



April 2, 2018

Via Electronic Filing

Barcy McNeal, Secretary
Docketing Division
Attn: Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

Re: *Suburban Natural Gas Co. v. Columbia Gas of Ohio*,
Case No. 17-2168-GA-CSS

Dear Secretary McNeal:

I am writing on behalf of National Gas & Oil Cooperative d/b/a The Energy Cooperative ("National"). National is a natural gas distribution cooperative headquartered in Newark, Ohio and serving over 35,000 members in 7 counties in eastern Ohio. National is writing this letter to express concerns similar to those raised by Suburban Natural Gas Co. ("Suburban") in the above-captioned complaint against Columbia Gas of Ohio ("Columbia").

National agrees with Suburban's concern that Columbia is improperly using its Demand Side Management ("DSM") program, specifically the EfficiencyCrafted Homes program, to gain a competitive cost advantage over smaller local distribution companies. National believes the use of the EfficiencyCrafted Homes program for this objective exceeds the intention and purpose of the DSM program and unfairly impacts smaller local distribution companies and their customers.

The cost to implement EfficiencyCrafted Homes is carried by Columbia's over 1 million customers, not its shareholders. Smaller local distribution companies, like National, simply do not have the member base to effectively implement and spread the costs of a similar program. Like any other smaller utility, obtaining new services and expanding customer base, particularly off existing infrastructure, is critical to reducing overall fixed costs on National's existing customers. Ultimately, Columbia's use of DSM programs to gain a competitive advantage in obtaining new services doesn't just hurt smaller local distribution companies, it hurts their customers.

If the Commission finds that Columbia is using or has used DSM programs such as EfficiencyCrafted Homes to gain a competitive advantage, National asks the Commission to consider the impact on the customers of smaller local distribution companies across the state of Ohio, and implement measures to prevent misuse of these programs.

Sincerely,
National Gas & Oil Cooperative
d/b/a The Energy Cooperative

A handwritten signature in blue ink, appearing to read "Todd P. Ware".

Todd P. Ware
President/CEO

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/2/2018 6:44:57 PM

in

Case No(s). 17-2168-GA-CSS

Summary: Correspondence of National Gas & Oil Cooperative in Support of Concerns Raised by Suburban Natural Gas Co. electronically filed by Ms. Lija Kaleps-Clark on behalf of National Gas & Oil Cooperative