

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Columbia Gas of Ohio, Inc. for Approval of)	Case No. 16-1309-GA-UNC
Demand Side Management Programs for)	
its Residential and Commercial Customers.)	

In the Matter of the Application of)	
Columbia Gas of Ohio, Inc. for Approval)	Case No. 16-1310-GA-AAM
to Change Accounting Methods.)	

**OHIO PARTNERS FOR AFFORDABLE ENERGY'S
MEMORANDUM CONTRA**

Ohio Partners for Affordable Energy ("OPAЕ") herein submits to the Public Utilities Commission of Ohio ("Commission") this memorandum contra one of the requests made in the June 22, 2016 motion of the Office of the Ohio Consumers' Counsel ("OCC") for a procedural schedule. OPAЕ objects specifically to OCC's request for a procedural schedule that disregards the September 28, 2016 date for the issuance of an Opinion and Order in these cases.

OPAЕ does not oppose OCC's motion for the adoption of a procedural schedule that allows for the full development of a factual record or appropriate due process. OPAЕ does not object to the filing of direct expert testimony. OPAЕ does not object to a hearing. However, OCC's proposed procedural schedule requests that a hearing commence on October 3, 2016 and that the Commission's Opinion and Order be issued at the Commission's discretion.

These applications made by Columbia Gas of Ohio, Inc. ("Columbia") are for approval of demand-side management ("DSM") programs for residential and commercial customers and a change in accounting methods. Columbia requested an Opinion and Order by September 28, 2016 because the current DSM program expires on December 31, 2016. The accelerated timeline is necessary in order to

have the program approved in time for delivery for calendar year 2017. Columbia Application at 21.

In these applications, Columbia is requesting to continue and enhance already existing programs. In Case No. 08-72-GA-AIR, in its December 3, 2008 Opinion and Order, the Commission approved the current procedures for the recovery of Columbia's DSM costs. The Commission approved the DSM program that Columbia is seeking in these applications to continue and enhance in Case Nos. 08-833-GA-UNC, 11-5028-GA-UNC and 11-5029-GA-AAM. Consistent with the Stipulation approved by the Commission in Case Nos. 11-5028-GA-UNC and 11-5029-GA-AAM, Columbia is requesting a continuation of the deferral treatment and cost recovery set forth in the 2011 dockets. In short, these instant applications represent the continuation and enhancement of already existing programs with funding procedures that are already in place.

The procedural schedule should recognize the necessity of the continuation of these already-existing programs in calendar year 2017. Because the current DSM program expires on December 31, 2016, Columbia's request for an accelerated timeline should be honored in order to have the DSM program approved in time for delivery for calendar year 2017.

Therefore, OPAE joins Columbia in requesting that the Opinion and Order in these cases be issued by September 28, 2016, and that any procedural schedule for testimony or hearings be established to accomplish an Opinion and Order by September 28, 2016.

Respectfully submitted,

s/s Colleen Mooney

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CERTIFICATE OF SERVICE

A copy of the foregoing Memorandum Contra will be served by the Commission's Docketing Division electronically upon the persons identified below who are electronically subscribed to these cases on this 7th day of July 2016.

/s/Colleen Mooney
Colleen L. Mooney

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Case No(s). 16-1309-GA-UNC, 16-1310-GA-AAM

Summary: Memorandum Contra electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy