

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

IN THE MATTER OF THE APPLICATION OF)	
EASTERN NATURAL GAS COMPANY FOR)	CASE NO. 15-0307-GA-UEx
APPROVAL OF AN ADJUSTMENT TO ITS)	
UNCOLLECTIBLE EXPENSE RATE RIDER)	

APPLICATION

**Kenneth N. Rosselet, Jr.
Eastern Natural Gas Company
4100 Holiday St. N.W., Suite 201
Canton, Ohio 44718**

July 20, 2015

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THE PUBLIC UTILITIES COMMISSION OF OHIO**

IN THE MATTER OF THE APPLICATION OF)	
EASTERN NATURAL GAS COMPANY FOR)	CASE NO. 15-0307-GA-UEx
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APPLICATION

The Eastern Natural Gas Company ("Eastern") hereby submits its annual Uncollectible Expense Rider Report and respectfully requests approval to revise its Uncollectible Expense Rider rate. In support of its Application, Eastern states as follows:

1. On January 26, 2005, the Commission issued an Entry in Case No. 04-1619-GA-UEx, in which it approved Eastern's application to defer its uncollectible expenses for calendar year 2004 rather than immediately institute an uncollectible rider.
2. The Commission in its Entry in Case No. 04-1619-GA-UEx ordered that an uncollectible rider would be considered in Eastern's then current base rate case, Case No. 04-1779-GA-AIR.
3. On January 11, 2006, the Commission issued its Opinion and Order in Case No. 04-1779-GA-AIR, in which it approved the Stipulation and Recommendation of the parties and authorized the current uncollectible expense rider rate of \$0.0088 per Ccf.
4. The Stipulation and Recommendation further required Eastern to submit a report of 2004 and 2005 uncollectibles written off, balances deferred, and amounts recovered within 60 days of approval of the rider along with a description of its

credit and collection policies. This report and the description of the credit and collection policies was filed with the Commission on March 10, 2006.

5. The Stipulation and Recommendation approved by the Commission, requires that subsequent reports will be filed in May of each year and will include annual data from the prior year.
6. Eastern filed a report in compliance with the Stipulation and Recommendation on April 30, 2007 (Case NO. 07-512-GA-UEx) and requested a new rider of \$0.01203 per Ccf. The rider was approved by the Commission in its Entry of June 27, 2007 and became effective July 1, 2007.
7. On April 30, 2008, Eastern filed Case No. 08-561-GA-UEx requesting a new Uncollectible Rider rate of \$0.00808 per Ccf. The rider was approved by the Commission in its Entry on July 2, 2008 and became effective August 1, 2008.
8. On April 30, 2009, Eastern filed Case No. 09-367-GA-UEx requesting a new Uncollectible Rider rate of \$0.00460 per Ccf. The rider was approved by the Commission in its Entry on June 10, 2009 and became effective July 1, 2009.
9. On April 29, 2010, Eastern filed Case No. 10-572-GA-UEx requesting a new Uncollectible Rider rate of \$0.00758 per Ccf. The rider was approved by the Commission in its Entry on May 26, 2010 and became effective July 1, 2010.
10. On May 5, 2011, Eastern filed Case No. 11-0307-GA-UEx requesting a new Uncollectible Rider rate of -\$0.00044 per Ccf. The rider was approved by the Commission in its Entry of June 22, 2011 and became effective July 1, 2011.
11. The Commission in its Entry of June 22, 2011 directed the PUCO Staff to examine Eastern's UEx balances, write-offs, and recoveries for 2009 and 2010, and that any required adjustments or corrections be considered in Eastern's 2012 UEx rider application.
12. On November 3, 2011 the Report by the Staff of the Public Utilities Commission of Ohio, Audit of the Uncollectibles Expense Mechanisms for the Period of

January 2009 through December 2010 was filed in Case No. 11-0307-GA-UEX. The Staff in its report made no recommendations or adjustments.

13. On April 26, 2012, Eastern filed Case No. 12-0307-GA-UEX requesting a new Uncollectible Rider rate of \$0.00604 per Ccf. This rate was approved by the Commission in its Entry of June 20, 2012.
14. In Case No. 12-0307-GA-UEX, the Commission Staff also recommended that, in the next gas cost recovery financial audit for Eastern in 2013, Staff should examine the monthly UEX balances, write-offs and recoveries for 2011 and 2012, which was approved in the Commission's June 20, 2012 Entry.
15. In January 2013, the Company was purchased by Utility Pipeline Ltd.
16. On May 31, 2013, Eastern filed Case No. 13-0307-GA-UEX requesting a new Uncollectible Rider rate of (\$0.00087) per Ccf. This rate was approved by the Commission in its Entry of July 2, 2013.
17. In the Company's last financial audit, Case No 13-0307-GA-UEX, the Staff examined the Company's monthly UEX balances, write-offs, and recoveries for the period of January 2011 thru December 2012. The only recommendation made by the Staff was starting with July 2013, recoveries from collection agencies be separated from the expenses. The Company has complied with this recommendation.
18. On June 19, 2014, Eastern filed Case No. 14-0307-GA-UEX requesting a new Uncollectible Rider rate of \$0.00000 per Ccf. This rate was approved by the Commission in its Entry of August 27, 2014.
19. Due to issues involving the switchover of the billing function from the Company's previous owners and the implementation of a new billing system both in July 2013, customer billings were delayed. The Company voluntarily placed into effect from July 2013 until such time as customer billings are back on a normal schedule a non-disconnect policy. From July 2013 thru the billing period of March 2015, no customers were disconnected for non-payment. No accounts were classified as uncollectible during 2014.

20. While the moratorium on disconnections and uncollectible write-offs may distort the calculation of this year's tracker rate it is the best information the Company has available.
21. Eastern now proposes a revised Rider rate of \$0.05145 per Ccf. The rate is comprised of (1) the balance of deferred uncollectible accounts expense net of recoveries as of April 30, 2015 amortized over a two-year period and (2) the average annual bad debt write-offs and collection expenses for the period of January 2014 thru April 2015.
22. Eastern's Rider states "The Company 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." The portion of the proposed Rider increase that is attributable to the prior period under-collection exceeds +/- 10%.
23. The resulting rate of \$0.05145 per Ccf is an increase and is just and reasonable and should be approved. Copies of the proposed current tariff sheets are Attachment 2 to this Application.

WHEREFORE, Eastern respectfully requests the Commission approve the new Uncollectible Expense Rider rate proposed in this application and authorize the filing in final form of Ninth Revised Sheet 29 contained in Attachment 2 of the application.

Respectfully submitted,

/s/ *Kenneth N. Rosselet, Jr.*

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ATTACHMENT 1

Eastern Natural Gas
Case No. 15-0307-GA-UEx
Bad Debt Tracker

Line No.				
1	Actual annual sales for Twelve Months Ended April 30, 2015	860,862	Mcf	
2	Actual Bad debt deferral as of:	4/30/2015	\$ 276,318	
3	Recovery period	2	Years	
4	Recovery amount - Line 2 ÷ Line 3	138,159		
5	Recovery rate - Line 4 ÷ Line 1	\$ 0.1605	per Mcf	
6	Actual bad debt write-off and collection expense (Jan 2014 thru Apr 2015)	\$ 304,785		
7	Number of Months in Period	16	Months	
8	Average Per Month (Line 6 ÷ Line 7)	\$ 19,049		
9	Annual Amount (Line 8 x 12)	\$ 228,589		
10	Recovery rate - Line 9 ÷ Line 1	\$ 0.3540	per Mcf	
8	Total Bad debt tracker - Line 5 + line 7	\$ 0.5145	per Mcf	
9	Tracker Rate Approved Case No. 14-0307-GA-UEx	\$ -	per Mcf	
10	Change \$ - Line 8 - Line 9	\$ 0.5145		
11	Percent Change % - Line 10 ÷ Line 9	N/A		

**EASTERN NATURAL GAS COMPANY
PUCO CASE NO.15-0307-GA-UEx
UNCOLLECTIBLE ACCOUNTS EXPENSE RIDER**

Attachment 1
Page 2 of 2

2014

Annual Balance Reconciliation

	January	February	March	April	May	June	July	August	September	October	November	December
(1) Balance - Beginning of Month (a)	\$ (33,379.06)	\$ (32,247.32)	\$ (30,841.19)	\$ (29,774.17)	\$ (28,978.88)	\$ (28,574.01)	\$ (28,399.44)	\$ (28,434.77)	\$ (28,322.45)	\$ (28,322.45)	\$ (28,322.45)	\$ (28,322.45)
(2) Bad Debts Written Off	-	-	-	-	-	-	-	-	-	-	-	-
(3) Collection Agency - Expenses	27.85	18.22	56.55	-	-	-	40.15	-	-	-	-	-
(4) Collection Agency - Recovery	132.64	86.76	269.24	-	-	-	191.17	-	-	-	-	-
(5) Recovery - Bad Debt Rider (b)	(1,236.53)	(1,474.67)	(1,279.71)	(795.29)	(404.87)	(174.57)	(115.69)	(112.32)	-	-	-	-
(6) Recovery - Other (c)												
(7) Incremental Bad Debt (2)+(3)-[(4)+(5)+(6)]	\$ 1,131.74	\$ 1,406.13	\$ 1,067.02	\$ 795.29	\$ 404.87	\$ 174.57	\$ (35.33)	\$ 112.32	\$ -	\$ -	\$ -	\$ -
(8) Balance Subtotal (1)+(7)	\$ (32,247.32)	\$ (30,841.19)	\$ (29,774.17)	\$ (28,978.88)	\$ (28,574.01)	\$ (28,399.44)	\$ (28,434.77)	\$ (28,322.45)	\$ (28,322.45)	\$ (28,322.45)	\$ (28,322.45)	\$ (28,322.45)
(9) Carrying Charges {[(1)+(8)]/2}x(d)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
(10) Balance - End of Month (8)+(9)	\$ (32,247.32)	\$ (30,841.19)	\$ (29,774.17)	\$ (28,978.88)	\$ (28,574.01)	\$ (28,399.44)	\$ (28,434.77)	\$ (28,322.45)	\$ (28,322.45)	\$ (28,322.45)	\$ (28,322.45)	\$ (28,322.45)

2015

Annual Balance Reconciliation

	January	February	March	April
(1) Balance - Beginning of Month (a)	\$ (28,322.45)	\$ 28,178.22	\$ 80,260.37	\$ 115,733.71
(2) Bad Debts Written Off	56,502.67	52,082.15	35,473.34	160,584.52
(3) Collection Agency - Expenses				
(4) Collection Agency - Recovery	2.00			
(5) Recovery - Bad Debt Rider (b)				
(6) Recovery - Other (c)				
(7) Incremental Bad Debt (2)+(3)-[(4)+(5)+(6)]	\$ 56,500.67	\$ 52,082.15	\$ 35,473.34	\$ 160,584.52
(8) Balance Subtotal (1)+(7)	\$ 28,178.22	\$ 80,260.37	\$ 115,733.71	\$ 276,318.23
(9) Carrying Charges {[(1)+(8)]/2}x(d)	\$ -	\$ -	\$ -	\$ -
(10) Balance - End of Month (8)+(9)	\$ 28,178.22	\$ 80,260.37	\$ 115,733.71	\$ 276,318.23

- (a) Excludes any deferred balance related to disconnection moratorium until amortized
- (b) Calculated: Actual consumption per month times authorized rider rate of rate **-\$0.0087 per Ccf** effective August 1, 2013 (Case No. 13-0307-GA-UEx) and authorized rider rate of **\$0.0000** per Ccf effective September 1, 2014 (Case No. 14-0307-GA-UEx.)
- However, due to issues of implementing a new billing system, the approved rates were not implemented during the period of August thru December. The amounts shown are the actual amounts billed during this period.

(c) Consists of customer payments, agency assistance, supplier discounts												
(d) Enter net monthly carrying charge rate	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Notes:

Carrying charge rate should be net of tax rate in calculation of recoverable balance

Disconnection Moratorium balances not eligible for carrying charges

ATTACHMENT 2

6. Uncollectible Expense Rider

Applicability. Applicable to all volumes served under the General Service Residential Rate (GSR) and General Service Commercial Rate (GSC). An additional charge shall be applied to all volumes for service rendered to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. The Company 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. The current Uncollectible Expense Rider rate is \$0.05145 per Ccf.

Issued: _____

Effective: _____

Filed Under Authority of Case No. 15-0307-GA-UEX
Issued by the Public Utilities Commission of Ohio

Issued by Andrew G. Duckworth, President

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in

Case No(s). 15-0307-GA-UEX

Summary: Application to revise the current UEX rate. electronically filed by Mr. Kenneth N Rosselet on behalf of Eastern Natural Gas Company