

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of       )  
Columbia Gas of Ohio, Inc. for Ap-       )       Case No. 18-321-GA-UEx  
proval of an Adjustment to its Uncol-       )  
lectible Expense Rider Rate.               )

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**APPLICATION OF  
COLUMBIA GAS OF OHIO, INC.**

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Columbia Gas of Ohio, Inc. ("Columbia"), hereby submits its annual Uncollectible Expense Rider Report, and also requests approval to increase its Uncollectible Expense Rider rate. In support of its Application, Columbia states as follows:

1. By Finding and Order dated December 17, 2003 (the "December 17 Order"), in Case No. 03-1127-GA-UNC, the Commission approved, in concept, an Uncollectible Expense Rider for Columbia and several other natural gas companies.

2. Pursuant to the December 17 Order, Columbia is required to file an annual report each May that identifies the amounts recovered, deferred and, as applicable, amortized pursuant to the Uncollectible Expense Rider. Attached hereto as Attachment 1 is Columbia's annual Uncollectible Expense Rider Report.

3. By Entry dated April 7, 2004, in Case No. 03-2572-GA-ATA, the Commission approved Columbia's initial Uncollectible Expense Rider rate. However, the December 17 Order further provided utilities with the opportunity to adjust their Uncollectible Expense Rider rates. Pursuant to Columbia's Uncollectible Expense Rider tariffs,<sup>1</sup> Columbia shall request "approval to change the rate if

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<sup>1</sup> See Section V, Seventeenth Revised Sheet No. 29, for customers served under rate schedules SGS and GS; Section VI, Ninth Revised Sheet No. 69, for customers served under rate schedules SGTs and GTs; and Section VII, Sixteenth Revised Sheet No. 29, Page 9 of 11, for customers served through Columbia's CHOICE Program. All tariff sheets include identical billing rates and adjustment provisions.

the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.”

4. On April 14, 2017, Columbia filed an Application for Approval of an Adjustment to its Uncollectible Expense Rider in Case No. 17-0321-GA-UEX. This filing proposed the establishment of a revised Uncollectible Expense Rider rate of \$0.0438 per Mcf. By Finding and Order dated May 24, 2017, the Commission approved the amended application and revised Uncollectible Expense Rider rate to \$0.0438 per Mcf.

5. Attachment 2 shows the impact per Mcf of the projected under-collection of bad-debt expense to be experienced by Columbia during the period June 2017 through May 2018. On May 31, 2018, Columbia projects it will have an under-collected balance of \$2,066,287. Without accounting for any projected changes in the bad debt balance, an increase of \$0.0117/Mcf would be required to make Columbia whole for this deficiency. Rather than increasing the Uncollectible Expense Rider to recover the increased total bad debt balance from June 2017 to May 2018, Columbia recommends adding the under-collected amount (\$2,066,287) to the projected total bad debt balance from June 2018 through May 2019. Therefore, included as Attachment 3, is a projection of Columbia’s anticipated bad debt under-recovery for the period June 2018 through May 2019. Attachment 3 shows a projected bad debt write off of \$10,858,067 during the period June 2018 through May 2019. Combining the projected under-collected balance at May 31, 2018 of (\$2,066,287), with the bad debt projection for the twelve months period ending May 31, 2019 results in a bad-debt recovery requirement of \$12,924,354 or a revised rate of \$0.0730. Therefore, Columbia proposes to increase its current Uncollectible Expense Rider by \$0.0292/Mcf in order that it may properly match its projected bad-debt experience with recoveries during the period twelve months ending May 31, 2019.

6. Columbia believes it is reasonable to consider the prospective application of the Uncollectible Expense Rider in the development of the appropriate Uncollectible Expense Rider rate because it better matches expenses with recoveries. The computation of the Uncollectible Expense Rider rate based on the collection year: (1) properly matches recoveries with expenses; (2) is consistent with the method approved by the Commission in Case No. 16-0321-GA-UEX for determining Columbia’s current Uncollectible Expense Tracker rate; and (3) in the aggregate, cannot result in over-collection of costs due to the annual true-up program requirements. For this reason, Columbia, therefore, proposes to increase its Uncollectible Expense Rider rate from \$0.0438 to \$0.0730 per Mcf. The rate is comprised

of: (1) Columbia's projected deferred uncollectible expenses at May 31, 2018; and (2) Columbia's estimated uncollectible accounts expense for the twelve-month period ending May 31, 2019. The calculation of the proposed Uncollectible Expense Rider rate is shown on Attachment 4.

7. The resulting Uncollectible Expense Rider rate of \$0.0730 per Mcf is just and reasonable and Columbia requests that the Commission expeditiously approve the proposed rate. Clean copies of the proposed tariff sheets and scored current tariff sheets are attached hereto as Attachment 5.

**WHEREFORE**, Columbia respectfully requests that the Commission approve the proposed Uncollectible Expense Rider rate proposed herein.

Respectfully submitted by,

**COLUMBIA GAS OF OHIO, INC.**

/s/ Joseph M. Clark

Joseph M. Clark, (Counsel of Record)

Stephen B. Seiple, Asst. General  
Counsel (0003809)

Joseph M. Clark, Senior Counsel  
(0080711)

P.O. Box 117  
290 W. Nationwide Blvd.,  
Columbus, Ohio 43216-0117  
Telephone: (614) 460-6988  
E-mail: josephclark@nisource.com  
sseiple@nisource.com

Attorneys for  
**COLUMBIA GAS OF OHIO, INC.**

## **ATTACHMENT 1**

Columbia Gas of Ohio, Inc.  
Uncollectible Expense Rider Report

Line No.	Calendar Year 2017 Actual Balances											
	January	February	March	April	May	June	July	August	September	October	November	December
1 Balance - Beginning of Month (a)	886,319.06	(752,057.96)	(2,121,421.85)	(2,931,121.60)	(2,359,866.40)	(1,068,236.26)	1,162,803.42	3,707,681.53	6,069,441.27	7,731,431.47	7,736,137.65	5,493,308.01
2 Bad Debts Written Off	1,947,422.36	1,759,884.65	2,193,658.70	2,334,331.42	2,272,354.62	2,924,718.86	3,238,534.39	3,080,974.37	2,580,587.10	2,816,686.75	4,544,450.17	2,461,947.68
3 Amortization of 2001 Deferral	-	-	-	-	-	-	-	-	-	-	-	-
4 Recovery - Base Rates	-	-	-	-	-	-	-	-	-	-	-	-
5 Consultant Fees	-	-	-	-	-	-	-	-	-	-	-	-
6 Recovery - Bad Debt Rider	(1,760,590.81)	(1,431,982.17)	(1,212,765.55)	(846,332.27)	(455,672.25)	(197,637.82)	(148,823.35)	(138,851.06)	(139,876.79)	(199,995.39)	(536,627.21)	(1,104,050.46)
7 Recovery - Other	(1,825,256.55)	(1,695,830.35)	(1,787,815.53)	(913,835.51)	(523,167.81)	(496,078.22)	(546,889.84)	(584,492.66)	(784,100.35)	(2,618,517.47)	(6,256,239.68)	(2,920,861.60)
8 Incremental Bad Debt (2)+[(3)+(4)+(5)+(6)+(7)	(1,638,425.00)	(1,367,927.87)	(806,922.38)	574,163.64	1,293,514.56	2,231,002.82	2,542,821.20	2,357,630.65	1,656,609.96	(1,826.11)	(2,248,416.72)	(1,562,964.38)
9 Balance Subtotal (1) + (8)	(752,105.94)	(2,119,985.83)	(2,928,344.23)	(2,356,957.96)	(1,066,351.84)	1,162,766.56	3,705,624.62	6,065,312.18	7,726,051.23	7,729,605.36	5,487,720.93	3,930,343.63
10 Carrying Charges [(1)+[(9)/2]x(12)	47.98	(1,436.02)	(2,777.37)	(2,908.44)	(1,884.42)	36.87	2,056.91	4,129.09	5,380.24	6,532.29	5,587.08	4,594.03
11 Balance - End of Month (9)+(10)	(752,057.96)	(2,121,421.85)	(2,931,121.60)	(2,359,866.40)	(1,068,236.26)	1,162,803	3,707,682	6,069,441	7,731,431	7,736,138	5,493,308	3,934,937.66
12 Monthly Pool Rates	0.11%	0.10%	0.11%	0.11%	0.11%	0.12%	0.13%	0.13%	0.12%	0.13%	0.13%	0.15%

Columbia Gas of Ohio, Inc.  
Uncollectible Expense Rider Report  
Calendar Year 2018 Actual

Line No.		January	Actual February	March
1	Balance - Beginning of Month	3,934,938	2,164,363	933,967
2	Bad Debts Written Off	1,753,416	1,476,083	1,950,927
3	Amortization of 2001 Deferral	-	-	-
4	Recovery - Base Rates			
5	Consultant Fees			-
6	Recovery - Bad Debt Rider	(1,723,263)	(1,348,118)	(1,075,272)
7	Recovery - Other	(1,805,062)	(1,360,197)	(1,451,454)
8	Incremental Bad Debt (2)+[(3)+(4)+(5)+(6)]	(1,774,908)	(1,232,231)	(575,798)
9	Balance Subtotal (1) + (8)	2,160,030	932,132	358,168
10	Carrying Charges [(1)+[(9)/2]x(11)]	4,334	1,835	980
11	Balance - End of Month (9)+(10)	2,164,363	933,967	359,148
12	Monthly Pool Rates	0.18%	0.15%	0.19%

NISOURCE INC. AND SUBSIDIARIES  
OPERATING COMPANIES MONEY POOL RATES  
January 2017 Through March 2018

MONTH	DAYS	AVERAGE DAILY BALANCES			MONTHLY INTEREST ACCRUALS			MONTHLY RATES *		
		S-T DEBT \$	INVESTMENT \$	COMPOSITE \$	S-T DEBT \$	INVESTMENT \$	COMPOSITE \$	S-T DEBT %	INVEST %	COMPOSITE %
JAN 2017	31	1,065,531,741.94	0.00	1,065,531,741.94	1,172,404.92	0.00	1,172,404.92	1.30%	0.00%	1.30%
FEB	29	934,300,892.86	0.00	934,300,892.86	903,468.82	0.00	903,468.82	1.26%	0.00%	1.26%
MAR	31	1,015,902,096.77	0.00	1,015,902,096.77	1,123,069.18	0.00	1,123,069.18	1.30%	0.00%	1.30%
APR	30	1,034,171,933.33	0.00	1,034,171,933.33	1,164,896.26	0.00	1,164,896.26	1.37%	0.00%	1.37%
MAY	31	812,516,129.03	30,181,684.23	842,697,813.26	913,335.86	15,862.99	929,198.85	1.32%	0.62%	1.29%
JUN	30	457,966,667.67	0.00	457,966,667.67	534,622.78	0.00	534,622.78	1.42%	0.00%	1.42%
JUL	31	678,419,354.84	0.00	678,419,354.84	896,933.34	0.00	896,933.34	1.56%	0.00%	1.56%
AUG	31	792,306,451.61	0.00	792,306,451.61	1,047,948.47	0.00	1,047,948.47	1.56%	0.00%	1.56%
SEP	30	576,938,400.00	0.00	576,938,400.00	716,409.68	0.00	716,409.68	1.51%	0.00%	1.51%
OCT	31	576,838,709.68	0.00	576,838,709.68	746,831.39	0.00	746,831.39	1.52%	0.00%	1.52%
NOV	30	727,833,333.33	0.00	727,833,333.33	924,976.38	0.00	924,976.38	1.55%	0.00%	1.55%
DEC	31	844,328,387.10	0.00	844,328,387.10	1,243,309.03	0.00	1,243,309.03	1.73%	0.00%	1.73%
JAN 2018	31	742,572,032.26	0.00	742,572,032.26	1,305,465.23	0.00	1,305,465.23	2.07%	0.00%	2.07%
FEB	28	611,779,035.71	0.00	611,779,035.71	941,653.99	0.00	941,653.99	2.01%	0.00%	2.01%
MAR	31	876,445,290.32	0.00	876,445,290.32	1,682,626.73	0.00	1,682,626.73	2.26%	0.00%	2.26%

## **ATTACHMENT 2**



Columbia Gas of Ohio, Inc.  
Uncollectible Expense Rider Report  
Based on Historic Balance @ March 31, 2018

Line No.	Description	Amount
1	Deferred Uncollectible Accounts Expense Balance As of May 31, 2018	2,066,287
2	Projected Volumes Twelve Months Ending May 31, 2019	177,126,933
3	Plus: Under(Over) Recovery of Uncollectible Expense TME May 31, 2018 per Mcf (Line 1 / Line 2)	0.0117

## **ATTACHMENT 3**

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## **ATTACHMENT 4**

Columbia Gas of Ohio, Inc.  
Uncollectible Expense Rider Calculation

Line No.	Description	Amount \$
1	Incremental Net Charge Offs for TME May 31, 2019 (Attachment 3 line 14)	10,858,067
2	Projected Volumes TME May 31, 2019	177,126,933
3	Proposed Revised Rate Effective June 1, 2018 per Mcf (Line 3 / Line 4)	0.0613
4	Plus: Under(Over) Recovery of Uncollectible Expense TME June 1, 2018 per Mcf (Attachment 2, Line 3)	<u>0.0117</u>
5	<b>Proposed Revised Rate Effective June 1, 2018 per Mcf</b> (Line 5 + Line 6)	<b>\$ 0.0730</b>

Columbia Gas of Ohio, Inc.  
Projected Bad-Debt Recovery @ Current Rates

Attachment 4  
Sheet 2 of 2

	Throughput	Current Rate	Revenue
Apr	17,887,360.7	0.0438	783,466
May	8,908,522.4	0.0438	390,193
Jun	4,945,840.8	-	-
Jul	3,629,037.5	-	-
Aug	3,532,131.3	-	-
Sep	3,711,049.7	-	-
Oct	5,487,067.3	-	-
Nov	11,902,601.3	-	-
Dec	23,839,829.8	-	-
Jan	33,967,563.6	-	-
Feb	32,727,255.2	-	-
Mar	26,447,524.6	-	-
Apr	17,980,762.2	-	-
May	8,956,270.0	-	-
Total	177,126,933		-

## **ATTACHMENT 5**

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION  
AND SALE OF GAS**

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**UNCOLLECTIBLE EXPENSE RIDER**

**APPLICABLE:**

To all customers served under rate schedules SGS and GS.

**UNCOLLECTIBLE EXPENSE RIDER:**

A charge of \$0.0730 per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

Filed in accordance with Public Utilities Commission of Ohio Entry dated .

Issued:

Issued By  
Daniel A. Creekmur., President

Effective: With meter readings on or



**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION  
AND SALE OF GAS**

---

**UNCOLLECTIBLE EXPENSE RIDER**

**APPLICABLE:**

To all customers served under rate schedules SGS and GS.

**UNCOLLECTIBLE EXPENSE RIDER:**

A charge of ~~\$0.0730~~~~\$0.0438~~ per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

Filed in accordance with Public Utilities Commission of Ohio Entry dated ~~May 24, 2017~~ in Case No. 17-321-GA-UEX.

Issued: ~~May 26, 2017~~

Effective: With meter readings on or ~~May 31,~~  
2017

Issued By  
Daniel A. Creekmur., President

COLUMBIA GAS OF OHIO, INC

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION  
AND SALE OF GAS**

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**UNCOLLECTIBLE EXPENSE RIDER**

**APPLICABLE**

To all customers served under rate schedules SGTS and GTS.

**UNCOLLECTIBLE EXPENSE RIDER**

A charge of \$0.0730 per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

Issued:

Filed in accordance with Public Utilities Commission of Ohio Entry dated .

Effective: With meter readings on or after

Issued By  
Daniel A. Creekmur, President

COLUMBIA GAS OF OHIO, INC

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**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION  
AND SALE OF GAS**

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**UNCOLLECTIBLE EXPENSE RIDER**

**APPLICABLE**

To all customers served under rate schedules SGTS and GTS.

**UNCOLLECTIBLE EXPENSE RIDER**

A charge of ~~\$0.0730~~~~\$0.0438~~ per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

**SECTION VII**  
**PART 29 - BILLING ADJUSTMENTS**  
**UNCOLLECTIBLE EXPENSE RIDER**

29.18 Applicability

To all customers served under rate schedules FRSGTS and FRGTS.

29.19 UNCOLLECTIBLE EXPENSE RIDER

A charge of \$0.0730 per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

Issued:

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Effective: With meter readings on or after

Issued By  
Daniel A. Creekmur, President

Columbia Gas of Ohio, Inc.

**SECTION VII**  
**PART 29 - BILLING ADJUSTMENTS**  
**UNCOLLECTIBLE EXPENSE RIDER**

29.18 Applicability

To all customers served under rate schedules FRSGTS and FRGTS.

29.19 UNCOLLECTIBLE EXPENSE RIDER

A charge of ~~\$0.0730~~~~\$0.0438~~ per Mcf shall be applied to all volumes for service rendered under applicable rate schedules to recover costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. Columbia shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over or under-collections.

Filed in accordance with Public Utilities Commission of Ohio Entry dated ~~May 24, 2017 in Case No. 17-321-GA-UEx.~~  
Issued: ~~May 26, 2017~~

Effective: With meter readings on or after  
~~May 31, 2017~~

Issued By  
Daniel A. Creekmur, President

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**Case No(s). 18-0321-GA-UEx**

Summary: Application for Approval of an Adjustment to its Uncollectible Expense Rider Rate electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.