BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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

Case No. 14-1006-GA-RDR

STATEMENT OF SUBURBAN NATURAL GAS COMPANY

Other than a point of clarification, Suburban Natural Gas Company ("Suburban") states that it has no objection to Staff's comments and, thus, there are no issues in the comments that need resolved.¹ Accordingly, the hearing in this matter currently scheduled for October 17, 2014 is not necessary.

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: <u>bmichael@sngco.com</u> Telephone: (740) 548-2450

Facsimile: (740) 548-2455

¹ The point of clarification relates to Staff's statement that "[t]he purpose of the IRP Rider is to allow Suburban to recover the costs of replacing prone-to-fail risers, as well as its costs related to the assumption of responsibility for the maintenance, repair and replacement of customer service lines." See Comments and Recommendations Submitted on behalf of the Staff of the Public Utilities Commission of Ohio ("Comments") at 1 (and other, similar statements in the Comments). Currently, Suburban is collecting such costs through the IRP Rider. But the purpose of the IRP Rider, generally and as already approved by the Commission, also includes accelerated recovery of costs associated with systematically replacing aging pipeline. See, e.g., In the Matter of the 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, A Report by the Staff of the Public Utilities Commission of Ohio, at 26; In the Matter of the Application of The Suburban Natural Gas Company for Approval of an Infrastructure Replacement Plan and Related Matters, Case No. 09-573-GA-UNC, Staff's Report of Investigation, at 1 (and, respectively, Opinions and Orders adopting same). Although Staff's Comments in this docket are clearly aimed only at the costs Suburban is currently recovering, Suburban offers these remarks in the interest of clarity.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Statement was served upon the following parties of record or as a courtesy, via U.S. Mail, postage prepaid, on this 2 day of September 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

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/29/2014 10:24:49 AM

in

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

Summary: Response Statement of Suburban Natural Gas Company electronically filed by Brandi L. Kayser on behalf of Suburban Natural Gas Company