

In the Matter of the Application of)
Suburban Natural Gas Company for Approval) Case No. 18-376-GA-RDR
of an Energy Efficiency Program (EEP) Pilot)
and Rider EEP Rate.)

Ohio Partners for Affordable Energy (“OPAE”) respectfully submits to the Public Utilities Commission of Ohio (“Commission”) these comments on the application of Suburban Natural Gas Company (“Suburban”) for approval of its Energy Efficiency Program (“EEP”) Pilot rider rate. In its Finding and Order in Suburban’s Case No. 17-594-GA-ALT dated November 1, 2017, the Commission approved the two-year EEP Pilot in order to weatherize the residences of Suburban’s high-usage Percentage of Income Payment Plan (“PIPP”) customers. In the same Finding and Order, the Commission also approved the Rider EEP and set it at zero. Case No. 17-594-GA-ALT, Finding and Order at 5. Suburban filed the instant case to establish the first Rider EEP charge with a per monthly bill rate of \$0.3431. Amended Application (May 4, 2018).

On September 12, 2018, the Staff of the Commission issued its Review and Recommendation with regard to the proposed rate and the tariff language. The Staff found that the amended application appropriately calculated the rider and recommended that the proposed rate of \$0.3431 per month be approved.

Suburban's proposed tariff language for Rider EEP was shown on Exhibit C of the Application. On September 28, 2018, Suburban modified the language of the tariff. Suburban, the Staff, and the Office of the Ohio Consumers' Counsel agreed to the modified tariff language.

On September 21, 2018, the attorney examiner issued an Entry stating that initial comments on the EEP Rate Application should be filed by October 5, 2018. As an intervenor in this proceeding, OPAE supports the Staff recommendation for a charge of \$0.3431 per month to be applied to General Service rate schedules to recover the costs associated with the implementation of cost-effective weatherization measures made available to Suburban's high-usage PIPP customers. OPAE also supports the amended tariff language submitted on September 28, 2018.

Respectfully submitted,

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CERTIFICATE OF SERVICE

A copy of the foregoing Comments will be served electronically by the Commission's Docketing Division upon the parties identified below on this 5th day of October 2018.

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Summary: Comments electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy