BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Form of Regulation.	)))	Case No. 17-2202-GA-ALT

APPLICATION OF COLUMBIA GAS OF OHIO, INC.

1. Introduction

Pursuant to Revised Code §§ 4929.05, 4929.051(A), 4929.11 and 4929.111, Columbia Gas of Ohio, Inc. ("Columbia") submits this application for a new alternative rate plan to establish a capital expenditure program rider ("CEP Rider"). The purpose of the CEP Rider is to recover the post-in-service carrying costs, incremental depreciation expense, and property tax expense currently deferred pursuant to Columbia's capital expenditure program deferral ("CEP Deferral"), as well as the corresponding assets to which these expenses are directly attributable in the capital expenditure program. The CEP Rider rate design will be based on the billing determinants and revenue requirement authorized by the Commission in Columbia's most recent rate case proceeding, Case Nos. 08-72-GA-AIR, et al. Columbia also proposes, pursuant to Revised Code § 4929.051(A), to "continue a revenue decoupling mechanism" by continuing its straight fixed variable rate design approved in Columbia's most recent rate case proceeding. Columbia will also be continuing the energy efficiency program that was approved in Case Nos. 16-1309-GA-UNC and 16-1309-GA-AAM.

The information required by Ohio Admin. Code 4901:1-19-06(C) is attached in the following exhibits:

Exhibit A: Alternative Rate Plan

Exhibit B: Authorized Exempted Services

Exhibit C: Discussion Regarding Cross-Subsidization of Services

Exhibit D:	Discussion Regarding Compliance with Revised Code §§ 4905.35 and 4929.02
Exhibit E:	List of Witnesses Sponsoring Application Exhibits
Exhibit F:	Current, Redline Proposed, and Clean Proposed Tariff Sheets
Exhibit G:	Typical Bill Comparison Based on Billing Determinants and Revenue from Case Nos. 08-72-GA-AIR, et al.
Exhibit H:	Columbia's Energy Efficiency Program
Exhibit I:	Schedules Supporting the Application

Columbia is filing testimony in support of this Application contemporaneous with this Application.

2. Notice

As required by Ohio Admin. Code 4901:1-19-06(A), Columbia notified Commission Staff on October 27, 2017, that Columbia intended to file this Application, by letter addressed to the directors of the Utilities and the Service Monitoring and Enforcement Departments. As required by Revised Code § 4909.43(B), Columbia also notified the mayor and legislative authority of each municipality Columbia serves of Columbia's intent to file this Application and the proposed rates on October 27, 2017, in writing.

3. Explanation of the Plan's Justness and Reasonableness

Columbia's proposed alternative rate plan to establish a CEP Rider is just and reasonable. By beginning a gradual recovery of the CEP Deferral and underlying assets in 2018, Columbia will request less than if it were to continue deferring expenses until the deferral reaches the SGS Class rate impact threshold established in Case Nos. 11-5351-GA-UNC, *et al.*, and continued by Case Nos. 12-3221-GA-UNC, *et al*. This is because Columbia will stop deferring additional post-in-service carrying costs associated with the balances incorporated into the proposed CEP Rider. Additionally, including recovery on and of the underlying investments to which the CEP Deferral relates will obviate the need to continue to defer future expenses associated with those investments. Because customers would save money by allowing Columbia to begin gradually recovering its CEP Deferral and the underlying related investments in 2018, Columbia believes its CEP Rider is just and reasonable.

4. Conclusion

For the reasons provided in this Application, Columbia respectfully requests that the Commission establish a CEP Rider, pursuant to the terms outlined herein, and grant any other necessary and proper relief.

Respectfully submitted,

/s/ Eric B. Gallon

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Verification

STATE OF OHIO)
) ss:
FRANKLIN COUNTY)

Daniel A. Creekmur, being first duly cautioned and sworn, deposes and says that he is the President of Columbia Gas of Ohio, Inc.; that the statements and schedules submitted herewith contain proposed revisions to existing schedule sheets and establish the facts and grounds upon which this Application is based; and that the data and facts set forth herein are true to the best of his knowledge and belief.

Daniel A. Creekmur
President

Sworn to before me, and subscribed in my presence, this 30th day of November, 2017.

Notary Public

SEAL

NOTARIAL SEAL
STATE OF OHIO

CHERYL A. MacDONALD
Notary Public, State of Ohio
My Commission Expires 3/26/2022

Verification

STATE OF INDIANA)
) ss:
LAKE COUNTY)

Samuel K. Lee, being first duly cautioned and sworn, deposes and says that he is the Corporate Secretary of Columbia Gas of Ohio, Inc., Applicant herein, that the statements and schedules submitted herewith contain proposed revisions to existing schedule sheets, establish the facts and grounds upon which this Application is based, and that the data and facts set forth herein are true to the best of his knowledge and belief.

Samuel K. Lee
Corporate Secretary

Sworn to before me and subscribed in my presence this 30th day of November, 2017.

Penny L. Kljajic
Notary Public

SEAL

NOTARY PUBLIC
NOTARY SEAL
STATE OF INDIANA
PENNY L. KLJAJIC
Lake County
My Commission Expires
November 21, 2025

CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 1st day of December, 2017, upon the persons listed below.

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Attorney for
COLUMBIA GAS OF OHIO, INC.

Exhibit A
Ohio Admin. Code 4901:1-19-06(C)(2)
Detailed Alternative Rate Plan

1. Background

1.1. Case Nos. 11-5351-GA-UNC and 11-5352-GA-AAM

In 2011, Columbia Gas of Ohio, Inc. ("Columbia") filed an application with the Commission to implement a capital expenditure program and to modify its accounting procedures to provide for: (1) capitalization of post-in-service carrying costs on those assets of the capital expenditure program that are placed into service but not reflected in rates as plant in service; and (2) deferral of depreciation expense and property taxes directly attributable to those assets of the capital expenditure program that are placed into service but not reflected in rates as plant in service ("CEP Deferral"). The Commission limited the CEP Deferral authority from October 1, 2011, through December 31, 2012. The Commission authorized Columbia to accrue CEP Deferral expense until the rates to recover these deferred expenses for the Small General Service ("SGS") class would be more than $1.50 per month. The Commission indicated that deferral of expenses could continue after Columbia filed to establish a recovery mechanism under Revised Code §§ 4909.18, 4929.05, or 4929.11. Finally, the Commission stated that it would consider the prudence and reasonableness of the magnitude of Columbia's CEP Deferral and associated capital spending in any future proceedings seeking cost recovery, at which time Columbia would be expected to provide detailed information regarding the expenditures for the Commission's review.

1.2. Case Nos. 12-3221-GA-UNC and 12-3222-GA-AAM

In 2012, the Commission authorized Columbia to continue its CEP Deferral beyond December 31, 2012, up and to the point where the accrued deferrals, if included in rates, would cause the rates charged to the SGS class of customers to increase by more than $1.50 per month. The Commission further stated, similar to Case Nos. 11-5351-GA-UNC, et al., that it would consider the prudence and reasonableness of the magnitude of Columbia's CEP Deferral and associated capital spending in any future proceedings seeking cost recovery, at which time Columbia would be expected to provide detailed information regarding the expenditures for the Commission's review.

Since 2012, Columbia has been filing annual updates by April 30 in Case Nos. 12-3221-GA-UNC, et al., detailing the monthly CEP investments and the calculations used to determine the associated deferrals. The annual information filings have also included all calculations used to determine the monthly deferred amounts, including a breakdown of the investments (by categories of capital investment), post-in-service carrying costs, depreciation expense, property tax expense, and all incremental revenue, as well as the capital budget for the upcoming year. Finally, these information filings have calculated the estimated rate Columbia would charge customers if it had monetized the deferred amounts.

2. Description of the CEP Investments and CEP Deferral Assets

When reviewing Columbia's Application in Case Nos. 12-3221-GA-UNC, et al., the Commission approved four categories of capital investment upon which CEP deferrals are based. These categories of capital investments are as follows:

a. **Replacement/Public Improvement/Betterment** – Replacement of facilities for any of the following reasons: (1) physical deterioration; (2) meeting the requirements of governmental authorities related to street and highway construction; (3) accommodating existing customer requests for facility relocation; and, (4) improving system operating conditions and ensuring adequate distribution system capacity and/or system reliability. This Replacement/Public Improvement/Betterment category may include, but is not limited to, costs related to installation of and/or improvements to mains and service lines, measuring and regulation stations, district regulator stations, excess pressure measuring stations, meters, meter sets, AMR devices, house regulators, and any associated buildings, land or land rights.

b. **Growth** – Facilities required to provide service to new customers or to provide increased load capacity to existing customers. This category may include, but is not limited to, costs associated with the installation of and/or improvement to mains and services (including service line installations to new customers served by existing mains), district regulator stations, excess pressure measuring stations, meters, meter sets, AMR devices, house regulators, and any associated land or land rights.

c. **Support Services** – Capital expenditures that are not directly related to gas facilities fall into this category, which may include, but is not limited to, costs associated with the purchase of and/or improvements to buildings and structures (including associated land and land rights), environmental remediation at company-owned facilities, office furniture and equipment, motorized equipment and trailers, power-operated equipment, and other miscellaneous equipment.

d. **Information Technology** – Capital expenditures related to technology and communications infrastructure. This category may include, but is not limited to, costs associated with the purchase and installation of communications equipment (including associated buildings, land, or land rights), data processing equipment, data processing software, and software licenses.

For all categories described above, the costs include (where applicable) supervisory, engineering, general, and administrative overheads and an Allowance for Funds Used During Construction, which are net of any contributions, deposits or other aid to construction. None of the capital expenditures in the categories described above include costs targeted for inclusion in Columbia's Infrastructure Replacement Program.

Columbia also adheres to the FERC Unified System of Accounts prescribed for Natural Gas Companies and Generally Accepted Accounting Principles when accounting for the actual cost of capital projects. Pursuant to the FERC Unified System of Accounts, all amounts included are just and reasonable. Projects that are deemed "used and useful" in serving the needs of Columbia's customers are reported as in service in these categories. Columbia also keeps detailed gas plant account records to permit identification, analysis, and verification of capitalized costs deferred.

Though Columbia is requesting authority to establish a CEP Rider, Columbia also requests accounting authority, to the extent necessary, to: (1) continue accounting for the deferral of depreciation expense on all investment between the dates the property is placed into service and the date recovery of the investment commences through the CEP Rider; (2) to continue deferring property taxes on all investment between the dates the property is placed into service and the date recovery of the investment commences through the CEP Rider; and (3) to continue deferral of post-in-service carrying costs on all investment between the dates the property is placed into service and the date recovery of the investment commences through the CEP Rider. Deferred expenses such as deferred depreciation, deferred property taxes, and deferred post-in-service carrying costs are amortized over the life of the associated assets using the current depreciation rate. Amortization does not begin until Columbia starts recovering the associated expense through the CEP Rider.

3. Calculation of the CEP Deferral

The Finding and Order in Case Nos. 11-5351-GA-UNC, et al., authorized a certain calculation and total monthly deferral of regulatory assets for those assets of the capital expenditure program that are placed in service but are not reflected in rates as plant in service. Since its inception, Columbia's CEP Deferral has been calculated as follows:

Total Monthly Deferral = (PISCC) + (Depreciation Expense) + (Property Tax Expense) – (Incremental Revenues)

Where:

PISCC = [(Previous Month's Cumulative Gross Plant Additions) – (Previous Month's Accumulated Depreciation) – (Previous Month's Cumulative Retirements)] + [(Long-Term Debt Rate) / (12 Months)]

Depreciation Expense = [(Previous Month's Cumulative Gross Plant Additions) – (Previous Month's Cumulative Retirements) + (½ Current Month's Plant Additions) – (½ Current Month's Retirements)] * [(Depreciation Rate) / (12 Months)]

Property Tax Expense = [(Previous Year-End Cumulative[1] Gross Plant Additions) – (Previous Year-End Cumulative[1] Retirements)] * (Percent Good Adjustment) * [(Effective Property Tax Rate) / (12 Months)]

Incremental Revenue = [(Current Month's Customers – Baseline Customers) * (Cost Portion of Rate)] + [(Consumption by Non-SFV Customers Directly Attributable to Program Investment) * (Cost Portion of Rate)] + (Other Revenues Directly Attributable to Program Investment)

1 The Finding and Order in Case Nos. 11-5351-GA-UNC, et al., referenced "Previous Month's Cumulative" expenses, while Property Tax activity should be calculated off previous year activity. Upon consultation with Commission Staff in 2012, Columbia concurs that the property tax expenditures should be calculated based on previous year balances.

4. CEP Rider

4.1. Revenue Requirement Components

Columbia will recover its CEP Deferral, as well as the corresponding assets to which these expenses are directly attributable, by computing a revenue requirement initially based on cumulative plant investment through December 31, 2015, with two additional adjustments to be made based on cumulative plant investment through December 31, 2016, and December 31, 2017. These revenue requirements will provide for a return on the Net CEP Investment of 10.95% (an 8.12% rate of return plus a tax gross-up factor of 2.84%) and the return of all capital expenditure program costs.

Total CEP Rider investment will be valued at the Investment Date (the date on which the underlying asset was placed in service) and the Deferral Date (the date on which deferrals are included in the CEP Rider revenue requirement for recovery). Cumulative gross plant additions are capitalized at Columbia's actual cost of replacement and shown as an adjustment to the Net CEP Investment as projects are placed in service. Post-in-service carrying costs are calculated at Columbia's weighted long-term cost of debt. Cumulative deferred depreciation expense is calculated at the applicable, Commission-approved depreciation rate. Cumulative deferred property taxes are calculated at the estimated composite property tax rate.

Deferred expenses such as deferred depreciation, deferred property taxes, and deferred post-in-service carrying costs are amortized over the life of the associated assets using the current depreciation rate. Amortization does not begin until Columbia starts recovering the associated expense through the CEP Rider.

Pursuant to the authority granted in Case Nos. 12-3221-GA-UNC, et al., Columbia will continue to defer eligible expenses associated with CEP investments not recovered through the CEP Rider until such time as Columbia recovers them through a separate proceeding.

4.2. Process for Establishing CEP Rider

Pursuant to Revised Code § 4929.111(C), any recovery authorized under Revised Code § 4929.111(D) is limited to the amounts that the application sought to recover, unless the Commission in its discretion authorizes additional recovery. To that end, Columbia's Application provides for the recovery of the CEP Deferral balance associated with assets placed in service on or before December 31, 2017. Columbia's proposal includes a gradual recovery on and of the underlying investments to which the CEP Deferral relates, pursuant to the table below. Pursuant to the Commission's Findings and Orders in Case Nos. 11-5351-GA-UNC, et al., and 12-3221-GA-UNC, et al., the Commission will have the opportunity to audit the prudence and reasonableness of all CEP investments and related deferrals through December 31, 2017, in this proceeding.

The CEP Rider will be a fixed monthly charge that will rely upon the billing determinants and revenue requirement authorized by the Commission in Columbia's most recent rate case proceeding, Case Nos. 08-72-GA-AIR, et al. Columbia is proposing to gradually implement the CEP Rider to mitigate the impact on customers. In particular, Columbia is proposing the following CEP Rider structure and SGS Class rates, before adjusting for any over- and under-recovery:

Rates Effective August 1	2018	2020	2022
Maximum SGS Class CEP Rider Rate	$3.28	$4.17	$4.92
CEP Asset Investment Year ("Investment Date")	2011 - 2015	2011 - 2016	2011 - 2017
CEP Deferral Balance Through ("Deferral Date")	December 31, 2017	December 31, 2019	December 31, 2021

Columbia is also proposing that the CEP Rider be adjusted every two years to ensure the CEP investments are gradually introduced to customers, and to ensure customers receive the benefit of timely reconciliation. For CEP investments placed in service after December 31, 2017, Columbia requests to continue deferring those expenses associated therewith until Columbia requests recovery in a separate proceeding. Columbia proposes to file an adjustment biennially by April 30 (starting in 2020), with rates to be implemented pursuant to Columbia's proposed tariff sheets attached as Exhibit F. The purpose of this filing is to set the CEP Rider, adjusted for actual deferrals and reconciled for any over- and under-recovery of the CEP Rider.

Through this Application, the Commission will have reviewed the CEP Deferral and corresponding assets through December 31, 2017, therefore, a subsequent audit of these assets will not be necessary in future years.

5. Proposed Tariff Sheets

Columbia further proposes several changes to its tariff, including the description of the CEP Rider for all Columbia customers. The proposed tariff sheet changes are shown in Exhibit F and reflect the rationale for the mechanism that is described in the Application, including this Exhibit A.

6. Continuation of a Revenue Decoupling Mechanism

With the establishment of the CEP Rider, Columbia is also continuing its revenue decoupling mechanism established in Case Nos. 08-72-GA-AIR, et al. In that case, Columbia established a straight fixed variable rate design, allowing its SGS customers to pay a fixed, monthly rate to capture Columbia's cost of service. With this Application, Columbia is continuing this rate design to ensure its customers continue receiving the benefit associated with revenue decoupling.

7. Continuation of an Energy Efficiency Program

Columbia is also continuing its energy efficiency program pursuant to Revised Code § 4929.051(A). As detailed in Exhibit H, the Commission most recently approved an extension of Columbia's energy efficiency program in Case Nos. 16-1309-GA-UNC, et al. With this Application, Columbia intends to continue its energy efficiency program approved in Case Nos. 16-1309-GA-UNC, et al. without modification.

Exhibit B
Ohio Admin. Code 4901:1-19-06(C)(3)
Authorized Exempted Services

As required by Ohio Admin. Code 4901:1-19-06(C)(3), the following is a list of the services the Commission has authorized Columbia to exempt and the case number(s) authorizing those exemptions:

Approved exempted services:	natural gas commodity sales services; ancillary services
Case numbers:	08-1344-GA-EXM 12-2637-GA-EXM

Moreover, as further required by Ohio Admin. Code 4901:1-19-06(C)(3), attached are copies of Columbia's approved Standard of Conduct (First Revised Tariff Sheet No. 22, Section VII). Columbia did not file a separation plan, for the reasons provided in its original exemption application (*see* Application Exhibit V, Case No. 08-1344-GA-EXM (Jan. 30, 2009)).

SECTION VII
PART 22 - STANDARDS OF CONDUCT

22.1 Standards of Conduct

In operation of the Company Customer CHOICE^{SM} Program, the Company will adhere to the following Standards of Conduct for Marketing Affiliates and Internal Merchant Operations:

1) Company must apply any tariff provision relating to transportation services in the same manner to the same or similarly situated persons if there is discretion in the application of the provision.

2) Company must strictly enforce a tariff provision for which there is no discretion in the application of the provision.

3) Company may not, through a tariff provision or otherwise, give any Retail Natural Gas Supplier or Governmental Aggregator or any Retail Natural Gas Supplier's or Governmental Aggregator's customers preference in matters, rates, information, or charges relating to transportation service including, but not limited to, scheduling, balancing, metering, storage, Backup Service or curtailment policy. For purposes of Company's Customer CHOICE^{SM} Program, any ancillary service provided by Company, e.g. billing and envelope service, that is not tariffed will be priced uniformly for all Retail Natural Gas Suppliers or Governmental Aggregators and available to all equally.

4) Company must process all similar requests for transportation in the same manner and within the same approximate period of time.

5) Company shall not disclose to anyone other than a Columbia Gas of Ohio employee, or employee of NiSource performing services for Columbia Gas of Ohio, any information regarding an existing or proposed gas transportation arrangement, which Company receives from the following sources:

   a) a customer or Retail Natural Gas Supplier or Governmental Aggregator
   b) a potential customer or Retail Natural Gas Supplier or Governmental Aggregator
   c) any agent of such customer or potential customer, or
   d) a Retail Natural Gas Supplier, Governmental Aggregator or other entity seeking to supply gas to a customer or potential customer, unless such customer, agent, or Retail Natural Gas Supplier or Governmental Aggregator authorizes disclosure of such information.

6) If a customer requests information about Retail Natural Gas Suppliers, Company should provide a list of all Retail Natural Gas Suppliers operating on its system and currently enrolling Customers, but shall not endorse any Retail Natural Gas Supplier nor indicate that any Retail Natural Gas Supplier will receive a preference.

7) To the maximum extent practicable, Company's operating employees and the operating employees of its marketing affiliate must function independently of each other. This includes complete separation of the Company's procurement activities from the affiliated marketing company's procurement activities.

SECTION VII

PART 22 - STANDARDS OF CONDUCT

8) Company shall not condition or tie its agreements for gas supply or for the release of interstate pipeline capacity to any agreement by a Retail Natural Gas Supplier, customer or other third party in which its marketing affiliate is involved.

9) Company and its marketing affiliate shall keep separate books of accounts and records.

10) Neither Company nor its marketing affiliate personnel shall communicate to any customer, Retail Natural Gas Supplier or third party the idea that any advantage might accrue for such customer, Retail Natural Gas Supplier or third party in the use of Company's service as a result of that customer's, Retail Natural Gas Supplier's or other third party's dealing with its marketing affiliate.

11) Company shall establish a complaint procedure for issues concerning compliance with these standards of conduct. All complaints, whether written or verbal, shall be referred to Columbia's General Counsel or his/her designee. The General Counsel or his/her designee shall orally acknowledge the complaint to the complainant within five (5) working days of receipt. The General Counsel or his/her designee shall prepare a written statement of the complaint which shall contain the name of the complainant and a detailed factual report of the complaint, including all relevant dates, companies involved, employees involved, and specific claim. The General Counsel or his/her designee shall communicate the results of the preliminary investigation to the complainant in writing within thirty (30) days after the complaint was received including a description of any course of action, which was taken. The General Counsel or his/her designee shall keep a file with all such complaint statements for a period of not less than three years.

12) If Company offers any Retail Natural Gas Supplier or any Retail Natural Gas Supplier's customers a discount or fee waiver for transportation services, balancing, meters or meter installation, storage or any other service offered to Retail Natural Gas Suppliers. Company must, upon request, prospectively offer such discounts or fee waivers to all similarly situated Retail Natural Gas Suppliers or Retail Natural Gas Suppliers' customers under similar terms and conditions.

13) Columbia Gas of Ohio's name or logo will not be used in its marketing affiliate's promotional material, unless the promotional material discloses in plain, legible or audible language, on the first page or at the first point where Columbia Gas of Ohio's name or logo appears, that its marketing affiliate is not the same company as Columbia Gas of Ohio. Columbia Gas of Ohio is also prohibited from participating in exclusive joint activities with its marketing affiliate including advertising, marketing, sales calls or joint proposals to any existing or potential customers.

Exhibit C
Ohio Admin. Code 4901:1-19-06(C)(4)
Cross-Subsidization of Services

As required by Ohio Admin. Code 4901:1-19-06(C)(4), Columbia states that it does not expect cross-subsidization of services to occur under its Alternative Rate Plan. Columbia is proposing a fixed monthly charge for the CEP Rider, which, along with Columbia's monthly delivery charge rate design, will continue to significantly reduce the subsidization of lower-use customers that would result from a rate design based on volumetric rates for recovery of fixed distribution service costs.

Exhibit D
Ohio Admin. Code 4901:1-19-06(C)(5)
Compliance with Revised Code §§ 4905.35 and 4929.02

Revised Code § 4905.35

Columbia complies with Revised Code § 4905.35. Columbia's public utility services are available on a comparable and nondiscriminatory basis. Columbia does not presently offer any bundled regulated and unregulated services. Columbia does not base the availability of any regulated services or goods, or the availability of a discounted rate or improved quality, price, term or condition for any regulated services or goods, on the identity of the supplier of any other services or goods or on the purchase of any unregulated services or goods from Columbia. Columbia offers its regulated services or goods to all similarly situated customers, including any persons with which it is affiliated or which it controls, under comparable terms and conditions.

Additionally, Columbia's approved Standard of Conduct (First Revised Tariff Sheet No. 22, Section VII) (attached in Exhibit B) requires Columbia to administer its CHOICE® program, and its tariffs more generally, in a nondiscriminatory and non-preferential manner, making all untariffed services equally available to all.

Revised Code § 4929.02

Revised Code § 4929.02 sets forth the state policy regarding natural gas services and goods. Columbia substantially complies with those policies. Columbia's Gas Transportation Service Program and CHOICE® Program both offer unbundled and comparable natural gas services and goods alternatives that allow customers to choose the supplier, price, terms, and other conditions that meet their needs. Those programs promote diversity of natural gas supplies and suppliers, by giving consumers effective control over the selection of those supplies and suppliers.

Establishing a CEP Rider will further advance Ohio's policies. By ensuring Columbia can continue to timely recover its investments and mitigate the potential impact to customers of a deferral continuing to build, the plan will enhance Columbia's ability to continue offering adequate, reliable, and reasonably priced natural gas goods and services. Moreover, Columbia proposes gradual adjustments to the CEP Rider, with this phase-in approach providing reasonably priced natural gas goods and services with known, measured adjustments occurring every other year.

The fixed monthly charge rate design of the proposed CEP Rider is consistent with the current fixed rate designs of Columbia's base monthly delivery charge and Columbia's infrastructure replacement program rider. Like these other two fixed rate charges, the proposed fixed monthly charge of the proposed CEP Rider continues the alignment of natural gas company interests with consumer interest in energy efficiency and energy conservation, pursuant to Revised Code § 4929.02(A)(12), by further removing a financial incentive for Columbia through increased throughput. Moreover, authorizing these known, measured adjustments on a non-volumetric basis to gradually allow recovery of the CEP Deferral and recovery of and on the underlying capital assets also affords customers notice in advance of possible changes, helping to provide budget certainty for all classes of customers. By continuing its energy efficiency (Demand-Side Management) program, Columbia is encouraging market access for cost-effective demand-side natural gas services and aligning its interests with its consumer's interests in energy efficiency and conservation, consistent with Revised Code § 4929.02(A)(4) and (12).

Implementing these proposals, along with Columbia's existing service programs, will ensure continued and enhanced compliance with the policies contained in Revised Code §§ 4905.35 and 4929.02.

Justness and Reasonableness of Columbia's Alternative Rate Plan

Columbia's proposed alternative rate plan to establish a CEP Rider is just and reasonable. By beginning a gradual recovery of the CEP Deferral and underlying assets in 2018, Columbia will request less than if it were to continue deferring expenses until the deferral reaches the SGS Class rate impact threshold established in Case Nos. 11-5351-GA-UNC, et al., and continued by Case Nos. 12-3221-GA-UNC, et al. This is because Columbia will stop deferring additional post-in-service carrying costs associated with the balances incorporated into the proposed CEP Rider. Additionally, including recovery on and of the underlying investments to which the CEP Deferral relates will obviate the need to continue to defer future expenses associated with those investments. Because customers would save money by allowing Columbia to begin gradually recovering its CEP Deferral and the underlying related investments in 2018, the CEP Rider is just and reasonable.

Exhibit E
Ohio Admin. Code 4901:1-19-06(C)(6)
List of Witnesses

Pursuant to Ohio Admin. Code 4901:1-19-06(C)(6), Columbia provides the following list of witnesses in support of its application and the corresponding exhibits each are sponsoring:

(1) Melissa L. Thompson, Columbia's Director of Regulatory Policy, will summarize Columbia's application, review Columbia's experience under the CEP, address the various requirements in the Ohio Revised Code and Ohio Administrative Code that specifically relate to alternative rate filings, and testify to the justness and reasonableness of Columbia's request to establish the CEP Rider. Ms. Thompson is sponsoring Exhibits A – F. Ms. Thompson is also explaining the continuation of Columbia's energy efficiency (Demand-Side Management) programs and is sponsoring Exhibit H.

(2) Diana M. Beil, Columbia's Director of Regulatory Affairs, will explain the underlying accounting and calculation of the proposed CEP Rider for all rate classes. Ms. Beil is sponsoring Exhibits G and I.

Each witness's testimony is being filed contemporaneous with this Application.

Exhibit F
Clean, Redline Proposed, Clean Proposed Tariff Sheets

	On and After December 3, 2009
All gas consumed per account per month	$.0000 per Mcf
Monthly Delivery Charge per account	$16.92 per Month

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the Small General Schools Sales base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel source, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to total Company fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

Low Usage, Low Income Incentive

Availability

The Low Usage, Low Income Incentive credit of $4 per account per month is available to a total of 6,000 residential customer accounts each month during the period from March 31, 2009 through the last billing unit of March, 2013. A Customer is eligible provided that the Customer qualifies or has qualified for the Home Energy Assistance Program, is not a participant in the Percentage of Income Payment Plan, and has annual weather-normalized throughput of less than 85 Mcf. The first 6,000 eligible Customers with the lowest annual consumption for the review period will receive the credit for the twelve months beginning with Unit 1 of billing in April of each year.

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section V, Part No. 3 of the Company’s Rules and Regulations governing the distribution and sale of gas.

(1) Standard Choice Offer Rider;
(2) PIP Plan Tariff Schedule Rider;
(3) Uncollectible Expense Rider;
(4) Gross Receipts Tax Rider;
(5) Excise Tax Rider;
(6) CHOICE/SCO Reconciliation Rider;
(7) Infrastructure Replacement Rider;
(8) Regulatory Assessment Rider;
(9) Demand Side Management Rider;
(10) Non-Temperature Balancing Service Fee; and
(11) Infrastructure Development Rider.

LATE PAYMENT CHARGE:

LATE PAYMENT CHARGE:

Upon next scheduled billing date, one and one-half percent (1-1/2%) will be applied to the unpaid balance, as provided in Section IV, Part No. 6 of the Company's Rules and Regulations governing the distribution and sales of gas.

First 25 Mcf per account per month	$1.6324 per Mcf
Next 75 Mcf per account per month	$1.2350 per Mcf
Over 100 Mcf per account per month	$0.9809 per Mcf

A Customer Charge of $21.37 per account per month, regardless of gas consumed.

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the General Schools base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to total Company fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section V, Part No. 3 of the Company’s Rules and Regulations governing the distribution and sale of gas.

(1) Standard Choice Offer Rider;
(2) PIP Plan Tariff Schedule Rider;
(3) Uncollectible Expense Rider;
(4) Gross Receipts Tax Rider;
(5) Excise Tax Rider;
(6) CHOICE/SCO Reconciliation Rider;
(7) Regulatory Assessment Rider;
(8) Infrastructure Replacement Program Rider;
(9) Non-Temperature Balancing Service Fee; and
(10) Infrastructure Development Rider.

LATE PAYMENT CHARGE:

Upon next scheduled billing date, one and one-half percent (1-1/2%) will be applied to the unpaid balance, as provided in Section IV, Part No. 6 of the Company's Rules and Regulations governing the distribution and sales of gas.

RULES AND REGULATIONS GOVERNING THE DISTRIBUTION AND SALE OF GAS

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to total Company fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

In the event that Customer no longer qualifies for service hereunder, Company may, upon thirty (30) days notice, terminate service hereunder and commence service under its Small General Service or General Service schedule.

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section V, Part No. 3 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) Standard Choice Offer Rider (SCO);
(2) PIP Plan Tariff Schedule Rider;
(3) Gross Receipts Tax Rider;
(4) Excise Tax Rider;
(5) CHOICE/SCO Reconciliation Rider;
(6) Regulatory Assessment Rider;
(7) Infrastructure Replacement Program Rider;
(8) Non-Temperature Balancing Service fee; and
(9) Infrastructure Development Rider.

LATE PAYMENT CHARGE:

Upon next scheduled billing date, one and one-half percent (1-1/2%) will be applied to the unpaid balance, as provided in Section IV, Part No. 6 of the Company's Rules and Regulations governing the distribution and sales of gas.

THIS SHEET IS RESERVED FOR FUTURE USE.

SMALL GENERAL SCHOOLS TRANSPORTATION SERVICE DELIVERY CHARGE

AVAILABILITY

Available to any primary or secondary school Customer accounts provided that service can be rendered within the limits of Company's operating conditions and facilities, Customer consumes less than 300 Mcf per year between September 1 and August 31; and Customer purchases 100% Backup Service. This service is available to Public School Districts that were receiving Transportation Service as October 7, 2009, including any new or existing facility placed into service prior to March 31, 2013 regardless of Backup Service. Annual consumption for Customers served hereunder will be reviewed each August 31st. Service is subject to the Rules and Regulations as set forth in Section VI, Part Nos. 1 through 27.

The Company will charge the following maximum rates for all Customer-owned volumes delivered by Company to Customer's facility where gas is being consumed:

	On and After December 3, 2009
Monthly Delivery Charge per account	$16.92 per Month

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the Small General Schools Transportation Service base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel source, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to fixed costs. Unless otherwise agreed by Company and customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VI, Part No. 27 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) PIP Plan Tariff Schedule Rider;
(2) Uncollectible Expense Rider;
(3) Gross Receipts Tax Rider;
(4) Excise Tax Rider;
(5) Infrastructure Replacement Program Rider;
(6) Demand Side Management Rider; and
(7) Infrastructure Development Rider.

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VI, Part No. 27 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) PIP Plan Tariff Schedule Rider;
(2) Uncollectible Expense Rider;
(3) Gross Receipts Tax Rider;
(4) Excise Tax Rider;
(5) Infrastructure Replacement Program Rider; and
(6) Infrastructure Development Rider.

UNACCOUNTED-FOR GAS

Company will retain a percentage of all volumes delivered to it for the account of Customer to offset unaccounted-for gas as a result of transporting these volumes. The unaccounted-for percentage is based on the Company's system wide average for the twelve (12) months ending August 31 of each year and is placed in effect as soon as practicable following the determination of the percentage.

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VI, Part No. 27 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) PIP Plan Tariff Schedule Rider;
(2) Gross Receipts Tax Rider;
(3) Excise Tax Rider;
(4) Infrastructure Replacement Program Rider; and
(5) Infrastructure Development Rider.

UNACCOUNTED-FOR GAS

Company will retain one percent (1%) of all volumes delivered to it for the account of Customer to offset unaccounted-for gas as a result of transporting gas volumes to Customer.

LATE PAYMENT CHARGE

Upon next scheduled billing date, one and one-half percent (1-1/2%) will be applied to the unpaid balance, as provided in Section IV, Part No. 6 of the Company's Rules and Regulations governing the distribution and sales of gas.

SECTION VII

PART 25 - FULL REQUIREMENTS SMALL GENERAL TRANSPORTATION SERVICE (FRSGTS)

25.7 Delivery Charge – Full Requirements Small General Schools Transportation Service

Availability

Available to all primary and secondary school Customer accounts provided that Customer consumes less than 300 Mcf per year between September 1 and August 31. Annual consumption for Customer's service hereunder will be reviewed each August 31st.

The maximum rates for all Customer-owned volumes delivered by Company to Customer's facility where gas is being consumed are:	On and After December 3, 2009
Monthly Delivery Charge	$16.92 per Month

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the Full Requirements Small General Schools Transportation Service base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel source, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

25.8 Billing Adjustments

For all gas delivered hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VII, Part 29 of this tariff:

1) Interim Emergency and Temporary PIP Plan Tariff Schedule Rider;
2) Gross Receipts Tax Rider;
3) Excise Tax Rider;
4) CHOICE/SCO Reconciliation Rider;
5) Uncollectible Expense Rider;
6) Infrastructure Replacement Program Rider;
7) Demand Side Management Rider;
8) Non-Temperature Balancing Service fee; and
9) Infrastructure Development Rider.

25.9 Late Payment Charge

Upon next scheduled billing date, an additional amount of 1.5% of the unpaid balance on the subsequent bill will become due and payable as part of the Customer's total obligation. This provision is not applicable to unpaid account balances of Customers enrolled in payment plans pursuant to Section 4901:1-18-04 of the Ohio Administrative Code.

SECTION VII

PART 28 - FULL REQUIREMENTS LARGE GENERAL TRANSPORTATION SERVICE (FRLGTS)

28.3 Transfer of Service

Without limiting any rights or remedies of a Retail Natural Gas Supplier, customers may leave a Retail Natural Gas Supplier's Aggregation Pool and join any other Aggregation Pool upon assessment of a $5.00 switching fee to the succeeding Retail Natural Gas Supplier by Company, or revert to sales service from Company for which there will be no switching fee.

28.4 Character of Service

Service provided under this schedule shall be considered firm service.

28.5 Delivery Service

The Company shall charge the following rates for all Customer-owned volumes delivered by Company to Customer's facility where gas is being consumed:

1)	First 2,000 Mcf per account per month	$0.4110 per Mcf
2)	Next 13,000 Mcf per account per month	$0.2520 per Mcf
3)	Next 85,000 Mcf per account per month	$0.2200 per Mcf
4)	Over 100,000 Mcf per account per month	$0.1740 per Mcf

28.6 A 'Customer Charge' of $595.00 per Account per month, regardless of gas consumed.

28.7 Flexible Delivery Charge

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the Full Requirements Large General Transportation Service (FRLGTS) base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel source, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to total Company fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

28.8 Billing Adjustments

For all gas delivered hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VII, Part 29 of this tariff.

1) Interim Emergency and Temporary PIP Plan Tariff Schedule Rider;
2) Gross Receipts Tax Rider;
3) Excise Tax Rider;
4) Infrastructure Replacement Program Rider;
5) CHOICE/SCO Reconciliation Rider;
6) Non-Temperature Balancing Service fee; and
7) Infrastructure Development Rider.

SECTION VII
PART 29 - BILLING ADJUSTMENTS

RESERVED FOR FUTURE USE.

	On and After December 3, 2009
All gas consumed per account per month	$.0000 per Mcf
Monthly Delivery Charge per account	$16.92 per Month

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the Small General Schools Sales base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel source, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to total Company fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

Low Usage, Low Income Incentive

Availability

The Low Usage, Low Income Incentive credit of $4 per account per month is available to a total of 6,000 residential customer accounts each month during the period from March 31, 2009 through the last billing unit of March, 2013. A Customer is eligible provided that the Customer qualifies or has qualified for the Home Energy Assistance Program, is not a participant in the Percentage of Income Payment Plan, and has annual weather-normalized throughput of less than 85 Mcf. The first 6,000 eligible Customers with the lowest annual consumption for the review period will receive the credit for the twelve months beginning with Unit 1 of billing in April of each year.

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section V, Part No. 3 of the Company’s Rules and Regulations governing the distribution and sale of gas.

(1) Standard Choice Offer Rider;
(2) PIP Plan Tariff Schedule Rider;
(3) Uncollectible Expense Rider;
(4) Gross Receipts Tax Rider;
(5) Excise Tax Rider;
(6) CHOICE/SCO Reconciliation Rider;
(7) Infrastructure Replacement Rider;
(8) Regulatory Assessment Rider;
(9) Demand Side Management Rider;
(10) Non-Temperature Balancing Service Fee~~; and~~
(11) Infrastructure Development Rider~~.~~; and
~~(11)~~(12) Capital Expenditure Program Rider.

~~**LATE PAYMENT CHARGE:**~~

LATE PAYMENT CHARGE:

Upon next scheduled billing date, one and one-half percent (1-1/2%) will be applied to the unpaid balance, as provided in Section IV, Part No. 6 of the Company's Rules and Regulations governing the distribution and sales of gas.

First 25 Mcf per account per month	$1.6324 per Mcf
Next 75 Mcf per account per month	$1.2350 per Mcf
Over 100 Mcf per account per month	$0.9809 per Mcf

A Customer Charge of $21.37 per account per month, regardless of gas consumed.

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the General Schools base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to total Company fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section V, Part No. 3 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) Standard Choice Offer Rider;
(2) PIP Plan Tariff Schedule Rider;
(3) Uncollectible Expense Rider;
(4) Gross Receipts Tax Rider;
(5) Excise Tax Rider;
(6) CHOICE/SCO Reconciliation Rider;
(7) Regulatory Assessment Rider;
(8) Infrastructure Replacement Program Rider;
(9) Non-Temperature Balancing Service Fee; ~~and~~
(10) Infrastructure Development Rider~~.~~, and
~~(10)~~(11) Capital Expenditure Program Rider.

LATE PAYMENT CHARGE:

Upon next scheduled billing date, one and one-half percent (1-1/2%) will be applied to the unpaid balance, as provided in Section IV, Part No. 6 of the Company's Rules and Regulations governing the distribution and sales of gas.

RULES AND REGULATIONS GOVERNING THE DISTRIBUTION AND SALE OF GAS

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to total Company fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

In the event that Customer no longer qualifies for service hereunder, Company may, upon thirty (30) days notice, terminate service hereunder and commence service under its Small General Service or General Service schedule.

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section V, Part No. 3 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) Standard Choice Offer Rider (SCO);
(2) PIP Plan Tariff Schedule Rider;
(3) Gross Receipts Tax Rider;
(4) Excise Tax Rider;
(5) CHOICE/SCO Reconciliation Rider;
(6) Regulatory Assessment Rider;
(7) Infrastructure Replacement Program Rider;
(8) Non-Temperature Balancing Service fee; ~~and~~
(9) Infrastructure Development Rider; and~~.~~
~~(9)~~(10) Capital Expenditure Program Rider.

LATE PAYMENT CHARGE:

Upon next scheduled billing date, one and one-half percent (1-1/2%) will be applied to the unpaid balance, as provided in Section IV, Part No. 6 of the Company's Rules and Regulations governing the distribution and sales of gas.

CAPITAL EXPENDITURE PROGRAM RIDER ("CEP Rider")

APPLICABILITY

To all customers billed by Columbia under rate schedules SGS, SGSS, GS, GSS and LGS.

DESCRIPTION

An additional charge per account, per month, regardless of gas consumed, to recover costs associated with Commission-approved capital expenditure program.

Columbia will file an adjustment biennially by April 30, 2020 and April 30, 2022, with rates to be implemented with the first billing unit of August. Columbia will set the CEP Rider rate to introduce additional investments, adjust for actual deferrals, and adjust for any over- and under-recovery for the CEP Rider.

RIDER RATE

Rate SGS, Small General Service	$3.28/Month
Rate GS, General Service	$27.64/Month
Rate LGS, Large General Service	$531.14/Month

~~THIS SHEET IS RESERVED FOR FUTURE USE~~.

RULES AND REGULATIONS GOVERNING THE DISTRIBUTION AND SALE OF GAS

SMALL GENERAL SCHOOLS TRANSPORTATION SERVICE DELIVERY CHARGE

AVAILABILITY

Available to any primary or secondary school Customer accounts provided that service can be rendered within the limits of Company's operating conditions and facilities, Customer consumes less than 300 Mcf per year between September 1 and August 31; and Customer purchases 100% Backup Service. This service is available to Public School Districts that were receiving Transportation Service as October 7, 2009, including any new or existing facility placed into service prior to March 31, 2013 regardless of Backup Service. Annual consumption for Customers served hereunder will be reviewed each August 31st. Service is subject to the Rules and Regulations as set forth in Section VI, Part Nos. 1 through 27.

The Company will charge the following maximum rates for all Customer-owned volumes delivered by Company to Customer's facility where gas is being consumed:

	On and After December 3, 2009
Monthly Delivery Charge per account	$16.92 per Month

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the Small General Schools Transportation Service base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel source, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to fixed costs. Unless otherwise agreed by Company and customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VI, Part No. 27 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) PIP Plan Tariff Schedule Rider;
(2) Uncollectible Expense Rider;
(3) Gross Receipts Tax Rider;
(4) Excise Tax Rider;
(5) Infrastructure Replacement Program Rider;
(6) Demand Side Management Rider; ~~and~~
(7) Infrastructure Development Rider~~.~~; and
~~(7)~~(8) Capital Expenditure Program Rider.

COLUMBIA GAS OF OHIO, INC.

RULES AND REGULATIONS GOVERNING THE DISTRIBUTION AND SALE OF GAS

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VI, Part No. 27 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) PIP Plan Tariff Schedule Rider;
(2) Uncollectible Expense Rider;
(3) Gross Receipts Tax Rider;
(4) Excise Tax Rider;
(5) Infrastructure Replacement Program Rider; ~~and~~
(6) Infrastructure Development Rider~~.~~; and
~~(6)~~(7) Capital Expenditure Program Rider.

UNACCOUNTED-FOR GAS

Company will retain a percentage of all volumes delivered to it for the account of Customer to offset unaccounted-for gas as a result of transporting these volumes. The unaccounted-for percentage is based on the Company's system wide average for the twelve (12) months ending August 31 of each year and is placed in effect as soon as practicable following the determination of the percentage.

COLUMBIA GAS OF OHIO, INC

RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VI, Part No. 27 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) PIP Plan Tariff Schedule Rider;
(2) Gross Receipts Tax Rider;
(3) Excise Tax Rider;
(4) Infrastructure Replacement Program Rider; ~~and~~
(5) Infrastructure Development Rider~~.~~; and
~~(5)~~(6) Capital Expenditure Program Rider.

UNACCOUNTED-FOR GAS

Company will retain one percent (1%) of all volumes delivered to it for the account of Customer to offset unaccounted-for gas as a result of transporting gas volumes to Customer.

LATE PAYMENT CHARGE

Upon next scheduled billing date, one and one-half percent (1-1/2%) will be applied to the unpaid balance, as provided in Section IV, Part No. 6 of the Company's Rules and Regulations governing the distribution and sales of gas.

RULES AND REGULATIONS GOVERNING THE DISTRIBUTION AND SALE OF GAS

CAPITAL EXPENDITURE PROGRAM RIDER (“CEP Rider”)

APPLICABILITY

To all customers billed by Columbia under rate schedules SGTS, SGTSS, GTS, GTSS and LGTS.

DESCRIPTION

An additional charge per account, per month, regardless of gas consumed, to recover costs associated with Commission-approved capital expenditure program.

Columbia will file an adjustment biennially by April 30, 2020 and April 30, 2022, with rates to be implemented with the first billing unit of August. Columbia will set the CEP Rider rate to introduce additional investments, adjust for actual deferrals, and adjust for any over- and under-recovery for the CEP Rider.

RATE RIDER:

Rate SGTS, Small General Transportation Service	\$3.28/Month
Rate GTS, General Transportation Service	\$27.64/Month
Rate LGTS, Large General Transportation Service	\$531.14/Month

SECTION VII

PART 25 - FULL REQUIREMENTS SMALL GENERAL TRANSPORTATION SERVICE (FRSGTS)

25.7 Delivery Charge – Full Requirements Small General Schools Transportation Service

Availability

Available to all primary and secondary school Customer accounts provided that Customer consumes less than 300 Mcf per year between September 1 and August 31. Annual consumption for Customer's service hereunder will be reviewed each August 31st.

The maximum rates for all Customer-owned volumes delivered by Company to Customer's facility where gas is being consumed are:	On and After December 3, 2009
Monthly Delivery Charge	$16.92 per Month

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the Full Requirements Small General Schools Transportation Service base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel source, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

25.8 Billing Adjustments

For all gas delivered hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VII, Part 29 of this tariff:

1) Interim Emergency and Temporary PIP Plan Tariff Schedule Rider;
2) Gross Receipts Tax Rider;
3) Excise Tax Rider;
4) CHOICE/SCO Reconciliation Rider;
5) Uncollectible Expense Rider;
6) Infrastructure Replacement Program Rider;
7) Demand Side Management Rider;
8) Non-Temperature Balancing Service fee; ~~and~~
9) Infrastructure Development Rider~~.~~; and
~~9)~~10) Capital Expenditure Program Rider.

25.9 Late Payment Charge

Upon next scheduled billing date, an additional amount of 1.5% of the unpaid balance on the subsequent bill will become due and payable as part of the Customer's total obligation. This provision is not applicable to unpaid account balances of Customers enrolled in payment plans pursuant to Section 4901:1-18-04 of the Ohio Administrative Code.

SECTION VII

PART 28 - FULL REQUIREMENTS LARGE GENERAL TRANSPORTATION SERVICE (FRLGTS)

28.3 Transfer of Service

Without limiting any rights or remedies of a Retail Natural Gas Supplier, customers may leave a Retail Natural Gas Supplier's Aggregation Pool and join any other Aggregation Pool upon assessment of a $5.00 switching fee to the succeeding Retail Natural Gas Supplier by Company, or revert to sales service from Company for which there will be no switching fee.

28.4 Character of Service

Service provided under this schedule shall be considered firm service.

28.5 Delivery Service

The Company shall charge the following rates for all Customer-owned volumes delivered by Company to Customer's facility where gas is being consumed:

1)	First 2,000 Mcf per account per month	$0.4110 per Mcf
2)	Next 13,000 Mcf per account per month	$0.2520 per Mcf
3)	Next 85,000 Mcf per account per month	$0.2200 per Mcf
4)	Over 100,000 Mcf per account per month	$0.1740 per Mcf

28.6 A 'Customer Charge' of $595.00 per Account per month, regardless of gas consumed.

28.7 Flexible Delivery Charge

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the Full Requirements Large General Transportation Service (FRLGTS) base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel source, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to total Company fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

28.8 Billing Adjustments

For all gas delivered hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VII, Part 29 of this tariff.

1) Interim Emergency and Temporary PIP Plan Tariff Schedule Rider;
2) Gross Receipts Tax Rider;
3) Excise Tax Rider;
4) Infrastructure Replacement Program Rider;
5) CHOICE/SCO Reconciliation Rider;
6) Non-Temperature Balancing Service fee; ~~and~~
7) Infrastructure Development Rider~~.~~; and
~~7)~~8) Capital Expenditure Program Rider.

SECTION VII
PART 29 - BILLING ADJUSTMENTS

~~RESERVED FOR FUTURE USE.~~
CAPITAL EXPENDITURE PROGRAM RIDER ("CEP Rider")

APPLICABILITY

To all customers billed by Columbia under rate schedules FRSGTS, FRSGTSS, FRGTS, FRGTSS, FRLGTS.

DESCRIPTION

An additional charge per account, per month, regardless of gas consumed, to recover costs associated with Commission-approved capital expenditure program.

Columbia will file an adjustment biennially by April 30, 2020 and April 30, 2022, with rates to be implemented with the first billing unit of August. Columbia will set the CEP Rider rate to introduce additional investments, adjust for actual deferrals, and adjust for any over- and under-recovery for the CEP Rider.

RATE RIDER:

Rate FRSGTS, Full Requirements Small General Transportation Service	$3.28/Month
Rate FRGTS, Full Requirements General Transportation Service	$27.64/Month
Rate FRLGTS, Full Requirements Large General Transportation Service	$531.14/Month

	On and After December 3, 2009
All gas consumed per account per month	$.0000 per Mcf
Monthly Delivery Charge per account	$16.92 per Month

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the Small General Schools Sales base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel source, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to total Company fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

Low Usage, Low Income Incentive

Availability

The Low Usage, Low Income Incentive credit of $4 per account per month is available to a total of 6,000 residential customer accounts each month during the period from March 31, 2009 through the last billing unit of March, 2013. A Customer is eligible provided that the Customer qualifies or has qualified for the Home Energy Assistance Program, is not a participant in the Percentage of Income Payment Plan, and has annual weather-normalized throughput of less than 85 Mcf. The first 6,000 eligible Customers with the lowest annual consumption for the review period will receive the credit for the twelve months beginning with Unit 1 of billing in April of each year.

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section V, Part No. 3 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) Standard Choice Offer Rider;
(2) PIP Plan Tariff Schedule Rider;
(3) Uncollectible Expense Rider;
(4) Gross Receipts Tax Rider;
(5) Excise Tax Rider;
(6) CHOICE/SCO Reconciliation Rider;
(7) Infrastructure Replacement Rider;
(8) Regulatory Assessment Rider;
(9) Demand Side Management Rider;
(10) Non-Temperature Balancing Service Fee
(11) Infrastructure Development Rider; and
(12) Capital Expenditure Program Rider.

LATE PAYMENT CHARGE:

Upon next scheduled billing date, one and one-half percent (1-1/2%) will be applied to the unpaid balance, as provided in Section IV, Part No. 6 of the Company's Rules and Regulations governing the distribution and sales of gas.

First 25 Mcf per account per month	$1.6324 per Mcf
Next 75 Mcf per account per month	$1.2350 per Mcf
Over 100 Mcf per account per month	$0.9809 per Mcf

A Customer Charge of $21.37 per account per month, regardless of gas consumed.

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the General Schools base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to total Company fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section V, Part No. 3 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) Standard Choice Offer Rider;
(2) PIP Plan Tariff Schedule Rider;
(3) Uncollectible Expense Rider;
(4) Gross Receipts Tax Rider;
(5) Excise Tax Rider;
(6) CHOICE/SCO Reconciliation Rider;
(7) Regulatory Assessment Rider;
(8) Infrastructure Replacement Program Rider;
(9) Non-Temperature Balancing Service Fee;
(10) Infrastructure Development Rider and
(11) Capital Expenditure Program Rider.

LATE PAYMENT CHARGE:

Upon next scheduled billing date, one and one-half percent (1-1/2%) will be applied to the unpaid balance, as provided in Section IV, Part No. 6 of the Company's Rules and Regulations governing the distribution and sales of gas.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to total Company fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

In the event that Customer no longer qualifies for service hereunder, Company may, upon thirty (30) days notice, terminate service hereunder and commence service under its Small General Service or General Service schedule.

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section V, Part No. 3 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) Standard Choice Offer Rider (SCO);
(2) PIP Plan Tariff Schedule Rider;
(3) Gross Receipts Tax Rider;
(4) Excise Tax Rider;
(5) CHOICE/SCO Reconciliation Rider;
(6) Regulatory Assessment Rider;
(7) Infrastructure Replacement Program Rider;
(8) Non-Temperature Balancing Service fee;
(9) Infrastructure Development Rider; and
(10) Capital Expenditure Program Rider.

LATE PAYMENT CHARGE:

Upon next scheduled billing date, one and one-half percent (1-1/2%) will be applied to the unpaid balance, as provided in Section IV, Part No. 6 of the Company's Rules and Regulations governing the distribution and sales of gas.

CAPITAL EXPENDITURE PROGRAM RIDER ("CEP Rider")

APPLICABILITY

To all customers billed by Columbia under rate schedules SGS, SGSS, GS, GSS and LGS.

DESCRIPTION

An additional charge per account, per month, regardless of gas consumed, to recover costs associated with Commission-approved capital expenditure program.

Columbia will file an adjustment biennially by April 30, 2020 and April 30, 2022, with rates to be implemented with the first billing unit of August. Columbia will set the CEP Rider rate to introduce additional investments, adjust for actual deferrals, and adjust for any over- and under-recovery for the CEP Rider.

RIDER RATE

Rate SGS, Small General Service	\$3.28/Month
Rate GS, General Service	\$27.64/Month
Rate LGS, Large General Service	\$531.14/Month

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SMALL GENERAL SCHOOLS TRANSPORTATION SERVICE DELIVERY CHARGE

AVAILABILITY

Available to any primary or secondary school Customer accounts provided that service can be rendered within the limits of Company's operating conditions and facilities, Customer consumes less than 300 Mcf per year between September 1 and August 31; and Customer purchases 100% Backup Service. This service is available to Public School Districts that were receiving Transportation Service as October 7, 2009, including any new or existing facility placed into service prior to March 31, 2013 regardless of Backup Service. Annual consumption for Customers served hereunder will be reviewed each August 31st. Service is subject to the Rules and Regulations as set forth in Section VI, Part Nos. 1 through 27.

The Company will charge the following maximum rates for all Customer-owned volumes delivered by Company to Customer's facility where gas is being consumed:

	On and After December 3, 2009
Monthly Delivery Charge per account	$16.92 per Month

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the Small General Schools Transportation Service base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel source, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to fixed costs. Unless otherwise agreed by Company and customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VI, Part No. 27 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) PIP Plan Tariff Schedule Rider;
(2) Uncollectible Expense Rider;
(3) Gross Receipts Tax Rider;
(4) Excise Tax Rider;
(5) Infrastructure Replacement Program Rider;
(6) Demand Side Management Rider;
(7) Infrastructure Development Rider; and
(8) Capital Expenditure Program Rider.

P.U.C.O. No. 2

Fifth Revised Sheet No. 55
Cancels
Fourth Revised Sheet No. 55

COLUMBIA GAS OF OHIO, INC.

RULES AND REGULATIONS GOVERNING THE DISTRIBUTION AND SALE OF GAS

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VI, Part No. 27 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) PIP Plan Tariff Schedule Rider;
(2) Uncollectible Expense Rider;
(3) Gross Receipts Tax Rider;
(4) Excise Tax Rider;
(5) Infrastructure Replacement Program Rider;
(6) Infrastructure Development Rider; and
(7) Capital Expenditure Program Rider.

UNACCOUNTED-FOR GAS

Company will retain a percentage of all volumes delivered to it for the account of Customer to offset unaccounted-for gas as a result of transporting these volumes. The unaccounted-for percentage is based on the Company's system wide average for the twelve (12) months ending August 31 of each year and is placed in effect as soon as practicable following the determination of the percentage.

BILLING ADJUSTMENTS

For all gas sold hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VI, Part No. 27 of the Company's Rules and Regulations governing the distribution and sale of gas.

(1) PIP Plan Tariff Schedule Rider;
(2) Gross Receipts Tax Rider;
(3) Excise Tax Rider;
(4) Infrastructure Replacement Program Rider;
(5) Infrastructure Development Rider; and
(6) Capital Expenditure Program Rider.

UNACCOUNTED-FOR GAS

Company will retain one percent (1%) of all volumes delivered to it for the account of Customer to offset unaccounted-for gas as a result of transporting gas volumes to Customer.

LATE PAYMENT CHARGE

Upon next scheduled billing date, one and one-half percent (1-1/2%) will be applied to the unpaid balance, as provided in Section IV, Part No. 6 of the Company's Rules and Regulations governing the distribution and sales of gas.

CAPITAL EXPENDITURE PROGRAM RIDER (“CEP Rider”)

APPLICABILITY

To all customers billed by Columbia under rate schedules SGTS, SGTSS, GTS, GTSS and LGTS.

DESCRIPTION

An additional charge per account, per month, regardless of gas consumed, to recover costs associated with Commission-approved capital expenditure program.

Columbia will file an adjustment biennially by April 30, 2020 and April 30, 2022, with rates to be implemented with the first billing unit of August. Columbia will set the CEP Rider rate to introduce additional investments, adjust for actual deferrals, and adjust for any over- and under-recovery for the CEP Rider.

RATE RIDER:

Rate SGTS, Small General Transportation Service	\$3.28/Month
Rate GTS, General Transportation Service	\$27.64/Month
Rate LGTS, Large General Transportation Service	\$531.14/Month

SECTION VII

PART 25 - FULL REQUIREMENTS SMALL GENERAL TRANSPORTATION SERVICE (FRSGTS)

25.7 Delivery Charge – Full Requirements Small General Schools Transportation Service

Availability

Available to all primary and secondary school Customer accounts provided that Customer consumes less than 300 Mcf per year between September 1 and August 31. Annual consumption for Customer's service hereunder will be reviewed each August 31st.

The maximum rates for all Customer-owned volumes delivered by Company to Customer's facility where gas is being consumed are:	On and After December 3, 2009
Monthly Delivery Charge	$16.92 per Month

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the Full Requirements Small General Schools Transportation Service base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel source, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

25.8 Billing Adjustments

For all gas delivered hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VII, Part 29 of this tariff:

1) Interim Emergency and Temporary PIP Plan Tariff Schedule Rider;
2) Gross Receipts Tax Rider;
3) Excise Tax Rider;
4) CHOICE/SCO Reconciliation Rider;
5) Uncollectible Expense Rider;
6) Infrastructure Replacement Program Rider;
7) Demand Side Management Rider;
8) Non-Temperature Balancing Service fee;
9) Infrastructure Development Rider; and
10) Capital Expenditure Program Rider.

25.9 Late Payment Charge

Upon next scheduled billing date, an additional amount of 1.5% of the unpaid balance on the subsequent bill will become due and payable as part of the Customer's total obligation. This provision is not applicable to unpaid account balances of Customers enrolled in payment plans pursuant to Section 4901:1-18-04 of the Ohio Administrative Code.

SECTION VII

PART 28 - FULL REQUIREMENTS LARGE GENERAL TRANSPORTATION SERVICE (FRLGTS)

28.3 Transfer of Service

Without limiting any rights or remedies of a Retail Natural Gas Supplier, customers may leave a Retail Natural Gas Supplier's Aggregation Pool and join any other Aggregation Pool upon assessment of a $5.00 switching fee to the succeeding Retail Natural Gas Supplier by Company, or revert to sales service from Company for which there will be no switching fee.

28.4 Character of Service

Service provided under this schedule shall be considered firm service.

28.5 Delivery Service

The Company shall charge the following rates for all Customer-owned volumes delivered by Company to Customer’s facility where gas is being consumed:

1)	First 2,000 Mcf per account per month	$0.4110 per Mcf
2)	Next 13,000 Mcf per account per month	$0.2520 per Mcf
3)	Next 85,000 Mcf per account per month	$0.2200 per Mcf
4)	Over 100,000 Mcf per account per month	$0.1740 per Mcf

28.6 A ‘Customer Charge’ of $595.00 per Account per month, regardless of gas consumed.

28.7 Flexible Delivery Charge

The maximum delivery charge for all deliveries by Company to Customer of Customer-owned gas under this provision will be equal to the Full Requirements Large General Transportation Service (FRLGTS) base rate then in effect. When a Customer can demonstrate to the Company and requests that a charge lower than the maximum delivery charge is necessary because of competition from a pipeline, distribution system or non natural gas fuel source, then the Company may charge a rate lower than the maximum delivery charge for all deliveries.

The minimum rate shall not be less than the variable cost of providing service hereunder plus some contribution to total Company fixed costs. Unless otherwise agreed by Company and Customer, Customer shall pay the maximum rate for all volumes delivered hereunder.

28.8 Billing Adjustments

For all gas delivered hereunder, the bill shall be computed to reflect the following billing adjustments as set forth in Section VII, Part 29 of this tariff.

1) Interim Emergency and Temporary PIP Plan Tariff Schedule Rider;
2) Gross Receipts Tax Rider;
3) Excise Tax Rider;
4) Infrastructure Replacement Program Rider;
5) CHOICE/SCO Reconciliation Rider;
6) Non-Temperature Balancing Service fee;
7) Infrastructure Development Rider; and
8) Capital Expenditure Program Rider.

SECTION VII
PART 29 - BILLING ADJUSTMENTS

CAPITAL EXPENDITURE PROGRAM RIDER ("CEP Rider")

APPLICABILITY

To all customers billed by Columbia under rate schedules FRSGTS, FRSGTSS, FRGTS, FRGTSS, and FRLGTS.

DESCRIPTION

An additional charge per account, per month, regardless of gas consumed, to recover costs associated with Commission-approved capital expenditure program.

Columbia will file an adjustment biennially by April 30, 2020 and April 30, 2022, with rates to be implemented with the first billing unit of August. Columbia will set the CEP Rider rate to introduce additional investments, adjust for actual deferrals, and adjust for any over- and under-recovery for the CEP Rider.

RATE RIDER:

Rate FRSGTS, Full Requirements Small General Transportation Service	$3.28/Month
Rate FRGTS, Full Requirements General Transportation Service	$27.64/Month
Rate FRLGTS, Full Requirements Large General Transportation Service	$531.14/Month

Exhibit G
Typical Bill Comparison

COLUMBIA GAS OF OHIO, INC.
CASE NO. 17-2202-GA-ALT
TYPICAL BILL COMPARISON
RATE SCHEDULE SMALL GENERAL SALES SERVICE (SGS)
PROPOSED RATES EFFECTIVE: AUGUST 2018 THROUGH 2022

Data: 12 MOS. ESTIMATED
TYPE OF FILING: ORIGINAL

SCHEDULE G
SHEET 1 OF 14

LINE NO.	RATE CODE	USAGE MCF (A)	MOST CURRENT RATE (B)	PROPOSED RATE (C)	INCREASE (D=C-B)	PERCENT OF INCREASE (E=D/B)	CURRENT BILL (F)	PROPOSED BILL (G)	DOLLAR INCREASE (H=G-F)	PERCENT OF INCREASE (I=H/F)	AVE. MONTHLY FUEL COST ADDITIONS CURRENT BILL (J)	CURRENT BILL INCLUDING FUEL COST (K=F+J)	PROPOSED BILL INCLUDING FUEL COST (L=G+J)	PERCENT OF CHANGE (M=(L-K)/K)
1	**SMALL GENERAL SERVICE SALES SERVICE**													
2	ALL GAS USED		0.5685	0.5685	-	0.0%					4.5240			
3	MONTHLY DELIVERY CHARGE AUGUST 2018		26.91	30.19	3.28	12.2%								
4	MONTHLY DELIVERY CHARGE AUGUST 2020		30.19	31.08	0.89	2.9%								
5	MONTHLY DELIVERY CHARGE AUGUST 2022		31.08	31.83	0.75	2.4%								
6	MONTHLY BILL AUGUST 2018	7.0					33.60	37.04	3.44	10.2%	33.25	66.85	70.29	5.2%
7	MONTHLY BILL AUGUST 2020	7.0					37.04	37.98	0.93	2.5%	33.25	70.29	71.23	1.3%
8	MONTHLY BILL AUGUST 2022	7.0					37.98	38.77	0.79	2.1%	33.25	71.23	72.01	1.1%
9	EXCISE TAX FIRST 100		0.1593											
10	EXCISE TAX NEXT 1900		0.0877											
11	EXCISE TAX OVER 2000		0.0411											
12	GROSS RECEIPTS TAX RATE		4.987%											

COLUMBIA GAS OF OHIO, INC.
CASE NO. 17-2202-GA-ALT
TYPICAL BILL COMPARISON
RATE SCHEDULE SMALL GENERAL SALES SERVICE - SCHOOLS (SGS - SCHOOLS)
PROPOSED RATES EFFECTIVE: AUGUST 2018 THROUGH 2022

Data: 12 MOS. ESTIMATED **SCHEDULE G**
TYPE OF FILING: ORIGINAL SHEET 2 OF 14

LINE NO.	RATE CODE	USAGE MCF (A)	MOST CURRENT RATE (B)	PROPOSED RATE (C)	INCREASE (D=C-B)	PERCENT OF INCREASE (E=D/B)	CURRENT BILL (F)	PROPOSED BILL (G)	DOLLAR INCREASE (H=G-F)	PERCENT OF INCREASE (I=H/F)	AVE. MONTHLY FUEL COST ADDITIONS CURRENT BILL (J)	CURRENT BILL INCLUDING FUEL COST (K=F+J)	PROPOSED BILL INCLUDING FUEL COST (L=G+J)	PERCENT OF CHANGE (M=(L-K)/K)
1	**SMALL GENERAL SERVICE SALES SERVICE - SCHOOLS**													
2	ALL GAS USED		0.5685	0.5685	-	0.0%					4.5240			
3	MONTHLY DELIVERY CHARGE AUGUST 2018		26.02	29.30	3.28	12.6%								
4	MONTHLY DELIVERY CHARGE AUGUST 2020		29.30	30.19	0.89	3.0%								
5	MONTHLY DELIVERY CHARGE AUGUST 2022		30.19	30.94	0.75	2.5%								
6	MONTHLY BILL AUGUST 2018	20.0					42.60	46.04	3.44	8.1%	94.99	137.59	141.04	2.5%
7	MONTHLY BILL AUGUST 2020	20.0					46.04	46.98	0.93	2.0%	94.99	141.04	141.97	0.7%
8	MONTHLY BILL AUGUST 2022	20.0					46.98	47.76	0.79	1.7%	94.99	141.97	142.76	0.6%
9	EXCISE TAX FIRST 100		0.1593											
10	EXCISE TAX NEXT 1900		0.0877											
11	EXCISE TAX OVER 2000		0.0411											
12	GROSS RECEIPTS TAX RATE		4.987%											

COLUMBIA GAS OF OHIO, INC.
CASE NO. 17-2202-GA-ALT
TYPICAL BILL COMPARISON
RATE SCHEDULE SMALL GENERAL TRANSPORTATION SERVICE (SGTS)
PROPOSED RATES EFFECTIVE: AUGUST 2018 THROUGH 2022

Data: 12 MOS. ESTIMATED
TYPE OF FILING: ORIGINAL

LINE NO.	RATE CODE	USAGE MCF (A)	MOST CURRENT RATE (B)	PROPOSED RATE (C)	INCREASE (D=C-B)	PERCENT OF INCREASE (E=D/B)	CURRENT BILL (F)	PROPOSED BILL (G)	DOLLAR INCREASE (H=G-F)	PERCENT OF INCREASE (I=H/F)	AVE. MONTHLY FUEL COST ADDITIONS PROPOSED BILL (J)	CURRENT BILL INCLUDING FUEL COST (K=F+J)	PROPOSED BILL INCLUDING FUEL COST (L=G+J)	PERCENT OF CHANGE (M=(L-K)/K)
1	**SMALL GENERAL TRANSPORTATION SERVICE**													
2	ALL GAS USED		0.2423	0.2423	-	0.0%					4.5240			
3	MONTHLY DELIVERY CHARGE AUGUST 2018		26.91	30.19	3.28	12.2%								
4	MONTHLY DELIVERY CHARGE AUGUST 2020		30.19	31.08	0.89	2.9%								
5	MONTHLY DELIVERY CHARGE AUGUST 2022		31.08	31.83	0.75	2.4%								
6	MONTHLY BILL AUGUST 2018	20.0					36.68	40.13	3.44	9.4%	97.27	133.95	137.39	2.6%
7	MONTHLY BILL AUGUST 2020	20.0					40.13	41.06	0.93	2.3%	97.27	137.39	138.33	0.7%
8	MONTHLY BILL AUGUST 2022	20.0					41.06	41.85	0.79	1.9%	97.27	138.33	139.12	0.6%
9	EXCISE TAX FIRST 100		0.1593											
10	EXCISE TAX NEXT 1900		0.0877											
11	EXCISE TAX OVER 2000		0.0411											
12	GROSS RECEIPTS TAX		4.987%											
13	SALES TAX		7.500%											

COLUMBIA GAS OF OHIO, INC.
CASE NO. 17-2202-GA-ALT
TYPICAL BILL COMPARISON
RATE SCHEDULE FULL REQUIREMENTS SMALL GENERAL TRANSPORTATION SERVICE (FRSGTS)
PROPOSED RATES EFFECTIVE: AUGUST 2018 THROUGH 2022

LINE NO.	RATE CODE	USAGE MCF (A)	MOST CURRENT RATE (B)	PROPOSED RATE (C)	INCREASE (D=C-B)	PERCENT OF INCREASE (E=D/B)	CURRENT BILL (F)	PROPOSED BILL (G)	DOLLAR INCREASE (H=G-F)	PERCENT OF INCREASE (I=H/F)	AVE. MONTHLY FUEL COST ADDITIONS PROPOSED BILL (J)	CURRENT BILL INCLUDING FUEL COST (K=F+J)	PROPOSED BILL INCLUDING FUEL COST (L=G+J)	PERCENT OF CHANGE (M=(L-K)/K)
1	**FULL REQUIREMENTS SMALL GENERAL TRANSPORTATION SERVICE**													
2	ALL GAS USED		0.5508	0.5508	-	0.0%					4.5240			
3	MONTHLY DELIVERY CHARGE AUGUST 2018		26.91	30.19	3.28	12.2%								
4	MONTHLY DELIVERY CHARGE AUGUST 2020		30.19	31.08	0.89	2.9%								
5	MONTHLY DELIVERY CHARGE AUGUST 2022		31.08	31.83	0.75	2.4%								
6	MONTHLY BILL AUGUST 2018	7.0					33.47	36.91	3.44	10.3%	34.04	67.51	70.96	5.1%
7	MONTHLY BILL AUGUST 2020	7.0					36.91	37.85	0.93	2.5%	34.04	70.96	71.89	1.3%
8	MONTHLY BILL AUGUST 2022	7.0					37.85	38.64	0.79	2.1%	34.04	71.89	72.68	1.1%
9	EXCISE TAX FIRST 100		0.1593											
10	EXCISE TAX NEXT 1900		0.0877											
11	EXCISE TAX OVER 2000		0.0411											
12	GROSS RECEIPTS TAX		4.987%											
13	SALES TAX		7.500%											

COLUMBIA GAS OF OHIO, INC.
CASE NO. 17-2202-GA-ALT
TYPICAL BILL COMPARISON
RATE SCHEDULE GENERAL SERVICE (GS)
PROPOSED RATES EFFECTIVE: AUGUST 2018 THROUGH 2022

Data: 12 MOS. ESTIMATED
TYPE OF FILING: ORIGINAL

SCHEDULE G

LINE NO.	RATE CODE	USAGE MCF (A)	MOST CURRENT RATE (B)	PROPOSED RATE (C)	INCREASE (D=C-B)	PERCENT OF INCREASE (E=D/B)	CURRENT BILL (F)	PROPOSED BILL (G)	DOLLAR INCREASE (H=G-F)	PERCENT OF INCREASE (I=H/F)	AVE. MONTHLY FUEL COST ADDITIONS PROPOSED BILL (J)	CURRENT BILL INCLUDING FUEL COST (K=F+J)	PROPOSED BILL INCLUDING FUEL COST (L=G+J)	PERCENT OF CHANGE (M=(L-K)/K)
1	**GENERAL SERVICE**													
2	FIRST 25 MCF		2.0768	2.0768	-						4.5240			
3	NEXT 75 MCF		1.6585	1.6585	-									
4	Over 100 MCF		1.391	1.3910	-									
5	MONTHLY DELIVERY CHARGE AUGUST 2018		100.36	128.00	27.64	27.5%								
6	MONTHLY DELIVERY CHARGE AUGUST 2020		128.00	136.22	8.22	6.4%								
7	MONTHLY DELIVERY CHARGE AUGUST 2022		136.22	143.38	7.16	5.3%								
8	MONTHLY BILL AUGUST 2018	25.0					164.06	193.07	29.02	17.7%	118.74	282.80	311.81	10.3%
9	MONTHLY BILL AUGUST 2018	100.0					307.19	336.21	29.02	9.4%	474.96	782.15	811.17	3.7%
10	MONTHLY BILL AUGUST 2018	500.0					928.17	957.18	29.02	3.1%	2,374.81	3,302.97	3,331.99	0.9%
11	MONTHLY BILL AUGUST 2018	1,500.0					2,480.61	2,509.63	29.02	1.2%	7,124.42	9,605.03	9,634.05	0.3%
12	MONTHLY BILL AUGUST 2020	25.0					193.07	201.70	8.63	4.5%	118.74	311.81	320.44	2.8%
13	MONTHLY BILL AUGUST 2020	100.0					336.21	344.84	8.63	2.6%	474.96	811.17	819.80	1.1%
14	MONTHLY BILL AUGUST 2020	500.0					957.18	965.81	8.63	0.9%	2,374.81	3,331.99	3,340.62	0.3%
15	MONTHLY BILL AUGUST 2020	1,500.0					2,509.63	2,518.26	8.63	0.3%	7,124.42	9,634.05	9,642.68	0.1%
16	MONTHLY BILL AUGUST 2022	25.0					201.70	209.22	7.52	3.7%	118.74	320.44	327.96	2.3%
17	MONTHLY BILL AUGUST 2022	100.0					344.84	352.35	7.52	2.2%	474.96	819.80	827.32	0.9%
18	MONTHLY BILL AUGUST 2022	500.0					965.81	973.33	7.52	0.8%	2,374.81	3,340.62	3,348.14	0.2%
19	MONTHLY BILL AUGUST 2022	1,500.0					2,518.26	2,525.77	7.52	0.3%	7,124.42	9,642.68	9,650.19	0.1%
20	EXCISE TAX FIRST 100		0.1593											
21	EXCISE TAX NEXT 1900		0.0877											
22	EXCISE TAX OVER 2000		0.0411											
23	GROSS RECEIPTS TAX		4.987%											

COLUMBIA GAS OF OHIO, INC.
CASE NO. 17-2202-GA-ALT
TYPICAL BILL COMPARISON
RATE SCHEDULE GENERAL SERVICE SCHOOLS (GS - SCHOOLS)
PROPOSED RATES EFFECTIVE: AUGUST 2018 THROUGH 2022

Data: 12 MOS. ESTIMATED
TYPE OF FILING: ORIGINAL

SCHEDULE G
SHEET 6 OF 14

LINE NO.	RATE CODE	USAGE MCF (A)	MOST CURRENT RATE (B)	PROPOSED RATE (C)	INCREASE (D=C-B)	PERCENT OF INCREASE (E=D/B)	CURRENT BILL (F)	PROPOSED BILL (G)	DOLLAR INCREASE (H=G-F)	PERCENT OF INCREASE (I=H/F)	AVE. MONTHL FUEL COST ADDITIONS ROPOSED BI (J)	CURRENT BILL INCLUDING FUEL COST (K=F+J)	PROPOSED BILL INCLUDING FUEL COST (L=G+J)	PERCENT OF CHANGE (M=(L-K)/K)
1	**SMALL GENERAL SERVICE SCHOOLS**													
2	FIRST 25 MCF		1.9909	1.9909	-						4.5240			
3	NEXT 75 MCF		1.5935	1.5935	-									
4	Over 100 MCF		1.3394	1.3394	-									
5	MONTHLY DELIVERY CHARGE AUGUST 2018		99.23	126.87	27.64	27.9%								
6	MONTHLY DELIVERY CHARGE AUGUST 2020		126.87	135.09	8.22	6.5%								
7	MONTHLY DELIVERY CHARGE AUGUST 2022		135.09	142.25	7.16	5.3%								
8	MONTHLY BILL AUGUST 2018	25.0					160.61	189.63	29.02	18.1%	118.74	279.35	308.37	10.4%
9	MONTHLY BILL AUGUST 2018	100.0					298.63	327.65	29.02	9.7%	474.96	773.59	802.61	3.8%
10	MONTHLY BILL AUGUST 2018	500.0					897.94	926.96	29.02	3.2%	2,374.81	3,272.74	3,301.76	0.9%
11	MONTHLY BILL AUGUST 2018	1,500.0					2,396.21	2,425.23	29.02	1.2%	7,124.42	9,520.63	9,549.64	0.3%
12	MONTHLY BILL AUGUST 2020	25.0					189.63	198.26	8.63	4.6%	118.74	308.37	317.00	2.8%
13	MONTHLY BILL AUGUST 2020	100.0					327.65	336.28	8.63	2.6%	474.96	802.61	811.24	1.1%
14	MONTHLY BILL AUGUST 2020	500.0					926.96	935.59	8.63	0.9%	2,374.81	3,301.76	3,310.39	0.3%
15	MONTHLY BILL AUGUST 2020	1,500.0					2,425.23	2,433.86	8.63	0.4%	7,124.42	9,549.64	9,558.27	0.1%
16	MONTHLY BILL AUGUST 2022	25.0					198.26	205.78	7.52	3.8%	118.74	317.00	324.52	2.4%
17	MONTHLY BILL AUGUST 2022	100.0					336.28	343.80	7.52	2.2%	474.96	811.24	818.76	0.9%
18	MONTHLY BILL AUGUST 2022	500.0					935.59	943.10	7.52	0.8%	2,374.81	3,310.39	3,317.91	0.2%
19	MONTHLY BILL AUGUST 2022	1,500.0					2,433.86	2,441.37	7.52	0.3%	7,124.42	9,558.27	9,565.79	0.1%
20	EXCISE TAX FIRST 100		0.1593											
21	EXCISE TAX NEXT 1900		0.0877											
22	EXCISE TAX OVER 2000		0.0411											
23	GROSS RECEIPTS TAX		4.987%											

COLUMBIA GAS OF OHIO, INC.
CASE NO. 17-2202-GA-ALT
TYPICAL BILL COMPARISON
RATE SCHEDULE GENERAL TRANSPORTATION SERVICE(GTS)
PROPOSED RATES EFFECTIVE: AUGUST 2018 THROUGH 2022

Data: 12 MOS. ESTIMATED
TYPE OF FILING: ORIGINAL

SCHEDULE G

LINE NO.	RATE CODE	USAGE MCF (A)	MOST CURRENT RATE (B)	PROPOSED RATE (C)	INCREASE (D=C-B)	PERCENT OF INCREASE (E=D/B)	CURRENT BILL (F)	PROPOSED BILL (G)	DOLLAR INCREASE (H=G-F)	PERCENT OF INCREASE (I=H/F)	AVE. MONTHL FUEL COST ADDITIONS ROPOSED BI (J)	CURRENT BILL INCLUDING FUEL COST (K=F+J)	PROPOSED BILL INCLUDING FUEL COST (L=G+J)	PERCENT OF CHANGE (M=(L-K)/K)
1	**GENERAL TRANSPORTATION SERVICE**													
2	FIRST 25 MCF		1.7506	1.7506	-						4.5240			
3	NEXT 75 MCF		1.3323	1.3323	-									
4	Over 100 MCF		1.0648	1.0648										
5	MONTHLY DELIVERY CHARGE AUGUST 2018		100.36	128.00	27.64	27.5%								
6	MONTHLY DELIVERY CHARGE AUGUST 2020		128.00	136.22	8.22	6.4%								
7	MONTHLY DELIVERY CHARGE AUGUST 2022		136.22	143.38	7.16	5.3%								
8	MONTHLY BILL AUGUST 2018	25.0					155.49	184.51	29.02	18.7%	121.58	277.08	306.09	10.5%
9	MONTHLY BILL AUGUST 2018	100.0					272.94	301.96	29.02	10.6%	486.33	759.27	788.29	3.8%
10	MONTHLY BILL AUGUST 2018	500.0					756.93	785.95	29.02	3.8%	2,431.65	3,188.58	3,217.60	0.9%
11	MONTHLY BILL AUGUST 2018	1,500.0					1,966.91	1,995.93	29.02	1.5%	7,294.95	9,261.86	9,290.88	0.3%
12	MONTHLY BILL AUGUST 2020	25.0					184.51	193.14	8.63	4.7%	121.58	306.09	314.72	2.8%
13	MONTHLY BILL AUGUST 2020	100.0					301.96	310.59	8.63	2.9%	486.33	788.29	796.92	1.1%
14	MONTHLY BILL AUGUST 2020	500.0					785.95	794.58	8.63	1.1%	2,431.65	3,217.60	3,226.23	0.3%
15	MONTHLY BILL AUGUST 2020	1,500.0					1,995.93	2,004.56	8.63	0.4%	7,294.95	9,290.88	9,299.51	0.1%
16	MONTHLY BILL AUGUST 2022	25.0					193.14	200.66	7.52	3.9%	121.58	314.72	322.24	2.4%
17	MONTHLY BILL AUGUST 2022	100.0					310.59	318.11	7.52	2.4%	486.33	796.92	804.44	0.9%
18	MONTHLY BILL AUGUST 2022	500.0					794.58	802.10	7.52	0.9%	2,431.65	3,226.23	3,233.75	0.2%
19	MONTHLY BILL AUGUST 2022	1,500.0					2,004.56	2,012.07	7.52	0.4%	7,294.95	9,299.51	9,307.02	0.1%
20	EXCISE TAX FIRST 100		0.1593											
21	EXCISE TAX NEXT 1900		0.0877											
22	EXCISE TAX OVER 2000		0.0411											
23	GROSS RECEIPTS TAX		4.987%											
24	SALES TAX		7.500%											

COLUMBIA GAS OF OHIO, INC.
CASE NO. 17-2202-GA-ALT
TYPICAL BILL COMPARISON
RATE SCHEDULE GENERAL TRANSPORTATION SERVICE - SCHOOLS (GTS - SCHOOLS)
PROPOSED RATES EFFECTIVE: AUGUST 2018 THROUGH 2022

Data: 12 MOS. ESTIMATED
TYPE OF FILING: ORIGINAL

SCHEDULE G
SHEET 8 OF 14

LINE NO.	RATE CODE	USAGE MCF (A)	MOST CURRENT RATE (B)	PROPOSED RATE (C)	INCREASE (D=C-B)	PERCENT OF INCREASE (E=D/B)	CURRENT BILL (F)	PROPOSED BILL (G)	DOLLAR INCREASE (H=G-F)	PERCENT OF INCREASE (I=H/F)	AVE. MONTHL FUEL COST ADDITIONS ROPOSED BI (J)	CURRENT BILL INCLUDING FUEL COST (K=F+J)	PROPOSED BILL INCLUDING FUEL COST (L=G+J)	PERCENT OF CHANGE (M=(L-K)/K)
1	**GENERAL TRANSPORTATION SERVICE - SCHOOLS**													
2	FIRST 25 MCF		1.6647	1.6647	-						4.5240			
3	NEXT 75 MCF		1.2673	1.2673	-									
4	Over 100 MCF		1.0132	1.0132										
5	MONTHLY DELIVERY CHARGE AUGUST 2018		99.23	126.87	27.64	27.9%								
6	MONTHLY DELIVERY CHARGE AUGUST 2020		126.87	135.09	8.22	6.5%								
7	MONTHLY DELIVERY CHARGE AUGUST 2022		135.09	142.25	7.16	5.3%								
8	MONTHLY BILL AUGUST 2018	25.0					152.05	181.07	29.02	19.1%	121.58	273.64	302.65	10.6%
9	MONTHLY BILL AUGUST 2018	100.0					264.38	293.40	29.02	11.0%	486.33	750.71	779.73	3.9%
10	MONTHLY BILL AUGUST 2018	500.0					726.70	755.72	29.02	4.0%	2,431.65	3,158.35	3,187.37	0.9%
11	MONTHLY BILL AUGUST 2018	1,500.0					1,882.51	1,911.52	29.02	1.5%	7,294.95	9,177.46	9,206.47	0.3%
12	MONTHLY BILL AUGUST 2020	25.0					181.07	189.70	8.63	4.8%	121.58	302.65	311.28	2.9%
13	MONTHLY BILL AUGUST 2020	100.0					293.40	302.03	8.63	2.9%	486.33	779.73	788.36	1.1%
14	MONTHLY BILL AUGUST 2020	500.0					755.72	764.35	8.63	1.1%	2,431.65	3,187.37	3,196.00	0.3%
15	MONTHLY BILL AUGUST 2020	1,500.0					1,911.52	1,920.15	8.63	0.5%	7,294.95	9,206.47	9,215.10	0.1%
16	MONTHLY BILL AUGUST 2022	25.0					189.70	197.22	7.52	4.0%	121.58	311.28	318.80	2.4%
17	MONTHLY BILL AUGUST 2022	100.0					302.03	309.55	7.52	2.5%	486.33	788.36	795.88	1.0%
18	MONTHLY BILL AUGUST 2022	500.0					764.35	771.87	7.52	1.0%	2,431.65	3,196.00	3,203.52	0.2%
19	MONTHLY BILL AUGUST 2022	1,500.0					1,920.15	1,927.67	7.52	0.4%	7,294.95	9,215.10	9,222.62	0.1%
20	EXCISE TAX FIRST 100		0.1593											
21	EXCISE TAX NEXT 1900		0.0877											
22	EXCISE TAX OVER 2000		0.0411											
23	GROSS RECEIPTS TAX		4.987%											
24	SALES TAX		7.500%											

COLUMBIA GAS OF OHIO, INC.
CASE NO. 17-2202-GA-ALT
TYPICAL BILL COMPARISON
RATE SCHEDULE FULL REQUIREMENTS GENERAL TRANSPORTATION SERVICE - (FRGTS)
PROPOSED RATES EFFECTIVE: AUGUST 2018 THROUGH 2022

Data: 12 MOS. ESTIMATED **SCHEDULE G**
TYPE OF FILING: ORIGINAL SHEET 9 OF 14

LINE NO.	RATE CODE	USAGE MCF (A)	MOST CURRENT RATE (B)	PROPOSED RATE (C)	INCREASE (D=C-B)	PERCENT OF INCREASE (E=D/B)	CURRENT BILL (F)	PROPOSED BILL (G)	DOLLAR INCREASE (H=G-F)	PERCENT OF INCREASE (I=H/F)	AVE. MONTHL FUEL COST ADDITIONS ROPOSED BI (J)	CURRENT BILL INCLUDING FUEL COST (K=F+J)	PROPOSED BILL INCLUDING FUEL COST (L=G+J)	PERCENT OF CHANGE (M=(L-K)/K)
1	**FULL REQUIREMENTS GENERAL TRANSPORTATION SERVICE**													
2	FIRST 25 MCF		2.0591	2.0591	-						4.5240			
3	NEXT 75 MCF		1.6408	1.6408	-									
4	Over 100 MCF		1.3733	1.3733										
5	MONTHLY DELIVERY CHARGE AUGUST 2018		100.36	128.00	27.64	27.5%								
6	MONTHLY DELIVERY CHARGE AUGUST 2020		128.00	136.22	8.22	6.4%								
7	MONTHLY DELIVERY CHARGE AUGUST 2022		136.22	143.38	7.16	5.3%								
8	MONTHLY BILL AUGUST 2018	25.0					163.59	192.61	29.02	17.7%	120.73	284.32	313.34	10.2%
9	MONTHLY BILL AUGUST 2018	100.0					305.33	334.35	29.02	9.5%	482.94	788.27	817.29	3.7%
10	MONTHLY BILL AUGUST 2018	500.0					918.88	947.89	29.02	3.2%	2,414.69	3,333.56	3,362.58	0.9%
11	MONTHLY BILL AUGUST 2018	1,500.0					2,452.74	2,481.75	29.02	1.2%	7,244.06	9,696.79	9,725.81	0.3%
12	MONTHLY BILL AUGUST 2020	25.0					192.61	201.24	8.63	4.5%	120.73	313.34	321.97	2.8%
13	MONTHLY BILL AUGUST 2020	100.0					334.35	342.98	8.63	2.6%	482.94	817.29	825.92	1.1%
14	MONTHLY BILL AUGUST 2020	500.0					947.89	956.52	8.63	0.9%	2,414.69	3,362.58	3,371.21	0.3%
15	MONTHLY BILL AUGUST 2020	1,500.0					2,481.75	2,490.38	8.63	0.3%	7,244.06	9,725.81	9,734.44	0.1%
16	MONTHLY BILL AUGUST 2022	25.0					201.24	208.76	7.52	3.7%	120.73	321.97	329.49	2.3%
17	MONTHLY BILL AUGUST 2022	100.0					342.98	350.50	7.52	2.2%	482.94	825.92	833.43	0.9%
18	MONTHLY BILL AUGUST 2022	500.0					956.52	964.04	7.52	0.8%	2,414.69	3,371.21	3,378.73	0.2%
19	MONTHLY BILL AUGUST 2022	1,500.0					2,490.38	2,497.90	7.52	0.3%	7,244.06	9,734.44	9,741.96	0.1%
20	EXCISE TAX FIRST 100		0.1593											
21	EXCISE TAX NEXT 1900		0.0877											
22	EXCISE TAX OVER 2000		0.0411											
23	GROSS RECEIPTS TAX		4.987%											
24	SALES TAX		6.750%											

COLUMBIA GAS OF OHIO, INC.
CASE NO. 17-2202-GA-ALT
TYPICAL BILL COMPARISON
RATE SCHEDULE FULL REQUIREMENTS GENERAL TRANSPORTATION SERVICE - SCHOOLS (FRGTS - SCHOOLS)
PROPOSED RATES EFFECTIVE: AUGUST 2018 THROUGH 2022

LINE NO.	RATE CODE	USAGE MCF (A)	MOST CURRENT RATE (B)	PROPOSED RATE (C)	INCREASE (D=C-B)	PERCENT OF INCREASE (E=D/B)	CURRENT BILL (F)	PROPOSED BILL (G)	DOLLAR INCREASE (H=G-F)	PERCENT OF INCREASE (I=H/F)	AVE. MONTHL FUEL COST ADDITIONS ROPOSED BI (J)	CURRENT BILL INCLUDING FUEL COST (K=F+J)	PROPOSED BILL INCLUDING FUEL COST (L=G+J)	PERCENT OF CHANGE (M=(L-K)/K)
1	**FULL REQUIREMENTS GENERAL TRANSPORTATION SERVICE - SCHOOLS**													
2	FIRST 25 MCF		1.9732	1.9732	-						4.5240			
3	NEXT 75 MCF		1.5758	1.5758	-									
4	Over 100 MCF		1.3217	1.3217										
5	MONTHLY DELIVERY CHARGE AUGUST 2018		99.23	126.87	27.64	27.9%								
6	MONTHLY DELIVERY CHARGE AUGUST 2020		126.87	135.09	8.22	6.5%								
7	MONTHLY DELIVERY CHARGE AUGUST 2022		135.09	142.25	7.16	5.3%								
8	MONTHLY BILL AUGUST 2018	25.0					160.15	189.17	29.02	18.1%	121.58	281.73	310.75	10.3%
9	MONTHLY BILL AUGUST 2018	100.0					296.77	325.79	29.02	9.8%	486.33	783.10	812.12	3.7%
10	MONTHLY BILL AUGUST 2018	500.0					888.65	917.67	29.02	3.3%	2,431.65	3,320.30	3,349.32	0.9%
11	MONTHLY BILL AUGUST 2018	1,500.0					2,368.33	2,397.35	29.02	1.2%	7,294.95	9,663.28	9,692.30	0.3%
12	MONTHLY BILL AUGUST 2020	25.0					189.17	197.80	8.63	4.6%	121.58	310.75	319.38	2.8%
13	MONTHLY BILL AUGUST 2020	100.0					325.79	334.42	8.63	2.6%	486.33	812.12	820.75	1.1%
14	MONTHLY BILL AUGUST 2020	500.0					917.67	926.30	8.63	0.9%	2,431.65	3,349.32	3,357.95	0.3%
15	MONTHLY BILL AUGUST 2020	1,500.0					2,397.35	2,405.98	8.63	0.4%	7,294.95	9,692.30	9,700.93	0.1%
16	MONTHLY BILL AUGUST 2022	25.0					197.80	205.32	7.52	3.8%	121.58	319.38	326.90	2.4%
17	MONTHLY BILL AUGUST 2022	100.0					334.42	341.94	7.52	2.2%	486.33	820.75	828.27	0.9%
18	MONTHLY BILL AUGUST 2022	500.0					926.30	933.81	7.52	0.8%	2,431.65	3,357.95	3,365.46	0.2%
19	MONTHLY BILL AUGUST 2022	1,500.0					2,405.98	2,413.50	7.52	0.3%	7,294.95	9,700.93	9,708.45	0.1%
20	EXCISE TAX FIRST 100		0.1593											
21	EXCISE TAX NEXT 1900		0.0877											
22	EXCISE TAX OVER 2000		0.0411											
23	GROSS RECEIPTS TAX		4.987%											
24	SALES TAX		7.500%											

COLUMBIA GAS OF OHIO, INC.
CASE NO. 17-2202-GA-ALT
TYPICAL BILL COMPARISON
RATE SCHEDULE LARGE GENERAL SERVICE (LGS)
PROPOSED RATES EFFECTIVE: AUGUST 2018 THROUGH 2022

Data: 12 MOS. ESTIMATED
TYPE OF FILING: ORIGINAL

SCHEDULE G
SHEET 11 OF 14

LINE NO.	RATE CODE	USAGE MCF (A)	MOST CURRENT RATE (B)	PROPOSED RATE (C)	INCREASE (D=C-B)	PERCENT OF INCREASE (E=D/B)	CURRENT BILL (F)	PROPOSED BILL (G)	DOLLAR INCREASE (H=G-F)	PERCENT OF INCREASE (I=H/F)	AVE. MONTHLY FUEL COST ADDITIONS PROPOSED BILL (J)	CURRENT BILL INCLUDING FUEL COST (K=F+J)	PROPOSED BILL INCLUDING FUEL COST (L=G+J)	PERCENT OF CHANGE (M=(L-K)/K)
1	**LARGE GENERAL SERVICE**													
2	FIRST 2,000 MCF		0.7257	0.7257	-	0.0%					4.5240			
3	NEXT 13,000 MCF		0.5667	0.5667	-	0.0%								
4	NEXT 85,000 MCF		0.5347	0.5347	-	0.0%								
5	Over 100,000 MCF		0.4887	0.4887	-	0.0%								
6	MONTHLY DELIVERY CHARGE AUGUST 2018		2844.62	3375.76	531.14	18.7%								
7	MONTHLY DELIVERY CHARGE AUGUST 2020		3375.76	3530.15	154.39	4.6%								
8	MONTHLY DELIVERY CHARGE AUGUST 2022		3530.15	3544.62	14.47	0.4%								
9	MONTHLY BILL AUGUST 2018	1,500.0					4,274.94	4,832.57	557.63	13.0%	7,124.42	11,399.36	11,956.99	4.9%
10	MONTHLY BILL AUGUST 2018	6,500.0					7,573.43	8,131.05	557.63	7.4%	30,872.48	38,445.90	39,003.53	1.5%
11	MONTHLY BILL AUGUST 2018	19,500.0					15,717.69	16,275.32	557.63	3.5%	92,617.43	108,335.12	108,892.75	0.5%
12	MONTHLY BILL AUGUST 2020	1,500.0					4,832.57	4,994.66	162.09	3.4%	7,124.42	11,956.99	12,119.08	1.4%
13	MONTHLY BILL AUGUST 2020	6,500.0					8,131.05	8,293.14	162.09	2.0%	30,872.48	39,003.53	39,165.62	0.4%
14	MONTHLY BILL AUGUST 2020	19,500.0					16,275.32	16,437.41	162.09	1.0%	92,617.43	108,892.75	109,054.84	0.1%
15	MONTHLY BILL AUGUST 2022	1,500.0					4,994.66	5,009.85	15.19	0.3%	7,124.42	12,119.08	12,134.27	0.1%
16	MONTHLY BILL AUGUST 2022	6,500.0					8,293.14	8,308.34	15.19	0.2%	30,872.48	39,165.62	39,180.81	0.0%
17	MONTHLY BILL AUGUST 2022	19,500.0					16,437.41	16,452.60	15.19	0.1%	92,617.43	109,054.84	109,070.03	0.0%
18	EXCISE TAX FIRST 100		0.1593											
19	EXCISE TAX NEXT 1900		0.0877											
20	EXCISE TAX OVER 2000		0.0411											
21	EXCISE TAX FLEXED RATE		0.0200											
22	GROSS RECEIPTS TAX		4.987%											
23	SALES TAX		7.500%											

COLUMBIA GAS OF OHIO, INC.
CASE NO. 17-2202-GA-ALT
TYPICAL BILL COMPARISON
RATE SCHEDULE LARGE GENERAL TRANSPORTATION SERVICE (LGTS)
PROPOSED RATES EFFECTIVE: AUGUST 2018 THROUGH 2022

Data: 12 MOS. ESTIMATED
TYPE OF FILING: ORIGINAL

SCHEDULE G
SHEET 12 OF 14

LINE NO.	RATE CODE	USAGE MCF (A)	MOST CURRENT RATE (B)	PROPOSED RATE (C)	INCREASE (D=C-B)	PERCENT OF INCREASE (E=D/B)	CURRENT BILL (F)	PROPOSED BILL (G)	DOLLAR INCREASE (H=G-F)	PERCENT OF INCREASE (I=H/F)	AVE. MONTHL` FUEL COST ADDITIONS ROPOSED BIL (J)	CURRENT BILL INCLUDING FUEL COST (K=F+J)	PROPOSED BILL INCLUDING FUEL COST (L=G+J)	PERCENT OF CHANGE (M=(L-K)/K)
1	**LARGE GENERAL TRANSPORTATION SERVICE**													
2	FIRST 2,000 MCF		0.3995	0.3995	-	0.0%					4.5240			
3	NEXT 13,000 MCF		0.2405	0.2405	-	0.0%								
4	NEXT 85,000 MCF		0.2085	0.2085	-	0.0%								
5	Over 100,000 MCF		0.1625	0.1625	-	0.0%								
6	MONTHLY DELIVERY CHARGE AUGUST 2018		2844.62	3375.76	531.14	18.7%								
7	MONTHLY DELIVERY CHARGE AUGUST 2020		3375.76	3530.15	154.39	4.6%								
8	MONTHLY DELIVERY CHARGE AUGUST 2022		3530.15	3544.62	14.47	0.4%								
9	MONTHLY BILL AUGUST 2018	1,500.0					3,761.24	4,318.87	557.63	14.8%	7,294.95	11,056.19	11,613.82	5.0%
10	MONTHLY BILL AUGUST 2018	6,500.0					5,347.39	5,905.01	557.63	10.4%	31,611.45	36,958.84	37,516.46	1.5%
11	MONTHLY BILL AUGUST 2018	19,500.0					9,039.57	9,597.20	557.63	6.2%	94,834.35	103,873.92	104,431.55	0.5%
12	MONTHLY BILL AUGUST 2020	1,500.0					4,318.87	4,480.96	162.09	3.8%	7,294.95	11,613.82	11,775.91	1.4%
13	MONTHLY BILL AUGUST 2020	6,500.0					5,905.01	6,067.10	162.09	2.7%	31,611.45	37,516.46	37,678.55	0.4%
14	MONTHLY BILL AUGUST 2020	19,500.0					9,597.20	9,759.29	162.09	1.7%	94,834.35	104,431.55	104,593.64	0.2%
15	MONTHLY BILL AUGUST 2022	1,500.0					4,480.96	4,496.15	15.19	0.3%	7,294.95	11,775.91	11,791.10	0.1%
16	MONTHLY BILL AUGUST 2022	6,500.0					6,067.10	6,082.30	15.19	0.3%	31,611.45	37,678.55	37,693.75	0.0%
17	MONTHLY BILL AUGUST 2022	19,500.0					9,759.29	9,774.48	15.19	0.2%	94,834.35	104,593.64	104,608.83	0.0%
18	EXCISE TAX FIRST 100		0.1593											
19	EXCISE TAX NEXT 1900		0.0877											
20	EXCISE TAX OVER 2000		0.0411											
21	EXCISE TAX FLEXED RATE		0.0200											
22	GROSS RECEIPTS TAX		4.987%											
23	SALES TAX		7.500%											

COLUMBIA GAS OF OHIO, INC.
CASE NO. 17-2202-GA-ALT
TYPICAL BILL COMPARISON
RATE SCHEDULE FULL REQUIREMENTS LARGE GENERAL TRANSPORTATION SERVICE (FRLGTS)
PROPOSED RATES EFFECTIVE: AUGUST 2018 THROUGH 2022

Data: 12 MOS. ESTIMATED
TYPE OF FILING: ORIGINAL

SCHEDULE G
SHEET 13 OF 14

LINE NO.	RATE CODE	USAGE MCF (A)	MOST CURRENT RATE (B)	PROPOSED RATE (C)	INCREASE (D=C-B)	PERCENT OF INCREASE (E=D/B)	CURRENT BILL (F)	PROPOSED BILL (G)	DOLLAR INCREASE (H=G-F)	PERCENT OF INCREASE (I=H/F)	AVE. MONTHL` FUEL COST ADDITIONS ROPOSED BIL (J)	CURRENT BILL INCLUDING FUEL COST (K=F+J)	PROPOSED BILL INCLUDING FUEL COST (L=G+J)	PERCENT OF CHANGE (M=(L-K)/K)
1	**FULL REQUIREMENTS LARGE GENERAL TRANSPORTATION SERVICE**													
2	FIRST 2,000 MCF		0.7080	0.7080	-	0.0%					4.5240			
3	NEXT 13,000 MCF		0.5490	0.5490	-	0.0%								
4	NEXT 85,000 MCF		0.5170	0.5170	-	0.0%								
5	Over 100,000 MCF		0.4710	0.4710	-	0.0%								
6	MONTHLY DELIVERY CHARGE AUGUST 2018		2844.62	3375.76	531.14	18.7%								
7	MONTHLY DELIVERY CHARGE AUGUST 2020		3375.76	3530.15	154.39	4.6%								
8	MONTHLY DELIVERY CHARGE AUGUST 2022		3530.15	3544.62	14.47	0.4%								
9	MONTHLY BILL AUGUST 2018	1,500.0					4,247.07	4,804.70	557.63	13.1%	7,294.95	11,542.02	12,099.65	4.8%
10	MONTHLY BILL AUGUST 2018	6,500.0					7,452.64	8,010.27	557.63	7.5%	31,611.45	39,064.09	39,621.72	1.4%
11	MONTHLY BILL AUGUST 2018	19,500.0					15,355.33	15,912.95	557.63	3.6%	94,834.35	110,189.68	110,747.30	0.5%
12	MONTHLY BILL AUGUST 2020	1,500.0					4,804.70	4,966.79	162.09	3.4%	7,294.95	12,099.65	12,261.74	1.3%
13	MONTHLY BILL AUGUST 2020	6,500.0					8,010.27	8,172.36	162.09	2.0%	31,611.45	39,621.72	39,783.81	0.4%
14	MONTHLY BILL AUGUST 2020	19,500.0					15,912.95	16,075.04	162.09	1.0%	94,834.35	110,747.30	110,909.39	0.1%
15	MONTHLY BILL AUGUST 2022	1,500.0					4,966.79	4,981.98	15.19	0.3%	7,294.95	12,261.74	12,276.93	0.1%
16	MONTHLY BILL AUGUST 2022	6,500.0					8,172.36	8,187.55	15.19	0.2%	31,611.45	39,783.81	39,799.00	0.0%
17	MONTHLY BILL AUGUST 2022	19,500.0					16,075.04	16,090.23	15.19	0.1%	94,834.35	110,909.39	110,924.58	0.0%
18	EXCISE TAX FIRST 100		0.1593											
19	EXCISE TAX NEXT 1900		0.0877											
20	EXCISE TAX OVER 2000		0.0411											
21	EXCISE TAX FLEXED RATE		0.0200											
22	GROSS RECEIPTS TAX		4.987%											
23	SALES TAX		7.500%											

COLUMBIA GAS OF OHIO, INC.
CASE NO. 17-2202-GA-ALT
TYPICAL BILL COMPARISON
RATE SCHEDULE LARGE GENERAL TRANSPORTATION SERVICE - MAINLINE (LGTS MAINLINE)
PROPOSED RATES EFFECTIVE: AUGUST 2018 THROUGH 2022

Data: 12 MOS. ESTIMATED
TYPE OF FILING: ORIGINAL

LINE NO.	RATE CODE	USAGE MCF (A)	MOST CURRENT RATE (B)	PROPOSED RATE (C)	INCREASE (D=C-B)	PERCENT OF INCREASE (E=D/B)	CURRENT BILL (F)	PROPOSED BILL (G)	DOLLAR INCREASE (H=G-F)	PERCENT OF INCREASE (I=H/F)	AVE. MONTHLY FUEL COST ADDITIONS TO BILL (J)	CURRENT BILL INCLUDING FUEL COST (K=F+J)	PROPOSED BILL INCLUDING FUEL COST (L=G+J)	PERCENT OF CHANGE (M=(L-K)/K)
1	**LARGE GENERAL TRANSPORTATION SERVICE - MAINLINE**													
2	ALL GAS USED - AUGUST 2018		0.1625	0.1625	-	0.0%					4.5240			
3	ALL GAS USED - AUGUST 2020		0.1625	0.1625	-	0.0%								
4	ALL GAS USED - AUGUST 2022		0.1625	0.1625	-	0.0%								
5	MONTHLY DELIVERY CHARGE AUGUST 2018		2844.62	3375.76	531.14	18.7%								
6	MONTHLY DELIVERY CHARGE AUGUST 2020		3375.76	3530.15	154.39	4.6%								
7	MONTHLY DELIVERY CHARGE AUGUST 2022		3530.15	3544.62	14.47	0.4%								
6	MONTHLY BILL AUGUST 2018	1,500.0					3,388.01	3,945.64	557.63	16.5%	7,294.95	10,682.96	11,240.59	5.2%
7	MONTHLY BILL AUGUST 2018	6,500.0					4,481.24	5,038.87	557.63	12.4%	31,611.45	36,092.69	36,650.32	1.5%
8	MONTHLY BILL AUGUST 2018	19,500.0					7,260.04	7,817.67	557.63	7.7%	94,834.35	102,094.39	102,652.02	0.5%
9	MONTHLY BILL AUGUST 2020	1,500.0					3,945.64	4,107.73	162.09	4.1%	7,294.95	11,240.59	11,402.68	1.4%
10	MONTHLY BILL AUGUST 2020	6,500.0					5,038.87	5,200.96	162.09	3.2%	31,611.45	36,650.32	36,812.41	0.4%
11	MONTHLY BILL AUGUST 2020	19,500.0					7,817.67	7,979.76	162.09	2.1%	94,834.35	102,652.02	102,814.11	0.2%
12	MONTHLY BILL AUGUST 2022	1,500.0					4,107.73	4,122.92	15.19	0.4%	7,294.95	11,402.68	11,417.87	0.1%
13	MONTHLY BILL AUGUST 2022	6,500.0					5,200.96	5,216.15	15.19	0.3%	31,611.45	36,812.41	36,827.60	0.0%
14	MONTHLY BILL AUGUST 2022	19,500.0					7,979.76	7,994.95	15.19	0.2%	94,834.35	102,814.11	102,829.30	0.0%
15	EXCISE TAX FIRST 100		0.1593											
16	EXCISE TAX NEXT 1900		0.0877											
17	EXCISE TAX OVER 2000		0.0411											
18	EXCISE TAX FLEXED RATE		0.0200											
19	GROSS RECEIPTS TAX		4.987%											
20	SALES TAX		7.500%											

Exhibit H
Columbia's Energy Efficiency Program

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of Demand Side Management Program for its Residential and Commercial Customers.	)))))	Case No. 16-1309-GA-UNC
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval to Change Accounting Methods.	)))	Case No. 16-1310-GA-AAM

APPLICATION OF
COLUMBIA GAS OF OHIO, INC.
TO CONTINUE ITS
DEMAND SIDE MANAGEMENT PROGRAM

1. Introduction

In this application, Columbia Gas of Ohio, Inc. ("Columbia") seeks approval to continue its Demand Side Management ("DSM") Program approved by the Public Utilities Commission of Ohio ("Commission") in Case Nos. 08-833-GA-UNC, 11-5028-GA-UNC, and 11-5029-GA-AAM. Columbia is a national, regional, and state leader among natural gas utilities in the development and implementation of innovative energy efficiency and weatherization programs for its customers. Columbia seeks to continue this leadership through the continuation of its DSM Program. Columbia proposes to invest an average of approximately $26.8 million annually in the proposed programs for calendar years 2017 through 2022.[1] Prior to filing this application to continue its DSM Program, Columbia presented the costs, savings and a description of the proposed DSM Program to Columbia's DSM Stakeholder Group.

[1] The budget will increase annually by approximately 3% to account for inflation and natural growth in successful programs. In addition to this amount, Columbia receives $7.1 million for WarmChoice® through base rates.

Columbia recovers the costs of its DSM Program through Columbia's Rider DSM. Columbia's Rider DSM is adjusted effective May each year to enable Columbia to recover the DSM costs incurred during the prior calendar year. Columbia proposes no changes to the currently approved procedures to review and adjust Rider DSM. Columbia is proposing, however, some modifications to the shared savings levels, which are detailed herein in Section 3.5.

Columbia is committed to helping its customers use natural gas more efficiently by effectively implementing its DSM Program. The key purposes of the DSM Program are to:

- Provide cost-effective, customer-oriented energy efficiency services for residential and commercial customers throughout Columbia's entire service territory
- Improve customer safety, comfort, and productivity
- Reduce wasteful and inefficient use of natural gas and other resources, such as water and electricity
- Increase customers' financial resources by reducing natural gas bills
- Lower customers' carbon dioxide emissions
- Support job creation and economic development
- Help the Commission comply with R.C. §§ 4929.02 and R.C. 4905.70
- Help the State of Ohio meet Pillar 7 of Ohio's 21st Century Energy Policy.

This DSM Program, Columbia's third since 2008, is based on third-party and internal energy efficiency analyses and results from the current DSM Program. The DSM Program term has been lengthened from five to six years in order to:

- Align the end date of the proposed DSM Program extension (December 31, 2021) with the expected end date of Columbia's next Infrastructure Replacement Program ("IRP") extension (December 31, 2022). Since 2012, Columbia has annually filed its application and testimony to adjust Rider DSM with its adjustment to Rider IRP. Ending and renewing both "programs" on the same schedule is ideal for stakeholders and the Commission.
- Reduce administrative burden and costs to customers, Columbia, stakeholders, and the Commission, while continuing to provide annual oversight through the Rider DSM application and review process, program evaluation, and input from the DSM Stakeholder Group.

- Provide stability for customers and businesses, and for the contractors that provide energy efficiency services to them, who expect utilities to offer and deliver energy efficiency as part of 21st century customer expectations for utility company operations.
- Maintain established and ongoing collaborative relationships with other utilities, units of local government, and other strategic partners in delivering energy efficiency services to customers and citizens of Ohio. This includes Columbia's key partnership with American Electric Power ("AEP Ohio") on programs that Columbia jointly delivers in shared service territories.

The DSM Program continues Columbia's current, successful programs and provides program enhancements to continue that success, serve additional market segments, and deliver more savings to customers.

2. Creating Value Through Demand Side Management

2.1. Long-Term Energy Reduction Benefits

Columbia has been providing energy-efficiency programs and services to its customers for over three decades, as described in Appendix C. The energy efficiency measures undertaken through Columbia's DSM programs since the inception of the WarmChoice® program in 1987, and the creation of the first DSM Program in 2008, will save customers over 60.7 Bcf of natural gas over the life of the measures. This equates to an estimated total savings of $492 million. In addition to the natural gas savings created by Columbia's programs, several of the programs create electricity savings through reduced use of air conditioning after insulation and air sealing measures are installed, reduced run time of furnace fans through lower heating and cooling loads, and more efficient furnace motors in Energy Star® qualified furnaces.

Columbia continued its 33-year legacy of leadership in energy efficiency with the last extension and expansion of its DSM Program in 2011. Table 1 provides a brief description of the current programs and shows the results for the first four years of the DSM Program, 2012-2015. The programs continue to meet and exceed customer service and natural gas reduction targets through a network of talented energy efficiency professionals and contractors who are among the best in the nation at effectively meeting the challenges of program design and implementation. A summary of accomplishments to date for the current DSM Program is shown below in Table 1.

Table 1 Current DSM Program Accomplishments

Program	Description	2012-2015 Customers Served	2012-2015 Lifetime Mcf Savings
Home Performance Solutions	In home Energy Audit and Rebates	22,251	7,128,796
WarmChoice®	Free Weatherization to income-eligible customers	8,129	5,200,248
High Efficiency Furnace Rebates	Rebates on high efficiency furnaces and boilers	11,434	2,290,047
EfficiencyCrafted® Homes	Incentives to home builders for homes 30% better than energy code	7,565	5,752,709
Home Energy Reports	Energy Efficiency behavior modification reports to motivate customers to engage in energy efficiency actions	430,000	753,261
Simple Energy Solutions	Online e-store and rebates on programmable thermostats, energy efficient showerheads, and faucet aerators	27,830	1,206,309
Residential Energy Code	Training for code officials, homebuilders, and trade allies on residential energy codes	595*	-
e3 smart	Energy efficiency education delivered as part of school curriculum, with kit of energy efficiency measures for students to install in their homes	82,019	199,673
Home Energy Checkup	On-line energy audit that refers customers to other DSM programs that can help them save more	241**	-
Innovative Energy Solutions	Prescriptive rebates, and custom rebates for energy audits and energy conservation measures for nonprofits, houses of worship, schools, hospitals, government and businesses	166	3,031,892
Energy Design Solutions	Commercial energy code education for small commercial building design professionals and trade allies	121***	-
U.S. EPA Portfolio Manager	Link to U.S. EPA's building energy benchmarking tool to determine efficiency level and next steps	3****	-

Notes:
* Training for code officials, homebuilders, contractors and real estate agents.
** Pilot period participation for new on-line energy audit.
*** Building design professionals and trade allies trained.
**** Key partnerships with City of Columbus, Ohio Hospital Association, and Ohio Interfaith Power and Light.

2.2. Multiple Non-Energy Benefits and Impacts of the DSM Program

The DSM Program provides Columbia's customers, ratepayers, and society with multiple benefits beyond energy and utility bill savings. Extensive research has been conducted into the additional benefits of DSM in the areas of macroeconomic impacts, public budget impacts, health, and well-being impacts, among many others. For instance, lifetime carbon dioxide reduction for Columbia's DSM Program is estimated to be 3,643,817 tons, the equivalent of taking 677,878 automobiles off the road for one year or planting 2,639,278 acres of trees. A bibliography of reports on these non-energy benefits ("NEBs") is included in Appendix E.

Columbia's DSM Program creates numerous NEBs, including:

- Lower water and sewer bills
- Avoided CO_2 emissions
- Direct economic benefits from jobs created by DSM programs
- Lower customer arrearages and bad debt
- Increased tax revenue to state and local government
- Secondary economic (multiplier) benefits
- Improvements in health and safety

These NEBs can, and should, be used in DSM cost tests to account for the full value proposition that energy efficiency provides to its customers. In Iowa[2] and Minnesota, which use the societal cost test to determine which energy efficiency programs to implement, NEBs are used as a key input to calculate the value of energy efficiency programs and their impact in their states. An economic impact assessment of energy efficiency efforts in Minnesota found a total net benefit of more than $5.9 billion in new economic output and nearly 55,000 job-years.[3] This Commission, too, can factor in NEBs in the cost tests to obtain a broader perspec-

[2] Iowa Admin. Code r.199-35.8(1)e.(1).
[3] Cadmus, *The Aggregate Economic Impact of the Conservation Improvement Program 2008-2013*, Prepared for the Minnesota Department of Commerce, Div. of Energy Resources (Oct. 2015) (*available at* http://mn.gov/commerce-stat/pdfs/card-report-aggregate-eco-impact-cip-2008-2013.pdf).

tive on the true value and impact that Columbia's DSM Program creates through ratepayer investments throughout Ohio.

2.3. Best Practice Awards and Recognition

Columbia's DSM programs and team members have been recognized for their leadership in the field of energy efficiency at the state, regional, and national levels. These awards and recognition are a testament to Columbia's focus on implementing best practices to market and deliver effective programs to customers.

The current portfolio of DSM programs has received 17 program awards, most of them in the past 3 to 4 years. Nationally, Columbia's largest programs, WarmChoice®, Home Performance Solutions, and EfficiencyCrafted® Homes, have received awards from the American Council for an Energy Efficient Economy and the United States Environmental Protection Agency ("U.S. EPA"), leading proponents of energy efficiency as a resource for helping Americans manage energy costs and greenhouse gas emissions. At the regional and state level, Columbia has been recognized by the Midwest Energy Efficiency Alliance and received the Ohio Governor's Award for Excellence in Energy Efficiency. Columbia's leadership, Commission Staff, and DSM Stakeholder Group members are to be credited for giving DSM Program staff the flexibility to develop and implement these peer-leading DSM programs in Ohio. A complete list of awards and recognition can be found in Appendix D.

2.4. Collaborative Partnerships and Community Engagement

Throughout its history in DSM, Columbia has worked collaboratively with many partners and stakeholders, from non-profit and governmental organizations to fellow natural gas and electric utilities, to determine the best ways to prudently use ratepayer funds to save energy and reduce bills for customers. The public-private partnerships enhance service delivery and customer satisfaction by reducing confusion about programs in the marketplace and offering streamlined, efficient service delivery methods to reach customers.

For instance, Columbia's partnership with AEP Ohio enabled the utilities to: 1) co-deliver the e³ smart program in schools in jointly served counties; 2) integrate Columbia's and AEP Ohio's new homes programs to save on program implementation and marketing costs; and 3) deliver and install high efficiency lighting products during Columbia's in-home energy audits. In addition, professional commercial building energy auditors are able to leverage both Columbia's and AEP Ohio's energy audit and rebate programs to maximize cost effective investments for each company's respective customers. Columbia also partnered with AEP Ohio in its Community Energy Savers program to ramp up energy efficiency upgrades in Athens County.

The low-income network that Columbia uses to implement its WarmChoice® program also acts as a one-stop-shop in delivering both utilities' income-eligible customer programs and link them to the many additional services for which they may be eligible. Since 1983, Columbia has used Ohio's exemplary community-based weatherization network to deliver Columbia's WarmChoice® program jointly with other services for income-eligible households, including the Home Energy Assistance Program ("HEAP") and the Percentage of Income Payment Plan ("PIPP Plus"), state and federally funded home repair programs, and other energy-efficiency services. Partnering with this network creates additional public value by linking income-eligible weatherization customers to other needed social programs such as Meals on Wheels, HeadStart, Health Services, Child Care, and other social services that can help improve customers' lives.

Another example of Columbia's effective partnerships is Columbia's relationship with Ohio Interfaith Power and Light and Ohio Hospital Association, which use U.S. EPA's Portfolio Manager Tool to benchmark energy usage in houses of worship and hospitals to help target those facilities for energy efficiency improvements.

3. Columbia's Proposed 2017-2022 DSM Program

Columbia believes it is in the continued best interest of its customers to continue to provide DSM services through programs that promote the installation and implementation of energy efficiency measures and technologies in a cost-effective manner. Over 500,000 homes and buildings in Columbia's service territory were built before energy codes were implemented in Ohio. For many of Columbia's customers, there are numerous barriers to the adoption of efficient technology, including higher incremental costs for high efficiency equipment, lack of customer education, lack of contractor trade ally training, lack of monetary resources, fear of change, and societal costs not being reflected in prices. Likewise, the default action for customers in regards to energy efficiency and reducing waste is no action, even when it is in their best interests to lower their energy bills. Accordingly, Columbia and the DSM Stakeholder Group believe that Columbia must continue to play a role in promoting and encouraging energy efficiency, economic development, and job creation in Ohio. Utility companies in the nation are in a unique position to bring energy efficiency to scale, which would be absent without these investments.

Specifically, Columbia will continue to take a leadership role in promoting energy efficiency because of Columbia's existing relationship with its customers, who often view Columbia as their primary source of energy information. Columbia's unique relationship with customers and stakeholders will allow it to continue to meet customers' needs for DSM services through technology, education, and incentives to help remove market barriers and speed the adoption of more efficient technologies. Other DSM Stakeholder Group members, including consumer advocate groups, contractors, trade allies and numerous energy-related organizations, are also an integral part of creating and maintaining a successful program as these groups interact with Columbia and its customers.

Residential and small commercial customers will continue to benefit from these proposed energy efficiency programs by having ready access to energy-saving measures and services that will directly reduce natural gas usage throughout the life of the energy efficiency measures, improving the affordability of natural gas service. Additionally, customers will benefit through improved safety and reliability of their heating equipment, better efficiency and comfort, as well as electricity and water savings.

Non-participating customers will also benefit through the establishment of a network of trained providers and an enhanced marketplace, with better access and availability to state-of-the-art energy conservation techniques promoted by these DSM programs. Moreover, non-participating customers may benefit from the price-dampening effects of energy efficiency and from the positive environmental impacts of the programs, as well as other societal benefits.

3.1. DSM Program for 2017 – 2022

Columbia is proposing to continue and enhance its portfolio of DSM programs, which offers a wide range of services to its residential and commercial customers. Each program has been determined to be cost-effective, as shown in Appendix B. While Columbia will continue to effectively administer its DSM Program, the programs will be implemented primarily by third-party consultants (vendors). Columbia proposes to continue offering these programs from January 1, 2017, through December 31, 2022. Columbia has also proposed budgets for each program, based on estimated projections of potential customer participation rates and activity within each program. Sources for costs of energy conservation measures included impact evaluation studies, engineering calculations, and industry sources. Based upon the results of Columbia's team and evaluation consultant's work, and discussions with the DSM Stakeholder Group, Columbia proposes that its DSM programs be continued and/or enhanced. These programs are described in Section 3.2, and are summarized in Table 2 below.

Table 2 Summary of DSM Programs

Program	Program Description
WarmChoice®	Low-income customer home weatherization
Home Performance Solutions	Low-cost home energy audits and rebates/discounts
Simple Energy Solutions	Energy efficient thermostat, showerhead, and aerator rebates
High Efficiency Furnace Rebates	Rebates for energy efficient furnaces and boilers
Home Energy Reports	Energy usage comparison reports, recommendations
Home Energy Checkup	Online energy audit tool
e3 smart	Student education program and kit of materials
EfficiencyCrafted® Homes	Incentives for homes built 30% more efficient
Residential Code Training	Energy code training for officials, trade allies
Energy Design Solutions	New commercial building above energy code education and incentives
Innovative Energy Solutions	Rebates on energy audits and measures for non-profits and businesses
EPA Portfolio Manager	Online energy use benchmarking for commercial buildings

3.2. Summary of Key Programmatic Enhancements to the DSM Programs

Columbia believes that maintaining the success of its DSM Program requires it to adjust its programs. Accordingly, Columbia is proposing several changes to its DSM portfolio of programs. These changes will strengthen the programmatic reach for customers and enable Columbia to enhance customers' opportunities for implementing energy efficient measures. A summary of Columbia's proposed DSM Program enhancements is provided in Table 3. Each program, and Columbia's proposed enhancements to each program, are discussed below.

Table 3 Summary of DSM Program Enhancements

Program	Program Enhancements
WarmChoice®	Increase weatherization assistance to customers in rental properties.
Home Performance Solutions	Provide audits to multi-family, residential buildings, add an option for walk-through audit.
Simple Energy Solutions	Higher rebates for learning thermostats, direct install component, partner with AEP Ohio.
HE HVAC Rebates	Add energy-efficient water heater rebates to the program; Energy Star qualified.
Home Energy Reports	Optimize mail versus email reports, enhance customer segmentation.
Home Energy Checkup	Continue to optimize customer segementation and DSM recommendations.
e^3 smart	School-to-school competitions to increase kit installation rates.
EfficiencyCrafted® Homes	Incorporate Residential Energy Code Training into the program, expand to more builders.
Residential Code Training	Remove as separate program, integrate into EfficiencyCrafted®Homes.
Energy Design Solutions	Expand square footage eligible based on market.
Innovative Energy Solutions	Include Preliminary Energy Audit (PEA) to increase audit to measure conversion rate.
EPA Portfolio Manager	Study/implement opportunity to automate uploading of customer energy data with customer permission.

3.2.1. Home Performance Solutions (Home Energy Audits)

Columbia proposes to both continue and enhance its highly successful Home Performance Solutions program, which currently provides low-cost, comprehensive, computerized and diagnostic in-home energy audits, combustion and gas leakage safety inspections, and cost-effective energy efficiency measure rebates to residential buildings with incomes above 150% of the federal poverty guidelines ("FPG"). Program enhancements include:

- Targeting more high-energy savings rental and multi-family properties for services

- Providing customers with an option for a quicker "walk through" energy analysis and safety inspection with a prescriptive list of rebate-eligible energy efficiency measures and lower rebate levels for those customers who don't desire the highest level of service that a comprehensive energy audit provides

In addition, Columbia will work with its program implementer and trade allies to determine the potential value of aligning the program's comprehensive energy audit with DOE/U.S. EPA Home Performance with Energy Star® requirements. Columbia is also evaluating potential inclusion of DOE's Home Energy Score, U.S. EPA's Home Energy Yardstick, or other rating tools that would provide value to the customer experience, increase the potential resale value of their property, or help market the program.

3.2.2. WarmChoice® Program (Income-eligible Weatherization Service)

The WarmChoice® program provides whole house weatherization services to natural gas heating customers with household incomes at or below 150% of the federal poverty guidelines. The program targets high-use homes and Percentage of Income Payment Program ("PIPP Plus") customers. The program is delivered through the nation's best community-based weatherization service delivery network and also delivers among the nation's highest residential natural gas savings per home served. The network brings a one-stop-shop approach to the WarmChoice® program that combines it with electric utility DSM programs, home repair programs, and other critical social services in order to maximize efficiency and benefits to customers. From 2014-2016, Columbia worked with its WarmChoice® provider network to develop a 21st-century home energy inspection and reporting system software to improve program efficiency and accountability. Enhancements to the WarmChoice® program design include:

- Increased targeting of high natural gas use rental properties
- Strategic targeting of PIPP Plus customers in rental properties

3.2.3. EfficiencyCrafted® Homes (Energy Efficient New Homes)

Columbia will continue its EfficiencyCrafted® Homes program, which offers incentives to home builders to build homes that exceed state energy code minimum levels. Participating homebuilders will continue to provide Ohio homebuyers with Energy Star® certified homes or EfficiencyCrafted® Homes that score 70 or lower on the Home Energy Rating System scale. Both standard market and affordable housing market homebuilders participate in the program. Columbia will also maintain its partnership with AEP Ohio in jointly served counties to match incentives to achieve high levels of energy efficiency in new homes. The program will also provide builders and home energy raters with training and technical assistance. Enhancements to the program include:

- Introduction of an additional per-home incentive to new builders in the program, to aid with recruitment of additional Ohio home builders
- Integration of energy code training for builders, code officials, and trade allies into this program from a previously separate program, in order to reduce administrative costs and take advantage of the natural synergies between the two programs

3.2.4. Simple Energy Solutions (Energy Efficient Products)

Columbia will continue and enhance its Simple Energy Solutions program and will offer rebates for standard and smart/wifi-enabled programmable thermostats, energy-efficient showerheads and faucet aerators. Eligible products will be available online through Columbia's e-store. Customers will also be able to use a mail-in rebate form with a receipt to support the direct purchase of qualifying products through local hardware or home improvement stores or other sources. Enhancements to the program include:

- A direct install component for some customers in multifamily buildings
- Partnerships with water/sewer utilities, where possible, to lower program implementation costs
- Increase in the availability and adoption of learning thermostats through Columbia's e-store and rebate forms
- Alignment of showerhead specifications with U.S. EPA's WaterSense program, where feasible

3.2.5. Home Energy Efficiency Reports (Behavior Modification)

The Home Energy Efficiency Report program will continue to provide customers with motivational information to help them take action to reduce their energy use. This is accomplished by comparing the participant's energy use with similar homes, and then using peer pressure and social norms to encourage customers to take action. This program approach has proven to be a successful way to engage customers in the energy efficiency discussion in a way that results in them taking action to lower their energy use. Enhancements to the program include:

- Optimizing the best method of report delivery and their frequency to customers
- Continuing to enhance customer segmentation so that report recommendations are even more appropriate for their needs

3.2.6. High-Efficiency Appliance Rebate Program (Appliance Rebates)

The current High-Efficiency Heating System Rebate program provides rebates to landlords and customers to incentivize them to install high-efficiency natural gas furnaces and boilers, rather than the minimum low-efficiency products that are currently available. Enhancements to the program include:

- Rebates on Energy Star® qualified furnaces and boilers of 96% and 90% Annual Fuel Utilization Efficiency, respectively
- Rebates on Energy Star® natural gas water heaters with a .67 Energy Factor or greater for tank type heaters and a .91 Energy Factor or greater for tankless water heaters

3.2.7. e^3 smart Program (Student Education)

Teachers participating in the e^3 smart program will continue to educate elementary, middle school, and high schools students about natural gas energy efficiency through energy education materials that Columbia provides as a formal part of the school's science curriculum, culminating with a kit of energy conservation materials that is provided to students to install at their home. The curriculum, which Columbia co-sponsors with AEP Ohio, complies with State of Ohio, Department of Education requirements. Proposed program enhancements include:

- School to School competitions to increase installation rates of energy efficiency kits

3.2.8. Home Energy Efficiency Checkup Program (Online Energy Efficiency Audit)

The Home Energy Efficiency Checkup program will continue to provide Columbia's customers with a web-based energy audit tool to enable them to evaluate their own home without an in-home visit. The tool will link customers to appropriate DSM programs that can provide them with opportunities to reduce their natural gas usage based on their energy usage level. This program is a good alternative for lower-use customers for whom a whole house audit may not be cost-effective, as well as those who want to make an initial foray into understanding how their home performs before committing to a more comprehensive energy audit. Enhancements include:

- Further optimization of appropriate, customer-focused energy efficiency messaging
- Potential integration of DOE/U.S. EPA home energy scoring tools into the energy audit tool.

3.2.9. Innovative Energy Solutions (Non-Profit and Business Energy Efficiency)

Columbia will continue its Innovative Energy Solutions program, which provides prescriptive rebates for certain energy efficiency measures as well as rebates for energy audits and custom energy efficiency measures for non-profits, schools, hospitals, houses of worship, municipal buildings and other commercial customers. All natural gas energy saving measures and technologies are eligible for consideration through the current energy audit or energy engineering estimation process used to determine cost effectiveness. Planned enhancements to the program include:

- Implementation of an American Society of Heating, Refrigeration and Air Conditioning Engineers ("ASHRAE")-compliant preliminary energy assessment ("PEA") tool to improved energy audit to completed work conversion ratios.

3.2.10. Energy Design Solutions (Energy Efficient New Buildings)

In order to move the commercial building market forward, Columbia proposes to continue its Energy Design Solutions program, an education program based on the ASHRAE Advanced Energy Design Guides. Educational seminars will be provided to architects, engineers, building developers and owners to help them understand the opportunities beyond first costs[4] to life-cycle costs[5] and energy use of new buildings over their life spans. Program enhancements include:

- Increasing the size of buildings eligible for incentives to help reduce first costs, in order to exceed current commercial energy code standards

3.2.11. U.S. EPA Portfolio Manager (Building Benchmarking)

Columbia will also continue to promote the use of the U.S. Environmental Protection Agency's Portfolio Manager, an interactive energy management tool that allows building owners to track and assess energy and water consumption in a secure on-line environment. U.S. EPA Portfolio Manager can help building owners set investment priorities, identify under-performing buildings, verify efficiency improvements, and receive U.S. EPA recognition for superior energy performance. Columbia will continue to partner with Ohio Hospital Association, Ohio Interfaith Power and Light, as well as the city of Columbus. Program enhancements include:

- Partnership with AEP Ohio to automate the uploading of utility energy usage data into the U.S. EPA Portfolio Manager tool.

3.3. DSM Stakeholder Group Process

Throughout the current DSM Program implementation period, Columbia met with its DSM Stakeholder Group annually. At these meetings, the DSM Stakeholder Group discussed DSM Program performance. At its February 23, 2016, stakeholder group meeting, Columbia informed the stakeholder group that it was working on its next DSM plan, and that it would provide details of the

[4] First costs are generally defined as the costs to construct a facility and do not include long-term operations and maintenance costs.

[5] Life cycle costs include the costs for operating and maintaining a facility over its useful life.

program plan at its next meeting. On May 13 and 25, 2016, Columbia presented its proposed 2017-2022 DSM Program plan and received positive feedback from the DSM Stakeholder Group. A complete list of DSM Stakeholders is included as Appendix A.

3.4. Proposed DSM Program Evaluation

Columbia has a long history of conducting program evaluations to determine how its energy efficiency programs are performing and how they might be improved. Columbia will continue to use multiple strategies to evaluate the effectiveness of the proposed DSM programs, including continuous tracking of, and feedback on, contractor program metrics and independent impact and process evaluations.

The program evaluation process includes impact evaluations using engineering savings estimates and process evaluations. For residential programs that install energy conservation measures, Columbia will continue to conduct an annual impact evaluation of estimated energy savings based on actual participation rates and engineering estimates, as well as the TRM, within three to six months of the end of the program year. Impact evaluations also will be conducted within 13 to 20 months of the end of the programs for which this type of analysis can be conducted.

In addition to independent evaluations, Columbia will provide quality assurance, technical assistance and training as part of its administration of the programs where applicable. In addition to quality assurance conducted by program implementers, Columbia will evaluate work completed by contractors for quality assurance purposes. Customer satisfaction surveys will also be implemented as part of some program implementation and evaluation processes. Training and orientation of contractors on program standards and acceptable installation methods also will be conducted. This will be the primary up-front strategy to ensure that quality work is performed for customers. Progressive and corrective improvement processes that can positively impact non-compliant work will be established on a program-by-program basis.

3.5. Shared Savings Performance Incentive

Columbia proposes to continue and amend its shared savings incentive mechanism. The mechanism gathers and tracks data for energy conservation measures installed through each DSM program. Columbia uses this data, with limited exceptions, to calculate the projected natural gas savings using the formulas identified in the State of Ohio Energy Efficiency Technical Reference Manual ("TRM"). The exceptions are the WarmChoice® program, where historic billing analysis is used; the Home Energy Reports program, where guaranteed contract savings with adjustments for measured actual savings are used; and the Innovative Energy Solutions program, where the energy audit projected natural gas savings are used. Using the energy conservation measure lifetime identified in the TRM, Columbia calculates the projected lifetime natural gas savings and the value of the natural gas savings for all of its DSM programs.

The shared savings mechanism is based on Columbia earning a share of the net benefits as calculated under the Utility Cost Test ("UCT"). Shared savings are computed on the difference between the net present value of program lifetime energy savings and non-energy benefits minus the program costs calculated from the UCT. The non-energy benefits, newly proposed in this continuation of the DSM program, recognize the value of the DSM programs more holistically. Columbia proposes including the following non-energy benefits: the value of water savings; CO_2 reductions; and direct economic impacts. These non-energy benefits were selected from a larger pool of non-energy benefits because they are both quantifiable and have highly reliable calculations to support the amounts. The estimated values per year for 2017-2022 are:

- Water Savings: Average of $2.2 million/year
- CO_2 reductions: Average of $6.3 million/year
- Direct Economic Impacts: Average of $2.8 million/year

The recovery of the shared savings performance incentive, grossed up for taxes, will be based on the following tiered levels of program achievement:

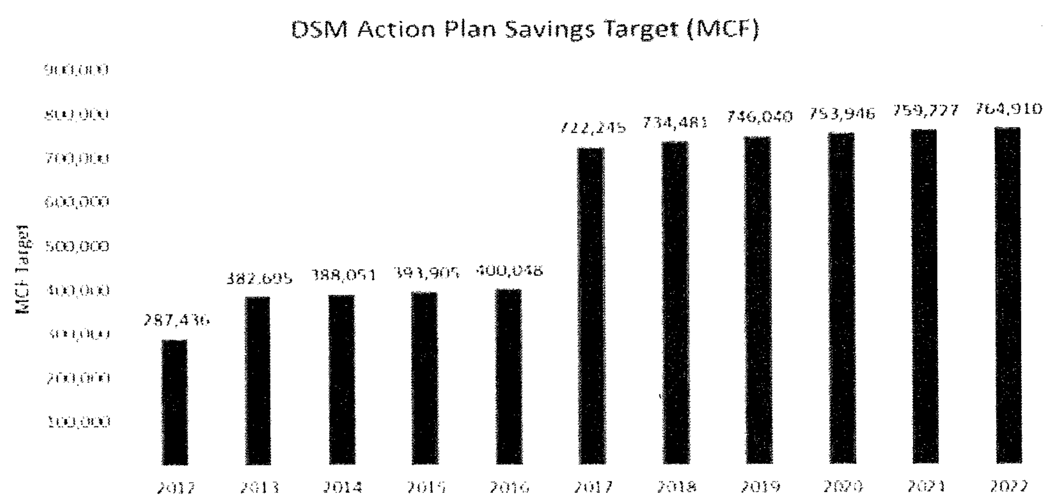
- No shared savings are earned for a program that does not meet 75% of the program impacts at its prorated budgeted cost level.
- 5% of the savings is earned once the program meets 75% of the projected program impacts at its prorated budgeted cost level up to 85% of budgeted expenditures.
- 5.5% of the savings is earned once the program meets 80% of the projected program impacts at its prorated budgeted cost level up to 90% of budgeted expenditures.
- 6% of the savings is earned once the program meets 85% of the projected program impacts at its prorated budgeted cost level up to 95% of budgeted expenditures.

- 6.5% of the savings is earned once the program meets 90% of the projected program impacts at its prorated budgeted cost level.
- 7% of the savings is earned once the program meets 95% of the projected program impacts at its prorated budgeted cost level.
- 7.5% of the savings is earned once the program meets 100% of the projected program impacts at its prorated budgeted cost level.
- 8.0% of the savings is earned once the program meets 105% of the projected program impacts at its prorated budgeted cost level.
- 8.5% of the savings is earned once the program meets 110% of the projected program impacts at its prorated budgeted cost level.
- 9% of the savings is earned once the program meets 115% of the projected program impacts at its prorated budgeted cost level.
- 9.5% of the savings is earned once the program meets 120% of the projected program impacts at its prorated budgeted cost level.
- 10% of the savings is earned once the program meets 125% of the projected program impacts at its prorated budgeted cost level.

The shared savings incentive potential is the equivalent of a return of approximately 3.7% to 6.2% on the investment.[6]

This shared savings incentive mechanism is further supported by Columbia increasing the DSM program annual Mcf savings targets by almost 100%, as shown in Figure 1 below.

Figure 1 2012-2022 DSM Program Savings Targets



[6] The 3.7% to 6.2% is based on $5,984,402 (shared savings amount at 5%) divided by $161,041,052 (total DSM budget) and $10,000,000 (shared savings amount at proposed cap) divided by $161,041,052 (total DSM budget).

Notwithstanding the proposed changes above, Columbia also proposes to cap the shared savings incentive, over the entire term of the DSM Program ending on December 31, 2022, at $10 million and grossed up for taxes.

Taken together, Columbia proposes to recognize non-energy benefits that can be reliably calculated and amend its shared savings opportunity while also challenging itself by almost doubling the savings amounts that must happen for shared savings to occur. This shared savings approach provides Columbia incentives for effectively and efficiently managing the programs and for meeting the ambitious program participation and impact goals.

5. Recovery of Costs Related to DSM

Consistent with the Stipulation approved by the Commission in Case Nos. 11-5028-GA-UNC and 11-5029-GA-AAM (hereinafter "2011 Extension"), Columbia requests a continuation of the deferral treatment and recovery set forth therein. In the 2011 Extension, Columbia and other stakeholders agreed that Columbia would continue filing annually to adjust the Rider DSM rate to allow for the review and recovery of DSM costs incurred and shared savings realized during the prior calendar year. Columbia and stakeholders further agreed that Columbia was authorized to continue deferring the difference between actual DSM program expenses (including carrying costs) and Columbia's portion of shared savings. Likewise, Columbia seeks authority to continue its accounting treatment to defer DSM program expenses resulting from the expansion and continuation of the programs approved by the Commission in the 2011 Extension, as described herein. Columbia also requests continuing the recovery mechanism approved by the Commission in the 2011 Extension.

R.C. § 4905.13 authorizes the Commission to establish systems of accounts to be kept by Ohio's public utilities and to prescribe the manner in which these accounts shall be kept. Pursuant to Ohio Admin. Code 4901:1-13-13, the Commission adopted the Uniform System of Accounts ("USOA") for gas utilities established by the Federal Energy Regulatory Commission ("FERC") for use in Ohio. The Commission may modify the USOA prescribed by FERC as it applies to utilities within the state of Ohio.

Columbia will defer expenses in special sub-accounts of Account 182-Other Regulatory Assets for recovery through Rider DSM. DSM expenses eligible for deferral will include all expenses incurred through implementation of comprehensive, ratepayer-funded, cost-effective, energy efficiency programs made available to all customers served under Columbia's Small General Service rate schedule. Consistent with its current program and the Commission's Opinion and Order in Case Nos. 08-0072-GA-AIR, *et al.*, Rider DSM will further include carrying costs to be computed at Columbia's current cost of long-term debt and any incentives approved by the Commission. Columbia's portion of shared savings during each calendar year will be calculated and supported through an annual filing based on actual data for the previous calendar year. This report will be filed by Columbia no later than June 30 of the subsequent calendar year with deferral authority assumed to be granted absent an objection by Staff within thirty days of the filing. Columbia will recognize its portion of shared savings upon receipt of authority to defer these amounts.[7]

The requested continuation and enhancement of Columbia's DSM Program and proposed change in accounting procedure does not result in any increase in rate or charge, and the Commission can therefore approve this application without a hearing.

6. Other DSM Considerations

6.1. DSM Program Funding Levels

Columbia will monitor and evaluate the level of success of all of its DSM programs. If, through program analysis, it is determined that a particular program design is not likely to invest all of the resources available to it, Columbia retains the flexibility to shift funding between and within programs without Commission approval in order to maximize program performance and customer benefits.

6.2. DSM Program Time Frames

The proposed time frame for DSM implementation is January 1, 2017, to December 31, 2022. Therefore, expedited treatment of this application is requested, with an approval date no later than September 28, 2016. Because Columbia has been working with the DSM Stakeholder Group both regarding its programmatic performance over the last term and in anticipation of this filing, Columbia does not anticipate that an expedited procedural schedule will impose any hardship. If, for any reason, a Commission decision on Columbia's application is not issued before December 31, 2016, Columbia requests that the program

[7] The DSM Deferral-Account 182 will be debited and Revenue or Contra-Expense will be credited.

be extended, on a temporary basis, under the existing construct to ensure Columbia is able to continue providing valuable DSM services to Ohio consumers.

7. Proposed Procedural Schedule

Columbia's current DSM Program expires on December 31, 2016. Because the DSM Program is expiring in less than six months, and Columbia has been meeting with the DSM Stakeholder Group, Columbia requests an accelerated procedural schedule as follows:

August 1 – Comments
August 29 – Reply Comments
September 28 – Opinion and Order

8. Conclusion

Columbia seeks authority from the Commission to: (1) continue its DSM Program for an additional six years; (2) include additional benefits for customers; (3) maintain the total DSM funding level at approximately $25 million for calendar year 2017; (4) increase the annual DSM funding level by approximately 3% each calendar year thereafter for the balance of the six-year period for inflation and natural growth in program demand; (5) continue its shared savings mechanism with increased Mcf targets, realization of non-energy benefits, and an overall shared savings incentive cap; (6) continue Rider DSM for the six-year period, as previously approved in Case No. 11-5028-GA-UNC; and (7) continue the accounting treatment of the DSM Program expenses as previously approved in the 2011 Extension.

Columbia hereby respectfully requests the Commission approve the Application to continue its DSM Program and change in accounting methods as described in the instant Application and establish an expedited procedural schedule to ensure implementation of the new programs by the date requested in this filing.

Respectfully submitted by,

COLUMBIA GAS OF OHIO, INC.

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(Willing to accept service by e-mail)

Attorneys for
COLUMBIA GAS OF OHIO, INC.

APPENDIX A

Columbia DSM Stakeholder Group

LAST NAME	FIRST NAME	COMPANY
AIREY	JONATHAN	VORYS
ALLWEIN	CHRIS	OPAE
ANDERSON	SHAWN	COH
ANDREWS	ADRIAN	COH
ARNOLD	DALE	Ohio Farm Bureau
BALLA	HANNA	COH
BUSSARD	MARILYN	COH
CHILDS	KIMBERLY	PUCO
CLARK	JOE	COH
DAVENPORT	DAVE	GLS
HALL	RANDY	Cornerstone Energy Conservation Services
HEALEY	CHRISTOPHER	OCC
HEMINGER	NED	HAWA
JENKINS	BRANDON	PUCO
JOHNSON	JOHN	GLS
KERN	KYLE	OCC
KLAUS	KRIS	OHIO Home Builders Assoc
LAVERTY	JOHN	COH
MASON	ROB	COH
MATTHEWS	TONY	PUCO
MELBY	MEGAN	COH
METZ	ANDREW	COH
MILLER	ERIN	City of Columbus
NOWINSKY	KELLI	COH
OHLER	DEBBIE	Ohio Bd of Bldg Standards
O'KEEFFE	CHRISTINA	MORPC
OLIKER	JOE	IGS
PIGG	SCOTT	Seventhwave
POE	SARAH	COH
RACHER	PAUL	COH
REES	RON	COAD
RINEBOLT	DAVE	OPAE
RIPKE	JAMES	PUCO
SAUER	LARRY	OCC
SHUTRUMP	COLLEEN	OCC
SMITH	CRAIG	PUCO
STEWART	TONJA	PUCO
SWEPSTON	MARK	Atlas Butler
THARP	DORA	NHST
THOMPSON	MELISSA	COH
WILLIAMS	SUZANNE	PUCO

APPENDIX B

1. Columbia DSM Program Cost Effectiveness Test Results

	SCT	TRC	PCT	UCT	RIM
Home Performance Solutions	2.29	1.91	11.51	1.52	$ 0.0059
WarmChoice	1.05	0.89		0.64	$ 0.0054
HE HVAC Rebates	3.29	2.91	4.85	3.55	$ 0.0020
Energy Efficient New Homes	2.36	1.90	3.76	3.31	$ 0.0025
Home Energy Reports	1.91	1.92		1.56	$ 0.0014
Simple Energy Solutions	4.31	3.88	9.50	5.47	$ 0.0007
Student Education	5.24	5.06		4.72	$ 0.0003
On Line Audit	-	-		-	$ 0.0002
Innovative Energy Solutions	1.78	1.64	4.33	2.12	$ 0.0012
Energy Design Solutions	-	-		-	$ 0.0005
EPA Portfolio Manager	-	-		-	$ 0.0001
Total	**2.05**	**1.76**	**7.00**	**1.64**	**$ 0.0206**

2. Columbia DSM Program Natural Gas Savings Projections

Program	2017	2018	2019	2020	2021	2022	Total
Home Performance Solutions	87,582	87,582	87,582	87,582	87,582	87,582	525,493
WarmChoice	68,515	68,515	68,515	68,515	68,515	68,515	411,088
HE HVAC Rebates	81,431	81,431	81,431	81,431	81,431	81,431	488,584
Energy Efficient New Homes	55,553	59,789	64,347	69,254	74,535	80,218	403,695
Home Energy Reports	336,000	344,000	351,000	354,000	354,000	354,000	2,093,000
Simple Energy Solutions	40,277	40,277	40,277	40,277	40,277	40,277	241,663
Student Education	13,226	13,226	13,226	13,226	13,226	13,226	79,355
On Line Audit	-	-	-	-	-	-	-
Innovative Energy Solutions	39,662	39,662	39,662	39,662	39,662	39,662	237,972
Energy Design Solutions	-	-	-	-	-	-	-
EPA Porfolio Manager	-	-	-	-	-	-	-
Totals	**722,245**	**734,481**	**746,040**	**753,946**	**759,227**	**764,910**	**4,480,849**

3. Columbia DSM Program Projected Budgets

Program	2017	2018	2019	2020	2021	2022	Total
Home Performance Solutions	$ 7,369,691	$ 7,621,030	$ 7,757,603	$ 8,019,555	$ 8,167,033	$ 8,365,611	$ 47,300,524
WarmChoice	$ 6,682,051	$ 6,882,513	$ 7,088,988	$ 7,301,658	$ 7,520,707	$ 7,746,329	$ 43,222,246
HE HVAC Rebates	$ 2,474,613	$ 2,511,614	$ 2,479,126	$ 2,547,162	$ 2,515,739	$ 2,584,874	$ 15,113,129
Energy Efficient New Homes	$ 2,850,140	$ 2,943,908	$ 3,210,465	$ 3,330,773	$ 3,625,866	$ 3,776,857	$ 19,738,010
Home Energy Reports	$ 1,654,422	$ 1,741,492	$ 1,713,136	$ 1,755,902	$ 1,826,691	$ 1,757,503	$ 10,449,145
Simple Energy Solutions	$ 811,456	$ 853,611	$ 825,980	$ 868,570	$ 841,388	$ 884,440	$ 5,085,444
Student Education	$ 325,771	$ 385,244	$ 345,001	$ 405,051	$ 365,403	$ 426,065	$ 2,252,535
On Line Audit	$ 349,349	$ 198,135	$ 199,459	$ 200,823	$ 202,227	$ 203,674	$ 1,353,668
Subtotal: Residential DSM	$ 22,517,494	$ 23,137,547	$ 23,619,758	$ 24,429,493	$ 25,065,055	$ 25,745,354	$ 144,514,701
Innovative Energy Solutions	$ 1,308,250	$ 1,335,798	$ 1,348,722	$ 1,362,033	$ 1,375,744	$ 1,389,866	$ 8,120,413
Energy Design Solutions	$ 538,178	$ 553,723	$ 569,735	$ 586,227	$ 603,214	$ 620,710	$ 3,471,786
EPA Porfolio Manager	$ 208,000	$ 140,300	$ 140,909	$ 141,536	$ 142,182	$ 142,848	$ 915,775
Subtotal: Commercial DSM	$ 2,054,428	$ 2,029,821	$ 2,059,365	$ 2,089,796	$ 2,121,140	$ 2,153,424	$ 12,507,975
DSMSG Support/DSM Planning	$ 70,000	$ 70,000	$ 70,000	$ 70,000	$ 70,000	$ 70,000	$ 420,000
Admin (non-program specific)	$ 556,300	$ 572,989	$ 590,179	$ 607,884	$ 626,121	$ 644,904	$ 3,598,377
Total : selected programs	$ 25,198,222	$ 25,810,356	$ 26,339,302	$ 27,197,174	$ 27,882,316	$ 28,613,682	$ 161,041,052
Total Budget	**$ 25,198,222**	**$ 25,810,356**	**$ 26,339,302**	**$ 27,197,174**	**$ 27,882,316**	**$ 28,613,682**	**$ 161,041,052**
WarmChoice Base Funding	$ 7,100,000	$ 7,100,000	$ 7,100,000	$ 7,100,000	$ 7,100,000	$ 7,100,000	$ 42,600,000
Total Budget with WC Base	**$ 32,298,222**	**$ 32,910,356**	**$ 33,439,302**	**$ 34,297,174**	**$ 34,982,316**	**$ 35,713,682**	**$ 203,641,052**

4. Columbia DSM Gas Cost Projections

Year Number	Year	Nominal Cost of Gas, $/Mcf
1	2017	$ 5.90
2	2018	$ 6.45
3	2019	$ 6.86
4	2020	$ 7.33
5	2021	$ 7.50
6	2022	$ 7.67
7	2023	$ 7.94
8	2024	$ 8.15
9	2025	$ 8.37
10	2026	$ 8.73
11	2027	$ 8.84
12	2028	$ 8.96
13	2029	$ 9.13
14	2030	$ 9.23
15	2031	$ 9.65
16	2032	$ 10.03
17	2033	$ 10.42
18	2034	$ 10.82
19	2035	$ 11.19
20	2036	$ 11.58
21	2037	$ 11.88
22	2038	$ 12.34
23	2039	$ 13.09
24	2040	$ 14.04
25	2041	$ 14.52
26	2042	$ 15.02
27	2043	$ 15.53
28	2044	$ 16.07
29	2045	$ 16.63
30	2046	$ 17.21
31	2047	$ 17.81
32	2048	$ 18.43
33	2049	$ 19.09
34	2050	$ 19.76
35	2051	$ 20.47
36	2052	$ 21.20
37	2053	$ 21.96
38	2054	$ 22.75
39	2055	$ 23.58

APPENDIX C

History of Columbia's DSM Program

Beginning with Operation HomeCheck, Columbia has been a leader among Ohio utilities in developing energy efficiency and weatherization programs over the past three decades. Established in 1983, Operation HomeCheck represented Columbia's first partnership with the Corporation for Ohio Appalachian Development ("COAD") and the Ohio Association of Community Action Agencies, or OACAA (community-based, non-profit organizations) and provided income-eligible customers with innovative, computerized in-home energy audits. Operation HomeCheck developed the capacity to perform more than 11,000 home energy audits annually in Columbia's service territory. Columbia and its partners further developed the energy audit program in 1986 by adding a low-cost weatherization component. The Columbia Gas of Ohio Weatherization Program provided both energy education and material installation services for eligible customers.

Columbia continued its energy efficiency partnership with the community action network in Ohio (the operators of USDOE's Home Weatherization Assistance program) by continuing to collaborate with COAD and OACAA, while adding Mid-Ohio Regional Planning Commission ("MORPC"), Neighborhood Housing Services of Toledo ("NHST"), and Lorain County Community Action Agency ("LCCAA"), as well as the State of Ohio's Department of Development, Office of Energy Efficiency, in a major effort that resulted in the creation of the innovative WarmChoice® program in 1987. WarmChoice® is Columbia's whole-house weatherization program for income-eligible customers. The goal of the program is to provide eligible customers with a complete set of weatherization measures, including attic, wall, floor, duct and pipe insulation, air sealing, water heater repairs and replacements, and furnace repairs and replacements, to help this segment of its customers manage their energy use, and consequently, save on utility bills. Additionally, the program focuses on health and safety to help ensure that low-income residents within Columbia's service territory are insulated from the dangers of antiquated, unsafe heating equipment despite income limitations. Since its inception in 1987, WarmChoice® has served over 63,000 households. In order to achieve these results, Columbia contracts with four community-based organizations to manage and operate the program.

2009-2011 DSM Program

Columbia expanded its weatherization efforts with its DSM Pilot Program. On January 23, 2008, the Commission issued an Opinion and Order in Case No. 05-221-GA-GCR, *et al.*, adopting the December 28, 2007 Joint Stipulation and Recommendation ("Stipulation"). Pursuant to the stipulation, the parties agreed that by July 1, 2008, Columbia would file a DSM application cooperatively developed by Columbia, the OCC, Staff and other stakeholders for approval of comprehensive energy efficiency programs for residential and commercial customers. The Stipulation allowed a DSM Program funding increase of $1 million in 2010 and 2011, provided energy efficiency targets were met.

On July 3, 2008, Columbia filed an application in Case No. 08-833-GA-UNC requesting approval of a Demand Side Management Program for residential and commercial customers. In partnership with the DSM Stakeholder Group, Columbia developed an innovative and comprehensive portfolio of energy efficiency programs. The programs included:

- WarmChoice®, the company's whole house weatherization program for income-eligible customers.
- Home Performance Solutions, which provides low-cost diagnostic energy audits and rebates to customers to help offset the cost of energy efficiency upgrades.
- Simple Energy Solutions, which provides instant discounts on energy efficient programmable thermostats and showerheads through Columbia's on-line, e-store, or a rebate available through a mail-in form for items purchased at local hardware or home improvement stores.
- New Home Solutions which, in coordination with AEP Ohio, provides incentives for Ohio homebuilders to exceed the state minimum energy code.
- The Ohio Small Business Energy Saver program, which provided on-line energy audits to commercial customers through a collaboration with the Ohio Department of Development and other investor-owned utilities.
- Energy Design Solutions, through which Columbia provided continuing education seminars on how to exceed the minimum commercial building energy efficiency code.
- Innovative Energy Solutions, which provided rebates to non-profits, houses of worship, schools, and other commercial customers for energy audits and energy conservation measures.

APPENDIX D

Recent DSM Awards

2016 Energy Star Certified Homes Market Leader Award, EfficiencyCrafted® Homes

2016 EPA Partner of the Year - Sustained Excellence in Energy Efficiency Program Delivery, EfficiencyCrafted® Homes

2015 Energy Star Certified Homes Market Leader Award, EfficiencyCrafted® Homes

2015 EPA Partner of the Year - Sustained Excellence in Energy Efficiency Program Delivery, EfficiencyCrafted® Homes

2015 Building Industry Association (BIA) of Central Ohio Marketing and Merchandising Excellence - Exceptional Digital Media Campaign, Efficiency Crafted Homes

2015 BIA of Central Ohio Marketing and Merchandising Excellence - Most Successful One-Time Event, EfficiencyCrafted® Homes

2015 SIA (Service Industry Advertising Association) Silver Award for Total Ad Campaign, EfficiencyCrafted® Homes

2014 National Local Media Association's Best New Local Contest, 3rd Place Nationally, Home Makeover Contest, Home Performance Solutions

2014 EPA Partner of the Year - Sustained Excellence Partner of the Year, Efficiency Crafted Homes

2014 BIA of Central Ohio, 27th Annual Marketing and Merchandising Excellence Awards, Best Environmental Marketing Award, EfficiencyCrafted® Homes ECH won a 2014 Platinum MarCom award in the Website/Informational category for the program's website

2014 Gold MarCom Award, Marketing/Promo Campaign/Branding Refresh Category, EfficiencyCrafted® Homes

2014 Midwest Energy Efficiency Alliance, Inspiring Efficiency Impact Award WarmChoice®

2013 American Council for an Energy Efficient Economy, Exemplary Program Award, Home Performance Solutions

2013 American Council for an Energy Efficient Economy, Exemplary Program Award, WarmChoice®

2013 EPA Partner of the Year Award, EfficiencyCrafted® Homes

2012 EPA Energy Star Partner of the Year Award, EfficiencyCrafted® Homes

2012 BIA of Central Ohio Association, Best On-site Outdoor Signage and Best Green Environmental Marketing, EfficiencyCrafted® Homes

2012 Alliance to Save Energy's "Stars of Energy Efficiency" for COAD's "Weatherize Murray City" project sponsored by Columbia Gas of Ohio, WarmChoice® and Home Performance Solutions

2011 Affordable Comfort, Inc. (ACI) recognized Jack Laverty as one of 25 people in the nation who have been instrumental in building the weatherization and energy efficiency industry and community.

Other Awards:

2004 Governor's Award for Excellence in Energy Efficiency, WarmChoice®

2004 American Council for an Energy Efficient Economy, Exemplary Low-income Program Award, WarmChoice®

APPENDIX E

Non-Energy Benefits Bibliography

1) National Resources Defense Council (NRDC) report from April, 2015 (R:15-01-B), "Bridging the Clean Energy Divide: Affordable Clean Energy Solutions for Today and Tomorrow."
2) "LET'S DO BETTER COST-EFFECTIVENESS ANALYSIS" Midwest Energy Solutions Conference, January 17, 2013, Rebecca Stanfield, NRDC.
3) CPUC Presentation, "California's Experience in Incorporating Non-Energy Benefits into Cost-Effectiveness Tests" presented by Joy Morgenstern - Senior Regulatory Analyst, International Energy Agency (IEA). Conference, October 16, 2013. (Includes range estimates for many individual NEBs and a roll-up value for all NEBs.)
4) American Council for an Energy Efficient Economy (ACEEE) report entitled, 'Recognizing the Multiple Benefits of Energy Efficiency", Christopher Russell, Brendon Baatz, Rachel Cluett, and Jennifer Amann, December, 2015 (Report IE1502). (Includes NEB estimates for building owners, expressed as % of bill savings, with range estimates.)
5) Job Multipliers from DSM appear in the following references:
   i) Zabin and Scott (2013), estimate employment impacts from California's Proposition 39, from previous IO studies that 6.2 direct and 2.3 indirect and induced jobs are created per $1 million in DSM investment.
   ii) District of Columbia Sustainable Energy Utility (DCSEU D. Nichols and J. Supp) estimates jobs created under the ARRA uses a rule-of-thumb estimate of 5 jobs per $1 million of investment, or total direct incentives paid divided by $200,000.
   iii) TVA commissioned Deloitte Consulting to conduct a predictive analysis of economic and job creation impacts from its DSM Program using the IMPLAN model, from which it determined a multiplier of 8 jobs per $1 million of DSM spending.
   iv) Pinnacle Economics calculated total gross job impacts for the Energy Trust of Oregon as being approximately 8.4 jobs per $1 million (2014).
   v) An OECD/IEA report – Capturing the Multiple Benefits of Energy Efficiency (2014) provided range estimates of between 7 and 22 jobs per

$1m euro-dollars invested in DSM resources , or about 6-19 jobs when converted into $US.

6) Some of the best summaries of NEBs appearing in the literature can be found in papers and studies authored (or co-authored) by Lisa Skumatz, including an article published in the Electricity Journal entitled, "Efficiency Programs Non-Energy Benefits: How States Are Finally Making Progress in Reducing Bias in Cost-Effectiveness Tests", Electricity Journal, October 2015.
7) Another paper co-authored by Skumatz (and Karen Imbierowicz) is entitled, "The Most Volatile Non-Energy Benefits (NEBs): New Research Results Homing In. on Environmental and Economic Impacts", w/, Skumatz Economic Research Associates, Inc., Skumatz Economic Research Associates, Inc. (SERA).
8) Publications by Synapse Energy Economics, Inc. including, "Benefit-Cost Analysis for Distributed Energy Resources A framework for Accounting for All Relevant Costs and Benefits", prepared for the Advanced Energy Economy Institute, September 22, 2014.
9) "Unleashing Energy Efficiency" co-authored by Tim Woolf, Erin Malone, Chris Neme and Robin LeBaron in Public Utilities Fortnightly, October, 2014. (This article presents a reporting template for an expanded Resource Value Framework (RVF) for B/C screening studies of DSM that includes NEBs reporting.)
10) "Capturing the Multiple Benefits of Energy Efficiency", released by the International Energy Agency (IEA), serving as a handbook (of sorts) for the estimation of NEBs, published in 2014. (This publication gives a more European perspective on NEBs than what is found in the U.S. publications.)

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in

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

Summary: Application to Continue its Demand Side Management Program electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of Demand Side Management Program for its Residential and Commercial Customers.	)))))	Case No. 16-1309-GA-UNC
In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval to Change Accounting Methods.	)))	Case No. 16-1310-GA-AAM

STIPULATION AND RECOMMENDATION

Ohio Admin. Code 4901-1-30 provides that any two or more parties to a proceeding may enter into a written stipulation covering the issues presented in such a proceeding. The purpose of this document is to set forth the understanding and agreement of Columbia Gas of Ohio, Inc. ("Columbia"), the Staff of the Public Utilities Commission of Ohio ("Staff"),[1] Ohio Partners for Affordable Energy ("OPAE"), Interstate Gas Supply, Inc. ("IGS"), Mid-Ohio Regional Planning Commission ("MORPC"), Ohio Hospital Association ("OHA"), and the Retail Energy Supply Association ("RESA")[23] (collectively, "Signatory Parties").[4] The Signatory Parties recommend that the Public Utilities Commission of Ohio ("Commission")

[1] Pursuant to Ohio Admin. Code 4901-1-10(C) and 4901-1-30, Staff is deemed a party for purposes of entering into this Stipulation.

[2] IGS and RESA support this Stipulation and Recommendation; provided, however, IGS and RESA do not take a position on the proposed gas costs or assumptions used to calculate the estimated gas costs in Columbia's application.

[3] The comments expressed in this filing represent the position of RESA as an organization, but may not represent the views of any particular member of the Association.

[4] There are several entities that do not plan to intervene and therefore become a formal Party to this proceeding. However, these entities support the Stipulation and urge the Commission to approve the Stipulation without modification. These entities are as follows: Ground Level Solutions, Corporation for Ohio Appalachian Development, Neighborhood Housing Services of Toledo d/b/a NeighborWorks – Toledo Region, City of Columbus, Ohio Home Builders Association, Cornerstone Energy Conservation Services, and Air Conditioning Contractors of Ohio. Each of these entities has provided Columbia with permission to represent support for the Stipulation.

approve and adopt this Stipulation and Recommendation ("Stipulation"), which resolves all of the issues in this case.

This Stipulation is supported by adequate data and information; represents a just and reasonable resolution of the issues raised in this proceeding; violates no regulatory principle or precedent; as a package, benefits ratepayers and the public interest; and is the product of serious bargaining among knowledgeable and capable parties to resolve the issues. While this Stipulation is not binding on the Commission, it is entitled to careful consideration by the Commission. For purposes of resolving certain issues raised by this proceeding, the Signatory Parties stipulate, agree and recommend as set forth below. Except for dispute resolution purposes in this proceeding, neither this Stipulation, nor the information and data contained therein or attached, shall be cited as precedent in any future proceeding for or against a Signatory Party, or the Commission itself. This Stipulation is a reasonable compromise involving a balancing of competing positions and it does not necessarily reflect the position that a Signatory Party would have taken if these issues had been fully litigated.

The Signatory Parties support this Stipulation and urge the Commission to accept and approve the terms found below.

1. The Signatory Parties recommend the Commission approve, without modification except as provided herein, the Application filed in this docket. By so doing, the Commission will authorize Columbia to continue its Demand Side Management ("DSM") Program and necessary accounting methods.

2. The Signatory Parties agree that the $70,000 per year of DSMSG Support/DSM Planning projected spending should be removed from the Columbia DSM Program Projected Budget in Appendix B, Table 3 of the Application.

3. The Signatory Parties agree that the non-energy benefits that Columbia proposed to incorporate in the shared savings performance incentive will not be included in the calculation of shared savings.

4. The Signatory Parties agree that the shared savings performance incentive, grossed up for taxes, will be based on the following tiered levels of program achievement:

Percent of Mcf Savings Targets Minimum	Percent of Mcf Savings Targets Maximum	Corresponding Shared Savings Percentage
100%	< 105%	5%
≥ 105%	< 110%	6%
≥ 110%	< 115%	7%
≥ 115%	< 120%	8%
≥ 120%	< 125%	9%
≥ 125%		10%

5. The Signatory Parties agree to cap the shared savings incentive, over the entire term of the DSM Program ending on December 31, 2022, at $4.5 million and grossed up for taxes.

6. Columbia agrees to work with OPAE and its member agencies, including the MORPC, Ground Level Solutions ("GLS"), Corporation for Ohio Appalachian Development ("COAD"), and Neighborhood Housing Services of Toledo d/b/a NeighborWorks – Toledo Region ("NWT"), to participate in Columbia's Home Performance Solutions Program.

7. Columbia agrees to work with OPAE and its member agencies, including MORPC, GLS, COAD, and NWT, to develop and execute community-based weatherization initiatives throughout Columbia's service area and to permit WarmChoice® contractors the discretion to collect a landlord contribution when weatherizing low-income customer property.

8. Columbia agrees to work with MORPC to further its local government energy partnership that involves energy benchmarking, energy audits, community education, and challenge programs and competitions. Columbia agrees to work with MORPC and other funding partners to finalize funding details, with Columbia agreeing to provide financial support for this initiative. The funding level may be determined by criteria including but not limited to local government participation, achieved energy savings and program participation by community residents.

9. Columbia agrees to provide a rebate of $75 per learning thermostat with its Simple Energy Solutions program. Columbia also agrees to engage in discussions with RESA, IGS, and Staff on mechanisms to streamline and/or enhance the rebate process associated with the Simple Energy Solutions program.

10. Columbia agrees to provide OHA usage data on a monthly, rather than a quarterly, basis.

11. This Stipulation constitutes a compromise resolution by the Signatory Parties of all issues raised by the Signatory Parties in this case. The Signatory Parties agree that if the Commission rejects all or any part of this Stipulation, or otherwise materially modifies its terms, any Signatory Party shall have the right, within thirty (30) days after the date of the Commission's Order, either to file an application for rehearing or to terminate and withdraw from the Stipulation by filing a notice of termination and withdrawal with the Commission in this proceeding. If an application for rehearing is filed and if the Commission does not, on rehearing, accept the Stipulation without material modification, any Signatory Party may terminate and withdraw from the Stipulation by filing a notice of termination and withdrawal with the Commission in this proceeding within ten (10) business days after the date of the Commission's Entry on Rehearing. Upon filing of a notice of termination and withdrawal by Columbia, the Stipulation shall immediately become null and void. In such event, the parties shall be afforded the opportunity to have this case decided on the record pursuant to a procedural schedule issued by the Commission.

12. The Signatory Parties understand and agree that while this Stipulation is not binding on the Commission, it is entitled to the Commission's careful consideration. The Signatory Parties agree that the Stipulation promotes sound regulatory policy and the public interest and they urge the Commission to adopt this agreement.

The undersigned hereby stipulate and agree and each represents that it is authorized to enter into this Stipulation this 12th day of August, 2016.

COLUMBIA GAS OF OHIO, INC.

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 12th day of August, 2016 upon the parties listed below.

/s/ Joseph M. Clark
Joseph M. Clark

Attorney for
COLUMBIA GAS OF OHIO, INC.

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

Summary: Stipulation and Recommendation electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.

THE PUBLIC UTILITIES COMMISSION OF OHIO

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 NO. 16-1309-GA-UNC
IN THE MATTER OF THE APPLICATION OF COLUMBIA GAS OF OHIO, INC. FOR APPROVAL TO CHANGE ACCOUNTING METHODS.	CASE NO. 16-1310-GA-AAM

OPINION AND ORDER

Entered in the Journal on December 21, 2016

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I. SUMMARY

{¶ 1} The Commission adopts the stipulation and recommendation submitted by Columbia Gas of Ohio, Inc., Staff, and five other parties to continue and expand the demand-side management programs, as modified by this Opinion and Order.

II. APPLICABLE LAW

{¶ 2} Columbia Gas of Ohio, Inc. (Columbia or Company) is a natural gas company as defined in R.C. 4905.03 and a public utility as defined in R.C. 4905.02, and, as such, is subject to the jurisdiction of the Commission.

{¶ 3} R.C. 4905.70 directs the Commission to initiate programs that will promote and encourage energy conservation and reduce the growth rate of energy consumption, promote economic efficiencies, and take into account long-run incremental costs. Further, pursuant to R.C. 4929.02(A)(12), it is the policy of the state to promote an alignment of natural gas company interests with consumer interests in energy efficiency and energy conservation.

{¶ 4} R.C. 4905.13 authorizes the Commission to establish systems of accounts to be kept by public utilities and to prescribe the manner in which these accounts will be kept. Pursuant to Ohio Adm.Code 4901:1-13-13, the Commission adopted the Uniform System of Accounts (USOA), which was established by the Federal Energy Regulatory Commission, for gas and natural gas companies in Ohio, except to the extent that the provisions of the USOA are inconsistent with any outstanding orders of the Commission. Additionally, the Commission may require the creation and maintenance of such additional accounts as may be prescribed to cover the accounting procedures of gas or natural gas companies operating within the state.

III. PROCEDURAL BACKGROUND

{¶ 5} On June 10, 2016, Columbia filed an application for approval to continue its demand-side management (DSM) programs previously approved by the Commission, with certain modifications. *In re Columbia Gas of Ohio, Inc.*, Case No. 08-833-GA-UNC (*2008 DSM Case*), Finding and Order (July 23, 2008); *In re Columbia Gas of Ohio, Inc.*, Case No. 11-5028-GA-UNC, et al. (*2011 DSM Case*), Finding and Order (Dec. 14, 2011). Columbia's initial DSM programs were cooperatively developed by Columbia, Staff, Ohio Consumers' Counsel (OCC), and other interested stakeholders to include comprehensive energy efficiency programs for residential and commercial customers. *In re Columbia Gas of Ohio, Inc.*, Case No. 05-221-GA-GCR, et al., Opinion and Order (Jan. 23, 2008) at 10-11, 14.

{¶ 6} In this application, Columbia proposes to extend the term of the DSM programs from five years to six years, commencing January 1, 2017, through December 31, 2022, and to enhance several of the DSM programs, including increasing the weatherization assistance to customers in rental properties, providing audits to multi-family residential buildings, adding rebates for energy efficient water heaters, offering a walk-through energy analysis option, and increasing the size of buildings eligible for incentives to encourage builders to exceed commercial energy code standards. Columbia proposes to invest an average of approximately $26.8 million annually. The proposed funding level for the DSM programs is approximately $25 million for calendar year 2017 and would increase annually, by approximately three percent each calendar year, thereafter for inflation and growth in program demand.[1] Further, in its application, Columbia proposes to amend the tiered shared savings mechanism to incorporate the value of water savings, carbon dioxide reductions, and direct economic impacts, with a cap of $10 million over the six-year term of the DSM programs, grossed up for taxes. Columbia seeks to continue the accounting treatment and cost recovery

1 Columbia also receives $7.1 million through base rates for the WarmChoice® program.

process approved by the Commission in the *2011 DSM Case*, with the continuation and expansion of the programs as proposed.

Program	Program Description
WarmChoice®	Low-income customer home weatherization
Home Performance Solutions	Low-cost home energy audits and rebates/discounts
Simple Energy Solutions	Energy efficient thermostat, showerhead, and aerator rebates
High Efficiency Furnace Rebates	Rebates for energy efficient furnaces and boilers
Home Energy Reports	Energy usage comparison reports and recommendations
Home Energy Checkup	Online energy audit tool
e3smart	Student education program and kit of materials
EfficiencyCrafted® Homes	Incentives for homes built 30 percent more efficient
Residential Code Training	Energy code training for officials, trade allies
Energy Design Solutions	New commercial building above energy code education and incentives
Innovative Energy Solutions	Rebates on energy audits and measures for non-profits and businesses
EPA Portfolio Manager	Online energy use benchmarking for commercial buildings

{¶ 7} The following parties filed for and were granted intervention in these cases: OCC, Ohio Partners for Affordable Energy (OPAE), Ohio Farm Bureau Federation, Mid-Ohio Regional Planning Commission (MORPC), Interstate Gas Supply, Inc. (IGS), Retail Energy Supply Association (RESA), Ohio Hospital Association (OHA), Environmental Law and Policy Center (ELPC), Northwest Ohio Aggregation Coalition (NOAC) and jointly, the city of Toledo, Lucas County Board of Commissioners, city of

Perrysburg, Lake Township Board of Trustees, city of Maumee, city of Oregon, city of Northwood, village of Ottawa Hills, city of Sylvania, and village of Holland (collectively, NOAC Communities).

{¶ 8} By Entry issued July 14, 2016, the procedural schedule in these matters was established. Pursuant to the July 14, 2016 Entry, motions to intervene were due July 27, 2016, comments were due August 8, 2016 and reply comments were due August 22, 2016. The July 14, 2016 Entry also advised the parties that, after consideration of the comments and reply comments, the Commission would determine whether a hearing was necessary.

{¶ 9} On August 5, 2016, the parties to these proceedings filed a joint motion for an extension and a request for expedited treatment. In the motion, the parties stated they had been engaged in productive settlement discussions and, in an effort to reach a settlement, agreed to additional settlement discussions. By Entry issued on August 8, 2016, the motion for an extension of time to file comments and reply comments was granted. Accordingly, the procedural schedule was revised and comments were due August 15, 2016, and reply comments were due August 29, 2016.

{¶ 10} On August 12, 2016, a joint stipulation and recommendation (stipulation) was filed by Columbia, Staff, OPAE, MORPC, IGS, RESA, and OHA that would resolve all of the issues in these cases. OCC, NOAC, NOAC Communities, and ELPC oppose the stipulation.

{¶ 11} Consistent with the revised procedural schedule, comments on Columbia's application were filed by Columbia, NOAC and the NOAC Communities, OHA, RESA, and OCC. Reply comments were filed by Columbia, NOAC and the NOAC Communities, OPAE, RESA, IGS, MORPC, OHA, and OCC.

{¶ 12} Numerous correspondence was filed in the dockets by consumers, businesses, and community organizations in support of the Company's DSM programs. No comments were filed in opposition to the application.

{¶ 13} By Entry issued on August 30, 2016, the procedural schedule for the Commission's consideration of the stipulation was established, including a hearing to commence on September 28, 2016.

{¶ 14} At the request of OCC, Columbia agreed to a one-day continuance of the hearing. Accordingly, the hearing was called on September 28, 2016, as scheduled, and continued, to commence on September 29, 2016.

{¶ 15} The hearing on the stipulation commenced on September 29, 2016, continuing each business day thereafter, and concluded on October 4, 2016.

{¶ 16} The parties filed initial and reply briefs on October 20, 2016, and November 4, 2016, respectively.

IV. Procedural Issues

A. *Motions for Protective Orders*

{¶ 17} On September 7, 2016, and November 4, 2016, Columbia filed motions for protective treatment. Columbia argues that certain information included in ten discovery responses and/or the attachments to the responses, and five exhibits offered into the record[2] contain confidential trade secrets in accordance with R.C. 1333.61 and Ohio Adm.Code 4901-1-24 and, as such, the information is entitled to protective treatment. Columbia divided the discovery responses and exhibits into three groups for the purpose of arguing compliance with R.C. 1333.61. The first group of information includes Columbia's expected customer participation rates by program, and for the portfolio of DSM programs, and the inputs to determine the avoided cost of natural gas

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2 OCC Exhibits 4 through 8 (Confidential).

used to calculate the cost-effectiveness of the DSM programs.[3] Columbia states this information is a compilation of confidential Columbia participation rates, inputs, business information, and business plans. The Company asserts that the information has both actual and potential economic value to other entities that provide energy efficiency services and disclosure of the information would harm Columbia's future ability to secure bids or negotiate the best deal for ratepayers. Program participation rates would demonstrate the expected growth or contraction of each DSM program. Columbia argues the inputs to calculate the cost-effectiveness of its DSM program could be used by competitors to create competing energy efficiency services based on the work done by Columbia. Columbia states that the information is the subject of reasonable efforts to maintain its secrecy in light of its value to others.

{¶ 18} The second group of discovery responses and exhibits for which Columbia seeks protective treatment includes a compilation of Columbia's energy efficiency measure rebates and incentive levels and energy audit costs, which is part of Columbia's business information and plans.[4] Columbia reasons this information would provide competitors and bidders the information used to model the cost-effectiveness of the DSM programs and allow bidders to bid up the rates. Columbia reasons that, if bidders do not know what Columbia budgets for each service, then bidders are incented to submit their best bid, which improves and increases competition. According to the Company, the details of Columbia's rebates, incentives, and energy audit costs would reveal to potential competitors and bidders the key components and cost drivers of the Company's DSM programs and public disclosure of such information would have a negative impact on Columbia and its customers. For the above noted reasons, Columbia asserts it takes reasonable efforts to maintain the secrecy of this information.

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3 Columbia's responses to: OCC Interrogatory Set 2, No. 1; OCC Request for Production of Documents Set 2, No. 9; OCC Interrogatory Set 4, Nos. 70-81; OCC Ex. 5, OCC Ex. 7, and OCC Ex. 8.

4 Columbia's responses to: OCC Interrogatory Set 2, No. 5; OCC Interrogatory Set 2, No. 13; OCC Request for Production of Documents Set 2, No. 6 Att. A (Confidential); OCC Ex. 4.

{¶ 19} The third group of discovery responses and exhibits includes, in Columbia's words, the essence of the Company's business information and plans and financial information on the DSM programs, including spreadsheets that comprise the work product of a DSM program design consultant in the development of Columbia's programs. Columbia maintains the value of this work product is maintained because the information is not known by competitors or bidders.[5] According to the Company, the discovery responses and exhibits contain highly proprietary information that is the foundation for Columbia's DSM programs. Columbia contends releasing this information to the public would provide competitors and bidders direct insight into the basis for and cost of Columbia's DSM programs and facilitate the development of other DSM programs at no cost. The information, according to Columbia, is proprietary to Columbia and is available only to Columbia and its consultants who developed the spreadsheets. Accordingly, the Company reasons the spreadsheets and exhibits have significant independent economic value to the extent the information is not known to others. Further, Columbia explains that OCC Set 4, No. 23, Attachment A includes a voluminous impact analysis and process evaluations from the past five years on individual DSM programs, including budgets, metrics, incentives, program eligibility, implementation strategies, and responsibilities and lessons learned. Columbia notes that the information in this group is the subject of reasonable efforts to maintain its secrecy under the circumstances.[6]

{¶ 20} Further, Columbia argues all the information for which it seeks protective treatment satisfies the six-part test set forth in *State ex rel. The Plain Dealer v. Ohio Dept. of Ins.*, 80 Ohio St.3d 513, 524-525, 687 N.E.2d 661 (1997). Columbia avers

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5 Columbia's responses to: OCC Request for Production of Documents Set 4, No. 22 Att. A (Confidential); OCC Request for Production of Documents Set 4, No. 23; Staff DSM Data Request Set 1, No. 6, Att. A (Confidential), Att. B (Confidential), and Att. B (Confidential) Supplemental – as corrected on August 10, 2016; OCC Ex. 8.

6 Columbia's responses to: OCC Request for Production of Documents Set 4, No. 22 Att. A (Confidential); OCC Request for Production of Documents Set 4, No. 23; Staff DSM Data Request Set 1, No. 6, Att. A (Confidential), Att. B (Confidential), and Att. B (Confidential) Supplemental – as corrected on August 10, 2016; OCC Ex. 6.

that, prior to these proceedings, the information was not known outside of the Company, except for the consultants that design and administer the DSM programs. Even internally, Columbia declares that only Columbia/NiSource Corporation employees who administer or directly interact with the DSM programs have access to the information on a need to know basis. Columbia adds that it derives material value from the information being known exclusively to Columbia. Over the years, Columbia states that significant time and money has been expended to develop the DSM program information at issue and public disclosure would allow a competitor to replicate the scope, breadth, and success of Columbia's programs without incurring any costs. Columbia argues protection of the information is not inconsistent with Ohio Revised Code Title 49 nor Commission precedent.

{¶ 21} Consistent with the protective agreement executed between Columbia and various intervenors, including OCC, OCC filed motions for protective treatment on September 13, September 22, September 27, October 20, November 4, and November 10, 2016, in association with the filing of its testimony, depositions, memorandum contra, post-hearing briefs, and motion to strike.

{¶ 22} On September 22, 2016, OCC filed a memorandum contra Columbia's motion for protective treatment. OCC argues Columbia's trade secret claims are overly broad with respect to the number of customers that will be able to participate in proposed energy efficiency programs, the dollar amount of rebates and incentives, and Columbia's cost-benefit calculations, including the assumptions, sources relied on by Columbia, projected price of natural gas, adjustments made, CHOICE price for natural gas, and the discount rate used by Columbia. OCC declares that none of the information constitutes trade secret information entitled to protection under Ohio law. Furthermore, OCC notes the Commission has previously determined that customer participation numbers and energy efficiency program costs are not entitled to protective treatment. *In re Duke Energy of Ohio, Inc.*, Case No. 11-4393-EL-RDR (*Duke DSM Rider*

Case), Entry (Oct. 3, 2011) at 2. OCC declares that, consistent with the ruling in the *Duke DSM Rider Case*, Columbia's request for a protective order of documents that contain projected customer participation numbers and energy efficiency program rebates should be denied on the basis the information is not trade secret. OCC argues Columbia has previously publicly disclosed its projected customer participation rates, rebates, and incentive amounts by program in its *2008 DSM Case* application and its *2011 DSM Case* application. OCC reasons that it is unclear what economic value Columbia derives from keeping the cost-effectiveness model from public disclosure, as Columbia's financial interest is limited to shared savings. OCC specifically notes that Columbia has shared the cost-effectiveness spreadsheets with OPAE and disclosed the rebate for programmable thermostats. OCC challenges Columbia's contention that the information requires protection from public disclosure and is trade secret as there is no evidence that Columbia has been harmed by the disclosure of the information. As to the inputs and data used in the Company's cost-effectiveness model, OCC reasons that Columbia fails to explain how these inputs are trade secrets or how any third party could use such information to its competitive advantage and is unrelated to Columbia's business as a natural gas distribution utility. OCC avers Columbia does not have an independent business interest in competing in the unregulated market for energy efficiency services. Accordingly, OCC requests that Columbia's motion for protective treatment be denied. To the extent that Columbia's motion for protective order is granted, OCC requests that Columbia be directed to redact the protected information included in any document, as opposed to the entire document, so as to minimize the amount of information protected from public disclosure.

{¶ 23} On September 27, 2016, Columbia filed a reply reiterating and expanding on its motion for protective treatment.

{¶ 24} R.C. 4905.07 provides that all facts and information in the possession of the Commission shall be public, except as provided in R.C. 149.43 and as consistent with the purposes of Title 49 of the Revised Code. R.C. 149.43 defines the term "public records" to exclude information, which, under state or federal law, may not be released. The Supreme Court of Ohio has clarified the "state or federal law" exemption is intended to cover trade secrets. *State ex rel. Besser v. Ohio State Univ.*, 89 Ohio St.3d 396, 399, 732 N.E.2d 373 (2000). To that end, Ohio Adm.Code 4901-1-24 allows an order to be issued to protect the confidentiality of information contained in a filed document deemed to constitute a trade secret under Ohio law, and where non-disclosure of the information is not inconsistent with the purposes of R.C. Title 49. R.C. 1333.61(D) defines a trade secret as information that satisfies both of the following criteria: (1) It derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (2) It is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

{¶ 25} The Commission has reviewed the information that is the subject of Columbia's motions for protective orders, and the memoranda in support. Applying the requirements that the information have independent economic value and be the subject of reasonable efforts to maintain its secrecy pursuant to R.C. 1333.61(D), as well as the six-factor test set forth by the Supreme Court of Ohio, the Commission finds that the information constitutes trade secret information. *See State ex rel. Plain Dealer v. Ohio Dept. of Ins.*, 80 Ohio St.3d 513, 524-525, 687 N.E.2d 661 (1997). Its release is, therefore, prohibited under state law. We find the information at issue in the *Duke DSM Rider Case,* which was the total utility budget costs per DSM program, has already been publicly provided in the present cases. Thus, the *Duke DSM Rider Case* is not directly on point. The Commission is not convinced that Columbia's disclosure of similar customer participation rates, rebates, and incentive levels in the Company's previous DSM proceedings justifies the public disclosure of current DSM program details. The Commission notes that, while OCC requests public disclosure of all the information for which Columbia requests protected treatment, OCC also encourages competitive bidding for WarmChoice® service providers and all the other DSM program contractors, to ensure the best contract price for vendor services (OCC Br. at 43-44). The Commission finds the disclosure of participation rates and detailed DSM program cost information at odds with the encouragement of competitive bidding. Columbia has a duty, as the administrator of the DSM programs, to facilitate, administer, and carry out the DSM programs, which includes assuring that the costs incurred are reasonable. The Commission also finds that non-disclosure of this information is not inconsistent with the purposes of R.C. Title 49. Therefore, the Commission finds that Columbia's motions for protective orders are reasonable with regard to the portions filed under seal and should be granted.

{¶ 26} Further, pursuant to Ohio Adm.Code 4901-1-24(D)(1), Columbia is directed to review the protected information included in any document, including the transcripts, and redact only the confidential trade secret information, so as to minimize the amount of information protected from public disclosure. Columbia should re-file the information in these dockets by January 13, 2017.

{¶ 27} Ohio Adm.Code 4901-1-24(F) provides that, unless otherwise ordered, protective orders issued pursuant to Ohio Adm.Code 4901-1-24(D) automatically expire after 24 months. Accordingly, confidential treatment shall be afforded for a period ending 24 months from the date of this Opinion and Order and, until that date, the Commission's Docketing Division should maintain the information under seal.

{¶ 28} Ohio Adm.Code 4901-1-24(F) requires a party wishing to extend a protective order to file an appropriate motion at least 45 days in advance of the expiration date of the order. If Columbia fails to file a motion to extend the protective orders, the Commission may release this information without prior notice.

B. Motions to Strike

{¶ 29} On November 10, 2016, OCC filed a motion to strike portions of OPAE's initial and reply briefs on the grounds that OPAE references a stipulation (Distribution Stipulation) filed in a prior Columbia distribution rate case, Case No. 08-72-GA-AIR, et al. (*2008 Distribution Rate Case*), which was not admitted into evidence in these matters. In the motion, OCC also requests sections of Columbia's reply brief be stricken on the grounds that the brief cites Columbia's *2011 DSM Case* application and data in Columbia's tariff sheets, which were not admitted into evidence in these proceedings. OCC argues that, because the information was not introduced into the record, OCC was not afforded the opportunity to challenge the extra record information. OCC reasons that the Commission has continuously rejected efforts by parties to include information in a brief that is not part of the record, including information submitted in other Commission proceedings. Accordingly, OCC requests the Commission strike eight sections of OPAE's initial and reply briefs.

{¶ 30} On November 18, 2016, OPAE filed a memorandum contra OCC's motion to strike. OPAE reasons that it is well-established that the Commission may cite a prior order without regard to whether the Commission's decision was entered into evidence in the current proceeding. To that end, OPAE notes that the language quoted in its brief is part of the Opinion and Order in Columbia's *2008 Distribution Rate Case* and was included to describe the process agreed to in the Distribution Stipulation. *2008 Distribution Rate Case*, Opinion and Order (Dec. 3, 2008) at 10. Further, OPAE reasons that the Distribution Stipulation filed in the *2008 Distribution Rate Case* permits any party to cite the stipulation for enforcement purposes irrespective of whether the order was admitted into evidence in these proceedings. Accordingly, OPAE concludes OCC's motion to strike portions of OPAE's initial brief and reply brief is without merit and should be denied.

{¶ 31} No party requested that the attorney examiner take administrative notice of any documents from the *2008 Distribution Case* and it is not required that any party to a Commission proceeding request administrative notice of a Commission order to cite the order in its brief. *In re Ohio Power Co.*, Case No. 10-2376-EL-UNC, et al., Opinion and Order (Dec. 14, 2011) at 16. Further, it is well-established policy that the Commission may cite any of its orders without regard to whether the Commission's decision has been offered into the record. The Commission is vested with the authority to grant administrative notice, subject to two limitations: where the opposing party had prior knowledge of the facts and had an adequate opportunity to explain and rebut the facts administratively noticed. *Canton Storage & Transfer Co. v. Pub. Util. Comm.*, 72 Ohio St.3d 1, 8, 647 N.E.2d 136 (1995).

{¶ 32} While it is clear that OPAE's briefs include language directly from the Distribution Stipulation filed in the *2008 Distribution Rate Case* on October 24, 2008, as opposed to language from the Commission's Order approving the stipulation, it cannot be argued that OCC did not have prior knowledge of the stipulation or the chance to rebut OPAE's interpretation of the stipulation. OCC was a party to the *2008 Distribution Rate Case* and a signatory to the Distribution Stipulation. *2008 Distribution Rate Case,* Opinion and Order (Dec. 3, 2008) at 5, 10. Further, the *2008 Distribution Rate Case,* as OCC cites in its motion, was discussed extensively in OPAE's initial brief and could have been challenged by OCC in its reply brief. Accordingly, the motion to strike the requested sections of OPAE's initial and reply briefs should be denied.

{¶ 33} In regard to Columbia's reply brief, OCC argues that Columbia cites the joint motion for an extension filed in these cases on August 5, 2016, in support of its claims of serious bargaining. OCC declares that the August 5, 2016 motion was not introduced nor admitted into the record of these proceedings and, therefore, the reference should be stricken from Columbia's reply brief. Further, OCC submits that portions of Columbia's reply brief rely on the application filed in the Company's *2011*

DSM Case, which was not introduced nor admitted into the record and, for that reason, OCC requests that those sections of the reply brief be stricken. Finally, OCC avers that Columbia relies on information from its tariff sheets, past and present, to substantiate its gas price projections as part of its cost-effectiveness calculations. OCC argues Columbia had ample opportunity to introduce this evidence into the record in support of the application and the stipulation but did not do so. Further, OCC states it submitted three discovery requests to Columbia asking the Company to describe, explain, and document its retail price adjustment, percentage of income payment plan (PIPP) rider projections, and uncollectible expense (UEX) rider projections and how the values were derived. OCC declares Columbia did not indicate that it relied on data from its tariff sheets to project the price of natural gas or its cost-effectiveness calculations. Pursuant to Ohio Adm.Code 4901-1-19(A) and 4901-1-16(D)(2), OCC avers Columbia is required to answer each interrogatory fully and to supplement its answers. Further, OCC deposed Columbia's witness on cost-effectiveness, John Laverty, and OCC was granted a subpoena and deposed Sara Poe, a Columbia employee. OCC argues that neither Mr. Laverty nor Ms. Poe mentioned that Columbia used data from its tariff sheets as part of its cost-effectiveness calculations, projections of the future price of natural gas, or the associated underlying assumptions in their respective depositions or during Mr. Laverty's cross-examination at the hearing. OCC argues it is an unfair surprise that Columbia claims, for the first time, in its reply brief that the Company relies on information in its tariff sheets. According to OCC, no party had an opportunity to cross-examine Mr. Laverty on the information in Columbia's tariff sheets and, therefore, OCC requests that Columbia's references to such information in its reply brief be stricken.

{¶ 34} Columbia filed a memorandum contra OCC's motion to strike on November 18, 2016. Columbia contends that the Commission has clear authority to take administrative notice of facts outside the evidentiary record, despite OCC's representations otherwise, and the Court has acknowledged that there is not an absolute right to or a prohibition against the Commission taking administrative notice, but depends on the facts of each case. Columbia contends that the descriptions of its filed and approved tariff charges, the quote from the motion for an extension, and general references to Columbia's *2011 DSM Case* application are incontrovertible and should not be controversial. Therefore, Columbia reasons the Commission can and should take administrative notice of the information.

{¶ 35} The Commission finds that the August 5, 2016 joint motion for an extension of the procedural schedule was not admitted into the evidentiary record of these cases and, therefore, the reference thereto in Columbia's reply brief and the associated footnote should be stricken. The Commission believes that to rule otherwise would have a chilling effect on a party's willingness to agree to a request for additional time to engage in settlement discussions. Accordingly, we grant OCC's motion to strike the requested section of page 5 of Columbia's reply brief and the associated footnote 22.

{¶ 36} The Commission also grants the request to strike references to the Company's application in the *2011 DSM Case* and the associated footnotes appearing on pages 37-38 and page 56 of Columbia's reply brief. While OCC was a party to Columbia's *2011 DSM Case*, the reply brief reflects Columbia's interpretation of its application and OCC has not been afforded an opportunity to challenge the information as presented in Columbia's reply brief. Accordingly, the Commission grants the request to strike references to the *2011 DSM Case* application and associated footnotes.

{¶ 37} However, the Commission denies OCC's remaining requests to strike references to Columbia's approved tariff sheets, past and present, and the associated footnotes. Columbia, like all public utilities under the Commission's jurisdiction, is required to file tariffs for all rates and charges for services furnished and can charge no more than reflected in the Company's tariff. R.C. 4905.22, 4905.30, and 4905.32. The General Assembly has vested with the Commission the statutory authority to review and approve tariffs and, once approved, a tariff has the same binding effect as a law. *In* *re Complaint of Reynoldsburg*, 134 Ohio St.3d 29, 38, 2012-Ohio-5270, 979 N.E.2d 1229, ¶ 41. The Commission will not strike references in Columbia's reply brief to its tariff and, therefore, the motion to strike should be denied.

V. Stipulation

{¶ 38} As previously noted, on August 12, 2016, a stipulation was filed that, if adopted, would resolve all of the issues in these proceedings and is summarized, as follows:[7]

> Columbia, Staff, OPAE, IGS,[8] MORPC, OHA, and RESA[9] (Signatory Parties) recommend that the Commission approve and adopt the stipulation that resolves all the issues in these cases. Further, the Signatory Parties agree:
>
> (1) The Signatory Parties recommend the Commission approve, without modification except as provided in the stipulation, the application filed in these dockets. By so doing, the Commission will authorize Columbia to continue its DSM program and necessary accounting methods.
>
> (2) The Signatory Parties agree that the $70,000 per year of DSM Stakeholder Group (DSMSG) Support/DSM Planning projected spending should be removed from the Columbia DSM Program Projected Budget in Appendix B, Table 3 of the application.
>
> (3) The Signatory Parties agree that the non-energy benefits that Columbia proposed to incorporate in the shared savings

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7 This is a summary of the stipulation and is not intended to supersede or replace the stipulation.

8 IGS supports this stipulation; however, IGS does not take a position on the proposed gas costs or assumptions used to calculate the estimated gas costs in Columbia's application.

9 RESA supports the stipulation; however, RESA does not take a position on the proposed gas costs or assumptions used to calculate the estimated gas costs in Columbia's application. The comments expressed in the filing represent the position of RESA as an organization, but may not represent the views of any particular member of RESA.

performance incentive will not be included in the calculation of shared savings.

(4) The Signatory Parties agree that the shared savings performance incentive, grossed up for taxes, will be based on the following tiered levels of program achievement:

Percent of Mcf[10] Savings Targets Minimum	Percent of Mcf Savings Targets Maximum	Corresponding Shared Savings Percentage
100%	<105%	5%
≥ 105%	<110%	6%
≥ 110%	<115%	7%
≥ 115%	<120%	8%
≥ 120%	<125%	9%
≥ 125%		10%

(6) The Signatory Parties agree to cap the shared savings incentive, over the entire term of the DSM program ending on December 31, 2022, at $4.5 million and grossed up for taxes.

(7) Columbia agrees to work with OPAE and its member agencies, including the MORPC, Ground Level Solutions (GLS), Corporation for Ohio Appalachian Development (COAD), and Neighborhood Housing Services of Toledo d/b/a NeighborWorks - Toledo Region (NWT), to participate in Columbia's Home Performance Solutions Program.

(8) Columbia agrees to work with OPAE and its member agencies, including MORPC, GLS, COAD, and NWT, to develop and execute community-based weatherization initiatives throughout Columbia's service area and to permit WarmChoice® contractors the discretion to collect a landlord contribution when weatherizing low-income customer property.

10 "Mcf" indicates a thousand cubic feet of natural gas.

(9) Columbia agrees to work with MORPC to further its local government energy partnership that involves energy benchmarking, energy audits, community education, and challenge programs and competitions. Columbia agrees to work with MORPC and other funding partners to finalize funding details, with Columbia agreeing to provide financial support for this initiative. The funding level may be determined by criteria, including, but not limited to, local government participation, achieved energy savings, and program participation by community residents.

(10) Columbia agrees to provide a rebate of $75 per learning thermostat with its Simple Energy Solutions program. Columbia also agrees to engage in discussions with RESA, IGS, and Staff on mechanisms to streamline and/or enhance the rebate process associated with the Simple Energy Solutions program.

(11) Columbia agrees to provide OHA usage data on a monthly, rather than a quarterly, basis.

(Joint Ex. 1 at 2-4.)

VI. Discussion

{¶ 39} Ohio Adm.Code 4901-1-30 authorizes parties to Commission proceedings to enter into a stipulation. Although not binding on the Commission, the terms of such an agreement are afforded substantial weight. *Consumers' Counsel v. Pub. Util. Comm.*, 64 Ohio St.3d 123, 125, 592 N.E.2d 1370 (1992), *citing Akron v. Pub. Util. Comm.*, 55 Ohio St.2d 155, 157, 378 N.E.2d 480 (1978). This concept is particularly valid where the stipulation is unopposed by any party and resolves all issues presented in the proceeding in which it is offered.

{¶ 40} The standard of review for considering the reasonableness of a stipulation has been discussed in a number of prior Commission proceedings. *See, e.g.,* *In re Cincinnati Gas & Elec. Co.*, Case No. 91-410-EL-AIR, Order on Remand (Apr. 14, 1994); *In re Western Reserve Telephone Co.*, Case No. 93-230-TP-ALT, Opinion and Order (Mar. 30, 1994); *In re Ohio Edison Co.*, Case No. 91-698-EL-FOR, et al., Opinion and Order (Dec. 30, 1993); *In re Cleveland Elec. Illum. Co.*, Case No. 88-170-EL-AIR, Opinion and Order (Jan. 31, 1989); *In re Restatement of Accounts and Records*, Case No. 84-1187-EL-UNC, Opinion and Order (Nov. 26, 1985). The ultimate issue for our consideration is whether the agreement, which embodies considerable time and effort by the signatory parties, is reasonable and should be adopted. In considering the reasonableness of a stipulation, the Commission has used the following criteria:

(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?

{¶ 41} The Ohio Supreme Court has endorsed the Commission's analysis using these criteria to resolve issues in a manner economical to ratepayers and public utilities. *Indus. Energy Consumers of Ohio Power Co. v. Pub. Util. Comm.*, 68 Ohio St.3d 559, 629 N.E.2d 423 (1994), *citing Consumers' Counsel* at 126. The Court stated in that case that the Commission may place substantial weight on the terms of a stipulation, even though the stipulation does not bind the Commission.

A. *Is the Settlement a Product of Serious Bargaining Among Capable, Knowledgeable Parties?*

1. **Signatory Parties' Position**

{¶ 42} The Signatory Parties aver the stipulation meets the first criterion of the three-part test. Columbia presented the testimony of Melissa L. Thompson, the Company's Director of Regulatory Policy, in support of the stipulation. Ms. Thompson testified the stipulation is the product of an open process where all parties were represented by able counsel and technical experts and invited to the DSMSG meetings to discuss settlement. Each party, according to Ms. Thompson, regularly participates in Commission proceedings and other regulatory matters, and was represented by experienced and competent counsel. Ms. Thompson states there were numerous stakeholder group meetings before and after the application was filed. (Co. Ex. 2 at 6-7.)

{¶ 43} Further, the witness offered that the stipulation represents a compromise of issues by knowledgeable and experienced parties, as the Signatory Parties represent a broad range of interests. Focusing on MORPC, Ms. Thompson notes that MORPC represents a consortium of 60 municipalities in a 15 county radius of central Ohio, including not only the residential customers in those communities but also the local economic development opportunities to make the communities more energy efficient. The witness also notes, as reflected in a footnote to the stipulation, a number of non-party stakeholders that support the stipulation (Joint Ex. 1 at 1, footnote 4). Further, Columbia witness Thompson also lists the specific ways Columbia's DSM application was amended by the stipulation, and the Signatory Parties agreed:

a. Columbia will eliminate $70,000 per year budgeted for DSMSG Support/DSM Planning Admin (non-program specific);

b. Columbia will eliminate non-energy benefits from the shared savings performance incentive mechanism;

c. Columbia will adjust the shared savings performance incentive mechanism percentages, including Columbia's ability to earn any shared savings if it achieves between 75 percent and 100 percent of the MCF savings targets;

d. Columbia will reduce the shared savings performance incentive mechanism cap from $10 million to $4.5 million over the six-year term and grossed up for taxes;

e. Columbia will work with OPAE and member agencies to participate in the Home Performance Solutions Program;

f. Columbia will work with OPAE and member agencies to develop and execute community-based weatherization initiatives;

g. Columbia will partner with MORPC's local government energy partnership program;

h. The rebate for wi-fi learning thermostats will be $75;

i. Columbia will discuss, along with IGS, RESA, and Staff, methods to streamline the rebate process associated with Simple Energy Solutions; and

j. Columbia will provide energy usage data to the OHA on a more frequent basis.

(Co. Ex. 2 at 1-2.)

{¶ 44} Further, Ms. Thompson testified that Columbia and Staff made additional attempts to negotiate a settlement with OCC directly at three in-person meetings after the application was filed. The witness indicated that settlement proposals were exchanged but ultimately Columbia was unable to reach a settlement with OCC. Similarly, according to Columbia, a conversation was had with NOAC where Columbia was informed of its settlement terms but ultimately no agreement was reached. Columbia reasons an inability to reach a settlement with all parties is not indicative of a lack of serious bargaining. (Co. Ex. 2 at 6-7.)

{¶ 45} In addition to the testimony offered by Columbia in support of the stipulation, RESA and Staff also offered witnesses in support of the stipulation. RESA witness Jack Keegan, Manager, Regulatory Affairs and Government Relations for Just Energy, testified that, although RESA did not intervene until July 27, 2016, RESA was an active participant in the settlement negotiations thereafter. Mr. Keegan offered that each party to the proceedings was invited to and did participate in discussions for the purpose of negotiating a settlement. (RESA Ex. 1 at 5.)

{¶ 46} Staff offered the testimony of Suzanne Williams, Administrator in the Research and Policy Division of the Rates and Analysis Department. Ms. Williams testified that the stipulation meets the three-part test used by the Commission to evaluate stipulations (Staff Ex. 1 at 2-3).

{¶ 47} OPAE submits, despite OCC's implications otherwise, Columbia followed the DSM application process agreed to in the joint stipulation and recommendation filed on October 24, 2008, and approved by the Commission in Columbia's *2008 Distribution Rate Case*. In OPAE's opinion, in the October 24, 2008 stipulation, the signatory parties, which included OCC, agreed the DSM stakeholder participants should consider the development of proposals for the continuation, modification, and/or expansion of the WarmChoice® program and Columbia's DSM programs, and associated funding levels, beyond 2011. OPAE argues that, inconsistent with that agreement, OCC now argues that the DSMSG meetings are not settlement meetings and that members of the DSMSG should not be in settlement discussions unless the DSMSG participant is also a party to the case with the Commission on the application (Tr. IV at 701). OPAE reasons that stakeholders in Columbia's DSM application may move to become an intervenor in the proceeding subsequent to the filing of the application or, as stakeholders may, as reflected in the stipulation, grant

Columbia permission to indicate their support for the stipulation (Joint Ex. 1 at 1, footnote 4). The point is, according to OPAE, this is the process Columbia is to follow in its DSM proceedings and OCC's arguments to discredit implementation of the process should be rejected. (OPAE Br. at 7-10.) Similarly, IGS reasons that OCC's arguments must fail. IGS offers that bargaining or the lack of bargaining between non-parties or in the presence of non-parties is relevant for purposes of compliance with the three-part test to evaluate stipulations (Tr. Vol. IV at 632-633).

{¶ 48} IGS notes, in testament to RESA's seriousness and efficiency, RESA filed to intervene 16 days before the stipulation was filed and RESA was able to negotiate a provision in the stipulation to address its interest (IGS Reply Br. at 4). Further, IGS recalls that ELPC filed for intervention after the established due date for such motions and acquiesced to the record as it existed. IGS submits the Commission's consideration of whether the stipulation meets the first criterion of the three-part test does not include matters after the stipulation was filed, including the intervention of another party. Finally, IGS declares it is not a requirement, as OCC claims, that the stipulation drastically modify the application to serve as evidence of serious bargaining.

2. **Opposing Intervenors' Positions**

{¶ 49} OCC argues the Signatory Parties did not engage in serious bargaining. OCC declares the May 13, May 25, June 24, June 30, and August 4, 2016 DSMSG meetings, which Columbia considers settlement discussions, included non-parties and were not for the purpose of engaging in serious bargaining but to inform stakeholders. Further, according to OCC, some of the signatory parties attended only one meeting and, therefore, cannot attest to whether serious bargaining occurred at meetings which they did not attend. OCC notes that RESA, NOAC, and the NOAC Communities only attended one of the settlement meetings and ELPC did not attend any of the larger stakeholder meetings. Therefore, RESA, according to OCC, cannot attest to whether serious bargaining occurred at the meetings RESA witness Keegan did not attend. (OCC Br. at 47-48.)

{¶ 50} Further, OCC argues the terms of the stipulation demonstrate a lack of serious bargaining to the extent that certain paragraphs of the agreement merely require Columbia to work with various Signatory Parties on energy efficiency initiatives without deadlines or the requirement of specific results, and to the extent that RESA's and IGS' interest appears to be limited to paragraph 9, regarding the learning thermostat, and the associated rebate. OCC alleges the only substantive changes to the application, as reflected in the stipulation, were the elimination of the $70,000 per year for DSMSG Support/DSM Planning and revisions to the shared savings mechanism. (OCC Br. at 48-49.)

{¶ 51} In addition, OCC claims the Signatory Parties lack diversity. OCC witness Haugh testified the Commission routinely considers whether the parties to a stipulation represent diverse interests[11] and OCC witness Williams submitted that the stipulation in these cases lacks any signatories representing only residential customers' interests, including low-income residential customers' interests. (OCC Ex. 9 at 6; OCC Ex. 12 at 4.) More specifically, OCC points out that four WarmChoice® providers, including MORPC, are members of OPAE and OPAE's business model is dependent on receiving administrative fees and grants from Ohio utilities (OCC Ex. 12 at 6). OCC avers OHA members may not pay any DSM program costs or shared savings if they are not in the Small General Service (SGS) rate class (Tr. Vol. II at 288). RESA, of which IGS is a member, represents natural gas marketers, which, OCC avers, are using these cases to support their business interests in smart thermostats. ELPC, NOAC, and NOAC Communities (collectively, ELPC/NOAC) and OCC declare the Signatory Parties receive substantial but unquantified benefits from the energy efficiency programs but

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[11] *In re Columbus Southern Power Co. and Ohio Power Co.*, Case No. 11-351-EL-AIR, et al., Opinion and Order (Dec. 14, 2011) at 9; *In re Dayton Power and Light Co.*, Case No. 14-563-EL-RDR, Opinion and Order (Sept. 9, 2015); *In re Columbus Southern Power Co. and Ohio Power Co.*, Case No. 05-376-EL-UNC, Entry on Remand (Feb. 11, 2015).

are not incurring any of the costs, as the costs of Columbia's DSM programs are paid by residential and small business customers. ELPC/NOAC allege there is a lack of detail in the stipulation, particularly in paragraphs 6, 8, and 9, to explain the benefit to the Signatory Parties, Columbia customers, or the DSM programs. Opposing intervenors encourage the Commission to consider, and weigh heavily, the fact that the stipulation is opposed by OCC, the statutory representative of residential customers; NOAC and the NOAC Communities, the other consumer representatives to these proceedings; and ELPC, the lone environmental organization in these cases. (OCC Br. at 49-51; ELPC/NOAC Br. at 14-15.)

3. Commission Decision on the First Prong of the Three-Part Test

{¶ 52} As part of the first component of the three-part test, the Commission considers whether each party was afforded the opportunity to participate in negotiations, is proficient in the negotiation process, and sufficiently understands the matters at issue.

{¶ 53} The Commission notes that Columbia's DSM programs, excluding WarmChoice®, have evolved over the last eight years. In the *2008 Distribution Rate Case*, Columbia filed an application to increase its tariff rates and charges for gas distribution service across its entire service territory, along with other applications. On October 24, 2008, Columbia and several parties, including OCC, filed the Distribution Stipulation resolving all the issues presented in the cases, except rate design. The Distribution Stipulation included a pre-application process for the development of future DSM applications to be filed by Columbia. More specifically, the Distribution Stipulation provided:

> As part of the stakeholder process, the stakeholder participants should consider the development of proposals for the continuation, modification and/or expansion of the WarmChoice® program and Columbia's DSM

> programs, and associated funding levels, beyond 2011. Should Columbia's DSM stakeholder group determine that a continuation, modification and/or expansion of the WarmChoice® program and Columbia's DSM programs is reasonable and prudent, the Parties agree that Columbia may file an application with the Commission seeking authority to continue, modify and/or expand Columbia's DSM programs and may also request authority to modify Rider DSM accordingly. However, the Parties agree that no such application may be filed until at least 18 months following the issuance of a Commission order adopting this Joint Stipulation and Recommendation. (Distribution Stipulation at 16).

{¶ 54} The Commission approved and adopted the Distribution Stipulation, including the pre-application process to be followed by Columbia in its subsequent DSM proceedings. *2008 Distribution Rate Case*, Opinion and Order (Dec. 3, 2008) at 5, 10, 15, 26. Columbia's subsequent DSM cases have followed the designated stakeholder group meeting process.

{¶ 55} There appears to be some disagreement whether the DSMSG meetings, which included interested stakeholders who did not request intervention in these matters, constitute settlement negotiations for the purpose of serious bargaining under the three-part test. While it appears that it may have been Columbia's intent to negotiate a resolution of the issues presented in these cases, at least in part by way of the DSMSG meetings, OCC avers such meetings cannot be considered settlement negotiation meetings. However, record evidence indicates the DSMSG meetings were not the sole opportunity for parties to attempt to negotiate a settlement in these matters. Columbia witness Thompson testified that all the parties to these matters were included in negotiations. According to Ms. Thompson, several DSMSG meetings were held before and after the DSM application was filed. Opposing parties have not asserted that they were excluded from DSMSG meetings or otherwise did not have the opportunity to discuss or negotiate terms to be included in the stipulation. OCC witness Haugh testified that OCC had the opportunity, outside of the DSMSG meetings, to offer terms to be included as part of the stipulation. Accordingly, the record evidence supports that OCC attended at least one DSMSG meeting, was not excluded from settlement negotiations, and OCC, as well as other parties, had the opportunity to negotiate settlement terms to be included in the stipulation whether at the DSMSG or in separate sessions with Columbia. (Co. Ex. 2 at 6-7; Staff Ex. 1 at 2-3; Tr. IV at 632-633, 773-774.)

{¶ 56} OCC asserts it is evident that serious bargaining did not occur on the basis the stipulation fails to alter Columbia's application in any significant respect other than the exclusion of administrative charges and the modification to the shared savings provision (OCC Br. at 48). The Commission disagrees. First, OCC's claims overlook the other amendments to the application and provisions of the stipulation that were not included in Columbia's application: working with OPAE and member agencies to participate in the Home Performance Solutions Program; working with OPAE and member agencies to develop and execute community-based weatherization initiatives; partnering with MORPC's local government energy partnership program; setting the rebate for wi-fi learning thermostats to $75; discussing with IGS, RESA, and Staff methods to streamline the rebate process associated with Simple Energy Solutions; and providing energy usage data to the OHA on a more frequent basis (Co. Ex. 2 at 2). Further, the number of amendments to the application via the stipulation is not sufficient to demonstrate a lack of serious bargaining under the three-part test utilized by the Commission. As previously noted, Columbia's DSM programs evolve from a collaborative process with interested stakeholders and the programs have been approved by the Commission in two prior cases. For these reasons, the Commission is not persuaded that the number or magnitude of amendments to the application, as reflected in the stipulation, demonstrates a lack of serious bargaining.

{¶ 57} Columbia and Staff witnesses testified that each of the parties employs experts in the energy industry and was represented by experienced and competent counsel. Opposing intervenors do not challenge this aspect of the first criterion of the three-part test. The Commission finds, based on the record in these matters, that each of the parties to these proceedings is capable and knowledgeable with respect to regulatory matters and that each was represented by experienced counsel familiar with Commission proceedings. (Co. Ex. 2 at 3; Staff Ex. 1 at 3.)

{¶ 58} OCC asserts a lack of diversity among signatory parties, emphasizing that the parties to these cases that represent the interests of residential customers, specifically OCC, NOAC, and the NOAC Communities, are not signatories to the stipulation. Further, OCC submits that OPAE and MORPC represent only their business interests and, in fact, are one and the same entity.

{¶ 59} The three-prong test utilized by the Commission and recognized by the Ohio Supreme Court does not incorporate a diversity of interest requirement for signatory parties. The Commission has repeatedly determined that we will not require any single party, including OCC, or class of customers to agree to a stipulation in order to meet the first criterion of the three-part test. *In re FirstEnergy*, Case No. 14-1297-EL-SSO, Opinion and Order (Mar. 31, 2016) at 43; *In re Ohio Power Co.*, Case No. 14-1693-EL-RDR, et al., Opinion and Order (Mar. 31, 2016) at 52-53; *In re Vectren Energy Delivery of Ohio, Inc.*, Case No. 13-1571-GA-ALT, Opinion and Order (Feb. 19, 2014) at 10; *In re FirstEnergy*, Case No. 12-1230-EL-SSO, Opinion and Order (July 18, 2012) at 26, *citing Dominion Retail, Inc. v. The Dayton Power and Light Co.*, Case No. 03-2405-EL-CSS, et al., Opinion and Order (Feb. 2, 2005) at 18, Entry on Rehearing (Mar. 23, 2005) at 7-8.

{¶ 60} There is no evidence in the record that an entire class of customers was excluded from the settlement negotiations or that any particular entity who had moved to intervene was prohibited from participating in DSMSG meetings or denied the opportunity to discuss terms to be included in the stipulation before it was filed with the Commission. We note that, after the stipulation was filed and the intervention deadline had passed, ELPC filed its motion to intervene out of time and agreed to accept the record as it existed at that time, which included the stipulation.

{¶ 61} The Commission notes that OPAE is a signatory party to the stipulation. OPAE has described itself to the Commission as a "nonprofit organization representing the interest of over 60 nonprofits providing energy assistance to low income families throughout the state of Ohio" with the purpose "to promote affordable energy policies and preserve access to essential energy services for all Ohioans." In addition, the Commission recognizes that OPAE members operate bill assistance, weatherization, energy efficiency, and consumer education programs throughout Ohio.[12] On that basis, the Commission reasons that, while OPAE may have multiple interests, OPAE's ultimate clientele is primarily low- and moderate-income residential consumers and the Commission has previously considered OPAE an advocate on behalf of low- and moderate-income customers. *See, e.g., In re Ohio Power Co.*, Case No. 14-1693-EL-RDR, et al., Opinion and Order (Mar. 31, 2016) at 51-52; *In re FirstEnergy*, Case No. 12-1230-EL-SSO, Opinion and Order (July 18, 2012) at 26. The Commission also recognizes, as OCC points out, that MORPC is a member of OPAE. MORPC is a voluntary association of more than 60 governmental entities and regional organizations of rural, urban, and suburban communities throughout central Ohio within the Columbia service territory.[13] In its reply brief, MORPC acknowledges that it is a part of Columbia's WarmChoice® provider network. MORPC states, however, that OCC witness Haugh opines without any knowledge of MORPC's interests in these matters, including the scope of the organization's involvement in regional planning activities, the impact of future energy consumption, and funding.

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12 *In re Commission Review of Ohio Adm.Code Chapters 4901:1-17 and 4901:1-18*, Case No. 03-888-AU-ORD, Joint Comments (June 12, 2003) at 4; *In re Ohio Department of Development*, Case No. 08-658-EL-UNC, Motion to Intervene (July 9, 2008) at 3.

13 *In re Columbia*, Case No. 16-1309-GA-UNC, MORPC Motion to Intervene (July 14, 2016) at 4-5.

{¶ 62} In addition to OPAE and MORPC, the Signatory Parties include Columbia, Staff, IGS, RESA, and OHA. Staff, like the Commission, is charged with balancing the interests of ratepayers, including residential consumers, with the interests of the utility and other stakeholders. IGS is a retail natural gas supplier and member of RESA. RESA is an association for gas and electric retail energy suppliers, including competitive retail natural gas suppliers, operating in Ohio. OHA represents more than 230 hospitals and health systems operating in the state. The Commission again emphasizes that the test recognized by the Ohio Supreme Court does not incorporate a diversity of interest requirement for signatory parties. Nonetheless, in this instance, the Signatory Parties to the stipulation represent a variety of diverse interests.

{¶ 63} Accordingly, the Commission concludes all parties, signatory and non-signatory, were afforded the opportunity to participate in negotiations, the parties are proficient in the negotiation process, and sufficiently understands the matters at issue in these proceedings. For these reasons, the Commission finds that the stipulation meets the first criterion of the three-part test.

B. *Does the Settlement, as a Package, Benefit Ratepayers and the Public Interest?*

1. Signatory Parties' Positions

{¶ 64} Columbia offers that, over the lifetime of its DSM programs, the programs have saved customers over 60.7 billion cubic feet (Bcf) of natural gas, equating to an estimated total savings of $492 million. In addition to the natural gas savings, certain of the DSM programs also save electricity by reduced use of air conditioning through improved insulation and air sealing, and reduced use of furnace fans. Columbia states the DSM programs provide non-energy benefits and impacts beyond reduced energy consumption and utility bill savings, including carbon dioxide reductions, lower water and sewer bills, improvements in health and safety, job creation, and reduced customer arrearages. Further, the Company asserts non-participants benefit from the establishment of a network of trained service providers, an enhanced marketplace with access to state of the art energy conservation techniques, and reduced bad debt. Further, non-participating customers may benefit from reduced energy prices as a result of energy efficiency and from the positive environmental impacts and other societal benefits. (Co. Ex. 1 at 3, 5, 8.)

{¶ 65} Columbia emphasizes that the stipulation increases the level of natural gas savings over the level of the current DSM programs and the level proposed in the application. Further, Columbia points out that the savings levels must be exceeded, pursuant to the stipulation, to trigger the shared savings provision and, as such, Columbia reasons it is required to do more to maintain the current incentive structure. The Company declares the DSM portfolio is cost-effective with a total resource cost (TRC) score of 1.76. Columbia, MORPC, and OHA conclude the stipulation facilitates the continued conservation of natural gas, saves customers money, and improves customer safety and health. (Co. Ex. 1 at 24, Appendix B; Co. Ex. 3 at 2, 8-9.)

{¶ 66} Columbia witness Thompson testified that the stipulation benefits ratepayers and the public in that Columbia's DSM programs have saved customers energy, curbed carbon dioxide emissions, and provided important life saving measures. Columbia and its DSM contractors perform safety inspections as a part of the home energy audits, which, for the period 2012 through 2015, identified 745 gas leaks, 957 electrical wiring issues, and 5,403 venting issues. Ms. Thompson testified the financial impact of the stipulation on Columbia's customers would equate to approximately $1.60 per month for SGS rate customers, excluding shared savings (based on averaging the projected annual impact on SGS customer bills over the six-year-term divided by twelve months, $19.1566/12= $1.60). Further, the stipulation reduces the amount of the shared savings proposed by the Company in the application to approximately the level approved in the current DSM portfolio, with the additional program year grossed up for taxes. (Co. Ex. 2 at 8-9, 10.)

{¶ 67} Staff witness Williams endorses the continuation of Columbia's DSM programs, as a means to continue to encourage customers to conserve natural gas and to promote affordable service and safety (Staff Ex. 1 at 4). RESA endorses the stipulation, to the extent that it includes a rebate for the installation of learning thermostats. RESA believes the rebates for learning thermostats offered through the DSM program promote the installation and implementation of this specific energy efficiency measure and technology (RESA Ex. 1 at 5). RESA witness Keegan testified that learning thermostats with the proper functionality allow consumers to learn from their usage behavior, control the climate in the location remotely, display energy consumption in real-time, and adjust the temperature by sensing whether the home is empty. Further, RESA notes, as part of the stipulation, Columbia has agreed to engage in further discussions with RESA, IGS, and Staff to streamline and/or enhance the rebate process. RESA submits that improving the rebate process could encourage additional customers to participate in the rebate program and install learning thermostats. (RESA Ex. 1 at 5-6.)

2. **Opposing Intervenors' Positions**

a. ELPC, NOAC, and the NOAC Communities

{¶ 68} ELPC, NOAC, and the NOAC Communities recommend Columbia focus on smart thermostats as a part of the Simple Energy Solutions program. ELPC, NOAC and NOAC Communities suggest the amount of the rebate be increased to $100. Opposing intervenors would reduce the budget allocated to HE HVAC Rebates and Home Performance Solutions to accommodate rebates for 46,000 thermostats per year of the program. ELPC/NOAC witnesses testified that the heating and cooling of unoccupied spaces is one of the largest wastes of energy. ELPC/NOAC offered that smart thermostats can provide annual savings of 119 to 123 therms over manual thermostats and 53 to 72 therms over programmable thermostats. ELPC/NOAC note, based on Columbia's own numbers, HE HVAC rebates and Home Performance

Solutions programs produce far fewer savings per dollar spent (costs more per Mcf saved) than the Simple Energy Solutions program, which includes smart thermostat rebates. ELPC/NOAC recommend Columbia include a public education and marketing component to its DSM programs. Opposing intervenors argue their proposal is the best way to increase active participation in Columbia's DSM programs. (ELPC Br. at 4-5; ELPC/NOAC Reply Br. at 2; ELPC/NOAC Ex. 1 at 4-9; NOAC Ex. 1 at 5-7.)

{¶ 69} OCC opposes the recommendation of ELPC, NOAC, and the NOAC Communities. In OCC's opinion, the proposal is only a slight improvement to the stipulation to the extent that it would improve customer participation, and fails to address OCC's remaining concerns with Columbia's DSM portfolio. OCC asserts that ELPC, NOAC, and the NOAC Communities did not offer any evidence that their proposal will make the DSM portfolio cost-effective. Accordingly, OCC concludes the stipulation, even if modified as proposed by ELPC, NOAC, and the NOAC Communities does not benefit customers or the public interest. (OCC Br. at 54-55.)

{¶ 70} Columbia opposes the proposed expansion of its Simple Energy Solutions program by shifting $22 million in funding from other programs over the six-year term to increase the amount of the rebate, and fund additional thermostat rebates, as well as undertake a customer education campaign on smart thermostat technology and customer installation assistance, as ELPC, NOAC, and the NOAC Communities propose. Columbia notes that these intervenors did not identify the cost of their customer education proposal or the associated administrative cost and did not perform a cost-effectiveness calculation. Columbia asserts it is not necessary to increase the rebate for smart thermostats, as the Company jointly administers certain of its energy efficiency programs with the electric distribution utilities that operate in Columbia's service territory, Ohio Power Company d/b/a AEP Ohio (AEP Ohio) and the FirstEnergy Corporation electric distribution utilities, The Cleveland Electric Illuminating Company, The Toledo Edison Company, and Ohio Edison Company (jointly and collectively, FirstEnergy). According to Columbia, AEP Ohio currently offers and proposes to continue, through 2019, a smart thermostat rebate to its customers (Tr. II at 193), while FirstEnergy currently has a pending application before the Commission to offer a smart thermostat rebate of $100 (Tr. II at 225, 227). Accordingly, Columbia contends customers will be able to access additional rebates, likely to exceed at least $100, and, therefore, it is unnecessary to increase the rebate offered in the stipulation. (Co. Reply Br. at 49-50.)

{¶ 71} The Commission denies opposing intervenors' recommendation to increase the number of and the amount of the smart thermostat rebate. We note that ELPC witness Jewell testified a rebate of 30 percent to 50 percent of the thermostat price is likely sufficient to incent a customer to purchase a smart thermostat where the average price of such devices is approximately $250 (Tr. II at 227-228). As noted, electric distribution utilities offering service in Columbia's territory either currently offer or have proposed to offer a rebate on smart thermostats. As proposed, Columbia customers will be eligible to receive a rebate from Columbia of $75 or 30 percent of the average smart thermostat purchase price of approximately $250. The Commission finds a $75 rebate from Columbia to be sufficient. It is likely that customers will be eligible to receive a rebate from Columbia and through their electric distribution utility. We direct Columbia to work with AEP Ohio and FirstEnergy to ensure that customers are eligible to receive a rebate from both their gas and electric utilities, and, if applicable, their gas marketer, for the purchase of a smart thermostat and that customers are not prohibited from processing or receiving both rebates, preferably through a single application process. Further, the record does not include sufficient information of the cost-effectiveness of the Simple Energy Solutions program if revised as opposing intervenors recommend. Accordingly, we deny ELPC's, NOAC's, and the NOAC Communities' request to amend Columbia's DSM program, at this time. However, the Commission directs, over the term of Columbia's DSM programs approved pursuant to this Opinion and Order, that as Columbia determines any other DSM program within the DSM portfolio is not performing as projected and the program budget should be reduced or the program discontinued, the funds should be transferred to the Simple Energy Solutions program to first develop an education and marketing campaign, in conjunction with electric distribution utilities and gas marketers operating in Columbia's service territory, and then, if participation in Simple Energy Solutions exceeds Columbia's projections, to increase the number of rebates available from Columbia for smart thermostats.

b. OCC's Position

{¶ 72} OCC argues ten specific reasons why Columbia's DSM programs and the stipulation amending the application do not benefit Columbia's customers or the public interest and, therefore, do not meet the second prong of the three-part test.

i. Decreases in Consumer Consumption

{¶ 73} OCC argues that, despite Columbia's claims that its energy efficiency programs have helped customers reduce their natural gas consumption, the Company ultimately projects that by 2022 the average customer will consume slightly more natural gas, 80.87 Mcf in comparison to the current consumption of 80.80 Mcf. For that reason, OCC avers Columbia's customers should not be required to pay for energy efficiency programs that do not reduce the average amount of natural gas consumed. (OCC Br. at 7-8.)

{¶ 74} In response, OPAE states that OCC did not present any projection for the amount of gas the average customer would be using in 2022 without the benefit of the current DSM programs or the continuation of such programs. Without this information, OPAE argues OCC cannot say that the DSM program provides no benefit. (OPAE Reply Br. at 9-10.)

ii. Cost-Effectiveness

{¶ 75} OCC argues Columbia failed to present sufficient record evidence to support its claims that Columbia's energy efficiency programs are cost-effective. OCC contends Columbia presented in its application the cost-effectiveness test results without any other supporting data or information, including the assumptions used to reach the test results, calculations, descriptions of the various cost-effectiveness tests, testimony on how the cost-benefit analysis was performed, or any other details. OCC reasons that Columbia has failed to meet its burden of proof to substantiate the results of its cost-benefit analysis for its DSM programs. (OCC Br. at 8-9; Co. Ex. 1 at 24, Appendix B, Table 1; Co. Ex. 3 at 8.)

{¶ 76} Further, based on Columbia witness Laverty's cross-examination, OCC claims Columbia's cost-benefit analysis was flawed and the calculations were manipulated to bolster the cost-effectiveness of Columbia's proposed DSM programs. OCC surmises Columbia's cost-effectiveness analysis is incorrect to the extent that: (a) Columbia relied on U.S. Energy Information Administration (EIA) 2015 reference case data to develop its natural gas price projections rather than the 2016 reference case data, which was available when the stipulation was signed; (b) Columbia made adjustments to increase the EIA 2015 reference case projections to account for its retail price adjustments, PIPP rider, UEX rider, and excise tax rider, as well as a temperature balancing service adjustment and an adjustment to reflect higher prices for non-standard choice offer (SCO) customers. However, OCC declares that Columbia witness Laverty did not know whether the adjustments were reasonable or how certain adjustments were performed, and did not independently verify the adjustments. Accordingly, OCC avers the Commission cannot conclude that Columbia's cost-benefit analysis is reliable or accurate. Based on OCC's analysis, OCC submits the cost-effectiveness of Columbia's DSM portfolio is a TRC score of 0.91. (OCC Ex. 12 at 13-16; OCC Br. at 8-16.)

{¶ 77} Columbia avers the Commission provided gas utilities a set of guidelines to follow in the Ohio Technical Reference Manual, which the Company used to prepare the pending application. *In the Matter of Protocols for the Measurement and Verification of Energy Efficiency and Peak Demand Reduction Measures*, Case No. 09-512-GE-UNC (*Energy Protocols Case*), Finding and Order (Oct. 15, 2009), Entry on Rehearing (July 31, 2013). (Co. Ex. 3 at 8, Appendix B; Co. Ex. 1 at 24.) Columbia reasons that any utility that adheres to the guidelines in the Ohio Technical Reference Manual is afforded a presumption of reasonableness. In preparing its cost-effectiveness calculations, Columbia states it used the 2015 EIA final natural gas costs projections, the most up-to-date information available at the time its DSM application was filed. The Company states EIA did not release its preliminary 2016 projections until more than two weeks after Columbia filed its application. Columbia recognizes that the 2016 EIA preliminary natural gas costs projections were available before the stipulation was filed on August 12, 2016; however, Columbia declares that it would cause chaos if a utility was required to refile its application each time new projections were issued and OCC did not cite any proceeding where the Commission has required a utility to update its projections. Further, Columbia reasons that OCC's unsubstantiated claims regarding updated EIA information are based on the mistaken belief that newer projections are more accurate. Columbia offered testimony to refute the accuracy of EIA projections over time. (Co. Ex. 3 at 6, Att. E.)

{¶ 78} In regard to Columbia's determination of the avoided cost of gas for the cost-effectiveness test, Columbia reasons that the adjustments reflect the volumetric riders incurred by SGS customers and the effect of reduced consumption. Columbia states two adjustment charges are established by statute and by Columbia's tariff, specifically noting the excise tax rider, which is set pursuant to R.C. 5727.811(A), and the non-temperature balancing service adjustment, which evolves from Columbia's tariff. Columbia submits that the remainder of Columbia's calculation of the projections is reasonable and is a conservative estimate of the applicable rider rates. Specifically, Columbia explains that the Company's SCO and the Default Sales Service (DSS) rates change monthly, while the PIPP rider and the UEX rider change annually. Columbia estimated the rates for the aforementioned riders based on the recent history of applicable riders during the current DSM program, since 2012. Columbia explained its basis for the calculation of its CHOICE rate and states that its competitive supplier participation rates are publicly available on the Commission's website. The Company notes that, while OCC challenges the CHOICE supplier rate calculation, OCC failed to offer any evidence that the shopping rates for Columbia's service territory were incorrect or evidence to suggest Columbia's assumptions or calculations were not reasonable. (Co. Reply Br. at 26-33.)

iii. Inclusion of Non-Energy Benefits

{¶ 79} OCC argues that, for the first time, Columbia includes non-energy benefits in its cost-benefit analyses (Tr. II at 338). According to OCC, non-energy benefits should not be included in the TRC cost-benefit test, as this is the primary criterion relied on by the Commission to evaluate energy efficiency programs, and non-energy benefits are specifically excluded by rule. Ohio Adm.Code 4901:1-39-1(Q). Further, OCC offers that natural gas energy efficiency programs should help reduce customers' bills, non-energy benefits accrue to Columbia customers and non-customers alike, and the jobs allegedly created as a result of Columbia's DSM programs are speculative. Natural gas energy efficiency programs should only be approved, according to OCC, when the direct energy benefits outweigh the direct costs. (OCC Br. at 16-18.)

{¶ 80} Columbia reiterates that the rules in Ohio Adm.Code Chapter 4901:1-39 do not apply to natural gas DSM portfolio programs and notes that the Commission has previously recognized non-energy benefits as system-wide benefits of DSM and energy efficiency programs, including reduced greenhouse gas emissions, increases in Ohio jobs and payrolls, and a reduction in natural gas prices that will be enjoyed by all consumers. *In re Vectren Energy Delivery of Ohio, Inc.*, Case No. 05-1444-GA-UNC (*Vectren 2005 DSM Case*), Supplemental Opinion and Order (June 27, 2007) at 17, Concurring Opinion of Commissioners Paul A. Centolella and Valerie A. Lemmie at 1. Accordingly, Columbia reasons that OCC's suggestion that the Company should be required to conduct an analysis of the effects of its DSM portfolio programs on Ohio's unemployment rate exceeds any level of proof the Commission has previously required in a natural gas DSM filing and should not be imposed in these cases. Furthermore, Columbia notes that, as calculated by OCC witness Haugh, removing the non-energy benefits from Columbia's TRC cost-effectiveness calculation merely reduces the TRC score by 0.3, resulting in an overall TRC score of 1.46. (OCC Ex. 13, MPH Ex. 8; Co. Reply Br. at 16, 33-34.)

iv. Discount Rate

{¶ 81} Various cost-benefit analyses require the application of a discount rate. OCC asserts the discount rate utilized by Columbia was unjustifiably low in the calculation of the utility costs test, participant cost test, and TRC test, which has the effect of increasing the cost-effectiveness scores. OCC offered testimony that the Commission has concluded that a utility's weighted average cost of capital (WACC) is the appropriate discount rate under the TRC test and Columbia's after tax WACC is 8.12 percent. *Energy Protocols Case*, Finding and Order (Oct. 15, 2009) at Appendix C at 6. Therefore, OCC avers Columbia failed to present evidence to justify a different discount rate than its WACC or to support the discount rates utilized in its cost-effectiveness tests. Accordingly, OCC requests that the Commission reject Columbia's cost-effectiveness test on that basis. (OCC. Ex. 12 at 14; Tr. III at 432-436, 438-439 (Confidential); OCC Br. at 18-22.)

{¶ 82} OCC concludes that, if all of Columbia's cost-effectiveness calculations are revised, as OCC believes appropriate, Columbia's DSM programs would not be cost-effective. OCC calculates the TRC test score for Columbia's DSM portfolio to be

0.91, based on four adjustments, and, therefore, reasons Columbia did not meet its burden of proof to demonstrate that the DSM portfolio is cost-effective. Accordingly, OCC reasons Columbia's DSM portfolio does not benefit customers or the public interest and the stipulation fails part two of the three-part test and must be rejected. (OCC. Ex. 12 at 16, MPH Ex. 8; OCC Br. at 22-24.)

{¶ 83} According to Columbia, it offered its justification for the discount rates it used to perform its cost-effectiveness tests. Columbia avers that, while OCC challenges the discount rates used by the Company, OCC did not produce evidence that the rates were incorrect or unrepresentative, or cite to any Commission regulation or precedent that requires a specific discount rate be applied. Columbia notes that, according to the Lawrence Berkeley National Laboratory study attached to the testimony of Mr. Laverty, a lower discount rate recognizes more net present value for savings projected to occur in later years, which is important for typically long-lived gas efficiency measures. (Co. Ex. 3, Attachment A at 36; Tr. III at 428 (Confidential); Co. Reply Br. at 34-37.)

{¶ 84} Columbia declares that its pending DSM application includes the same level of information and details to support the cost-effectiveness of its DSM programs as provided in the Company's prior DSM applications, which were approved by the Commission. *2008 DSM Case*, Finding and Order (July 23, 2008); *2011 DSM Case*, Finding and Order (Dec. 14, 2011). Further, Columbia states it provided additional information and details regarding its cost-effectiveness calculations in discovery to any party that executed a confidentiality agreement (Tr. III at 394; OCC Ex. 4-8 (Confidential)). According to Columbia, the Commission has no specific filing requirements for natural gas DSM applications and, in light thereof, the Commission should find that Columbia presented sufficient information to meet its burden of proof in the pending matters. (Co. Reply Br. at 37-38.)

{¶ 85} OCC emphasizes that only Columbia's SGS rate class incurs the Company's DSM rider rate but all customers, including large commercial and industrial customers, may participate in Columbia's DSM programs and receive rebates. Large commercial and industrial customers are served via Columbia's General Services and Large General Services rate classes. OCC specifically notes that Columbia offers three DSM programs for commercial and industrial customers, Innovative Energy Solutions, Energy Design Solutions, and U.S. EPA Portfolio Manager. OCC reasons that it is unjust and unreasonable to allow customers that do not pay for the DSM programs to receive benefits from the programs and, therefore, the Commission should find that the stipulation is not in the public interest. In the alternative, OCC argues that, if the Commission elects to approve the stipulation, the stipulation should be modified to: (a) either require all customer classes to pay the DSM rider or prohibit customers that are not in the SGS rate class from participating in the energy efficiency programs; and (b) establish a cap on the total rebate amount that can be received by a single customer. (OCC Br. at 25-29.)

{¶ 86} Columbia reasons that OCC's criticism of Innovative Energy Solutions is misguided as the program offers prescriptive rebates for specified energy efficiency measures, custom audits, and specified energy conservation measures to non-profits, houses of worship, schools, hospitals, municipal buildings, and businesses. However, Columbia reasons that natural gas savings that result from this program benefit all the Company's customers. Columbia states that it imposes a per meter limit on the rebates under the Innovative Energy Solutions program. The Company notes that, although only 166 customers participated in the program from 2012 through 2015, the projected lifetime savings from those customers' projects is over three million Mcf and, furthermore, Columbia emphasizes that the program is cost-effective. Columbia declares that, while OCC advocates that the incentives for the Innovative Energy Solutions program be substantially reduced and that customers who do not pay the DSM rider be prohibited from participating in DSM programs, OCC's witnesses did not offer any support for these recommendations and OCC's initial brief does not cite any evidentiary support for these recommendations. Therefore, Columbia reasons that, given the success of the program, its cost-effectiveness, and the lack of witness testimony opposing the program, the Commission should allow the program to continue as provided in the application and stipulation. (Tr. III at 390 (Confidential); Co. Ex. 1 at 4, Table 1, 9, Table 2, 14.)

{¶ 87} OCC argues that Columbia's EfficiencyCrafted Homes program is budgeted to pay $19.7 million to home builders over the six-year term. OCC points out that the rebate is not paid directly to the customer that ultimately buys the home; the builder receives one rebate for every single home that meets Columbia's requirements; there is no limit to the number of rebates a builder can receive; the builder is not required to pass any portion of the rebate to the purchaser of the home; and there is no requirement that the builder be a Columbia customer or be located in Columbia's service territory or in the state of Ohio. In this application, Columbia requests to expand the program to include an additional per home incentive to recruit additional home builders to the program. OCC argues Columbia should be prohibited from offering additional incentives to recruit new home builders at customer expense. OCC asserts this DSM program has little to nothing to do with energy efficiency and should be rejected by the Commission on the basis that it is not in the public interest. Further, if the stipulation is approved, OCC recommends the Commission should, at a minimum, modify the dollar amount of the rebates offered and cap the number of rebates that a single home builder can receive. (Co. Ex. 1 at 12, Appendix B, Table 3; OCC Br. at 27-29; Tr. II at 316, 364.)

{¶ 88} Columbia responds that the Commission has previously encouraged other natural gas utilities to develop energy efficiency programs that capture what otherwise would become lost opportunities to achieve efficiency improvements in new buildings. *In re Dominion East Ohio,* Case No. 07-829-GA-AIR, et al., Opinion and Order

(Oct. 15, 2008) at 23; *In re Vectren Energy Delivery of Ohio, Inc.*, Case No. 07-1080-GA-AIR, Opinion and Order (Jan. 7, 2009) at 13. Columbia, in collaboration with AEP Ohio, offers the EfficiencyCrafted Homes program to encourage builders to exceed state energy code minimum levels to conserve electricity and gas. To increase participation in this program, Columbia proposes, as a part of this application, to offer an additional per home incentive to new builders to the program. Columbia states the EfficiencyCrafted Homes program is one of the most effective in conserving natural gas as the 7,565 homes constructed under the program from 2012 through 2015 are expected to result in over 5.7 million Mcf of natural gas savings over the life of the homes (Co. Ex. 1 at 9, Table 2, 11-12). Columbia states it is irrelevant that the home builder, rather than the homeowner, receives the incentive and further reasons there is no practical way to determine whether the home builder passes any portion of the rebate onto the purchaser of the home. Columbia reasons that homes that are 30 percent more efficient than codes require save Columbia customers' money on their natural gas bill over the life of the building and reduce aggregate natural gas usage leading to numerous system-wide benefits. For these reasons, Columbia avers it is in customers' interest and the public's interest to provide builders with incentives to build more energy efficient homes and to encourage greater participation in the EfficiencyCrafted Homes program without regard to the builder's location or how much the builder participates in the program. (Co. Reply Br. at 44-46; Tr. at 317-318, 388 (Confidential); Co. Ex. 1 at 4, Table 1, 9, Table 2.)

v. Participation Rates

{¶ 89} OCC argues that only three percent of Columbia's customers actively participated in the energy efficiency programs each year from 2012 through 2015, excluding the Home Energy Reports. As described by Columbia, Home Energy Reports are informational reports comparing the customer's energy usage to the energy usage of similar homes but do not require any action from the customer to reduce consumption. OCC argues Columbia budgets $1.7 to $1.8 million per year for the Home Energy

Reports and the budget for WarmChoice® is about $14.3 million but reaches only approximately 2,000 customers each year. OCC avers that Columbia's energy efficiency programs take money from 97 percent of its customers to subsidize programs for the few customers that actively participate each year at a cost of $31.5 million, excluding the Home Energy Reports. OCC submits it is unjust and unreasonable to allow large commercial and industrial customers to participate in DSM programs and receive rebates when such customers are exempt from paying the DSM rider or shared savings. Accordingly, OCC contends Columbia's DSM programs are not in the public interest and asks that the Commission reject the stipulation in the same fashion it rejected the stipulation in a prior DSM case involving Vectren Energy Delivery of Ohio, Inc. *Vectren 2005 DSM Case*, Opinion and Order (Sept. 13, 2006) at 12-13. In the event that the Commission approves Columbia's application to continue its DSM programs, OCC urges the Commission to only approve the continuation through 2017 and direct Columbia to work with the DSMSG to develop a plan to wind down the non-low income programs and convert them to programs that target low- and moderate-income customers with the conversion to be completed by December 31, 2019. (Co. Ex. 1 at 12-13, 24-25; OCC Ex. 9 at 7, 23; OCC Br. 29-33.)

vi. WarmChoice®

{¶ 90} Further, OCC argues Columbia's participation rates for WarmChoice®, its low-income weatherization assistance program, are low, as less than one percent of the approximately 230,000 low-income customers in the Company's service territory participate each year at an average cost of $7,000 per customer served. In comparison, OCC notes that the federal home weatherization assistance program offered in Ohio has a cost per unit of $2,512 in comparison to the $7,000 spent by Columbia. Accordingly, OCC recommends that the Commission direct Columbia to work with its DSMSG to maximize the number of energy efficiency measures provided to low-income Ohioans each year and to reduce the amount spent per home to increase the number of customers receiving benefits. To that end, OCC recommends Columbia's

WarmChoice® program continue as planned for 2017 and that Columbia be directed to work with OCC and its DSMSG to modify the program or develop a new low-income program that decreases the amount spent per customer, as well as maximizes the number of energy efficiency measures provided to low-income customers and competitively bids Columbia's low-income programs. Further, OCC recommends that, starting in 2018, the cost of non-energy efficiency repairs for WarmChoice® customers should not be included in the cost of the program. Finally, OCC recommends that Columbia should coordinate with the HeatShare and Fuel Fund programs to inform customers about the availability of the Company's energy efficiency programs. (OCC Br. at 33-35.)

vii. Non-Participant Benefits

{¶ 91} Further, OCC alleges that non-participating Columbia customers do not benefit from the DSM program and that Columbia, despite its statements otherwise, failed to provide evidentiary support that non-participants, 97 percent of its customers, benefit from the energy efficiency programs. OCC asserts that Columbia witness Laverty merely attached, without further explanation or description, two studies regarding non-participant benefits of gas energy efficiency programs. OCC notes that Mr. Laverty admits he did not perform any analysis to verify the accuracy of the studies attached to his testimony. In contrast, OCC asserts that Mr. Haugh offered and substantiated his testimony that natural gas energy efficiency programs do not offer corresponding system-wide benefits for natural gas customers, which is consistent with Staff's testimony offered in a prior Commission case in 2006. *See Vectren 2005 DSM Case*, Opinion and Order (Sept. 13, 2006) at 10, 12-13. OCC avers there is no basis in the record on which the Commission can conclude that Columbia's energy efficiency programs provide any benefits to non-participants and, therefore, the DSM programs are not in the best interest of customers or public policy. (OCC Br. at 35-38; OCC Ex. 12 at 12.)

{¶ 92} Columbia reasons that OCC's rationale regarding active participation levels is flawed. Columbia notes that OCC excluded from its calculations customers who actively participated in the Company's energy efficiency programs, including WarmChoice®, prior to 2012, and the 430,000 customers that receive Columbia's Home Energy Reports each year, which equates to approximately 30 percent of Columbia's customers. Columbia reasons that, while Home Energy Report participants are not required to do so, participants have actually reduced their natural gas consumption from 2012 to 2015, and have reduced their consumption over the duration of the program by 753,261 Mcf (Co. Ex. 1 at 4). Columbia reasons, if three percent of its customers continue to actively participate in its DSM programs, excluding the Home Energy Reports program, then one in three customers, or approximately 33 percent, will have participated between 2012 and 2022. The Company notes that a participation rate of 33 percent is significantly more than the one percent the Commission found insufficient in the *Vectren 2005 DSM Case* cited by OCC.

{¶ 93} Further, Columbia reasons, contrary to OCC's assertions, the Commission has recognized more than the direct cost savings benefits for participating customers in gas DSM programs. The other benefits of gas DSM programs, like Columbia's, include reduced greenhouse gas emissions, increased employment rates, and natural gas price reductions as a result of reduced demand. Further, Columbia reasons current low natural gas prices do not justify dismantling or discontinuing Columbia's DSM program as DSM programs provide a hedge against future price volatility. (Co. Ex. 3 at 6.)

viii. Six-Year Term of DSM Portfolio

{¶ 94} Columbia notes that the Commission approved its current DSM portfolio for a term of five years and there are certain synergies and efficiencies associated with a six-year term, including: (a) aligning the DSM program term with the Infrastructure Replacement Program (IRP) rider filings, as the two riders have been considered and reviewed together over the past years; (b) reduced administrative burden and costs, including bidding the programs through the supply chain; (c) sub-contractors benefit from longer timeframes to develop business plans and assure employment; and (d) stability of the programs for customers. While Columbia admits the DSM portfolio and IRP are not programmatically linked, the riders have been annually reviewed together, which is efficient for both Columbia and Staff. Also, Columbia reasons that the longer DSM term can result in cost savings with contractors. (Co. Ex. 3 at 6-7.)

{¶ 95} OCC argues that none of the reasons offered by Columbia justifies a six-year term for its DSM portfolio. OCC states Columbia has filed the DSM rider and IRP rider in a single filing and there is no reason why the Company cannot continue to file its rider application in this way if the DSM portfolio program is approved for a term of less than six years. Therefore, OCC contends the Commission should give no weight to the DSM/IRP justification offered by Columbia. OCC declares the remaining reasons offered by Columbia to justify a six-year term are speculative and no evidence was admitted to support such claims. OCC notes Columbia admits that, under its previous DSM portfolio with a term of three years, the Company was able to secure contractors for each of its programs. Further, OCC indicates that Columbia has not provided any evidence that a DSM term of six years will result in lower contract implementation costs or facilitate the Company's ability to secure vendors or to maintain relationships with its stakeholders. OCC advocates for a three-year term to allow the Commission to reevaluate the DSM programs on a shorter timeframe to protect customers from paying for programs that need to be modified, reduced, or eliminated as a result of the current market or industry best practices. Thus, OCC concludes the Commission should give no weight to any of the reasons offered by Columbia to extend the term of the DSM programs beyond three years. (OCC Br. at 40-42.)

{¶ 96} ELPC, NOAC, and the NOAC Communities also endorse a three-year term for the DSM portfolio for flexibility to respond to the market without locking in the utility (ELPC/NOAC Ex. 1 at 15, 16; Tr. II at 196, 216). Further, ELPC, NOAC, and the NOAC Communities propose that the three-year period should be used to address the issues identified by ELPC, NOAC, the NOAC Communities, and OCC, consistent with electric energy efficiency plans, and to prepare an improved, up-to-date DSM plan that reflects then available technology. These intervenors assert that Columbia has failed to refute the arguments raised against a six-year DSM program. (ELPC/NOAC Br. at 13; ELPC/NOAC Reply Br. at 3-4; Tr. at 242.)

ix. Competitive Bidding of DSM Contractors

{¶ 97} Columbia states that it plans to competitively bid some but not all of its proposed energy efficiency programs (Tr. II at 303, 306). OCC notes that Staff has advocated for competitive bidding for energy efficiency programs as a way of maximizing savings on the cost of programs. OCC notes that four of Columbia's WarmChoice® contractors, COAD, GLS, MORPC, and NWT, are OPAE members and are not selected by a competitive bid process (Tr. II at 308). OCC reasons that Columbia's opposition to competitively bidding WarmChoice® vendors is based on general statements unsupported by record evidence. OCC states Columbia, as a program administrator, has a duty to ensure that customers are not paying more than necessary for program services and, therefore, the Company has not presented any justification for declining to competitively bid WarmChoice® or the other programs in its DSM portfolio. (OCC Br. at 42-44.)

x. Shared Savings

{¶ 98} OCC asserts that, while the stipulation states the shared savings will be $4.5 million, customers will actually pay $6.9 million, the equivalent of $4.5 million grossed up for taxes, over the six years of Columbia's DSM program. OCC notes that, under the current DSM program, Columbia received $3.9 million in shared savings over the five-year term without any gross-up for taxes. Comparing the current DSM shared savings provision to the proposed shared savings provision, on an annual basis, OCC emphasizes that there is a 47 percent increase, or $780,000 per year compared to $1,150,000. OCC advises that such a large increase is excessive and should be rejected by the Commission. (Tr. I at 48-49; OCC Br. at 44-45.)

{¶ 99} In its reply brief, Columbia explains that, under its currently approved DSM program, Columbia's shared savings are determined based on the programs achieving at least 75 percent of the projected program impacts at its prorated budgeted cost level. The shared savings incentive increases if the overall DSM program exceeds projected impacts at the budgeted costs. However, total recovery under the shared savings incentive is capped at $3.9 million over the five-year term of the Company's current programs. *2011 DSM Case,* Finding and Order (Dec. 14, 2011) 4, 6. In its pending DSM application, Columbia proposed to include non-energy benefits, add incentives for savings above 110 percent of projected impacts, increase the percentage the Company could earn from 8.5 percent to 10 percent if the program achieved 125 percent of the projected program impacts, increase its annual savings targets, and cap the shared savings incentive for the six-year term at $10 million, grossed up for taxes. The stipulation eliminates non-energy benefits, revises the incentive performance levels to require the Company to achieve 100 percent of savings targets, and reduces the cap to $4.5 million, excluding taxes, from the $10 million proposed by Columbia. Accordingly, Columbia posits that the stipulation benefits ratepayers and the public interest and should be approved by the Commission. (Co. Ex. 1 at 17-19; Joint Ex. 1 at 3.)

xi. Other Miscellaneous Arguments

{¶ 100} OCC argues that three of the proposed energy efficiency programs, On-line Audit, Energy Design Solutions, and EPA Portfolio Manager, are projected not to result in any energy savings and did not result in any natural gas savings from 2012 through 2015. OCC points out that these three programs would cost customers a total of $5.74 million over the proposed six-year term of the DSM program. OCC reasons that it is neither in the public interest nor the interest of customers to pay for programs that have not and will not help customers reduce their natural gas usage and, therefore, OCC recommends that the Commission not approve the On-line Audit, Energy Design Solutions, or the EPA Portfolio Manager programs as part of Columbia's DSM portfolio. (OCC Br. at 45-46.)

{¶ 101} In addition, OCC argues, pursuant to the rules in Ohio Adm.Code Chapter 4901:1-39, a utility is required to evaluate its energy efficiency programs. OCC reasons that Columbia failed to evaluate its DSM programs or to consider alternatives to amend its current programs. OCC notes that Columbia admits that it did not consider any new DSM programs as a part of its application, or reevaluate the energy efficiency measures installed under the WarmChoice® program (Tr. II at 278, 299-300). As such, OCC holds that Columbia's DSM programs do not benefit its customers or the public interest and the stipulation should be rejected. (OCC Br. at 38-40.)

{¶ 102} Further, OCC reasons that one effect of historically low natural gas prices, which are projected to remain relatively low through 2040, is the reduced benefits of the energy efficiency programs (OCC Ex. 12 at 11). OCC encourages the Commission to consider the reduced value of the DSM programs in light of the current and projected low natural gas prices. OCC asserts it is unjust and unreasonable to require the majority of Columbia's customers to subsidize energy efficiency programs for the three percent of customers who actively participate, especially in an era of low gas prices where the value of such energy efficiency programs is significantly reduced. (OCC Br. at 46-47.)

{¶ 103} ELPC/NOAC argue that Columbia's natural gas savings target is ten percent lower than the savings target the Company achieved in 2015 and, therefore, there is little risk to the Company that the target will be reached (Co. Ex. 1 at 18; ELPC/NOAC Br. at 12).

{¶ 104} On the other hand, ELPC/NOAC reason that, in times of low gas prices, energy efficiency measures and DSM programs should be encouraged because customers may have money in their budget to purchase or install energy efficiency measures and DSM programs, such as a smart thermostat or weatherization, that can protect the customer when gas and energy prices rise (Tr. II at 210-211). For this reason, ELPC/NOAC reason now is a good time to encourage rather than cancel, as OCC requests, Columbia's DSM programs. (ELPC/NOAC Reply Br. at 4.)

c. Commission Decision on the Second Prong of the Three-Part Test.

{¶ 105} Columbia and the other Signatory Parties submit that the application, as modified by the stipulation, benefits Columbia's ratepayers and the public interest in natural gas savings of approximately $492 million based on over 60.7 Bcf of natural gas saved, reductions in electricity usage, environmental improvements, utility bill savings, reductions in customer arrearages, improvements in health and safety, and job creation. The bill impact of Columbia's proposed DSM programs is estimated to be $1.60 per month for SGS customers. (Co. Ex. 1 at 3, 5, 8; Co. Ex. 3 at 2, 8-9; Staff Ex. 1 at 4; RESA Ex. 1 at 5-6.)

{¶ 106} OCC opposes the stipulation and challenges whether the stipulation benefits Columbia's ratepayers or the public interest in numerous respects. In evaluating Columbia's application, as modified by the stipulation, for compliance with the second prong of the three-part test, we emphasize that the Commission considers the stipulation as a package. The Commission notes the rules at Ohio Adm.Code Chapter 4901:1-39 apply to electric energy efficiency programs and the Commission has not adopted parallel provisions applicable to natural gas energy efficiency programs. Ohio Adm.Code 4901:1-39-02 specifically provides that the purpose of the chapter is to establish rules for the implementation of electric utility programs. The Commission did, however, issue a set of guidelines for gas utilities to follow in the development of their energy efficiency programs. *Energy Protocols Case*, Finding and Order (Oct. 15, 2009), Entry on Rehearing (July 31, 2013).

{¶ 107} In support of its testimony that natural gas energy efficacy programs do not provide system-wide benefits to non-participants, OCC relied on the testimony Staff presented in the *Vectren 2005 DSM Case* to substantiate OCC's position. In the *Vectren 2005 DSM Case*, the Commission ultimately approved the April 2006 stipulation, with certain modifications, despite Staff's arguments regarding gas DSM programs. *Vectren 2005 DSM Case*, Case No. 05-1444-GA-UNC, Opinion and Order (Sept. 13, 2006).[14] The Commission is not bound to the position advocated by Staff in any proceeding. It is axiomatic that the Commission speaks through its orders.

{¶ 108} For almost a decade, the Commission has approved gas DSM programs that produce demonstrable benefits, reasonably balance total costs, and minimize the impact to non-participants. *Vectren 2005 DSM Case*, Opinion and Order (Sept. 13, 2006); *In re Dominion East Ohio*, Case No. 07-829-GA-AIR, et al., Opinion and Order (Oct. 15, 2008) at 22-23; *In re The Cincinnati Gas and Electric Co.*, Case No. 95-656-GA-AIR, Opinion and Order (Dec. 12, 1996); *2008 Distribution Rate Case*, Opinion and Order (Dec. 3, 2008) at 10; *Vectren 2005 DSM Case*, Supplemental Opinion and Order (June 27, 2007); *In re Vectren Energy Delivery of Ohio, Inc.*, Case No. 14-747-GA-RDR,

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[14] While OCC was initially a signatory party to the April 2006 stipulation in the *Vectren 2005 DSM Case*, OCC subsequently filed a notice of termination and withdrawal. A second stipulation was filed in the case on December 21, 2006. By Supplemental Opinion and Order issued June 27, 2007, the Commission approved the December 2006 stipulation.

Finding and Order (May 28, 2014). The Commission continues to find value in Ohio's gas distribution utilities offering DSM programs. The record in these proceedings, as characterized by OCC, is insufficient to justify the elimination of Columbia's DSM programs or any individual DSM program, at this time. We note that natural gas prices are currently at historic lows and are projected to remain low through 2040 (OCC Ex. 12 at 10-11, MPH Ex. 2). We recognize that, while the current low price of natural gas is unlikely to incent a customer to install or implement energy conservation measures, such programs need to be continuously encouraged. Even ELPC/NOAC, who oppose the stipulation, advocate that energy efficiency measures and DSM programs be encouraged, in times of low gas prices, because customers may have money in their budget to purchase or install energy efficiency measures and DSM programs that can protect the customer when gas and energy prices rise (Tr. II at 210-211). Further, the Commission recognizes that certain of Columbia's DSM programs involve measures that provide long-term energy conservation benefits that may accrue over decades, such as the construction of energy efficient homes, weatherization, and the installation of furnaces and boilers, hot water heaters, and other energy efficient appliances (Co. Ex. 1 at 9). Accordingly, the Commission finds this period of low gas prices may present a particularly appropriate time to encourage and incentivize customer participation through the DSM programs.

{¶ 109} Further, two of the factors presented by OCC as justification that Columbia's DSM programs, as modified by the stipulation as a package, do not benefit ratepayers or the public interest are unpersuasive -- the expected decrease in energy consumption as compared to the current consumption and program participation levels. OCC notes that, according to the application, the average customer will consume slightly more natural gas in 2022, 80.87 Mcf, as compared to the current consumption level of 80.80 Mcf. On that basis, OCC concludes that Columbia's customers should not be required to pay for energy efficiency programs that do not reduce average natural gas consumption. As noted before, the historically low cost of natural gas is less likely to incent consumers to install energy conservation measures without some incentive or rebate. Indeed, customers are probably less likely to be conscientious of their energy consumption when prices are low. For these reasons, the Commission is not persuaded that, because Columbia's DSM programs are not projected to reduce average customer natural gas consumption by 2022, in comparison to the current level, the DSM programs should be discontinued. The Commission believes low natural gas prices adversely affect program participation rates. The Home Energy Reports program is a cost-effective means to provide customers energy efficiency and conservation information and to facilitate the customer's informed choice to install energy efficiency devices.

{¶ 110} Although Columbia presented only the results of its cost-effectiveness test in its application, the Company also offered a witness to substantiate its calculations, assumptions, and methodology and responded to discovery requests supporting its cost-effectiveness scores. Columbia met its burden to demonstrate the results of its cost- benefit analysis for the DSM programs.

{¶ 111} OCC challenges Columbia's cost-effectiveness analysis, calculations, inputs, and methodology. As previously noted, the rules in Ohio Adm.Code Chapter 4901:1-39 are applicable to electric utility energy efficiency programs, not gas energy efficiency programs. The Commission enacted guidelines for natural gas utility programs. *Energy Protocols Case,* Finding and Order (Oct. 15, 2009), Entry on Rehearing (July 31, 2013). Pursuant thereto, gas utility applicants that follow the guidelines in the Ohio Technical Reference Manual are afforded a presumption of reasonableness. *Energy Protocols Case,* Finding and Order (Oct. 15, 2009), Entry on Rehearing (July 31, 2013) at 11. Any party to the case may, however, challenge that presumption.

{¶ 112} OCC argues that Columbia's cost-effectiveness calculations are incorrect and four adjustments are necessary to correct the calculations. According to OCC witness Haugh, Columbia's TRC score should be revised to: (1) reflect the 2016

EIA price forecasts, (2) implement an 8.12 percent discount rate, (3) eliminate non-energy benefits, and (4) revise the CHOICE price adjustments. In total, OCC's adjustments reduce the TRC score for Columbia's DSM programs to 0.91, where a score of less than one is defined not to be cost-effective (OCC Ex. 12 at MPH Ex. 8).

{¶ 113} The Commission rejects OCC's assertion that the Company should have updated its 2015 EIA natural gas costs projections, included in the application filed June 10, 2016, with the 2016 reference case data. The 2015 EIA natural gas cost projections were the most recent projections available when the application was filed on June 10, 2016. The 2016 reference case data was not released until after the application was filed but prior to the filing of the stipulation on August 12, 2016. While the 2015 EIA natural gas cost projections through 2022 are somewhat higher, approximately 16 percent, than the 2016 EIA price forecast, the projections are just that, projections, and even the most reliable projections may be proven wrong in the future, particularly over extended periods of time (OCC Ex. 12 at 10-11; $5.03/MMBTU as compared to $6.00/MMBTU). The record evidence does not conclusively establish the accuracy of either set of information over the other EIA projections. Furthermore, this factor of the cost-effectiveness calculation, as adjusted by OCC witness Haugh, would reduce Columbia's TRC score by 0.28, from 1.76 to 1.59 for the DSM portfolio (OCC Ex. 12 at MPH Ex. 8). The Commission rejects OCC's declaration that the 2016 EIA price forecast is more accurate, based on the information presented in this record, than the 2015 natural gas price projections and, therefore, needed to be used in Columbia's calculation of its TRC test as the appropriate projections to be implemented in an update to Columbia's DSM application or to the stipulation. The total of OCC's remaining three adjustments, if accepted by the Commission, would reduce the portfolio TRC test score by 0.68, to 1.09 (OCC Ex. 12 at MPH Ex. 8). Therefore, we find consideration of the remaining cost-effectiveness adjustments recommended by OCC are not pivotal to our decision and need not be addressed further.

{¶ 114} OCC directly contests certain of Columbia's DSM programs, including Innovative Energy Solutions, EfficiencyCrafted Homes, and Home Energy Reports. Columbia's DSM programs address energy conservation and efficiency through a variety of programs for residential and commercial customers, including the Innovative Energy Solutions program for commercial customers. OCC did not offer sufficient record evidence to justify limiting customer participation in Columbia's DSM program to only Columbia's SGS rate class or to support the reduction or further limitation of the rebates and incentives offered under the program. However, the Commission is ever mindful of the cost impact to customers for the DSM programs and, to that end, directs that, as a part of the next annual audit of Columbia's DSM programs and/or DSM rider, a comprehensive review of the rebates and incentives awarded to participants in each DSM program be conducted.

{¶ 115} The Commission finds that Columbia's EfficiencyCrafted Homes program is an effective method to encourage the construction of energy efficient homes in Columbia's service territory. Homes can exist for decades, if not longer, and installing energy efficient and conservation measures during construction can provide long-term savings for the resident. The key factor is that the home is located within Columbia's service territory and the customer is served by Columbia. The Commission finds OCC has not presented any convincing justification to limit the number of incentives or rebates or to modify the amount of the incentive or rebate a builder may receive under the Efficiency Crafted Home program. We are concerned that limiting the number of incentives or modifying the amount of the incentives, as OCC recommends, may have the adverse effect of causing builders to forgo installing energy efficiency and conservation measures in new homes. However, Columbia has requested to revise the EfficiencyCrafted Homes program to include an additional per home incentive to attract new builders. The Commission finds that Columbia has failed to present sufficient evidence that an additional incentive is needed to induce new home builders to participate in the program, particularly in light of the fact that the incentive or rebate is paid directly to the builder; the Commission has not altered the builder incentives or rebates, as requested, in these proceedings; and there is no feasible way to determine, as Columbia admits, whether the incentives or rebates are passed on to the purchaser of the home. We note that the record demonstrates that, for the period 2012 through 2015, over 70 home builders participated in the program to construct 7,565 homes, with four builders constructing more than half of the homes, specifically 4,194 homes, and receiving rebates or incentives (OCC Ex. 3). Accordingly, the Commission denies this provision of Columbia's DSM application and directs that any new builder incentive be deducted from the projected budget for the term of the DSM program.

{¶ 116} We find the Home Energy Reports program is a low-cost means to inform customers of their energy consumption, particularly customers with the discretionary income to install energy efficiency and conservation measures. The Home Energy Reports program can make customers more sensitive to their energy usage, in comparison to other similarly sized residences, and may entice customers to install energy efficiency devices or implement conservation measures.

{¶ 117} Opposing intervenors challenge the shared savings provision of the stipulation. The adjustments to the shared savings incentives, as reflected in the stipulation, are a reduction to the incentives proposed by the Company in its DSM application. The Commission notes that the shared savings provision in the stipulation, whether grossed up for taxes or not, reflects a reduction in the cap and also requires that the Company achieve 100 percent of the savings target rather than 75 percent.

{¶ 118} DSM energy efficiency programs are to be based on a balancing of benefits in comparison to the cost incurred by Columbia's customers. Based on the record in these matters and after considering Columbia's application, as modified by the stipulation and as further modified by this Opinion and Order, the Commission finds that the stipulation, as a package, benefits ratepayers and the public interest.

{¶ 119} The Commission reminds Columbia, and all jurisdictional natural gas utilities that offer energy efficiency programs and recover the associated costs from ratepayers, that each has a duty, as the administrator of such programs, to ensure that its ratepayers incur and pay only reasonable and prudently incurred DSM charges. The annual audit of gas DSM programs and riders may include, among other matters, a requirement that Columbia demonstrate that costs passed through the rider for services received are accurate and no more than appropriate. Further, the Commission shall review the DSM programs for cost containment and control, including whether or not a competitive bid should be issued for contracts or services, as well as a review and evaluation of the rates charged by DSM program vendors/contractors to ensure that they are within the range of reasonableness for comparable services in the area.

C. Does the Settlement Package Violate Any Important Regulatory Principle or Practice?

1. Signatory Parties' Position

{¶ 120} Columbia witness Thompson testified that the stipulation does not violate any important regulatory principle or practice and that natural gas DSM programs have a long history in Ohio. According to the witness, Columbia's DSM programs, as they currently exist, have been in existence for almost eight years, and WarmChoice® has benefited customers for almost 33 years. Ms. Thompson stated Columbia is not requesting significant programmatic changes to its DSM programs in this application and notes that the Commission previously found its DSM portfolio to be reasonable. (Co. Ex. 2 at 11.)

{¶ 121} Further, Staff witness Williams testified that, based on her involvement in these proceedings and review of the stipulation, she believes that the stipulation complies with all important and relevant regulatory principles and practices (Staff Ex. 1 at 3).

2. OCC's Position

{¶ 122} OCC argues that Ohio law does not authorize or require natural gas energy efficiency programs. Accordingly, OCC submits the Commission is not bound or enabled by statute to approve customer funding for Columbia's DSM programs. Nonetheless, OCC suggests that, if the Commission elects to permit gas energy efficiency programs, the Commission should be guided by its electric energy efficiency rules, specifically referring to Ohio Adm.Code 4901:1-39-01(F). To that end, OCC argues Columbia failed to demonstrate that its DSM programs, as a whole, are cost-effective under the TRC test, excluding non-energy benefits. Further, OCC reasons, consistent with Ohio Adm.Code 4901:1-39-04(B), Columbia's energy efficiency programs that are not cost-effective under the TRC test shall provide substantial non-energy benefits, which OCC asserts Columbia has failed to demonstrate. (OCC Br. at 52-53.)

{¶ 123} Columbia, Staff, and OPAE aver the stipulation comports with Ohio law and policy, as well as Commission precedent. R.C. 4905.70 and 4929.02(A)(12). Columbia offers that, for more than 20 years, the Commission has endorsed DSM programs, declaring that, if cost-effective gas DSM programs are proposed by an Ohio gas utility, cost recovery will be considered on a case-by-case basis. *In re the Commission-Ordered Investigation Into Gas Integrated Resource Planning*, Case No. 94-526-GA-COI, Opinion and Order (Oct. 20, 1994). Columbia and the other Signatory Parties note that the Commission has repeatedly authorized natural gas utilities, including Columbia, to establish and recover at least a portion of the costs of their DSM programs. *In re The Cincinnati Gas and Electric Co.*, Case No. 95-656-GA-AIR, Opinion and Order (Dec. 12, 1996); *2008 Distribution Rate Case*, Opinion and Order (Dec. 3, 2008) at 10; *Vectren 2005 DSM Case*, Opinion and Order (Sept. 13, 2006) at 13 (recognizing that conservation and energy efficiency should be an integral part of natural gas policy but denying the stipulation), Supplemental Opinion and Order (June 27, 2007) at 17 (granting a revised stipulation by the parties that included DSM programs); *In re Dominion East Ohio*, Case No 07-829-GA-AIR, et al., Opinion and Order (Oct. 15, 2008) at 7, 22-23, 28; *In re Vectren Energy Delivery of Ohio, Inc.*, Case No. 14-747-GA-RDR, Finding and Order (May 28, 2014).

{¶ 124} OPAE notes that, while OCC advocates for the elimination of Columbia's proposed DSM programs based on costs and few participants, OCC did not compare the cost of Columbia's current DSM programs with the cost of the proposed DSM programs, was not aware of the participation rates of other Ohio electric or natural gas utility programs, and asserts that the DSM programs do not lower natural gas usage. However, OPAE argues OCC cannot say what natural gas usage would be without Columbia's DSM programs. (Tr. III at 535; OPAE Reply Br. at 25-27.)

3. Commission Decision on the Third Prong of the Three-Part Test

{¶ 125} Pursuant to R.C. 4905.70, the Commission is vested with the authority to initiate programs that will promote and encourage energy conservation and reduce the growth rate of energy consumption, promote economic efficiencies, and take into account long-run incremental costs. Further, pursuant to R.C. 4929.02(A)(12), it is the policy of the state to promote an alignment of natural gas company interests with consumer interests in energy efficiency and energy conservation. Thus, the Commission concludes that it is vested with the statutory authority to authorize natural gas utilities to implement DSM energy efficiency and energy conservation programs and, to that end, has approved such programs for more than 20 years. It is under this authority that we consider Columbia's pending application to continue its DSM portfolio programs, with certain modifications, as amended by the stipulation and this Opinion and Order. (Co. Ex. 2 at 11; Staff Ex. 1 at 3.) Accordingly, we find that the stipulation does not violate any important regulatory principle or practice.

{¶ 126} The Commission has long-recognized that conservation and energy efficiency should be an integral part of natural gas policy. The Commission has recognized that DSM program designs that are cost-effective, produce demonstrable benefits, and produce a reasonable balance between reducing total costs and minimizing impacts on non-participants are consistent with Ohio's economic and energy policy objectives. *In re Dominion East Ohio*, Case No. 07-829-GA-AIR, et al., Opinion and Order (Oct. 15, 2008) at 22-23.

VII. COMMISSION CONCLUSION ON THE APPLICATION AND THE STIPULATION

{¶ 127} Accordingly, having determined that the stipulation meets each of the criteria of the three-part test, the Commission finds that the stipulation should be approved and adopted, as the application and stipulation have been modified by the Commission in this Opinion and Order. We note that, while ELPC elected not to endorse the stipulation, ELPC witness Jewell agreed that gas utilities should be encouraged to administer DSM programs as customers tend not to take action unless the gas utility offers rebates, incentives, customer education, and other encouragement to implement energy efficiency and DSM measures (Tr. II at 209). The Commission agrees that gas utilities are a key point of contact to encourage customers to engage in energy conservation and efficiency, particularly in times where the price of energy may not serve as an incentive. As previously noted, the Commission has recognized, and finds the same to be true today, that DSM programs that are cost-effective, have demonstrable benefits, and have a reasonable balance between reducing total costs and minimizing impacts to non-participant customers are beneficial to Ohio's economy and energy policy objectives. *In re Dominion East Ohio*, Case No. 07-829-GA-AIR, et al., Opinion and Order (Oct. 15, 2008) at 22-23.

VIII. Findings of Fact and Conclusions of Law

{¶ 128} Columbia is a natural gas company as defined in R.C. 4905.03 and a public utility as defined in R.C. 4905.02, and, as such, is subject to the jurisdiction of the Commission.

{¶ 129} On June 10, 2016, Columbia filed an application for approval to continue its DSM programs previously approved by the Commission, with certain modifications.

{¶ 130} On August 12, 2016, Columbia, Staff OPAE, IGS, MORPC, OHA, and RESA filed a stipulation that would resolve all of the issues in these proceedings. OCC, ELPC, NOAC, and the NOAC Communities opposed the stipulation.

{¶ 131} A hearing on the stipulation commenced on September 29, 2016, and ended on October 4, 2016.

{¶ 132} The stipulation is reasonable, meets the criteria used by the Commission to evaluate stipulations, and should be adopted, as modified in this Opinion and Order.

IX. Order

{¶ 133} It is, therefore,

{¶ 134} ORDERED, That the stipulation filed August 12, 2016, be approved and adopted, as modified herein. It is, further,

{¶ 135} ORDERED, That Columbia implement its DSM portfolio programs as proposed in its application filed June 10, 2016, and as modified by the stipulation and this Opinion and Order. It is, further,

{¶ 136} ORDERED, That Columbia's motions for protective treatment are granted and the Docketing Division is directed to maintain the information granted protective treatment under seal for 24 months from the date of this Opinion and Order, until December 21, 2018. It is, further,

{¶ 137} ORDERED, That Columbia review the documents filed under seal, redact only the confidential trade secret information, and file the redacted documents by January 13, 2017. It is, further,

{¶ 138} ORDERED, That OCC's motion to strike be granted, in part, and denied, in part, as discussed above in this Opinion and Order. It is, further,

{¶ 139} ORDERED, That nothing in this Opinion and Order shall be binding upon this Commission in any future investigation or proceeding involving the justness or reasonableness of any rate, charge, rule, or regulation. It is, further,

{¶ 140} ORDERED, That a copy of this Opinion and Order be served upon all parties of record.

THE PUBLIC UTILITIES COMMISSION OF OHIO

Asim Z. Haque, Chairman

Lynn Slaby

M. Beth Trombold

Thomas W. Johnson

M. Howard Petricoff

GNS/dah

Entered in the Journal DEC 2 1 2016

Barcy F. McNeal
Secretary

Exhibit I
Schedules Supporting the Application

Columbia Gas of Ohio, Inc.

Capital Expenditure Program (CEP) Rider

Case No. 17-2202-GA-ALT

Rate Development

Line No.	Investment Date Deferral Date Effective Date	12/31/2015 12/31/2017 8/1/2018	12/31/2016 12/21/2019 8/1/2020	12/31/2017 12/31/2021 8/1/2022	12/31/2017 12/31/2017 8/1/2018	Reference
	Description					
1	Revenue Requirement from Case No. 17-2202-GA-ALT	$ 69,813,552.48	$ 90,109,804	$ 108,321,421	$ 109,436,639	Page 2
	Allocated Plant in Service per Case No. 08-0072-GA-AIR(1)					
2	SGS Class	$ 1,406,934.00	$ 1,406,934.00	$ 1,406,934.00	$ 1,406,934.00	
3	GS Class	$ 274,607.00	$ 274,607.00	$ 274,607.00	$ 274,607.00	
4	LGS Class	$ 59,651.00	$ 59,651.00	$ 59,651.00	$ 59,651.00	
5	Total	$ 1,741,192.00	$ 1,741,192.00	$ 1,741,192.00	$ 1,741,192.00	
	Percent by Class					
6	SGS Class	80.80%	80.80%	80.80%	80.80%	
7	GS Class	15.77%	15.77%	15.77%	15.77%	
8	LGS Class	3.43%	3.43%	3.43%	3.43%	
9	Total	100.00%	100.00%	100.00%	100.00%	
	Revenue Requirement Allocated to Each Class					
10	SGS Class	$ 56,411,389.81	$ 72,811,353.81	$ 87,526,872.47	$ 88,428,001.57	
11	GS Class	$ 11,010,440.09	$ 14,211,403.97	$ 17,083,595.87	$ 17,259,479.28	
12	LGS Class	$ 2,391,722.58	$ 3,087,046.06	$ 3,710,952.66	$ 3,749,158.61	
13	Total	$ 69,813,552.48	$ 90,109,803.84	$ 108,321,420.99	$ 109,436,639.47	
	Number of Projected Bills TME July 31					
14	SGS Class	17,205,292	17,445,695	17,786,622	17,205,292	
15	GS Class	398,333	396,257	398,093	398,333	
16	LGS Class	4,503	4,503	4,206	4,503	
17	Total					
18	**Projected Impact Per Month - SGS**	$ 3.28	$ 4.17	$ 4.92	$ 5.14	
19	**Projected Impact Per Month - GS**	$ 27.64	$ 35.86	$ 42.91	$ 43.33	
20	**Projected Impact Per Month - LGS**	$ 531.14	$ 685.55	$ 882.40	$ 832.59	

Columbia Gas of Ohio, Inc.

Capital Expenditure Program (CEP) Rider

Case No. 17-2202-GA-ALT

Revenue Requirement Calculation

Line No.	Investment Date	12/31/2015	12/31/2016	12/31/2017	12/31/2017	
			Gradual Approach			
	Deferral Date	**12/31/2017**	**12/31/2019**	**12/31/2021**	**12/31/2017**	**Reference**
	Description					
	Return on Investment					
1	Plant In-Service					
2	Additions	$ 416,225,596.83	$531,306,317.53	$666,377,545.78	$666,377,545.78	Page 3
3	Retirements	$ 74,420,570.91	$91,631,499.10	$120,380,724.14	$120,380,724.14	Page 3
4	Total Plant In-Service	$ 341,805,025.92	$ 439,674,818.43	$ 545,996,821.64	$ 545,996,821.64	
5	Less: Accumulated Provision for Depreciation					
6	Depreciation Expense	$ 42,078,664.83	$ 61,172,381.29	$ 135,608,478.83	$ 48,622,872.42	Pages 4, 7 & 10
7	Retirements	$ 74,420,570.91	$91,631,499.10	$120,380,724.14	$120,380,724.14	Page 3
8	Total Accumulated Provision for Depreciation	$ 32,341,906.08	$ 30,459,117.82	$ (15,227,754.69)	$ 71,757,851.72	
9	Deferred Plant Depreciation	$ 42,078,664.83	$59,066,779.98	$73,584,519.12	$48,622,872.42	Pages 4, 7 & 10
10	Deferred PISCC	$ 64,181,005.63	$85,280,861.72	$103,449,767.61	$70,084,122.10	Pages 5, 8 & 11
11	Deferred Property Taxes	$ 28,360,430.35	$37,744,954.80	$53,031,794.93	$29,641,072.64	Pages 6, 9 & 12
12	Deferred Taxes on PISCC	$ (22,463,351.97)	$ (29,848,301.60)	$ (36,207,418.66)	$ (24,529,442.74)	
13	Deferred Taxes on Property Taxes	$ (9,926,150.62)	$ (13,210,734.18)	$ (18,561,128.22)	$ (10,374,375.42)	
14	Deferred Taxes on Liberalized Depreciation	($90,007,910.22)	($108,962,339.54)	($119,188,013.28)	($101,659,656.00)	
15	Net CEP Investment	$ 386,369,620.00	$ 500,205,157.42	$ 586,878,588.45	$ 629,539,266.37	
16	Approved Pre-tax Rate of Return	10.95%	10.95%	10.95%	10.95%	
17	Annualized Return on Net CEP Investment	$ 42,307,473.39	$ 54,772,464.74	$ 64,263,205.44	$ 68,934,549.67	
	Operating Expenses					
18	Annualized Depreciation	$ 14,701,962.15	$ 18,766,854.88	$ 23,537,854.31	$ 23,537,854.31	Pages 4, 7 & 10
19	Annualized Deferred Depreciation Amortization	$ 1,486,307	$ 2,160,737	$ 2,812,281	$ 1,717,462	Pages 4, 7 & 10
20	Annualized PISCC Amortization	$ 2,267,007.90	$ 3,125,739.39	$ 3,970,624.88	$ 2,475,518.37	Pages 5, 8 & 11
21	Annualized Property Tax Expense	$ 8,049,052.28	$ 9,900,649.59	$ 11,724,270.23	$ 11,724,270.23	Pages 6, 9 & 12
22	Annualized Deferred Property Tax Amortization	$ 1,001,749.96	$ 1,383,358.28	$ 2,013,184.94	$ 1,046,984.93	Pages 6, 9 & 12
	Revenue Requirement	$ 69,813,552.48	$ 90,109,803.84	$ 108,321,420.99	$ 109,436,639.47	
23	(Over)/Under Recovered Balance	$ -	$ -	$ -	$ -	
24	**Total Amount to be Collected Beginning August 2018**	**$ 69,813,552.48**	**$ 90,109,803.84**	**$ 108,321,420.99**	**$ 109,436,639.47**	

Columbia Gas of Ohio, Inc.

Capital Expenditure Program (CEP) Rider

Case No. 17-2202-GA-ALT

Plant Additions and Retirements by Month

Line No.	Description	2011	2012	2013	2014	2015	2016	2017	Cumulative Total
1	CEP Gross Additions	$ 18,987,654	$ 60,372,513	$ 72,950,902	$ 128,819,142	$ 135,095,385	$ 115,080,721	$ 135,071,228	$ 666,377,546
2	CEP Gross Retirements	$ (5,712,212)	$ (11,588,999)	$ (19,539,073)	$ (24,183,682)	$ (13,396,605)	$ (17,210,928)	$ (28,749,225)	$ (120,380,724)
3	Total Balance	$ 13,275,442	$ 48,783,514	$ 53,411,830	$ 104,635,460	$ 121,698,781	$ 97,869,793	$ 106,322,003	$ 545,996,822

Line No.	Description	Oct 11	Nov 11	Dec 11	Jan 12	Feb 12	Mar 12	Apr 12	May 12	Jun 12	Jul 12	Aug 12	Sep 12	Oct 12	Nov 12	Dec 12
4	CEP Gross Additions	$ 5,412,828	$ 5,038,820	$ 8,536,006	$ 3,159,456	$ 4,420,758	$ 3,003,572	$ 6,212,115	$ 4,454,023	$ 4,470,893	$ 6,105,856	$ 7,666,497	$ 4,329,771	$ 4,957,855	$ 6,091,460	$ 5,500,258
5	CEP Retirements	$ (524,596)	$ (977,921)	$ (4,209,696)	$ (619,575)	$ (720,632)	$ (446,366)	$ (560,741)	$ (664,635)	$ (2,617,043)	$ (774,481)	$ (362,727)	$ (776,465)	$ (1,707,250)	$ (1,208,591)	$ (1,130,493)
6	CEP Net Plant	$ 4,888,233	$ 4,060,899	$ 4,326,310	$ 2,539,881	$ 3,700,125	$ 2,557,206	$ 5,651,374	$ 3,789,388	$ 1,853,850	$ 5,331,375	$ 7,303,771	$ 3,553,306	$ 3,250,605	$ 4,882,869	$ 4,369,765
7	Cumulative Balance	$ 4,888,233	$ 8,949,132	$ 13,275,442	$ 15,815,323	$ 19,515,448	$ 22,072,654	$ 27,724,028	$ 31,513,416	$ 33,367,266	$ 38,698,641	$ 46,002,411	$ 49,555,717	$ 52,806,322	$ 57,689,191	$ 62,058,956

Line No.	Description	Jan 13	Feb 13	Mar 13	Apr 13	May 13	Jun 13	Jul 13	Aug 13	Sep 13	Oct 13	Nov 13	Dec 13	Total
8	CEP Gross Additions	$ 4,182,849	$ 2,690,278	$ 5,346,870	$ 4,752,269	$ 4,568,762	$ 4,429,822	$ 5,586,619	$ 7,603,387	$ 5,605,654	$ 7,121,854	$ 9,332,557	$ 11,729,982	$ 72,950,902
9	CEP Retirements	$ (627,686)	$ (1,526,366)	$ (864,718)	$ (4,374,274)	$ (678,199)	$ (684,062)	$ (482,304)	$ (734,201)	$ (2,017,943)	$ (1,623,130)	$ (1,728,753)	$ (4,197,436)	$ (19,539,073)
10	CEP Net Plant	$ 3,555,163	$ 1,163,911	$ 4,482,152	$ 377,995	$ 3,890,563	$ 3,745,760	$ 5,104,315	$ 6,869,186	$ 3,587,711	$ 5,498,724	$ 7,603,804	$ 7,532,546	$ 53,411,830
11	Cumulative Balance	$ 65,614,119	$ 66,778,030	$ 71,260,182	$ 71,638,177	$ 75,528,739	$ 79,274,499	$ 84,378,814	$ 91,248,000	$ 94,835,711	$ 100,334,435	$ 107,938,240	$ 115,470,786	

Line No.	Description	Jan 14	Feb 14	Mar 14	Apr 14	May 14	Jun 14	Jul 14	Aug 14	Sep 14	Oct 14	Nov 14	Dec 14	Total
12	CEP Gross Additions	$ 2,171,791	$ 5,288,766	$ 6,161,793	$ 20,730,659	$ 5,764,865	$ 5,953,839	$ 7,518,273	$ 7,096,060	$ 7,786,745	$ 37,088,065	$ 12,043,377	$ 11,214,907	$ 128,819,142
13	CEP Retirements	$ (364,625)	$ (706,922)	$ (350,389)	$ (961,162)	$ (403,737)	$ (855,202)	$ (5,486,925)	$ (466,585)	$ (1,114,114)	$ (780,951)	$ (918,148)	$ (11,774,923)	$ (24,183,682)
14	CEP Net Plant	$ 1,807,166	$ 4,581,844	$ 5,811,404	$ 19,769,497	$ 5,361,128	$ 5,098,638	$ 2,031,348	$ 6,629,475	$ 6,672,631	$ 36,307,115	$ 11,125,229	$ (560,016)	$ 104,635,460
15	Cumulative Balance	$ 117,277,952	$ 121,859,795	$ 127,671,199	$ 147,440,697	$ 152,801,825	$ 157,900,463	$ 159,931,811	$ 166,561,286	$ 173,233,917	$ 209,541,032	$ 220,666,261	$ 220,106,245	

Line No.	Description	Jan 15	Feb 15	Mar 15	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	Nov 15	Dec 15	Total
16	CEP Gross Additions	$ 4,718,362	$ 4,437,166	$ 6,590,234	$ 5,161,696	$ 10,032,892	$ 8,911,193	$ 7,707,096	$ 9,860,453	$ 12,364,437	$ 12,594,612	$ 10,041,640	$ 42,675,605	$ 135,095,385
17	CEP Retirements	$ (1,298,587)	$ (2,592,237)	$ (477,117)	$ (1,096,549)	$ (813,347)	$ (615,514)	$ (507,366)	$ (669,531)	$ (1,054,891)	$ (65,919)	$ (1,786,140)	$ (2,419,406)	$ (13,396,605)
18	CEP Net Plant	$ 3,419,775	$ 1,844,928	$ 6,113,117	$ 4,065,147	$ 9,219,545	$ 8,295,679	$ 7,199,730	$ 9,190,922	$ 11,309,546	$ 12,528,692	$ 8,255,500	$ 40,256,199	$ 121,698,781
19	Cumulative Balance	$ 223,526,020	$ 225,370,948	$ 231,484,066	$ 235,549,213	$ 244,768,758	$ 253,064,437	$ 260,264,167	$ 269,455,089	$ 280,764,635	$ 293,293,327	$ 301,548,827	$ 341,805,026	

Line No.	Description	Jan 16	Feb 16	Mar 16	Apr 16	May 16	Jun 16	Jul 16	Aug 16	Sep 16	Oct 16	Nov 16	Dec 16	Total
20	CEP Gross Additions	$ 6,787,006	$ 7,973,852	$ 8,941,719	$ 8,601,311	$ 9,869,286	$ 12,883,430	$ 9,034,300	$ 9,942,529	$ 10,066,818	$ 11,448,897	$ 8,122,765	$ 11,408,809	$ 115,080,721
21	CEP Retirements	$ (309,358)	$ (1,296,611)	$ (531,588)	$ (1,156,163)	$ (1,012,758)	$ (1,265,500)	$ (627,573)	$ (620,639)	$ (6,680,026)	$ (1,366,970)	$ (912,261)	$ (1,431,481)	$ (17,210,928)
22	CEP Net Plant	$ 6,477,648	$ 6,677,241	$ 8,410,130	$ 7,445,148	$ 8,856,528	$ 11,617,930	$ 8,406,727	$ 9,321,889	$ 3,386,792	$ 10,081,927	$ 7,210,503	$ 9,977,328	$ 97,869,793
23	Cumulative Balance	$ 348,282,674	$ 354,959,915	$ 363,370,045	$ 370,815,193	$ 379,671,722	$ 391,289,652	$ 399,696,378	$ 409,018,268	$ 412,405,060	$ 422,486,987	$ 429,697,490	$ 439,674,818	

Line No.	Description											*Estimated*		
		Jan 17	Feb 17	Mar 17	Apr 17	May 17	Jun 17	Jul 17	Aug 17	Sep 17	Oct 17	Nov 17	Dec 17	Total
24	CEP Gross Additions	$ 8,137,583	$ 7,987,755	$ 9,780,061	$ 8,850,985	$ 7,136,691	$ 8,891,116	$ 7,117,300	$ 11,504,965	$ 11,398,666	$ 11,981,822	$ 10,369,730	$ 31,914,553	$ 135,071,228
25	CEP Retirements	$ (3,572,858)	$ (1,524,496)	$ (1,648,181)	$ (2,543,091)	$ (3,414,571)	$ (2,288,755)	$ (2,245,106)	$ (1,657,034)	$ (2,226,892)	$ (1,708,441)	$ (1,451,762)	$ (4,468,037)	$ (28,749,225)
26	CEP Net Plant	$ 4,564,725	$ 6,463,259	$ 8,131,880	$ 6,307,894	$ 3,722,119	$ 6,602,360	$ 4,872,194	$ 9,847,932	$ 9,171,774	$ 10,273,381	$ 8,917,968	$ 27,446,516	$ 106,322,003
27	Cumulative Balance	$ 444,239,544	$ 450,702,803	$ 458,834,683	$ 465,142,578	$ 468,864,697	$ 475,467,057	$ 480,339,251	$ 490,187,183	$ 499,358,957	$ 509,632,338	$ 518,550,306	$ 545,996,822	

Columbia Gas of Ohio, Inc.

Capital Expenditure Program (CEP) Rider

Case No. 17-2202-GA-ALT

Provision for Plant Depreciation for Investment Date 12/31/2015

Line No.	Description	Oct 11	Nov 11	Dec 11	Jan 12	Feb 12	Mar 12	Apr 12	May 12	Jun 12	Jul 12	Aug 12	Sep 12	Oct 12	Nov 12	Dec 12
1	CEP Net Plant Depreciation	$ 5,540	$ 15,682	$ 25,188	$ 32,970	$ 40,042	$ 47,133	$ 56,436	$ 67,136	$ 73,531	$ 81,675	$ 95,995	$ 108,299	$ 116,010	$ 125,228	$ 135,715
2	Accumulated Depreciation Reserve	$ 5,540	$ 21,222	$ 46,410	$ 79,380	$ 119,421	$ 166,554	$ 222,991	$ 290,126	$ 363,658	$ 445,333	$ 541,327	$ 649,626	$ 765,637	$ 890,865	$ 1,026,579

Line No.	Description	Jan 13	Feb 13	Mar 13	Apr 13	May 13	Jun 13	Jul 13	Aug 13	Sep 13	Oct 13	Nov 13	Dec 13
3	CEP Net Plant Depreciation	$ 129,566	$ 148,941	$ 155,293	$ 160,761	$ 165,563	$ 174,154	$ 184,110	$ 199,044	$ 210,895	$ 221,193	$ 236,042	$ 253,197
4	Accumulated Depreciation Reserve	$ 1,156,146	$ 1,305,087	$ 1,460,380	$ 1,621,140	$ 1,786,703	$ 1,960,857	$ 2,144,967	$ 2,344,010	$ 2,554,905	$ 2,776,098	$ 3,012,141	$ 3,265,337

Line No.	Description	Jan 14	Feb 14	Mar 14	Apr 14	May 14	Jun 14	Jul 14	Aug 14	Sep 14	Oct 14	Nov 14	Dec 14
5	CEP Net Plant Depreciation	$ 263,782	$ 271,023	$ 363,691	$ 400,976	$ 437,603	$ 452,849	$ 463,241	$ 475,864	$ 495,252	$ 557,894	$ 652,123	$ 668,138
6	Accumulated Depreciation Reserve	$ 3,529,119	$ 3,800,142	$ 4,163,834	$ 4,564,809	$ 5,002,413	$ 5,455,261	$ 5,918,502	$ 6,394,365	$ 6,889,617	$ 7,447,511	$ 8,099,634	$ 8,767,772

Line No.	Description	Jan 15	Feb 15	Mar 15	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	Nov 15	Dec 15
7	CEP Net Plant Depreciation	$ 672,473	$ 680,453	$ 672,378	$ 687,358	$ 706,910	$ 732,688	$ 755,494	$ 779,617	$ 809,788	$ 844,872	$ 875,461	$ 946,859
8	Accumulated Depreciation Reserve	$ 9,440,244	$ 10,120,697	$ 10,793,075	$ 11,480,434	$ 12,187,344	$ 12,920,032	$ 13,675,525	$ 14,455,142	$ 15,264,930	$ 16,109,802	$ 16,985,264	$ 17,932,122

Line No.	Description	Jan 16	Feb 16	Mar 16	Apr 16	May 16	Jun 16	Jul 16	Aug 16	Sep 16	Oct 16	Nov 16	Dec 16
9	CEP Net Plant Depreciation	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106
10	Accumulated Depreciation Reserve	$ 18,938,228	$ 19,944,334	$ 20,950,440	$ 21,956,546	$ 22,962,652	$ 23,968,758	$ 24,974,864	$ 25,980,970	$ 26,987,076	$ 27,993,182	$ 28,999,288	$ 30,005,394

Line No.	Description	Jan 17	Feb 17	Mar 17	Apr 17	May 17	Jun 17	Jul 17	Aug 17	Sep 17	Oct 17	*Estimated* Nov 17	Dec 17
11	CEP Net Plant Depreciation	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106	$ 1,006,106
12	Accumulated Depreciation Reserve	$ 31,011,499	$ 32,017,605	$ 33,023,711	$ 34,029,817	$ 35,035,923	$ 36,042,029	$ 37,048,135	$ 38,054,241	$ 39,060,347	$ 40,066,453	$ 41,072,559	$ 42,078,665

Annualized Depreciation Expense

Line No.	Description	2015
13	Cumulative CEP Additions	$ 416,225,596.83
14	Depreciation Rate	3.53%
15	Annualized Depreciation	**$ 14,701,962.15**

Annualized Deferred Plant Depreciation Amortization

Line No.	Description	2017
13	Cumulative Deferred Depreciation	$ 42,078,665
14	Depreciation Rate	3.53%
15	Annualized Deferred Plant Depreciation Amort	**$ 1,486,306.81**
16	Monthly Deferred Plant Depreciation Amort	**$ 123,858.90**

Columbia Gas of Ohio, Inc.

Capital Expenditure Program (CEP) Rider

Case No. 17-2202-GA-ALT

Post-in-Service Carrying Cost for Investment Date 12/31/2015

Line No.	Description	Oct 11	Nov 11	Dec 11	Jan 12	Feb 12	Mar 12	Apr 12	May 12	Jun 12	Jul 12	Aug 12	Sep 12	Oct 12	Nov 12	Dec 12
1	Interest Deferral	$ -	$ 23,600	$ 43,152	$ 63,940	$ 76,057	$ 93,747	$ 105,879	$ 132,922	$ 150,913	$ 159,517	$ 184,891	$ 219,729	$ 236,379	$ 251,530	$ 274,525
2	Accumulated PISCC	$ -	$ 23,600	$ 66,751	$ 130,692	$ 206,749	$ 300,496	$ 406,376	$ 539,297	$ 690,210	$ 849,727	$ 1,034,618	$ 1,254,347	$ 1,490,726	$ 1,742,256	$ 2,016,781

Line No.	Description	Jan 13	Feb 13	Mar 13	Apr 13	May 13	Jun 13	Jul 13	Aug 13	Sep 13	Oct 13	Nov 13	Dec 13
3	Interest Deferral	$ 228,896	$ 309,076	$ 313,943	$ 334,690	$ 335,732	$ 353,593	$ 370,719	$ 394,311	$ 426,295	$ 442,486	$ 467,792	$ 503,121
4	Accumulated PISCC	$ 2,245,677	$ 2,554,753	$ 2,868,696	$ 3,203,386	$ 3,539,118	$ 3,892,711	$ 4,263,430	$ 4,657,741	$ 5,084,036	$ 5,526,522	$ 5,994,314	$ 6,497,435

Line No.	Description	Jan 14	Feb 14	Mar 14	Apr 14	May 14	Jun 14	Jul 14	Aug 14	Sep 14	Oct 14	Nov 14	Dec 14
5	Interest Deferral	$ 538,025	$ 545,426	$ 566,096	$ 592,218	$ 685,090	$ 708,698	$ 730,975	$ 738,494	$ 768,000	$ 797,621	$ 969,038	$ 1,019,257
6	Accumulated PISCC	$ 7,035,460	$ 7,580,886	$ 8,146,982	$ 8,739,200	$ 9,424,289	$ 10,132,988	$ 10,863,962	$ 11,602,456	$ 12,370,457	$ 13,168,078	$ 14,137,116	$ 15,156,373

Line No.	Description	Jan 15	Feb 15	Mar 15	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	Nov 15	Dec 15
7	Interest Deferral	$ 995,052	$ 1,007,987	$ 1,013,470	$ 1,039,087	$ 1,054,991	$ 1,095,071	$ 1,130,680	$ 1,161,022	$ 1,200,625	$ 1,250,061	$ 1,305,072	$ 1,339,820
8	Accumulated PISCC	$ 16,151,425	$ 17,159,412	$ 18,172,882	$ 19,211,969	$ 20,266,959	$ 21,362,030	$ 22,492,710	$ 23,653,732	$ 24,854,356	$ 26,104,417	$ 27,409,490	$ 28,749,310

Line No.	Description	Jan 16	Feb 16	Mar 16	Apr 16	May 16	Jun 16	Jul 16	Aug 16	Sep 16	Oct 16	Nov 16	Dec 16
9	Interest Deferral	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321
10	Accumulated PISCC	$ 30,225,631	$ 31,701,951	$ 33,178,272	$ 34,654,593	$ 36,130,913	$ 37,607,234	$ 39,083,555	$ 40,559,875	$ 42,036,196	$ 43,512,516	$ 44,988,837	$ 46,465,158

												Estimated	
Line No.	Description	Jan 17	Feb 17	Mar 17	Apr 17	May 17	Jun 17	Jul 17	Aug 17	Sep 17	Oct 17	Nov 17	Dec 17
11	Interest Deferral	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321	$ 1,476,321
12	Accumulated PISCC	$ 47,941,478	$ 49,417,799	$ 50,894,120	$ 52,370,440	$ 53,846,761	$ 55,323,082	$ 56,799,402	$ 58,275,723	$ 59,752,044	$ 61,228,364	$ 62,704,685	$ 64,181,006

Annualized Deferred PISCC Amortization

Line No.	Description	Amount
13	Cumulative Deferred PISCC	$ 64,181,006
14	Depreciation Rate	3.53%
15	Annualized Deferred PISCC Amort	**$ 2,267,007.90**
16	Monthly Deferred PISCC Amort	**$ 188,917.32**

Columbia Gas of Ohio, Inc.

Capital Expenditure Program (CEP) Rider

Case No. 17-2202-GA-ALT

Property Tax for Investment Date 12/31/2015

Line No.	Description	Jan 12	Feb 12	Mar 12	Apr 12	May 12	Jun 12	Jul 12	Aug 12	Sep 12	Oct 12	Nov 12	Dec 12
1	Property Taxes	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130
2	Cumulative Deferred Property Taxes	$ 29,130	$ 58,259	$ 87,389	$ 116,518	$ 145,648	$ 174,777	$ 203,907	$ 233,036	$ 262,166	$ 291,295	$ 320,425	$ 349,554
		Jan 13	Feb 13	Mar 13	Apr 13	May 13	Jun 13	Jul 13	Aug 13	Sep 13	Oct 13	Nov 13	Dec 13
3	Property Taxes	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926
4	Cumulative Deferred Property Taxes	$ 480,480	$ 611,406	$ 742,331	$ 873,257	$ 1,004,182	$ 1,135,108	$ 1,266,033	$ 1,396,959	$ 1,527,884	$ 1,658,810	$ 1,789,735	$ 1,920,661
		Jan 14	Feb 14	Mar 14	Apr 14	May 14	Jun 14	Jul 14	Aug 14	Sep 14	Oct 14	Nov 14	Dec 14
5	Property Taxes	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988
6	Cumulative Deferred Property Taxes	$ 2,169,648	$ 2,418,636	$ 2,667,624	$ 2,916,611	$ 3,165,599	$ 3,414,587	$ 3,663,574	$ 3,912,562	$ 4,161,550	$ 4,410,537	$ 4,659,525	$ 4,908,513
		Jan 15	Feb 15	Mar 15	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	Nov 15	Dec 15
7	Property Taxes	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640
8	Cumulative Deferred Property Taxes	$ 5,371,153	$ 5,833,793	$ 6,296,433	$ 6,759,073	$ 7,221,714	$ 7,684,354	$ 8,146,994	$ 8,609,634	$ 9,072,274	$ 9,534,915	$ 9,997,555	$ 10,460,195
		Jan 16	Feb 16	Mar 16	Apr 16	May 16	Jun 16	Jul 16	Aug 16	Sep 16	Oct 16	Nov 16	Dec 16
9	Property Taxes	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873
10	Cumulative Deferred Property Taxes	$ 11,164,069	$ 11,867,942	$ 12,571,815	$ 13,275,689	$ 13,979,562	$ 14,683,436	$ 15,387,309	$ 16,091,183	$ 16,795,056	$ 17,498,930	$ 18,202,803	$ 18,906,677
												Estimated	
		Jan 17	Feb 17	Mar 17	Apr 17	May 17	Jun 17	Jul 17	Aug 17	Sep 17	Oct 17	Nov 17	Dec 17
11	Property Taxes	$ 669,817	$ 669,817	$ 669,817	$ 2,085,772	$ 669,817	$ 669,817	$ 669,817	$ 669,817	$ 669,817	$ 669,817	$ 669,817	$ 669,817
12	Cumulative Deferred Property Taxes	$ 19,576,493	$ 20,246,310	$ 20,916,126	$ 23,001,898	$ 23,671,714	$ 24,341,531	$ 25,011,348	$ 25,681,164	$ 26,350,981	$ 27,020,797	$ 27,690,614	$ 28,360,430

Annualized Property Tax Amortization

Line No.	Description	Amount
13	Cumulative Deferred Property Tax	$ 28,360,430
14	Depreciation Rate	3.53%
15	Annualized Deferred Property Tax Amort	$ 1,001,749.96
16	Monthly Deferred Property Tax Amort	$ 83,479.16

Annualized Property Tax Expense

Line No.	Description	2011	2012	2013	2014	2015	Total
17	Net Cost Taxable Property	$16,835,080.97	$55,188,343.02	$63,896,415.84	$ 117,188,313.97	$ 129,028,033.72	
18	Percent Good	78.30%	81.70%	85.00%	88.30%	91.70%	
19	Taxable Value	$13,181,868.40	$45,088,876.25	$54,311,953.46	$ 103,477,281.24	$ 118,318,706.92	
20	Valuation Percentage	25.00%	25.00%	25.00%	25.00%	25.00%	
21	Total Taxable Value	$ 3,295,467.10	$11,272,219.06	$13,577,988.37	$ 25,869,320.31	$ 29,579,676.73	
22	Average Property Tax Rate per $1,000 of Valuation	$ 96.29	$ 96.29	$ 96.29	$ 96.29	$ 96.29	
23	**Property Tax**	$ 317,309.54	$ 1,085,364.40	$ 1,307,379.24	$ 2,490,870.62	$ 2,848,128.47	$ 8,049,052.28

Columbia Gas of Ohio, Inc.

Capital Expenditure Program (CEP) Rider

Case No. 17-2202-GA-ALT

Provision for Plant Depreciation for Investment Date 12/31/2016

Line No.	Description	Oct 11	Nov 11	Dec 11	Jan 12	Feb 12	Mar 12	Apr 12	May 12	Jun 12	Jul 12	Aug 12	Sep 12	Oct 12	Nov 12	Dec 12	Total
1	CEP Net Plant Depreciation	$ 5,540	$ 15,682	$ 25,188	$ 32,970	$ 40,042	$ 47,133	$ 56,436	$ 67,136	$ 73,531	$ 81,675	$ 95,995	$ 108,299	$ 116,010	$ 125,228	$ 135,715	$ 1,026,579
2	Accumulated Depreciation Reserve	$ 5,540	$ 21,222	$ 46,410	$ 79,380	$ 119,421	$ 166,554	$ 222,991	$ 290,126	$ 363,658	$ 445,333	$ 541,327	$ 649,626	$ 765,637	$ 890,865	$ 1,026,579	

Line No.	Description	Jan 13	Feb 13	Mar 13	Apr 13	May 13	Jun 13	Jul 13	Aug 13	Sep 13	Oct 13	Nov 13	Dec 13	Total
3	CEP Net Plant Depreciation	$ 129,566	$ 148,941	$ 155,293	$ 160,761	$ 165,563	$ 174,154	$ 184,110	$ 199,044	$ 210,895	$ 221,193	$ 236,042	$ 253,197	$ 2,238,758
4	Accumulated Depreciation Reserve	$ 1,156,146	$ 1,305,087	$ 1,460,380	$ 1,621,140	$ 1,786,703	$ 1,960,857	$ 2,144,967	$ 2,344,010	$ 2,554,905	$ 2,776,098	$ 3,012,141	$ 3,265,337	

Line No.	Description	Jan 14	Feb 14	Mar 14	Apr 14	May 14	Jun 14	Jul 14	Aug 14	Sep 14	Oct 14	Nov 14	Dec 14	Total
5	CEP Net Plant Depreciation	$ 263,782	$ 271,023	$ 363,691	$ 400,976	$ 437,603	$ 452,849	$ 463,241	$ 475,864	$ 495,252	$ 557,894	$ 652,123	$ 668,138	$ 5,502,434
6	Accumulated Depreciation Reserve	$ 3,529,119	$ 3,800,142	$ 4,163,834	$ 4,564,809	$ 5,002,413	$ 5,455,261	$ 5,918,502	$ 6,394,365	$ 6,889,617	$ 7,447,511	$ 8,099,634	$ 8,767,772	

Line No.	Description	Jan 15	Feb 15	Mar 15	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	Nov 15	Dec 15	Total
7	CEP Net Plant Depreciation	$ 672,473	$ 680,453	$ 672,378	$ 687,358	$ 706,910	$ 732,688	$ 755,494	$ 779,617	$ 809,788	$ 844,872	$ 875,461	$ 946,859	$ 9,164,351
8	Accumulated Depreciation Reserve	$ 9,440,244	$ 10,120,697	$ 10,793,075	$ 11,480,434	$ 12,187,344	$ 12,920,032	$ 13,675,525	$ 14,455,142	$ 15,264,930	$ 16,109,802	$ 16,985,264	$ 17,932,122	

Line No.	Description	Jan 16	Feb 16	Mar 16	Apr 16	May 16	Jun 16	Jul 16	Aug 16	Sep 16	Oct 16	Nov 16	Dec 16	Total
9	CEP Net Plant Depreciation	$ 1,015,639	$ 1,035,000	$ 1,057,205	$ 1,080,540	$ 1,104,532	$ 1,134,666	$ 1,164,137	$ 1,190,229	$ 1,208,933	$ 1,228,756	$ 1,254,206	$ 1,279,502	$ 13,753,346
10	Accumulated Depreciation Reserve	$ 18,947,762	$ 19,982,762	$ 21,039,967	$ 22,120,507	$ 23,225,039	$ 24,359,705	$ 25,523,842	$ 26,714,071	$ 27,923,004	$ 29,151,760	$ 30,405,966	$ 31,685,469	

Line No.	Description	Jan 17	Feb 17	Mar 17	Apr 17	May 17	Jun 17	Jul 17	Aug 17	Sep 17	Oct 17	*Estimated* Nov 17	Dec 17	Total
11	CEP Net Plant Depreciation	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 15,530,238
12	Accumulated Depreciation Reserve	$ 32,979,655	$ 34,273,842	$ 35,568,028	$ 36,862,215	$ 38,156,401	$ 39,450,588	$ 40,744,774	$ 42,038,961	$ 43,333,147	$ 44,627,334	$ 45,921,520	$ 47,215,706	

Line No.	Description	Jan 18	Feb 18	Mar 18	Apr 18	May 18	*Estimated* Jun 18	Jul 18	Aug 18	Sep 18	Oct 18	Nov 18	Dec 18	Total
13	CEP Net Plant Depreciation	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 1,294,186	$ 288,081	$ 288,081	$ 288,081	$ 288,081	$ 288,081	$ 10,499,708
14	CEP Rider Depreciation Amort	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	
15	Accumulated Depreciation Reserve	$ 48,509,893	$ 49,804,079	$ 51,098,266	$ 52,392,452	$ 53,686,639	$ 54,980,825	$ 56,275,012	$ 56,439,234	$ 56,603,455	$ 56,767,677	$ 56,931,899	$ 57,096,120	

Line No.	Description	Jan 19	Feb 19	Mar 19	Apr 19	May 19	*Estimated* Jun 19	Jul 19	Aug 19	Sep 19	Oct 19	Nov 19	Dec 19	Total
16	CEP Net Plant Depreciation	$ 288,081	$ 288,081	$ 288,081	$ 288,081	$ 288,081	$ 288,081	$ 288,081	$ 288,081	$ 288,081	$ 288,081	$ 288,081	$ 288,081	$ 3,456,967
17	CEP Rider Depreciation Amort	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	
18	Accumulated Depreciation Reserve	$ 57,260,342	$ 57,424,563	$ 57,588,785	$ 57,753,007	$ 57,917,228	$ 58,081,450	$ 58,245,672	$ 58,409,893	$ 58,574,115	$ 58,738,337	$ 58,902,558	$ 59,066,780	

Annualized Depreciation Expense

Line No.	Description	2016
19	Cumulative CEP Additions	$ 531,306,317.53
20	Depreciation Rate	3.53%
22	Annualized Depreciation	**$ 18,766,854.88**
23		

Annualized Deferred Plant Depreciation Amortization

Description	2019
Cumulative Deferred Depreciation	$ 61,172,381
Depreciation Rate	3.53%
Annualized Deferred Plant Depreciation Amort	**$ 2,160,736.97**
Monthly Deferred Plant Depreciation Amort	**$ 180,061.41**

Depreciation Expense

Line No.	Description	Jan 18	Feb 18	Mar 18	Apr 18	May 18	Jun 18	Jul 18	Aug 18	Sep 18	Oct 18	Nov 18	Dec 18
24	CEP Rider Depreciation Expense	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51
25	Accumulated Depreciation Expense	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,225,163.51	$ 2,450,327.03	$ 3,675,490.54	$ 4,900,654.05	$ 6,125,817.56

Line No.	Description	Jan 19	Feb 19	Mar 19	Apr 19	May 19	Jun 19	Jul 19	Aug 19	Sep 19	Oct 19	Nov 19	Dec 19
26	CEP Rider Depreciation Expense	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51
27	Accumulated Depreciation Expense	$ 7,350,981.08	$ 8,576,144.59	$ 9,801,308.10	$ 11,026,471.62	$ 12,251,635.13	$ 13,476,798.64	$ 14,701,962.15	$ 15,927,125.67	$ 17,152,289.18	$ 18,377,452.69	$ 19,602,616.21	$ 20,827,779.72

Columbia Gas of Ohio, Inc.

Capital Expenditure Program (CEP) Rider

Case No. 17-2202-GA-ALT

Post-in-Service Carrying Cost for Investment Date 12/31/2016

Line No.	Description	Oct 11	Nov 11	Dec 11	Jan 12	Feb 12	Mar 12	Apr 12	May 12	Jun 12	Jul 12	Aug 12	Sep 12	Oct 12	Nov 12	Dec 12	Total
1	PISCC Deferral	$ -	$ 23,600	$ 43,152	$ 63,940	$ 76,057	$ 93,747	$ 105,879	$ 132,922	$ 150,913	$ 159,517	$ 184,891	$ 219,729	$ 236,379	$ 251,530	$ 274,525	$ 2,016,781
2	Accumulated PISCC	$ -	$ 23,600	$ 66,751	$ 130,692	$ 206,749	$ 300,496	$ 406,376	$ 539,297	$ 690,210	$ 849,727	$ 1,034,618	$ 1,254,347	$ 1,490,726	$ 1,742,256	$ 2,016,781	

Line No.	Description	Jan 13	Feb 13	Mar 13	Apr 13	May 13	Jun 13	Jul 13	Aug 13	Sep 13	Oct 13	Nov 13	Dec 13	Total
3	PISCC Deferral	$ 228,896	$ 309,076	$ 313,943	$ 334,690	$ 335,732	$ 353,593	$ 370,719	$ 394,311	$ 426,295	$ 442,486	$ 467,792	$ 503,121	$ 4,480,653
4	Accumulated PISCC	$ 2,245,677	$ 2,554,753	$ 2,868,696	$ 3,203,386	$ 3,539,118	$ 3,892,711	$ 4,263,430	$ 4,657,741	$ 5,084,036	$ 5,526,522	$ 5,994,314	$ 6,497,435	

Line No.	Description	Jan 14	Feb 14	Mar 14	Apr 14	May 14	Jun 14	Jul 14	Aug 14	Sep 14	Oct 14	Nov 14	Dec 14	
5	PISCC Deferral	$ 538,025	$ 545,426	$ 566,096	$ 592,218	$ 685,090	$ 708,698	$ 730,975	$ 738,494	$ 768,000	$ 797,621	$ 969,038	$ 1,019,257	$ 8,658,938
6	Accumulated PISCC	$ 7,035,460	$ 7,580,886	$ 8,146,982	$ 8,739,200	$ 9,424,289	$ 10,132,988	$ 10,863,962	$ 11,602,456	$ 12,370,457	$ 13,168,078	$ 14,137,116	$ 15,156,373	

Line No.	Description	Jan 15	Feb 15	Mar 15	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	Nov 15	Dec 15	
7	PISCC Deferral	$ 995,052	$ 1,007,987	$ 1,013,470	$ 1,039,087	$ 1,054,991	$ 1,095,071	$ 1,130,680	$ 1,161,022	$ 1,200,625	$ 1,250,061	$ 1,305,072	$ 1,339,820	$ 13,592,937
8	Accumulated PISCC	$ 16,151,425	$ 17,159,412	$ 18,172,882	$ 19,211,969	$ 20,266,959	$ 21,362,030	$ 22,492,710	$ 23,653,732	$ 24,854,356	$ 26,104,417	$ 27,409,490	$ 28,749,310	

Line No.	Description	Jan 16	Feb 16	Mar 16	Apr 16	May 16	Jun 16	Jul 16	Aug 16	Sep 16	Oct 16	Nov 16	Dec 16	
9	PISCC Deferral	$ 1,476,321	$ 1,501,218	$ 1,526,938	$ 1,560,455	$ 1,589,467	$ 1,624,803	$ 1,672,589	$ 1,705,603	$ 1,742,670	$ 1,752,597	$ 1,792,953	$ 1,820,104	$ 19,765,717
10	Accumulated PISCC	$ 30,225,631	$ 31,726,849	$ 33,253,786	$ 34,814,241	$ 36,403,708	$ 38,028,510	$ 39,701,099	$ 41,406,703	$ 43,149,373	$ 44,901,970	$ 46,694,923	$ 48,515,027	

Line No.	Description	Jan 17	Feb 17	Mar 17	Apr 17	May 17	Jun 17	Jul 17	Aug 17	Sep 17	Oct 17	*Estimated* Nov 17	Dec 17	
11	PISCC Deferral	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,754,751	$ 1,754,751	$ 21,569,095
12	Accumulated PISCC	$ 50,320,986	$ 52,126,946	$ 53,932,905	$ 55,738,864	$ 57,544,824	$ 59,350,783	$ 61,156,743	$ 62,962,702	$ 64,768,661	$ 66,574,621	$ 68,329,371	$ 70,084,122	

Line No.	Description	Jan 18	Feb 18	Mar 18	Apr 18	May 18	Jun 18	*Estimated* Jul 18	Aug 18	Sep 18	Oct 18	Nov 18	Dec 18	
11	PISCC Deferral	$ 1,754,751	$ 1,754,751	$ 1,754,751	$ 1,754,751	$ 1,754,751	$ 1,754,751	$ 1,754,751	$ 360,299	$ 360,299	$ 360,299	$ 360,299	$ 360,299	$ 14,084,749
12	CEP Rider PISCC Amortization	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	
13	Accumulated PISCC	$ 71,838,873	$ 73,593,624	$ 75,348,374	$ 77,103,125	$ 78,857,876	$ 80,612,626	$ 82,367,377	$ 82,538,758	$ 82,710,140	$ 82,881,521	$ 83,052,903	$ 83,224,284	

Line No.	Description	Jan 19	Feb 19	Mar 19	Apr 19	May 19	Jun 19	*Estimated* Jul 19	Aug 19	Sep 19	Oct 19	Nov 19	Dec 19	
14	PISCC Deferral	$ 360,299	$ 360,299	$ 360,299	$ 360,299	$ 360,299	$ 360,299	$ 360,299	$ 360,299	$ 360,299	$ 360,299	$ 360,299	$ 360,299	$ 4,323,585
15	CEP Rider PISCC Amortization	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	
16	Accumulated PISCC	$ 83,395,666	$ 83,567,047	$ 83,738,429	$ 83,909,810	$ 84,081,192	$ 84,252,573	$ 84,423,954	$ 84,595,336	$ 84,766,717	$ 84,938,099	$ 85,109,480	$ 85,280,862	

Annualized Deferred PISCC Amortization

Line No.	Description	Amount
17	Cumulative Deferred PISCC	$ 88,492,456
18	Depreciation Rate	3.53%
19	Annualized Deferred PISCC Amort	**$ 3,125,739.39**
20	Monthly Deferred PISCC Amort	**$ 260,478.28**

Columbia Gas of Ohio, Inc.

Capital Expenditure Program (CEP) Rider

Case No. 17-2202-GA-ALT

Property Tax for Investment Date 12/31/2016

Line No.	Description	Jan 12	Feb 12	Mar 12	Apr 12	May 12	Jun 12	Jul 12	Aug 12	Sep 12	Oct 12	Nov 12	Dec 12	Total
1	Property Taxes	29,130	29,130	29,130	29,130	29,130	29,130	29,130	29,130	29,130	29,130	29,130	29,130	349,554
2	Cumulative Deferred Property Taxes	29,130	58,259	87,389	116,518	145,648	174,777	203,907	233,036	262,166	291,295	320,425	349,554	
		Jan 13	Feb 13	Mar 13	Apr 13	May 13	Jun 13	Jul 13	Aug 13	Sep 13	Oct 13	Nov 13	Dec 13	
3	Property Taxes	130,926	130,926	130,926	130,926	130,926	130,926	130,926	130,926	130,926	130,926	130,926	130,926	1,571,106
4	Cumulative Deferred Property Taxes	480,480	611,406	742,331	873,257	1,004,182	1,135,108	1,266,033	1,396,959	1,527,884	1,658,810	1,789,735	1,920,661	
		Jan 14	Feb 14	Mar 14	Apr 14	May 14	Jun 14	Jul 14	Aug 14	Sep 14	Oct 14	Nov 14	Dec 14	
5	Property Taxes	248,988	248,988	248,988	248,988	248,988	248,988	248,988	248,988	248,988	248,988	248,988	248,988	2,987,852
6	Cumulative Deferred Property Taxes	2,169,648	2,418,636	2,667,624	2,916,611	3,165,599	3,414,587	3,663,574	3,912,562	4,161,550	4,410,537	4,659,525	4,908,513	
		Jan 15	Feb 15	Mar 15	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	Nov 15	Dec 15	
7	Property Taxes	462,640	462,640	462,640	462,640	462,640	462,640	462,640	462,640	462,640	462,640	462,640	462,640	5,551,683
8	Cumulative Deferred Property Taxes	5,371,153	5,833,793	6,296,433	6,759,073	7,221,714	7,684,354	8,146,994	8,609,634	9,072,274	9,534,915	9,997,555	10,460,195	
		Jan 16	Feb 16	Mar 16	Apr 16	May 16	Jun 16	Jul 16	Aug 16	Sep 16	Oct 16	Nov 16	Dec 16	
9	Property Taxes	703,873	703,873	703,873	703,873	703,873	703,873	703,873	703,873	703,873	703,873	703,873	703,873	8,446,482
10	Cumulative Deferred Property Taxes	11,164,069	11,867,942	12,571,815	13,275,689	13,979,562	14,683,436	15,387,309	16,091,183	16,795,056	17,498,930	18,202,803	18,906,677	
		Jan 17	Feb 17	Mar 17	Apr 17	May 17	Jun 17	Jul 17	Aug 17	Sep 17	Oct 17	*Estimated* Nov 17	Dec 17	
11	Property Taxes	894,533	894,533	894,533	894,533	894,533	894,533	894,533	894,533	894,533	894,533	894,533	894,533	10,734,397
12	Cumulative Deferred Property Taxes	19,801,210	20,695,743	21,590,276	22,484,809	23,379,342	24,273,875	25,168,408	26,062,942	26,957,475	27,852,008	28,746,541	29,641,074	
		Jan 18	Feb 18	Mar 18	Apr 18	May 18	*Estimated* Jun 18	Jul 18	Aug 18	Sep 18	Oct 18	Nov 18	Dec 18	
11	Property Taxes	841,304	841,304	841,304	841,304	841,304	841,304	841,304	218,462	218,462	218,462	218,462	218,462	6,981,436
	CEP Rider Property Tax Amortization	-	-	-	-	-	-	-	(83,479)	(83,479)	(83,479)	(83,479)	(83,479)	
12	Cumulative Deferred Property Taxes	30,482,378	31,323,682	32,164,986	33,006,290	33,847,594	34,688,898	35,530,203	35,665,185	35,800,167	35,935,150	36,070,132	36,205,115	
		Jan 19	Feb 19	Mar 19	Apr 19	May 19	*Estimated* Jun 19	Jul 19	Aug 19	Sep 19	Oct 19	Nov 19	Dec 19	
11	Property Taxes	211,799	211,799	211,799	211,799	211,799	211,799	211,799	211,799	211,799	211,799	211,799	211,799	2,541,590
	CEP Rider Property Tax Amortization	(83,479)	(83,479)	(83,479)	(83,479)	(83,479)	(83,479)	(83,479)	(83,479)	(83,479)	(83,479)	(83,479)	(83,479)	
12	Cumulative Deferred Property Taxes	36,333,435	36,461,755	36,590,075	36,718,395	36,846,715	36,975,035	37,103,355	37,231,675	37,359,995	37,488,315	37,616,635	37,744,955	

Annualized Property Tax Amortization

Line No.	Description	Amount
13	Cumulative Deferred Property Tax	39,164,101
14	Depreciation Rate	3.53%
15	Annualized Deferred Property Tax Amort	1,383,358.28
16	Monthly Deferred Property Tax Amort	115,279.86

Annualized Property Tax Expense

Line No.	Description	2011	2012	2013	2014	2015	2016	Total
16	Net Cost Taxable Property	16,835,080.97	55,188,343.02	63,896,415.84	117,188,313.97	129,028,033.72	105,967,700.57	
17	Percent Good	71.70%	75.00%	78.30%	81.70%	85.00%	88.30%	
18	Taxable Value	12,070,753.06	41,391,257.26	50,030,893.60	95,742,852.52	109,673,828.66	93,569,479.60	
19	Valuation Percentage	25.00%	25.00%	25.00%	25.00%	25.00%	25.00%	
20	Total Taxable Value	3,017,688.26	10,347,814.32	12,507,723.40	23,935,713.13	27,418,457.17	23,392,369.90	
21	Average Property Tax Rate per $1,000 of Valuation	98.40	98.40	98.40	98.40	98.40	98.40	
22	**Property Tax**	296,930.47	1,018,190.44	1,230,718.29	2,355,194.39	2,697,884.79	2,301,731.22	9,900,649.59

Columbia Gas of Ohio, Inc.

Capital Expenditure Program (CEP) Rider

Case No. 17-2202-GA-ALT

Provision for Plant Depreciation for Investment Date 12/31/2017

Line No.	Description	Oct 11	Nov 11	Dec 11	Jan 12	Feb 12	Mar 12	Apr 12	May 12	Jun 12	Jul 12	Aug 12	Sep 12	Oct 12	Nov 12	Dec 12	Total
1	CEP Net Plant Depreciation	$ 5,540	$ 15,682	$ 25,188	$ 32,970	$ 40,042	$ 47,133	$ 56,436	$ 67,136	$ 73,531	$ 81,675	$ 95,995	$ 108,299	$ 116,010	$ 125,228	$ 135,715	$ 1,026,579
2	Accumulated Depreciation Reserve	$ 5,540	$ 21,222	$ 46,410	$ 79,380	$ 119,421	$ 166,554	$ 222,991	$ 290,126	$ 363,658	$ 445,333	$ 541,327	$ 649,626	$ 765,637	$ 890,865	$ 1,026,579	

Line No.	Description	Jan 13	Feb 13	Mar 13	Apr 13	May 13	Jun 13	Jul 13	Aug 13	Sep 13	Oct 13	Nov 13	Dec 13	Total
3	CEP Net Plant Depreciation	$ 129,566	$ 148,941	$ 155,293	$ 160,761	$ 165,563	$ 174,154	$ 184,110	$ 199,044	$ 210,895	$ 221,193	$ 236,042	$ 253,197	$ 2,238,758
4	Accumulated Depreciation Reserve	$ 1,156,146	$ 1,305,087	$ 1,460,380	$ 1,621,140	$ 1,786,703	$ 1,960,857	$ 2,144,967	$ 2,344,010	$ 2,554,905	$ 2,776,098	$ 3,012,141	$ 3,265,337	

Line No.	Description	Jan 14	Feb 14	Mar 14	Apr 14	May 14	Jun 14	Jul 14	Aug 14	Sep 14	Oct 14	Nov 14	Dec 14	
5	CEP Net Plant Depreciation	$ 263,782	$ 271,023	$ 363,691	$ 400,976	$ 437,603	$ 452,849	$ 463,241	$ 475,864	$ 495,252	$ 557,894	$ 652,123	$ 668,138	$ 5,502,434
6	Accumulated Depreciation Reserve	$ 3,529,119	$ 3,800,142	$ 4,163,834	$ 4,564,809	$ 5,002,413	$ 5,455,261	$ 5,918,502	$ 6,394,365	$ 6,889,617	$ 7,447,511	$ 8,099,634	$ 8,767,772	

Line No.	Description	Jan 15	Feb 15	Mar 15	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	Nov 15	Dec 15	
7	CEP Net Plant Depreciation	$ 672,473	$ 680,453	$ 672,378	$ 687,358	$ 706,910	$ 732,688	$ 755,494	$ 779,617	$ 809,788	$ 844,872	$ 875,461	$ 946,859	$ 9,164,351
8	Accumulated Depreciation Reserve	$ 9,440,244	$ 10,120,697	$ 10,793,075	$ 11,480,434	$ 12,187,344	$ 12,920,032	$ 13,675,525	$ 14,455,142	$ 15,264,930	$ 16,109,802	$ 16,985,264	$ 17,932,122	

Line No.	Description	Jan 16	Feb 16	Mar 16	Apr 16	May 16	Jun 16	Jul 16	Aug 16	Sep 16	Oct 16	Nov 16	Dec 16	
9	CEP Net Plant Depreciation	$ 1,015,639	$ 1,035,000	$ 1,057,205	$ 1,080,540	$ 1,104,532	$ 1,134,666	$ 1,164,137	$ 1,190,229	$ 1,208,933	$ 1,228,756	$ 1,254,206	$ 1,279,502	$ 13,753,346
10	Accumulated Depreciation Reserve	$ 18,947,762	$ 19,982,762	$ 21,039,967	$ 22,120,507	$ 23,225,039	$ 24,359,705	$ 25,523,842	$ 26,714,071	$ 27,923,004	$ 29,151,760	$ 30,405,966	$ 31,685,469	

Line No.	Description	Jan 17	Feb 17	Mar 17	Apr 17	May 17	Jun 17	Jul 17	Aug 17	Sep 17	Oct 17	Estimated Nov 17	Dec 17	
11	CEP Net Plant Depreciation	$ 1,300,905	$ 1,317,135	$ 1,338,616	$ 1,359,867	$ 1,374,629	$ 1,389,824	$ 1,406,712	$ 1,428,376	$ 1,456,369	$ 1,484,987	$ 1,513,232	$ 1,566,752	$ 16,937,404
12	Accumulated Depreciation Reserve	$ 32,986,373	$ 34,303,508	$ 35,642,124	$ 37,001,991	$ 38,376,620	$ 39,766,445	$ 41,173,157	$ 42,601,533	$ 44,057,902	$ 45,542,889	$ 47,056,121	$ 48,622,872	

Line No.	Description	Jan 18	Feb 18	Mar 18	Apr 18	May 18	Estimated Jun 18	Jul 18	Aug 18	Sep 18	Oct 18	Nov 18	Dec 18	
13	CEP Net Plant Depreciation	$ 1,607,146	$ 1,607,146	$ 1,607,146	$ 1,607,146	$ 1,607,146	$ 1,607,146	$ 1,607,146	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 14,255,225
14	CEP Rider Depreciation Amort	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	
15	Accumulated Depreciation Reserve	$ 50,230,019	$ 51,837,165	$ 53,444,311	$ 55,051,457	$ 56,658,603	$ 58,265,750	$ 59,872,896	$ 60,350,077	$ 60,827,258	$ 61,304,440	$ 61,781,621	$ 62,258,803	

Line No.	Description	Jan 19	Feb 19	Mar 19	Apr 19	May 19	Estimated Jun 19	Jul 19	Aug 19	Sep 19	Oct 19	Nov 19	Dec 19	
16	CEP Net Plant Depreciation	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 7,212,483
17	CEP Rider Depreciation Amort	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	
18	Accumulated Depreciation Reserve	$ 62,735,984	$ 63,213,165	$ 63,690,347	$ 64,167,528	$ 64,644,709	$ 65,121,891	$ 65,599,072	$ 66,076,253	$ 66,553,435	$ 67,030,616	$ 67,507,797	$ 67,984,979	

Line No.	Description	Jan 20	Feb 20	Mar 20	Apr 20	May 20	Estimated Jun 20	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	
19	CEP Net Plant Depreciation	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 601,040	$ 312,960	$ 312,960	$ 312,960	$ 312,960	$ 312,960	$ 5,772,080
20	CEP Rider Depreciation Amort	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (123,859)	$ (180,061)	$ (180,061)	$ (180,061)	$ (180,061)	$ (180,061)	
21	Accumulated Depreciation Reserve	$ 68,462,160	$ 68,939,341	$ 69,416,523	$ 69,893,704	$ 70,370,886	$ 70,848,067	$ 71,325,248	$ 71,458,147	$ 71,591,045	$ 71,723,943	$ 71,856,841	$ 71,989,740	

Line No.	Description	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Estimated Jun 21	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	
22	CEP Net Plant Depreciation	$ 312,960	$ 312,960	$ 312,960	$ 312,960	$ 312,960	$ 312,960	$ 312,960	$ 312,960	$ 312,960	$ 312,960	$ 312,960	$ 312,960	$ 3,755,516
23	CEP Rider Depreciation Amort	$ (180,061)	$ (180,061)	$ (180,061)	$ (180,061)	$ (180,061)	$ (180,061)	$ (180,061)	$ (180,061)	$ (180,061)	$ (180,061)	$ (180,061)	$ (180,061)	
24	Accumulated Depreciation Reserve	$ 72,122,638	$ 72,255,536	$ 72,388,435	$ 72,521,333	$ 72,654,231	$ 72,787,129	$ 72,920,028	$ 73,052,926	$ 73,185,824	$ 73,318,723	$ 73,451,621	$ 73,584,519	

Annualized Depreciation Expense

Line No.	Description	2017
25	Cumulative CEP Additions	$ 666,377,545.78
26	Depreciation Rate	3.53%
27	Annualized Depreciation	**$ 23,537,854.31**
28		

Annualized Deferred Plant Depreciation Amortization

	2021	2017
Cumulative Deferred Depreciation	$ 79,618,177	$ 48,622,872
Depreciation Rate	3.53%	3.53%
Annualized Deferred Plant Depreciation Amort	**$ 2,812,281.20**	**$ 1,717,461.96**
Monthly Deferred Plant Depreciation Amort	**$ 234,356.77**	**$ 143,121.83**

Depreciation Expense

Line No.	Description	Jan 18	Feb 18	Mar 18	Apr 18	May 18	Jun 18	Jul 18	Aug 18	Sep 18	Oct 18	Nov 18	Dec 18
29	CEP Rider Depreciation Expense	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51
30	Accumulated Depreciation Expense	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,225,163.51	$ 2,450,327.03	$ 3,675,490.54	$ 4,900,654.05	$ 6,125,817.56

Line No.	Description	Jan 19	Feb 19	Mar 19	Apr 19	May 19	Jun 19	Jul 19	Aug 19	Sep 19	Oct 19	Nov 19	Dec 19
31	CEP Rider Depreciation Expense	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51
32	Accumulated Depreciation Expense	$ 7,350,981.08	$ 8,576,144.59	$ 9,801,308.10	$11,026,471.62	$12,251,635.13	$13,476,798.64	$14,701,962.15	$15,927,125.67	$17,152,289.18	$18,377,452.69	$19,602,616.21	$20,827,779.72

Line No.	Description	Jan 20	Feb 20	Mar 20	Apr 20	May 20	Jun 20	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20
33	CEP Rider Depreciation Expense	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,225,163.51	$ 1,563,904.57	$ 1,563,904.57	$ 1,563,904.57	$ 1,563,904.57	$ 1,563,904.57
34	Accumulated Depreciation Expense	$22,052,943.23	$ 23,278,106.74	$24,503,270.26	$25,728,433.77	$26,953,597.28	$28,178,760.79	$29,403,924.31	$30,967,828.88	$32,531,733.45	$34,095,638.03	$35,659,542.60	$37,223,447.17

Line No.	Description	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21
35	CEP Rider Depreciation Expense	$ 1,563,904.57	$ 1,563,904.57	$ 1,563,904.57	$ 1,563,904.57	$ 1,563,904.57	$ 1,563,904.57	$ 1,563,904.57	$ 1,563,904.57	$ 1,563,904.57	$ 1,563,904.57	$ 1,563,904.57	$ 1,563,904.57
36	Accumulated Depreciation Expense	$38,787,351.75	$ 40,351,256.32	$41,915,160.89	$43,479,065.47	$45,042,970.04	$46,606,874.61	$48,170,779.19	$49,734,683.76	$51,298,588.33	$52,862,492.91	$54,426,397.48	$55,990,302.05

Columbia Gas of Ohio, Inc.
Capital Expenditure Program (CEP) Rider
Case No. 17-2202-GA-ALT
Post-in-Service Carrying Cost for Investment Date 12/31/2017

Line No.	Description	Oct 11	Nov 11	Dec 11	Jan 12	Feb 12	Mar 12	Apr 12	May 12	Jun 12	Jul 12	Aug 12	Sep 12	Oct 12	Nov 12	Dec 12	Total
1	PISCC Deferral	$ -	$ 23,600	$ 43,152	$ 63,940	$ 76,057	$ 93,747	$ 105,879	$ 132,922	$ 150,913	$ 159,517	$ 184,891	$ 219,729	$ 236,379	$ 251,530	$ 274,525	$ 2,016,781
2	Accumulated PISCC	$ -	$ 23,600	$ 66,751	$ 130,692	$ 206,749	$ 300,496	$ 406,376	$ 539,297	$ 690,210	$ 849,727	$ 1,034,618	$ 1,254,347	$ 1,490,726	$ 1,742,256	$ 2,016,781	

Line No.	Description													Total
		Jan 13	Feb 13	Mar 13	Apr 13	May 13	Jun 13	Jul 13	Aug 13	Sep 13	Oct 13	Nov 13	Dec 13	Total
3	PISCC Deferral	$ 228,896	$ 309,076	$ 313,943	$ 334,690	$ 335,732	$ 353,593	$ 370,719	$ 394,311	$ 426,295	$ 442,486	$ 467,792	$ 503,121	$ 4,480,653
4	Accumulated PISCC	$ 2,245,677	$ 2,554,753	$ 2,868,696	$ 3,203,386	$ 3,539,118	$ 3,892,711	$ 4,263,430	$ 4,657,741	$ 5,084,036	$ 5,526,522	$ 5,994,314	$ 6,497,435	
		Jan 14	Feb 14	Mar 14	Apr 14	May 14	Jun 14	Jul 14	Aug 14	Sep 14	Oct 14	Nov 14	Dec 14	
5	PISCC Deferral	$ 538,025	$ 545,426	$ 566,096	$ 592,218	$ 685,090	$ 708,698	$ 730,975	$ 738,494	$ 768,000	$ 797,621	$ 969,038	$ 1,019,257	$ 8,658,938
6	Accumulated PISCC	$ 7,035,460	$ 7,580,886	$ 8,146,982	$ 8,739,200	$ 9,424,289	$ 10,132,988	$ 10,863,962	$ 11,602,456	$ 12,370,457	$ 13,168,078	$ 14,137,116	$ 15,156,373	
		Jan 15	Feb 15	Mar 15	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	Nov 15	Dec 15	
7	PISCC Deferral	$ 995,052	$ 1,007,987	$ 1,013,470	$ 1,039,087	$ 1,054,991	$ 1,095,071	$ 1,130,680	$ 1,161,022	$ 1,200,625	$ 1,250,061	$ 1,305,072	$ 1,339,820	$ 13,592,937
8	Accumulated PISCC	$ 16,151,425	$ 17,159,412	$ 18,172,882	$ 19,211,969	$ 20,266,959	$ 21,362,030	$ 22,492,710	$ 23,653,732	$ 24,854,356	$ 26,104,417	$ 27,409,490	$ 28,749,310	
		Jan 16	Feb 16	Mar 16	Apr 16	May 16	Jun 16	Jul 16	Aug 16	Sep 16	Oct 16	Nov 16	Dec 16	
9	PISCC Deferral	$ 1,476,321	$ 1,501,218	$ 1,526,938	$ 1,560,455	$ 1,589,467	$ 1,624,803	$ 1,672,589	$ 1,705,603	$ 1,742,670	$ 1,752,597	$ 1,792,953	$ 1,820,104	$ 19,765,717
10	Accumulated PISCC	$ 30,225,631	$ 31,726,849	$ 33,253,786	$ 34,814,241	$ 36,403,708	$ 38,028,510	$ 39,701,099	$ 41,406,703	$ 43,149,373	$ 44,901,970	$ 46,694,923	$ 48,515,027	
												Estimated		
		Jan 17	Feb 17	Mar 17	Apr 17	May 17	Jun 17	Jul 17	Aug 17	Sep 17	Oct 17	Nov 17	Dec 17	
11	PISCC Deferral	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,805,959	$ 1,754,751	$ 1,754,751	$ 21,569,095
12	Accumulated PISCC	$ 50,320,986	$ 52,126,946	$ 53,932,905	$ 55,738,864	$ 57,544,824	$ 59,350,783	$ 61,156,743	$ 62,962,702	$ 64,768,661	$ 66,574,621	$ 68,329,371	$ 70,084,122	
							Estimated							
		Jan 18	Feb 18	Mar 18	Apr 18	May 18	Jun 18	Jul 18	Aug 18	Sep 18	Oct 18	Nov 18	Dec 18	
13	PISCC Deferral	$ 1,716,324	$ 1,716,324	$ 1,716,324	$ 1,716,324	$ 1,716,324	$ 1,716,324	$ 1,716,324	$ 743,163	$ 743,163	$ 743,163	$ 743,163	$ 743,163	$ 15,730,082
14	CEP Rider PISCC Amortization	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	
15	Accumulated PISCC	$ 71,800,446	$ 73,516,770	$ 75,233,094	$ 76,949,418	$ 78,665,742	$ 80,382,066	$ 82,098,390	$ 82,652,635	$ 83,206,881	$ 83,761,126	$ 84,315,372	$ 84,869,617	
							Estimated							
		Jan 19	Feb 19	Mar 19	Apr 19	May 19	Jun 19	Jul 19	Aug 19	Sep 19	Oct 19	Nov 19	Dec 19	
16	PISCC Deferral	$ 743,163	$ 743,163	$ 743,163	$ 743,163	$ 743,163	$ 743,163	$ 743,163	$ 743,163	$ 743,163	$ 743,163	$ 743,163	$ 743,163	$ 8,917,954
17	CEP Rider PISCC Amortization	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	
18	Accumulated PISCC	$ 85,423,863	$ 85,978,108	$ 86,532,354	$ 87,086,599	$ 87,640,845	$ 88,195,090	$ 88,749,336	$ 89,303,581	$ 89,857,827	$ 90,412,072	$ 90,966,318	$ 91,520,563	
							Estimated							
		Jan 20	Feb 20	Mar 20	Apr 20	May 20	Jun 20	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	
19	PISCC Deferral	$ 737,379	$ 737,379	$ 737,379	$ 737,379	$ 737,379	$ 737,379	$ 737,379	$ 737,379	$ 737,379	$ 737,379	$ 737,379	$ 737,379	$ 8,848,553
20	CEP Rider PISCC Amortization	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (188,917)	$ (260,478)	$ (260,478)	$ (260,478)	$ (260,478)	$ (260,478)	
21	Accumulated PISCC	$ 92,069,025	$ 92,617,487	$ 93,165,950	$ 93,714,412	$ 94,262,874	$ 94,811,336	$ 95,359,798	$ 95,836,699	$ 96,313,600	$ 96,790,501	$ 97,267,403	$ 97,744,304	
							Estimated							
		Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	
22	PISCC Deferral	$ 735,934	$ 735,934	$ 735,934	$ 735,934	$ 735,934	$ 735,934	$ 735,934	$ 735,934	$ 735,934	$ 735,934	$ 735,934	$ 735,934	$ 8,831,203
23	CEP Rider PISCC Amortization	$ (260,478)	$ (260,478)	$ (260,478)	$ (260,478)	$ (260,478)	$ (260,478)	$ (260,478)	$ (260,478)	$ (260,478)	$ (260,478)	$ (260,478)	$ (260,478)	
24	Accumulated PISCC	$ 98,219,759	$ 98,695,214	$ 99,170,670	$ 99,646,125	$ 100,121,580	$ 100,597,036	$ 101,072,491	$ 101,547,946	$ 102,023,402	$ 102,498,857	$ 102,974,312	$ 103,449,768	

Annualized Deferred PISCC Amortization

Line No.	Description	2021	2017
25	Cumulative Deferred PISCC	$ 112,411,914	$ 70,084,122
26	Depreciation Rate	3.53%	3.53%
27	Annualized Deferred PISCC Amort	**$ 3,970,624.88**	**$ 2,475,518.37**
28	Monthly Deferred PISCC Amort	**$ 330,885.41**	**$ 206,293.20**

Columbia Gas of Ohio, Inc.

Capital Expenditure Program (CEP) Rider

Case No. 17-2202-GA-ALT

Property Tax for Investment Date 12/31/2017

Line No.	Description	Jan 12	Feb 12	Mar 12	Apr 12	May 12	Jun 12	Jul 12	Aug 12	Sep 12	Oct 12	Nov 12	Dec 12	Total
1	Property Taxes	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 29,130	$ 349,554
2	Cumulative Deferred Property Taxes	$ 29,130	$ 58,259	$ 87,389	$ 116,518	$ 145,648	$ 174,777	$ 203,907	$ 233,036	$ 262,166	$ 291,295	$ 320,425	$ 349,554	
		Jan 13	Feb 13	Mar 13	Apr 13	May 13	Jun 13	Jul 13	Aug 13	Sep 13	Oct 13	Nov 13	Dec 13	
3	Property Taxes	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 130,926	$ 1,571,106
4	Cumulative Deferred Property Taxes	$ 480,480	$ 611,406	$ 742,331	$ 873,257	$ 1,004,182	$ 1,135,108	$ 1,266,033	$ 1,396,959	$ 1,527,884	$ 1,658,810	$ 1,789,735	$ 1,920,661	
		Jan 14	Feb 14	Mar 14	Apr 14	May 14	Jun 14	Jul 14	Aug 14	Sep 14	Oct 14	Nov 14	Dec 14	
5	Property Taxes	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 248,988	$ 2,987,852
6	Cumulative Deferred Property Taxes	$ 2,169,648	$ 2,418,636	$ 2,667,624	$ 2,916,611	$ 3,165,599	$ 3,414,587	$ 3,663,574	$ 3,912,562	$ 4,161,550	$ 4,410,537	$ 4,659,525	$ 4,908,513	
		Jan 15	Feb 15	Mar 15	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	Nov 15	Dec 15	
7	Property Taxes	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 462,640	$ 5,551,683
8	Cumulative Deferred Property Taxes	$ 5,371,153	$ 5,833,793	$ 6,296,433	$ 6,759,073	$ 7,221,714	$ 7,684,354	$ 8,146,994	$ 8,609,634	$ 9,072,274	$ 9,534,915	$ 9,997,555	$ 10,460,195	
		Jan 16	Feb 16	Mar 16	Apr 16	May 16	Jun 16	Jul 16	Aug 16	Sep 16	Oct 16	Nov 16	Dec 16	
9	Property Taxes	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 703,873	$ 8,446,482
10	Cumulative Deferred Property Taxes	$ 11,164,069	$ 11,867,942	$ 12,571,815	$ 13,275,689	$ 13,979,562	$ 14,683,436	$ 15,387,309	$ 16,091,183	$ 16,795,056	$ 17,498,930	$ 18,202,803	$ 18,906,677	
		Jan 17	Feb 17	Mar 17	Apr 17	May 17	Jun 17	Jul 17	Aug 17	Sep 17	Oct 17	*Estimated* Nov 17	Dec 17	
11	Property Taxes	$ 894,533	$ 894,533	$ 894,533	$ 894,533	$ 894,533	$ 894,533	$ 894,533	$ 894,533	$ 894,533	$ 894,533	$ 894,533	$ 894,533	$ 10,734,396
12	Cumulative Deferred Property Taxes	$ 19,801,210	$ 20,695,743	$ 21,590,276	$ 22,484,809	$ 23,379,342	$ 24,273,875	$ 25,168,408	$ 26,062,941	$ 26,957,474	$ 27,852,007	$ 28,746,540	$ 29,641,073	
		Jan 18	Feb 18	Mar 18	Apr 18	May 18	*Estimated* Jun 18	Jul 18	Aug 18	Sep 18	Oct 18	Nov 18	Dec 18	
13	Property Taxes	$ 1,107,541	$ 1,107,541	$ 1,107,541	$ 1,107,541	$ 1,107,541	$ 1,107,541	$ 1,107,541	$ 484,698	$ 484,698	$ 484,698	$ 484,698	$ 484,698	$ 10,176,275
14	CEP Rider Property Tax Amortization	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	
15	Cumulative Deferred Property Taxes	$ 30,748,613	$ 31,856,154	$ 32,963,694	$ 34,071,235	$ 35,178,775	$ 36,286,316	$ 37,393,856	$ 37,795,075	$ 38,196,295	$ 38,597,514	$ 38,998,733	$ 39,399,952	
		Jan 19	Feb 19	Mar 19	Apr 19	May 19	*Estimated* Jun 19	Jul 19	Aug 19	Sep 19	Oct 19	Nov 19	Dec 19	
16	Property Taxes	$ 611,995	$ 611,995	$ 611,995	$ 611,995	$ 611,995	$ 611,995	$ 611,995	$ 611,995	$ 611,995	$ 611,995	$ 611,995	$ 611,995	$ 7,343,936
17	CEP Rider Property Tax Amortization	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	
18	Cumulative Deferred Property Taxes	$ 39,928,467	$ 40,456,983	$ 40,985,498	$ 41,514,014	$ 42,042,529	$ 42,571,045	$ 43,099,560	$ 43,628,076	$ 44,156,591	$ 44,685,107	$ 45,213,622	$ 45,742,138	
		Jan 20	Feb 20	Mar 20	Apr 20	May 20	*Estimated* Jun 20	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	
19	Property Taxes	$ 616,350	$ 616,350	$ 616,350	$ 616,350	$ 616,350	$ 616,350	$ 616,350	$ 331,321	$ 331,321	$ 331,321	$ 331,321	$ 331,321	$ 5,971,054
20	CEP Rider Property Tax Amortization	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	$ (83,479)	$ (115,280)	$ (115,280)	$ (115,280)	$ (115,280)	$ (115,280)	
21	Cumulative Deferred Property Taxes	$ 46,275,009	$ 46,807,879	$ 47,340,750	$ 47,873,621	$ 48,406,492	$ 48,939,363	$ 49,472,233	$ 49,688,274	$ 49,904,315	$ 50,120,357	$ 50,336,398	$ 50,552,439	
		Jan 21	Feb 21	Mar 21	Apr 21	May 21	*Estimated* Jun 21	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	
21	Property Taxes	$ 321,893	$ 321,893	$ 321,893	$ 321,893	$ 321,893	$ 321,893	$ 321,893	$ 321,893	$ 321,893	$ 321,893	$ 321,893	$ 321,893	$ 3,862,714
22	CEP Rider Property Tax Amortization	$ (115,280)	$ (115,280)	$ (115,280)	$ (115,280)	$ (115,280)	$ (115,280)	$ (115,280)	$ (115,280)	$ (115,280)	$ (115,280)	$ (115,280)	$ (115,280)	
23	Cumulative Deferred Property Taxes	$ 50,759,052	$ 50,965,665	$ 51,172,278	$ 51,378,891	$ 51,585,504	$ 51,792,117	$ 51,998,730	$ 52,205,343	$ 52,411,956	$ 52,618,569	$ 52,825,182	$ 53,031,795	

Annualized Property Tax Amortization

Line No.		2021	2017
24	Cumulative Deferred Property Tax	$ 56,995,052	$ 29,641,073
25	Depreciation Rate	3.53%	3.53%
26	Annualized Deferred Property Tax Amort	$ 2,013,184.94	$ 1,046,984.93

Annualized Property Tax Expense

Line No.		2011	2012	2013	2014	2015	2016	2017	Total
27	Net Cost Taxable Property	$ 16,835,080.97	$ 55,188,343.02	$ 63,896,415.84	$ 117,188,313.97	$ 129,028,033.72	$ 105,967,700.57	$ 119,848,791.46	
28	Percent Good	65.00%	68.30%	71.70%	75.00%	78.30%	81.70%	85.00%	
29	Taxable Value	$ 10,942,802.63	$ 37,693,638.28	$ 45,813,730.16	$ 87,891,235.48	$ 101,028,950.40	$ 86,575,611.37	$ 101,871,472.74	
30	Valuation Percentage	25.00%	25.00%	25.00%	25.00%	25.00%	25.00%	25.00%	
31	Total Taxable Value	$ 2,735,700.66	$ 9,423,409.57	$ 11,453,432.54	$ 21,972,808.87	$ 25,257,237.60	$ 21,643,902.84	$ 25,467,868.18	
32	Average Property Tax Rate per $1,000 of Valuation	$ 99.40	$ 99.40	$ 99.40	$ 99.40	$ 99.40	$ 99.40	$ 99.40	
33	**Property Tax**	$ 271,919.53	$ 936,655.50	$ 1,138,433.02	$ 2,184,023.96	$ 2,510,485.23	$ 2,151,331.80	$ 2,531,421.20	$ 11,724,270.23

Columbia Gas of Ohio, Inc.

Capital Expenditure Program (CEP) Rider

Case No. 17-2202-GA-ALT

Deferred Balances as of 12/31/2017

Line No.	Description	12/31/2017
	Gross CEP Deferrals	
1	Depreciation Deferral	$ 48,622,872
2	PISCC Deferral	$ 70,084,122
3	Property Tax Deferral	$ 29,641,073
4	Total Gross CEP Deferrals	$ 148,348,067
	Deferred Tax Offset	
7	Deferred Tax Offset (35.0%)	$ (51,921,824)
9	Total Net Deferrals	$ 96,426,244
	Revenue Requirement Calculation	
10	Pretax Return on Net Deferrals (10.95%)	$ 10,558,674
11	Amortization of Deferred Assets	$ 5,239,965
12	Total Revenue Requirement	$ 15,798,639
	Customer Class Allocation	
13	SGS (80.80%)	$ 12,765,300
14	GS (15.77%)	$ 2,491,445
15	LGS (3.43%)	$ 541,893
16	Allocated Revenue Requirement	$ 15,798,639
	Customer Class Allocation	
17	Average SGS Customer Bills	17,033,281
18	Average GS Customer Bills	406,004
19	Average LGS Customer Bills	4,503
20	Total Customer Count	17,443,788
	Increase in Monthly Customer Charge	
21	SGS Customer Charge	$ 0.75
22	GS Customer Charge	$ 6.14
23	LGS Customer Charge	$ 120.34