

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Co- )  
lumbia Gas of Ohio, Inc. for Approval of ) Case No. 16-2422-GA-ALT  
an Alternative Form of Regulation to Ex- )  
tend and Increase Its Infrastructure Re- )  
placement Program. )

**INITIAL POST-HEARING BRIEF OF  
COLUMBIA GAS OF OHIO, INC.**

**1. INTRODUCTION**

On February 27, 2017, Columbia Gas of Ohio, Inc. (“Columbia”) filed an Application to extend Columbia’s Infrastructure Replacement Program (“IRP”) and Rider IRP for an additional five-year term (2018-2022).<sup>1</sup> On August 18, 2017, Columbia, Commission Staff (“Staff”), and Ohio Partners for Affordable Energy (“OPAЕ”) filed a Joint Stipulation and Recommendation (“Stipulation”) to extend the IRP and otherwise resolve all issues in this proceeding, with no opposition from Industrial Energy Users-Ohio (“IEU-Ohio”).<sup>2</sup> Only the Office of the Ohio Consumers’ Counsel (“OCC”) opposed the Stipulation.

The Commission approved Columbia’s alternative regulation plan and Rider IRP almost nine years ago.<sup>3</sup> Since then, Columbia’s IRP has replaced bare steel, cast iron, wrought iron, and unprotected coated steel mains in the Columbia gas distribution system at a reasonable cost to consumers. It has replaced prone-to-fail risers, repaired and replaced hazardous customer service lines, and installed automated meter reading devices. And, it has replaced inside meters with outside meters where necessary to mitigate the safety risks associated with higher operating pressures on those replaced mains. These investments under the IRP have benefited Columbia’s consumers by economically improving the safety and reliability of gas distribution service and demonstrated an overall reduction in

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<sup>1</sup> Columbia Exhibit 1.

<sup>2</sup> Joint Exhibit 1.

<sup>3</sup> The Commission originally approved Columbia’s alternative regulation plan in Case No. 08-0073-GA-ALT, *et al.* The Commission approved a stipulation to extend the Rider IRP in Case No. 11-5515-GA-ALT, *et al.*

leaks found since the IRP began. Columbia, Staff, and OPAE now ask the Commission to allow those benefits to continue.

As demonstrated below, the Stipulation meets the Commission's criteria for the approval of settlements. The Stipulation should be approved without modification.

## **2. HISTORICAL AND CURRENT IRP AND PROPOSED IRP EXTENSION**

In April 2008, the Commission approved a stipulation making Columbia responsible for maintaining, repairing, and replacing hazardous customer service lines.<sup>4</sup> The Commission further authorized Columbia to capitalize its investment in the repair and replacement of such lines; defer related depreciation, incremental property taxes, and post-in-service carrying charges; and recover those costs through a monthly, fixed IRP Rider updated annually.<sup>5</sup>

In December 2008, the Commission approved a stipulation establishing a revised rider, Rider IRP, for a period of five years and adding two components to the IRP: an Accelerated Mains Replacement Program ("AMRP") and an Automatic Meter Reading Devices ("AMRD") Program.<sup>6</sup> The AMRP is a 25-year program under which Columbia will ultimately replace an estimated 4,100 miles of corroding and hazardous bare steel, unprotected coated steel, wrought iron, and cast iron mains ("priority pipe") and associated metallic service lines.<sup>7</sup> The AMRD Program entailed the installation of AMRDs on residential and commercial meters served by Columbia over a five-year period.<sup>8</sup> The Commission also reaffirmed Columbia's

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<sup>4</sup> See *In the Matter of the Application of Columbia Gas of Ohio, Inc., for Approval of Tariffs to Recover, Through an Automatic Adjustment Clause, Costs Associated with the Establishment of an Infrastructure Replacement Program and for Approval of Certain Accounting Treatment*, Case No. 07-478-GA-UNC, Opinion and Order, at 9, 34, and 36 (Apr. 9, 2008).

<sup>5</sup> *Id.* at 10-12.

<sup>6</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Form of Regulation and for a Change in its Rates and Charges*, Case No. 08-0072-GA-AIR *et al.*, Opinion and Order, at 8, 26 (Dec. 3, 2008).

<sup>7</sup> See *id.* See also Joint Exhibit 1 at 2, fn. 4. Columbia's estimated 4,050 miles of priority pipe was clarified in Case No. 11-5515-GA-ALT to be an estimated 4,100 miles of priority pipe, of which 155 miles of unprotected coated steel were included in the total mileage amount. See Columbia Exhibit 1 at Exhibit A, Detailed Alternative Rate Plan at 7, fn. 48.

<sup>8</sup> Columbia Exhibit 1 at 3.

responsibility for maintaining, repairing, and replacing service lines “determined \* \* \* to present an existing or probable hazard to persons and property \* \* \* .”<sup>9</sup>

In November 2012, the Commission approved a stipulation extending the IRP for an additional five years (incorporating IRP investments made from January 1, 2013, through December 31, 2017), with certain clarifications.<sup>10</sup> Among other things, the Commission authorized Columbia to:

- replace non-priority pipe as part of Columbia’s AMRP when it is more economical to replace such pipe than to attempt to tie into the existing sections of pipe, but only if the pipe length is less than or equal to certain specified footages (between 205 feet and 435 feet, depending on pipe diameter);<sup>11</sup>
- replace sections of plastic pipe associated with priority pipe-replacement projects, so long as the plastic pipe replaced did not exceed 5% of the pipe footage replaced under the AMRP each year;<sup>12</sup>
- replace ineffectively coated steel pipe associated with priority pipe-replacement projects, so long as Columbia cathodically tested the coating on any coated steel pipe installed after 1954 and only included the costs of testing and replacing ineffectively coated steel pipe in Rider IRP;<sup>13</sup>
- capitalize and recover the cost to move inside meters outside where Columbia replaced the pipe segment associated with the meter as part of the AMRP, increased the pipe’s pressure to regulated pressure (greater

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<sup>9</sup> *Id.* at 6.

<sup>10</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Form of Regulation*, Case No. 11-5515-GA-ALT, Opinion and Order (Nov. 28, 2012).

<sup>11</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Form of Regulation*, Case No. 11-5515-GA-ALT, Opinion and Order, at 4, 5, 12 (Nov. 28, 2012). *See also* Columbia Exhibit 1 at Exhibit A, Detailed Alternative Rate Plan at 8. Columbia may replace 205 feet of 8-inch pipe, 250 feet of 6-inch pipe, 365 feet of 4-inch pipe, and 435 feet of 2-inch pipe.

<sup>12</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Form of Regulation*, Case No. 11-5515-GA-ALT, Opinion and Order, at 4, 5, 12 (Nov. 28, 2012).

<sup>13</sup> *Id.* at 6, 12.

than 1 psig), and operated the replacement mains and associated service lines at that pressure within two years;<sup>14</sup> and

- recover costs associated with replacing pipe segments that include priority pipe when a governmental entity asks Columbia to relocate its facilities within a public right-of-way, if plastic pipe makes up no more than 25% of the total relocated footage.<sup>15</sup>

The approved stipulation also established a new basis for calculating O&M savings from the AMRP, to be reflected as a reduction to the Rider IRP rate, and new guaranteed minimum O&M savings (rising from \$750,000 in 2012 to \$1,250,000 in 2014 to 2017).<sup>16</sup> Additionally, it imposed limits on the monthly Rider IRP charge for Columbia's Small General Service and Small General Transportation Service (collectively, "SGS Class") customers, starting at \$6.20 for investments made in 2013 and rising to \$10.20 for investments made in 2017.<sup>17</sup> Finally, it required Columbia to provide \$2,562,500, funded by Columbia's shareholders, to continue its low-income customer assistance fund through the 2017-18 winter heating season.<sup>18</sup>

Columbia, with Staff and OPAE's support, now seeks the Commission's approval to continue the IRP and Rider IRP, under the scope and procedures currently applicable to both, for another five-year period, from 2018 through 2022.<sup>19</sup> The stipulating parties agree that Columbia may continue its Rider IRP at the current rate of return, but with greater guaranteed minimum O&M savings than the current IRP.<sup>20</sup> Concomitantly, the Stipulation sets new caps on the monthly Rider

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<sup>14</sup> *Id.* at 6-7, 12.

<sup>15</sup> *Id.* at 7, 12.

<sup>16</sup> *Id.* at 7-8, 12.

<sup>17</sup> *Id.* at 8-9, 12.

<sup>18</sup> *Id.* at 9, 12.

<sup>19</sup> Columbia Exhibit 1; Joint Exhibit 1.

<sup>20</sup> *See* Joint Exhibit 1.

IRP charge to be paid by Columbia's SGS Class,<sup>21</sup> as follows, all of which are lower than the caps originally proposed in Columbia's Application:<sup>22</sup>

<b>Investment Year</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>Rates Effective</b>	May 2019	May 2020	May 2021	May 2022	May 2023
<b>Maximum Rider IRP SGS Class Rate</b>	\$11.35	\$12.50	\$13.70	\$14.95	\$16.20
<b>Minimum AMRP O&amp;M Savings</b>	\$2.00 million	\$2.00 million	\$2.25 million	\$2.50 million	\$2.50 million

### 3. ARGUMENT

The Commission has adopted (and the Supreme Court of Ohio has approved)<sup>23</sup> a three-part test for considering settlements, which asks:

- (1) Is the settlement a product of serious bargaining among capable, knowledgeable parties?
- (2) Does the settlement, as a package, benefit ratepayers and the public interest?
- (3) Does the settlement package violate any important regulatory principle or practice?<sup>24</sup>

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<sup>21</sup> The SGS Class includes Small General Sales Service, Small General Schools Sales Service, Small Gas Transportation Service, Small General Schools Transportation Service, Full Requirements Small General Transportation Service, and Full Requirements Small General Schools Transportation Service. *See* Columbia Exhibit 3, Beil Testimony, at 4-5 n. 1.

<sup>22</sup> *See* Joint Exhibit 1.

<sup>23</sup> *Indus. Energy Consumers of Ohio Power Co. v. Pub. Util. Comm.*, 68 Ohio St.3d 559 (1994).

<sup>24</sup> *See, e.g., In the Matter of the Application of Columbia Gas of Ohio, Inc., for Approval of Demand-Side Management Programs for its Residential and Commercial Customers*, Case Nos. 11-5028-GA-UNC, *et al.*, Finding and Order, at 7 (December 14, 2011).

Although not binding on the Commission, the terms of a settlement are afforded substantial weight.<sup>25</sup> “The ultimate issue for [the Commission’s] consideration is whether the [Stipulation], which embodies considerable time and effort by the signatory parties,” satisfies the three-part test and should be adopted.<sup>26</sup> Based on the information provided in Columbia’s Application and at hearing, and the support of the Commission’s Staff and OP&E, the Stipulation passes the Commission’s three-part test and should be adopted.

### **3.1. The Stipulation is the product of serious bargaining among capable and knowledgeable parties.**

First, the Stipulation is the product of an open negotiation process, in which all parties were invited to participate, and in which all parties presented various settlement positions and proposals that were reviewed, considered and discussed.<sup>27</sup> During the negotiations, which included in-person settlement conferences and electronic correspondence to exchange term sheets, each party was represented by able counsel and technical experts.<sup>28</sup> Further, each party to the Stipulation regularly participates in Commission proceedings and other regulatory matters.<sup>29</sup>

That the Stipulation represents a comprehensive compromise of issues raised by parties with diverse interests demonstrates that it is the product of serious bargaining. Without infringing on the confidentiality afforded to settlement discussions, the Signatory Parties had differing positions concerning the maximum Rider IRP SGS Class rate, as well as the minimum threshold for O&M savings.<sup>30</sup> The Stipulation resolved the concerns of the Staff and OP&E, both of which represent the interests of low-income customers.<sup>31</sup> Moreover, IEU-Ohio, which represents the interests of industrial customers, does not oppose the Stipulation.<sup>32</sup>

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<sup>25</sup> *Consumers’ Counsel v. Pub. Util. Comm.*, 64 Ohio St.3d 123, 125 (1992).

<sup>26</sup> *In the Matter of the Application of the East Ohio Gas Company d/b/a Dominion East for Approval of an Alternative Form of Regulation to Extend and Increase its Pipeline Infrastructure Replacement Program*, Case No. 15-362-GA-ALT, Opinion and Order, at 10-11 (September 14, 2016).

<sup>27</sup> Columbia Exhibit 5 at 3-4.

<sup>28</sup> *Id.*; Joint Exhibit 1.

<sup>29</sup> Columbia Exhibit 5 at 4.

<sup>30</sup> *Id.*

<sup>31</sup> Joint Exhibit 1; Columbia Exhibit 5 at 3, 4.

<sup>32</sup> Columbia Exhibit 5 at 3.

Although OCC opposes the Stipulation, the Commission does not require unanimous stipulations and no one party possesses a veto over stipulations.<sup>33</sup> Put differently, the Commission does not require OCC to agree to a stipulation in order to meet the first prong of the three-prong test.<sup>34</sup> The Stipulation is the product of serious bargaining among capable and knowledgeable parties and meets the Commission's criteria for approval of settlements.

### **3.2. The Stipulation, as a package, benefits ratepayers and the public interest.**

In approving past stipulations to institute and expand Columbia's Infrastructure Replacement Program, the Commission has repeatedly held that the program promotes the public interest.<sup>35</sup> As described above, the Stipulation extends the existing IRP, which improves safety and gas distribution reliability for customers and the public, for another five-year term and provides increased guaranteed minimum O&M savings for Columbia's customers.

Each of the previously approved and continuing facets of Columbia's IRP provides clear public benefits. In the 2007 IRP case, the Commission recognized that "service line leaks \* \* \* can present significant safety hazards and \* \* \* have the potential to cause catastrophic damage to the customer's property or neighboring properties."<sup>36</sup> The Commission found that "allowing Columbia to take responsibility for the repair of \* \* \* hazardous customer service lines" would enhance public safety, because it would "allow Columbia, as the employer or hirer of independent contractors, to control[ ] more effectively[ ] the work product of the

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<sup>33</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of Tariffs to Recover Through an Automatic Adjustment Clause Costs Associated with the Establishment of an Infrastructure Replacement Program and for Approval of Certain Accounting Treatment*, Case No. 07-478-GA-UNC, Opinion and Order, at 32 (Apr. 9, 2008).

<sup>34</sup> *In re FirstEnergy*, Case No. 12-1230-EL-SSO, Opinion and Order, at 26 (July 18, 2012).

<sup>35</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of Tariffs to Recover Through an Automatic Adjustment Clause Costs Associated with the Establishment of an Infrastructure Replacement Program and for Approval of Certain Accounting Treatment*, Case No. 07-478-GA-UNC, Opinion and Order, at 34-35 (Apr. 9, 2008); *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Form of Regulation and for a Change in its Rates and Charges*, Case No. 08-0072-GA-AIR *et al.*, Opinion and Order, at 13-15, 26 (Dec. 3, 2008).

<sup>36</sup> *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of Tariffs to Recover Through an Automatic Adjustment Clause Costs Associated with the Establishment of an Infrastructure Replacement Program and for Approval of Certain Accounting Treatment*, Case No. 07-478-GA-UNC, Opinion and Order, at 29 (Apr. 9, 2008).

plumbers making repairs to the system.”<sup>37</sup> On appeal, the Supreme Court of Ohio affirmed that “[t]he record support[ed] the [C]ommission’s determination that service lines \* \* \* present safety issues” and affirmed “the [C]ommission’s decision to place service-line responsibility in the hands of a single regulated company[.]” Columbia.<sup>38</sup>

Columbia’s AMRP similarly improves public safety. In 2011, the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) issued guidance asserting that certain “high-risk pipe,” including bare steel and cast iron mains, required immediate action.<sup>39</sup> Columbia witness Donald Ayers similarly testified that “bare steel, unprotected coated steel, wrought iron, and cast iron” gas mains “are typically more likely to leak, due to their material type, protection, age, and other characteristics.”<sup>40</sup> The Commission “complied with the objectives of PHMSA’s guidance [by] implement[ing] various AMRPs for local distribution utilities,” thereby “mitigat[ing] the high risk associated with main pipelines.”<sup>41</sup> The Commission has said that “requir[ing] Ohio’s \* \* \* major natural gas utilities to gradually update old cast iron and bare steel pipelines with more modern protected steel and plastic lines” will “increase natural gas pipeline safety above and beyond the federal pipeline safety regulations[.]”<sup>42</sup>

Moreover, the Stipulation also enables Columbia to coordinate the replacement of this pipe in advance of state or municipal construction projects, which eliminates concerns over the intrusive maintenance efforts that Columbia would

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<sup>37</sup> *Id.* at 34-35.

<sup>38</sup> *Util. Serv. Partners v. PUC*, 124 Ohio St. 3d 284, 2009-Ohio-6764, ¶¶ 26-27 (2009).

<sup>39</sup> *See In re Application of Duke Energy Ohio, Inc., for Approval of an Alternative Rate Plan Pursuant to R.C. 4929.05 for an Accelerated Service Line Replacement Program*, Case No. 14-1622-GA-ALT, Opinion and Order, at ¶ 30 (Oct. 26, 2016).

<sup>40</sup> Columbia Exhibit 2 at 2.

<sup>41</sup> *In re Application of Duke Energy Ohio, Inc., for Approval of an Alternative Rate Plan Pursuant to R.C. 4929.05 for an Accelerated Service Line Replacement Program*, Case No. 14-1622-GA-ALT, Opinion and Order, at ¶ 60 (Oct. 26, 2016).

<sup>42</sup> Public Utilities Commission of Ohio, Natural gas pipeline safety in Ohio, <http://www.puco.ohio.gov/be-informed/consumer-topics/natural-gas-pipeline-safety-in-ohio/#sthash.Itw4zAqV.dpbs>. Columbia respectfully requests that the Commission take administrative notice of this information. The Commission may take administrative notice of information on its website. *See, e.g., In re Application of Ohio Edison Co., The Cleveland Electric Illuminating Co., and The Toledo Edison Co. for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan*, Case No. 14-1297-EL-SSO, Opinion and Order, at 79 n.16 (Mar. 31, 2016).

otherwise have to take in order to repair leaks and maintain an aging natural gas distribution system.<sup>43</sup>

In addition to the safety and reliability benefits provided by Columbia's IRP, the Stipulation protects customers' economic interests. Columbia has thoroughly demonstrated the factors driving the Stipulation's higher annual Rider IRP caps: demand for underground facility camera crews, demand for natural gas qualified construction crews and resources, and expiration of existing construction contracts.<sup>44</sup> Yet, the Stipulation minimizes the financial impact of the IRP on Columbia's customers by securing lower maximum annual Rider IRP rates than those proposed in Columbia's Application.<sup>45</sup> Customers are also guaranteed financial benefits pursuant to the floor set by the Stipulation's O&M savings provision, which provides for a minimum level of savings higher than that approved by the Commission in its 2012 Order.<sup>46</sup>

The Commission has held that a stipulation benefits the public interest when it enables the accelerated replacement of corrosion-prone pipelines to ensure safe and reliable gas delivery and protects ratepayers by capping the cost recovery charge.<sup>47</sup> The Stipulation meets these criteria, and accordingly should be found to benefit customers and serve the public interest.

### **3.3. The Stipulation, as a package, does not violate any important regulatory principle or practice.**

Finally, the Stipulation satisfies part three of the Commission's "reasonableness" test because there is no evidence that it violates any regulatory principle

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<sup>43</sup> Columbia Exhibit 5 at 5.

<sup>44</sup> Columbia Exhibit 2 at 5-9.

<sup>45</sup> Joint Exhibit 1 at 3.

<sup>46</sup> *Id.*; see *In re Application of Columbia Gas of Ohio, Inc., for Approval of an Alternative Form of Regulation*, Case No. 11-5515-GA-ALT, Opinion and Order, at 7-8 (November 28, 2012).

<sup>47</sup> See *In re Application of the East Ohio Gas Company d/b/a Dominion East for Approval of an Alternative Form of Regulation to Extend and Increase its Pipeline Infrastructure Replacement Program*, Case No. 15-362-GA-ALT, Opinion and Order, ¶ 37 (September 14, 2016); see also *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc., for Approval of an Alternative Rate Plan for Continuation of its Distribution Replacement Rider*, Case No. 13-1571-GA-ALT, Opinion and Order, at 15-16 (Feb. 19, 2014).

or practice. Indeed, the Commission previously concluded that Columbia's alternative regulation program violates no important regulatory principle or practice.<sup>48</sup> The present Stipulation simply extends the existing program, with minor increases in the Rider IRP rate caps and similarly increased guaranteed savings.

It is the policy of this state to promote the availability to consumers of "adequate, reliable, and reasonably priced natural gas services and goods."<sup>49</sup> Columbia's IRP will continue to improve the safety and reliability of service, increase customer satisfaction and convenience, and reduce leakage.<sup>50</sup> Moreover, the Commission has recognized that the safety risks presented by natural gas necessitate the accelerated replacement of corrosion-prone lines,<sup>51</sup> and Columbia's IRP will reduce those risks. By ensuring that Columbia is given the opportunity to timely recover its investments in replacing and repairing aging infrastructure, the plan will enhance Columbia's ability to continue to offer adequate, reliable, and reasonably priced natural gas services and goods, in furtherance of this state's policies.<sup>52</sup>

#### 4. CONCLUSION

The Commission has consistently recognized the importance of reducing risk in natural gas distribution systems. Columbia's Rider IRP facilitates the continuation of safe and reliable gas distribution service through the economical replacement of corrosion-prone pipeline infrastructure and certain associated non-priority pipe in an accelerated manner. The Stipulation, moreover, caps Columbia's recovery under Rider IRP over the course of the IRP's next term and returns even greater O&M savings to Columbia's customers.

In sum, the Stipulation is a balanced and reasonable resolution of all of the issues in this proceeding. For the reasons stated above, Columbia respectfully requests that the Commission expeditiously approve Columbia's Application, as modified by the Stipulation, in order to continue the benefits to customers and

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<sup>48</sup> *In re Application of Columbia Gas of Ohio, Inc., for Approval of an Alternative Form of Regulation*, Case No. 11-5515-GA-ALT, Opinion and Order, at 11 (Nov. 28, 2012).

<sup>49</sup> R.C. 4929.02(A)(1).

<sup>50</sup> Columbia Exhibit 4 at 9.

<sup>51</sup> *See In re Application of the East Ohio Gas Company d/b/a Dominion East for Approval of an Alternative Form of Regulation to Extend and Increase its Pipeline Infrastructure Replacement Program*, Case No. 15-362-GA-ALT, Opinion and Order, at 14-15 (Sept. 14, 2016).

<sup>52</sup> Columbia Exhibit 4 at 9.

stakeholders provided as a result of Columbia's successful infrastructure replacement program.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

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