

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Columbia Gas of Ohio, Inc. for)	Case No. 15-321-GA-UEx
Approval of an Adjustment to its)	
Uncollectible Expense Rider Rate.)	

**APPLICATION OF
COLUMBIA GAS OF OHIO, INC.**

Columbia Gas of Ohio, Inc. ("Columbia"), hereby submits its annual Uncollectible Expense Rider Report, and also requests approval to decrease its Uncollectible Expense Rider rate. In support of its Application, Columbia states as follows:

1. By Finding and Order dated December 17, 2003 (the "December 17 Order"), in Case No. 03-1127-GA-UNC, the Commission approved, in concept, an Uncollectible Expense Rider for Columbia and several other natural gas companies.

2. Pursuant to the December 17 Order, Columbia is required to file an annual report each May that identifies the amounts recovered, deferred and, as applicable, amortized pursuant to the Uncollectible Expense Rider. Attached hereto as Attachment 1 is Columbia's annual Uncollectible Expense Rider Report.

3. By Entry dated April 7, 2004, in Case No. 03-2572-GA-ATA, the Commission approved Columbia's initial Uncollectible Expense Rider rate. However, the December 17 Order further provided utilities with the opportunity to adjust their Uncollectible Expense Rider rates. Pursuant to Columbia's Uncollectible Expense Rider tariffs,¹ Columbia shall request "approval to change

¹ See Section IV, Fourteenth Revised Sheet No. 29, for customers served under rate schedules SGS and GS; Section IV, Sixth Revised Sheet No. 69, for customers served under rate schedules SGTS and GTS; and Section VII, Thirteenth Revised Sheet No. 29, Page 9 of 11, for customers served

the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.”

4. On April 14, 2014, Columbia filed an Application for Approval of an Adjustment to its Uncollectible Expense Rider in Case No. 14-0321-GA-UEX. This filing proposed the establishment of a revised Uncollectible Expense Rider rate of \$0.1457 per Mcf. By Finding and Order dated May 28, 2014, the Commission approved the application and revised Uncollectible Expense Rider rate to \$0.1457 per Mcf.

5. Attachment 2 shows Columbia’s collection of the Uncollectible Expense Rider during the period June 2014 through May 2015. On May 31, 2015, Columbia projects it will have an under-collected balance of \$2,684,499. Without accounting for any projected changes in the bad debt balance, an increase of \$0.0149/Mcf would be required to make Columbia whole for this deficiency. Rather than increasing the Uncollectible Expense Rider to recover the increased total bad debt balance from June 2014 to May 2015, Columbia recommends adding the under-collected amount (\$2,684,499) to the projected total bad debt balance from June 2015 through May 2016. Therefore, included as Attachment 3, is a projection of Columbia’s anticipated bad debt from June 2015 through May 2016. Attachment 3 shows a projected bad debt write off balance of \$19,208,733 on May 31, 2016. Combining the projected under-collected balance at May 31, 2015 of \$2,684,499, with the bad debt projection as of May 31, 2016 of \$19,208,733, results in bad-debt recovery requirement of \$21,893,232 or a revised rate of \$0.1214. Therefore, Columbia proposes to decrease its current Uncollectible Expense Rider by \$0.0243/Mcf in order that it may properly match its projected bad-debt experience with recoveries during the period twelve months ending May 31, 2016.

6. Columbia believes it is reasonable to consider the prospective application of the Uncollectible Expense Rider in the development of the appropriate Uncollectible Expense Rider rate because it better matches expenses with recoveries. The computation of the Uncollectible Expense Rider rate based on the collection year: (1) properly matches recoveries with expenses; (2) is consistent with the method approved by the Commission in Case No. 14-0321-GA-UEX for determining Columbia’s current Uncollectible Expense Tracker rate; and, (3) in the aggregate, cannot result in over-collection of costs due to the

through Columbia’s CHOICE Program. All tariff sheets include identical billing rates and adjustment provisions.

annual true-up program requirements. For this reason, Columbia, therefore, proposes to decrease its Uncollectible Expense Rider rate from \$0.1457 to \$0.1214 per Mcf. The rate is comprised of: (1) Columbia's projected deferred uncollectible expenses at May 31, 2015; and (2) Columbia's estimated uncollectible accounts expense for the twelve-month period ending May 31, 2016. The calculation of the proposed Uncollectible Expense Rider rate is shown on Attachment 4.

7. The resulting Uncollectible Expense Rider rate of \$0.1214 per Mcf is just and reasonable and Columbia requests that the Commission expeditiously approve the proposed rate. Clean copies of the proposed tariff sheets and scored current tariff sheets are attached hereto as Attachment 5.

WHEREFORE, Columbia respectfully requests that the Commission approve the proposed Uncollectible Expense Rider rate proposed herein.

Respectfully submitted by,

COLUMBIA GAS OF OHIO, INC.

/s/ Brooke E. Leslie

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Attorneys for
COLUMBIA GAS OF OHIO, INC.

ATTACHMENT 1

Line No.		Calendar Year 2014 Actual Balances											
		January	February	March	April	May	June	July	August	September	October	November	December
1	Balance - Beginning of Month (a)	2,299,308	3,101,375	3,804,093	4,699,986	6,340,139	8,846,095	12,681,362	17,223,234	22,338,677	25,569,981	26,046,172	21,631,203
2	Bad Debts Written Off	2,815,131	2,546,977	2,437,604	2,841,647	3,031,284	5,176,974	5,767,966	6,418,598	4,880,390	4,686,687	8,511,163	5,413,833
3	Amortization of 2001 Deferral	-	-	-	-	-	-	-	-	-	-	-	-
4	Recovery - Base Rates	-	-	-	-	-	-	-	-	-	-	-	-
5	Consultant Fees	-	-	-	-	-	-	-	-	-	-	-	-
6	Recovery - Bad Debt Rider	662,056	681,463	574,843	357,857	172,285	(697,861)	(497,708)	(475,743)	(506,955)	(823,009)	(1,899,749)	(3,718,716)
7	Recovery - Other	(2,666,174)	(2,526,844)	(2,117,936)	(1,551,145)	(700,081)	(647,344)	(734,216)	(835,124)	(1,151,472)	(3,397,551)	(11,035,678)	(5,979,202)
8	Incremental Bad Debt (2)+[(3)+(4)+(5)+(6)+(7)	801,014	701,596	894,511	1,638,360	2,503,489	3,831,769	4,536,042	5,107,731	3,221,963	466,128	(4,424,264)	(4,284,084)
9	Balance Subtotal (1) + (8)	3,100,322	3,802,971	4,698,604	6,338,345	8,843,628	12,677,468	17,217,403	22,330,964	25,560,641	26,036,109	21,621,908	17,347,119
10	Carrying Charges [(1)+(9)/2x(12)	1,053	1,122	1,382	1,794	2,467	3,498	5,830	7,713	9,340	10,063	9,295	8,868
11	Balance - End of Month (9)+(10)	3,101,375	3,804,093	4,699,986	6,340,139	8,846,095.07	12,681,362	17,223,234	22,338,677	25,569,981	26,046,172	21,631,203	17,355,986
12	Monthly Pool Rates	0.06%	0.05%	0.05%	0.05%	0.05%	0.05%	0.06%	0.06%	0.06%	0.06%	0.06%	0.07%

Columbia Gas of Ohio, Inc.
Uncollectible Expense Rider Report
Calendar Year 2015 Actual

Line No.		January	Actual February	March
1	Balance - Beginning of Month	17,355,986	12,611,188	7,812,032
2	Bad Debts Written Off	2,751,216	3,013,636	2,827,311
3	Amortization of 2001 Deferral	-	-	-
4	Recovery - Base Rates			
5	Consultant Fees			
6	Recovery - Bad Debt Rider	(4,862,656)	(5,231,213)	(4,886,699)
7	Recovery - Other	(2,642,121)	(2,586,888)	(2,955,841)
8	Incremental Bad Debt (2)+[(3)+(4)+(5)+(6)	(4,753,561)	(4,804,465)	(5,015,229)
9	Balance Subtotal (1) + (8)	12,602,425	7,806,723	2,796,803
10	Carrying Charges [(1)+[(9)/2]x(11)	8,763	5,309	2,069
11	Balance - End of Month (9)+(10)	12,611,188	7,812,032	2,798,872
12	Monthly Pool Rates	0.09%	0.08%	0.06%

NISOURCE INC. AND SUBSIDIARIES
OPERATING COMPANIES MONEY POOL RATES
January 2014 Through March 2015

MONTH	DAYS	AVERAGE DAILY BALANCES			MONTHLY INTEREST ACCRUALS			MONTHLY RATES *		
		S-T DEBT \$	INVESTMENT \$	COMPOSITE \$	S-T DEBT \$	INVESTMENT \$	COMPOSITE \$	S-T DEBT %	INVEST %	COMPOSITE %
JAN 2014	31	328,543,419.35	0.00	328,543,419.35	199,226.62	0.00	199,226.62	0.71%	0.00%	0.71%
FEB	29	167,246,428.57	0.00	167,246,428.57	88,854.03	0.00	88,854.03	0.69%	0.00%	0.69%
MAR	31	270,738,612.90	0.00	270,738,612.90	139,152.48	0.00	139,152.48	0.61%	0.00%	0.61%
APR	30	192,372,033.33	0.00	192,372,033.33	93,526.55	0.00	93,526.55	0.59%	0.00%	0.59%
MAY	31	375,367,161.29	0.00	375,367,161.29	195,312.58	0.00	195,312.58	0.61%	0.00%	0.61%
JUN	30	642,382,433.33	0.00	642,382,433.33	337,642.80	0.00	337,642.80	0.64%	0.00%	0.64%
JUL	31	1,239,807,483.87	0.00	1,239,807,483.87	700,685.31	0.00	700,685.31	0.67%	0.00%	0.67%
AUG	31	1,373,042,096.77	0.00	1,373,042,096.77	853,034.65	0.00	853,034.65	0.73%	0.00%	0.73%
SEP	30	1,038,572,533.33	0.00	1,038,572,533.33	572,919.94	0.00	572,919.94	0.67%	0.00%	0.67%
OCT	31	1,096,835,774.19	0.00	1,096,835,774.19	612,103.45	0.00	612,103.45	0.66%	0.00%	0.66%
NOV	30	1,231,309,600.00	0.00	1,231,309,600.00	721,202.17	0.00	721,202.17	0.71%	0.00%	0.71%
DEC	31	1,286,316,612.90	0.00	1,286,316,612.90	890,127.73	0.00	890,127.73	0.81%	0.00%	0.81%
JAN 2015	31	1,196,354,516.13	0.00	1,196,354,516.13	1,111,598.18	0.00	1,111,598.18	1.09%	0.00%	1.09%
FEB	28	529,710,214.29	0.00	529,710,214.29	419,414.28	0.00	419,414.28	1.03%	0.00%	1.03%
MAR	31	30,985,612.90	0.00	30,985,612.90	19,710.90	0.00	19,710.90	0.75%	0.00%	0.75%

ATTACHMENT 2

Columbia Gas of Ohio, Inc.
Uncollectible Expense Rider Report
Based on Historic Balance @ March 31, 2015

Line No.	Description	Amount
1	Deferred Uncollectible Accounts Expense Balance As of May 31, 2015	2,684,499
2	Projected Volumes Twelve Months Ending May 31, 2016	180,441,521
3	Plus: Under(Over) Recovery of Uncollectible Expense TME May 31, 2015 per Mcf (Line 1 / Line 2)	0.0149

ATTACHMENT 3

[illegible]

ATTACHMENT 4

Columbia Gas of Ohio, Inc.
Uncollectible Expense Rider Calculation

Line No.	Description	Amount \$
1	Incremental Net Charge Offs for TME May 31, 2016 (Attachment 3 line 14)	19,208,733
2	Projected Volumes TME May 31, 2016	180,441,521
3	Proposed Revised Rate Effective June 1, 2015 per Mcf (Line 3 / Line 4)	0.1065
4	Plus: Under(Over) Recovery of Uncollectible Expense TME June 1, 2015 per Mcf (Attachment 2, Line 3)	0.0149
5	Proposed Revised Rate Effective June 1, 2015 per Mcf (Line 5 + Line 6)	\$ 0.1214

Columbia Gas of Ohio, Inc.
Projected Bad-Debt Recovery @ Current Rates

	Throughput	Current Rate	Revenue
Apr	18,031,754.7	0.1457	2,627,227
May	9,832,220.5	0.1457	1,432,555
Jun	5,235,210.4	-	-
Jul	3,435,077.9	-	-
Aug	3,313,425.5	-	-
Sep	3,489,819.5	-	-
Oct	5,553,759.2	-	-
Nov	12,597,243.3	-	-
Dec	24,195,541.0	-	-
Jan	33,330,185.8	-	-
Feb	33,393,472.7	-	-
Mar	27,809,386.3	-	-
Apr	18,208,504.6	-	-
May	9,879,894.9	-	-
Total	180,441,521		-

ATTACHMENT 5

Columbia Gas of Ohio, Inc.

SECTION VII

PART 29 - BILLING ADJUSTMENTS

UNCOLLECTIBLE EXPENSE RIDER

29.18 Applicability

To all customers served under rate schedules FRSGTS and FRGTS.

29.19 UNCOLLECTIBLE EXPENSE RIDER

A charge of ~~\$0.12140-1457~~ per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

Filed in accordance with Public Utilities Commission of Ohio Entries dated July 6, 1989 in Case No. 89-500-AU-TRF.

Issued: May 30, 2014

Effective: With meter readings on or after
May 30, 2014

Issued By
J. W. Partridge Jr. Daniel A. Creekmur, President

Columbia Gas of Ohio, Inc.

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Daniel A. Creekmur, President

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

UNCOLLECTIBLE EXPENSE RIDER

APPLICABLE:

To all customers served under rate schedules SGS and GS.

UNCOLLECTIBLE EXPENSE RIDER:

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Issued: ~~May-30, 2014~~

Effective: With meter readings on or after May-
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Issued By
~~J. W. Partridge Jr~~Daniel A. Creekmur, President

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AND SALE OF GAS**

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APPLICABLE

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in

Case No(s). 15-0321-GA-UEx

Summary: Application for approval of an adjustment to its Uncollectible Expense Rider Rate electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.