

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Annual Applica-)
tion of Columbia Gas of Ohio, Inc. for) Case No. 17-2374-GA-RDR
an Adjustment to Rider IRP and Rider)
DSM Rates.)

**STATEMENT INFORMING THE COMMISSION WHETHER
ISSUES RAISED IN COMMENTS HAVE BEEN RESOLVED**

In accordance with the Attorney Examiner's Entry dated March 6, 2018, this Statement is submitted to inform the Public Utilities Commission of Ohio ("Commission") whether the issues in comments have been resolved.

On March 23, 2017, Staff, the Office of the Ohio Consumers' Counsel ("OCC"), and the Ohio Partners for Affordable Energy ("OPAЕ") filed comments. Additionally, OCC, OPAЕ and Industrial Energy Users-Ohio ("IEU") filed Motions to Intervene in this docket. Columbia, Staff, OCC, OPAЕ, and IEU (collectively, the "Parties") met to discuss these comments and have resolved all of the issues raised in the comments.¹

For purposes of resolving certain issues raised in the comments, the Parties recommend the Commission accept the issue resolution set forth below. Except for dispute resolution purposes in this proceeding, neither this Statement of Issues, nor the information and data contained therein or attached, shall be cited as precedent in any future proceeding for or against any Party to this case, or the Commission itself. This Statement of Issues is a reasonable compromise involving a balancing of competing positions and it does not necessarily reflect the position that a Party would have taken if these issues had been fully litigated.

¹ IEU-Ohio and OCC neither support nor oppose this Statement of Issues.

Rider IRP

Staff filed its Comments recommending approval of Columbia's Rider IRP as filed on February 27, 2018. However, Staff recommended a downward adjustment of \$4,315.54, plus any applicable carrying charges, for various meal expenditures. Staff also recommended an adjustment upward of \$58,779 to remedy an incorrect reimbursement that was applied to Rider IRP. Staff also acknowledged the current Commission investigation in Case No. 18-47-AU-COI and reserved the right to recommend adjustments to Columbia's Rider IRP, including potential refunds, on the basis of the Staff's ongoing investigation and/or Commission findings and directives in the 18-47-AU-COI case. Finally, Staff recommended the Commission direct Columbia to note in its tariffs that Rider IRP is subject to reconciliation and potential refunds as determined by the Commission.

Similarly, OCC requested rider language regarding refunds if charges are later found to be imprudent, unreasonable, or unlawful. OCC also commented that Columbia's Rider IRP adjustments for January – April 2018 should be subject to reconciliation and that customers should begin receiving refunds now for excess associated deferred income taxes ("ADIT") instead of waiting until May 2019.² Finally, OP&A also requested the Commission ensure that the recent corporate tax reduction be properly reflected in the cost recovery charges approved in this case.

Based on discussions with the Staff, it was determined that the adjustment for meals expenditures should be reduced to \$3,721.53 and that Columbia already adjusted its Rider IRP revenue requirement upwards by \$58,779 in its Application. Thus the parties agree that no further adjustments are required other than for meals expenditures.

The Parties recommend the Commission resolve Rider IRP issues as follows:

1. Adjust Rider IRP revenue requirement downward by \$3,721.53 related to meal expenditures.
2. Columbia will place the following language in its Rider IRP Tariff:
This Rider is subject to reconciliation or adjustment, including, but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to: (1) the twelve-month period of expenditures upon which the rates were calculated, if determined to be unlawful,

² OCC reserves the right to raise this issue for the Commission's consideration in Case No. 18-47-AU-COI or any other relevant docket ordered by the Commission to address the tax reform changes in Case No. 18-47-AU-COI.

unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio; and (2) the Commission's orders in Case No. 18-47-AU-COI or any case ordered by the Commission to address the tax reform changes in Case No. 18-47-AU-COI.

3. Columbia's tax adjustments of Rider IRP for January – April 2018, found on Schedules AMRP-1 Line 28, R-1 Line 26, and AMRD-1 Line 29, will be reconciled for any over- or under-recovery in Columbia's 2019 Rider IRP adjustment case, effective in May 2019.

Rider DSM

Staff commented it completed its audit of Columbia's DSM program and recommended approval of the proposed DSM rate. However, Staff requested a one-time independent review of prior years' spending along with an analysis to determine the sustainability of the DSM programs beyond 2022. Staff also reserved the right to examine the last 3 months of 2017 revenues and expenditures during the next DSM audit.

Similar to its Rider IRP comments, OCC requested the Commission require Columbia to insert tariff language regarding refunds. OCC also commented that the Commission should ensure customers are not being double charged for DSM programs in which Columbia and American Electric Power-Ohio partner. Finally, OCC commented that large commercial and industrial customers should pay for DSM programs as these customers receive rebates under Columbia's DSM Program.

The Parties recommend the Commission resolve Rider DSM issues as follows:

1. Columbia will place the following language in its Rider DSM Tariff:
This Rider is subject to reconciliation or adjustment, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of expenditures upon which the rates were calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.
2. Columbia agrees to financial audits of Rider DSM by Deloitte similar in form to Case No. 09-1036-GA-UNC, limited to calendar years 2018 and 2019. The financial audits will be completed in addition to any review by Staff of Rider DSM in the respective proceedings reviewing calendar

year 2018 and 2019 expenditures. Columbia shall be permitted to recover the reasonable costs of such audits through Rider DSM.

3. Columbia agrees with Staff's recommendation to review the last three months of 2017 in Columbia's next Rider DSM proceeding.
4. Columbia acknowledges that OCC filed an application for rehearing in Case No. 16-1309-GA-UNC, et al., which is still pending. To that end, Columbia agrees to make any required modifications ordered in the Commission's Second Entry on Rehearing or subsequent entries on rehearing in that case, or any required modifications resulting from an appeal of that case to the Supreme Court of Ohio. All parties reserve the right to file an application for rehearing or appeal of any subsequent order or entry on rehearing in that proceeding.

Therefore, the Parties respectfully request the Commission approve Columbia's February 27, 2017 Application with the modifications and conditions suggested herein. The Parties also respectfully request the Commission admit into the record the following: Columbia's Notice of Intent; Columbia's Application and supporting testimony; the comments submitted in this docket by Staff, OCC, and OPAE; and this Statement of Issues Resolution. The Parties also request the Commission grant the pending motions to intervene. Finally, the Parties request the Commission cancel the hearing in this matter and issue an order in time for Columbia to implement Rider IRP and Rider DSM effective with the first billing cycles in May 2018.

Respectfully submitted,

By: /s/ Joseph M. Clark

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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 28th day of March, 2018, upon the parties listed below.

/s/ Joseph M. Clark

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Summary: Notice / Statement Informing the Commission Whether Issues Raised in
Comments Have Been Resolved electronically filed by Cheryl A MacDonald on behalf of
Columbia Gas of Ohio, Inc.