

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of :
Eastern Natural Gas Company for : Case No. 13-1985-GA-UNC
Approval of a New Bill Format Pursuant :
to Rule 4901:1-13-11, Ohio :
Administrative Code. :

In the Matter of the Application of **Pike** :
Natural Gas Company for Approval of : Case No. 13-1986-GA-UNC
a New Bill Format Pursuant to Rule :
4901:1-13-11, Ohio Administrative Code. :

In the Matter of the Application of :
Southeastern Natural Gas Company : Case No. 13-1987-GA-UNC
for Approval of a New Bill Format :
Pursuant to Rule 4901:1-13-11, Ohio :
Administrative Code. :

**STAFF'S MEMORANDUM IN RESPONSE TO THE
COMPANIES' MOTION FOR WAIVERS**

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December 15, 2014

STAFF’S MEMORANDUM IN RESPONSE TO THE COMPANIES’ MOTION FOR WAIVERS

On September 23, 2013 in accordance with Ohio Administrative Code 4901:1-13-11(D), Eastern Natural Gas Company, Pike Natural Gas Company, and Southeastern Natural Gas Company (“the Companies”) filed an application for approval of new bill formats in Case Nos. 13-1985-GA-UNC, 13-1986-GA-UNC, and 13-1987-GA-UNC, respectively. On November 5, 2013, the attorney examiner suspended the application from the 45-day automatic approval process in order to provide additional time for review by the Commission and Staff. *See* Entry (Nov. 5, 2013). On September 26, 2014, the Companies filed a revised application for approval of new bill formats. After engaging in a collaborative review process with Staff, the Companies filed a second revised application on November 28, 2014.

In conjunction with the second revised application, on December 4, 2014, the Companies filed a motion for waivers of certain requirements of the Ohio Administrative Code. Those requirements are as follows:

1. 4901:1-13-11(B)(6) requires that bills issued by or for the gas or natural gas company display a rate schedule, if applicable.
2. 4901:1-13-11(B)(23) requires that bills issued by or for the gas or natural gas company display an explanation of codes and abbreviations used.
3. 4901:1-18-15(D) requires that the gas or natural gas company include the PIPP customer’s anniversary date on each monthly bill.

In support of the motion for waiver, the Companies state that in order to bring the bill formats into full compliance with the requirements of the Ohio Administrative Code, additional programming changes are required. The Companies state that those changes have been communicated to their outside billing vendor and are currently in process. However, full implementation of those changes will not be completed until an unspecified point in 2015.

During the course of the collaborative review process, Staff shared with the Companies three concerns regarding certain items on the proposed formats. The first two items of concern are as follows:

1. The Gross Receipts Tax Rider sometimes appears as two line items, the result of separate GRT calculations on the fixed and usage-based charges. These two line items should be combined so they appear as a single charge.
2. On bills for PIPP and Budget customers, the order of line items in the billing detail creates confusion between the current charges and the amount currently due, which should appear as the last charge listed.

While these two areas are not addressed by specific rule requirements, Staff believes that addressing these concerns would noticeably enhance the clarity of the bill, and promote the objectives of 4901:1-13-11(B)(1), which states that “bills issued by or for the gas or natural gas company shall be accurate and rendered at monthly intervals and shall contain clear and understandable form and language.”

For the third item, Staff recommends that the Companies add a twelve-month usage history chart. Although this is not required on bills where competition is unavailable, Staff believes that the usage chart will provide valuable information to the customer.

The Companies addressed these three concerns in their second revised application, stating that implementation will require additional programming. The Companies' anticipated completion dates range from the next billing cycle to an undetermined point in 2015 as part of a system upgrade.

Staff has reviewed the second revised bill format application and motion for waiver, and recommends that both be approved by the Commission. Staff notes that the Companies state the waiver is believed to be temporary and that the Companies will continue to modify the billing formats as the new billing system matures and upgrades are implemented. Further, the Companies state that future revisions to the bill formats will be filed with the Commission for review and approval prior to implementation.

Staff recommends that if any of the pending items detailed above have not been fully implemented by June 1, 2015, the Companies should provide to Staff a report of current progress as well as anticipated deadlines for completion. Additionally, Staff recommends that the Companies continue to collaborate with Staff regarding proposed format changes.

Respectfully submitted,

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Ohio Attorney General

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Section Chief

/s/ Ryan P. O'Rourke

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PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Memorandum in Response** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail upon the Companies' counsel, Stephen M. Howard, Vorys Sater Seymour & Pease, 52 East Gay Street, Columbus, Ohio, 43215, smhoward@vorys.com, this 15th day of December, 2014.

/s/ Ryan P. O'Rourke

Ryan P. O'Rourke
Assistant Attorney General

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Case No(s). 13-1985-GA-UNC, 13-1986-GA-UNC, 13-1987-GA-UNC

Summary: Response Staff's Memorandum in Response to the Companies' Motion for Waivers submitted by Assistant Attorney General Ryan O'Rourke on behalf of the Staff of the Public Utilities Commission of Ohio. electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio