349.93	\$ 2,347.24	\$ 2,342.94	\$ 2,349.70	\$ 2,348.86	\$ 2,344.27	\$ 2,339.69	\$ 2,338.84	\$ 2,334.24	\$ 2,335.26	\$ 2,336.26

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/30/2014 2:49:35 PM

in

Case No(s). 14-1006-GA-RDR

Summary: Notice Pre-filing Notice of Suburban Natural Gas Company electronically filed by Brandi L. Kayser on behalf of Suburban Natural Gas Company