

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Suburban)
Natural Gas Company for an Increase in Gas) Case No. 18-1205-GA-AIR
Distribution Rates.)

In the Matter of the Application of Suburban) Case No. 18-1206-GA-ATA
Natural Gas Company for Tariff Approval)

In the Matter of the Application of Suburban)
Natural Gas Company for Approval of Certain) Case No. 18-1207-GA-AAM
Accounting Authority)

**MOTION TO STRIKE OBJECTIONS
OF THE OFFICE OF THE OHIO CONSUMERS' COUNSEL AND OHIO PARTNERS
FOR AFFORDABLE ENERGY
BY
SUBURBAN NATURAL GAS COMPANY**

Pursuant to R.C. 4909.19(C), Ohio Adm. Code 4901-1-12, Ohio Adm. Code 4901-1-28(B), and the Public Utilities Commission of Ohio's (Commission) Entry issued on February 8, 2019,¹ Suburban Natural Gas Company (Suburban) hereby files this Motion for an order striking certain objections raised by the Office of the Ohio Consumers' Counsel (OCC) and Ohio Partners for Affordable Energy (OPAE) to the February 6, 2019 Report of the Staff of the Commission (Staff Report) issued in this proceeding.² Specifically, Suburban moves to strike OPAE's first, second, and fourth objections, as well as OPAE's "Summary of Major Issues," and OCC's fourth and fifth objections as these objections and issues list do not conform to the Commission's requirements that all objections be made with

¹ See Entry at ¶ 11 (February 8, 2019).

² See Staff Report (February 6, 2019).

specificity and that the objections be validly made, relating to the pending rate proceeding and investigation and consistent with Ohio law and Commission precedent.

The reasons for this Motion are explained more fully in the accompanying Memorandum in Support. For the reasons specified therein, Suburban requests that the Commission strike the objections and issues list identified above in accordance with Ohio law and the Commission's rules, as doing so will allow for a fair framing of the issues at the hearing regarding Suburban's Application for an Increase in Rates consistent with Ohio Adm. Code 4901-1-28.

Respectfully submitted,

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MEMORANDUM IN SUPPORT

I. INTRODUCTION AND PROCEDURAL HISTORY

On July 31, 2018, Suburban filed its Notice of Intent to File an Application for an Increase in Rates, for Tariff Approval, and for Approval of Certain Accounting Authority with the Commission.³ That same day, Suburban filed a Motion to Establish a Test Period and Date Certain and for a Waiver of a Standard Filing Requirement,⁴ and an amended motion for a waiver on August 23, 2018.⁵ In the initial Motion for Test Period, Suburban requested a test period of March 1, 2018 to February 28, 2019 and a date certain of February 28, 2019.⁶

³ Notice of Intent of Suburban Natural Gas Company to File an Application for Increase in Rates, for Tariff Approval, and for Approval of Certain Accounting Authority (July 31, 2018).

⁴ Motion of Suburban Natural Gas Company to Establish a Test Period and Date Certain and for a Waiver of a Standard Filing Requirement (July 31, 2018) (Motion for Test Period).

⁵ Amended Motion of Suburban Natural Gas Company for a Waiver of a Standard Filing Requirement (August 23, 2018) (Amended Motion).

⁶ Motion for Test Period at 1.

Suburban filed its Application for an Increase in Rates and Charges, for Tariff Approval, and for Approval of Certain Accounting Authority on August 31, 2018 (Application).⁷ On September 5, 2018, the Commission adopted Suburban's requested test period and date certain, while also granting Suburban's request for waiver of certain filing requirements.⁸ On September 19, 2018, Suburban filed its second waiver request, requesting to waive the Standard Filing Requirement that requires a utility to submit a cost of service study as part of an application for an increase in rates.⁹ No party objected to that request, and it was granted on October 10, 2018.¹⁰

OCC and OPAE intervened on August 30, 2018 and September 7, 2018, respectively. The Commission accepted Suburban's Application as of the August 31, 2018 filing date by Entry dated October 24, 2018. The Staff of the Commission (Staff) filed the Staff Report on February 6, 2019.¹¹ The Commission established a procedural schedule by Entry on February 8, 2019.¹² That procedural schedule noted the statutory deadline of March 8, 2019 for the filing of objections to the Staff Report and set a March 25, 2019 deadline for the filing of motions to strike the objections of other parties to the Staff Report.¹³

Pursuant to the Commission's procedural schedule, Suburban,¹⁴ OCC,¹⁵ and OPAE¹⁶ submitted their respective objections to the Staff Report on March 8, 2019. Suburban now files

⁷ See its Application for an Increase in Rates and Charges, for Tariff Approval, and for Approval of Certain Accounting Authority (August 31, 2018) (Application).

⁸ Entry at ¶¶ 9-11 (September 5, 2018).

⁹ Motion of Suburban Natural Gas Company for a Waiver of a Standard Filing Requirement (September 19, 2018).

¹⁰ Entry at ¶ 11 (October 10, 2018).

¹¹ Staff Report (February 6, 2019).

¹² See Entry (February 8, 2019).

¹³ Id. at ¶¶ 10-11.

¹⁴ See Objections to the Staff Report by Suburban Natural Gas Company (March 8, 2019) (Suburban Objections).

this Motion to Strike Objections of OCC and OPAE that were improperly asserted and are not in accord with Ohio law, Commission rules, and precedent governing the filing of objections to a Staff Report issued in an application for an increase in rates filed by a utility. In doing so, Suburban asks the Commission to strike OPAE's first, second, and fourth objections as well as OPAE's "Summary of Major Issues" and OCC's fourth and fifth objections.

II. RELEVANT LEGAL STANDARDS

Ohio law and Commission rules govern the filing of objections to a Staff Report in an application for an increase in rates and the requirements to which those objections must conform. First, R.C. 4909.19(C) requires the Commission to conduct an investigation regarding all facts set forth in a utility's application for an increase in rates and issue a written report that is filed with the Commission.¹⁷ Parties are then afforded the opportunity to file objections to the Staff Report within 30 days of its issuance.¹⁸ Staff fulfilled the Commission's obligation to investigate and file a written report with the filing of the Staff Report on February 6, 2019 and Suburban, OCC, and OPAE each exercised their statutory right to file objections to the Staff Report within 30 days.

The Commission, however, has established particularized rules regarding the form of objections and provided that objections which do not conform to those rules be stricken.¹⁹ The Commission has further determined that parties are not permitted to relitigate the same issues *ad*

¹⁵ See Objections to the PUCO's Staff's Report of Investigation by The Office of the Ohio Consumers' Counsel (March 8, 2019) (OCC Objections).

¹⁶ Objection to the Staff Report and Summary of Major Issues (March 8, 2019) (OPAE Objections).

¹⁷ See R.C. 4909.19(C).

¹⁸ *Id.*

¹⁹ Ohio Adm. Code 4901-1-28(B).

nauseum once those issues have already been resolved by the Commission. Both of these issues are relevant to Suburban's Motion to Strike. The specific rules and precedents are set out below.

A. Objections to the Staff Report Must Be Specific, and Non-Specific Objections May Be Stricken.

After the filing of an application for an increase in rates pursuant to R.C. 4909.18, R.C. 4909.19(C) requires the Commission to cause an "investigation to be made of the facts set forth in said application and the exhibits attached thereto, and of the matters connected therewith" and to file a written report.²⁰ The statute also allows objections "to such report" to be made by any party. The Commission has determined that in order for an objection to a Staff Report to be valid and heard it must be specific and relate to the investigation of the rate application. Explicitly, Ohio Adm. Code 4901-1-28(B) provides:

Any party may file objections to a report of investigation described in paragraph (A) of this rule, within thirty days after such report is filed with the commission. Such objections may relate to the findings, conclusions, or recommendations contained in the report, or to the failure of the report to address one or more specific items. **All objections must be specific. Any objections that fail to meet this requirement may be stricken upon motion of any party or the commission staff or upon motion of the commission, the legal director, the deputy legal director, or the attorney examiner.**²¹

The Commission has held that the specificity requirement of Ohio Adm. Code 4901-1-28 means that "[a]ny objection that is not specific enough to convey what is actually being placed at issue should be struck."²² These requirements allow all parties to be informed of the substance of the objections raised to the Staff Report and to prepare accordingly for the hearing.

²⁰ R.C. 4909.19(C).

²¹ Ohio Adm. Code 4901-1-28(B) (emphasis added).

²² See *In the Matter of the Application of Ohio-American Water Company for Authority to Increase Its Rates for Water Service Provided to Its Entire Service Area*, Case No. 01-626-WW-AIR, Entry at ¶ 3 (January 4, 2002).

B. Parties Are Not Permitted to Use One Proceeding to Relitigate Issues Already Resolved in a Recent, Separate Proceeding.

Just as the Staff Report must be based upon the investigation of the facts that are set forth in the application for an increase in rates and the attached exhibits, the objections also have to either “relate to the findings, conclusions, or recommendations contained in the report, or to the failure of the report to address one or more specific items” from the rate case application, exhibits, and investigation.²³ The objections may not go beyond the scope of the application, exhibits, and investigation and raise new issues.

Moreover, in addition to its interest in allowing only specific objections of the parties to be heard regarding the application for an increase in rates, the Commission has an interest in ensuring some measure of administrative efficiency. To that end, the Commission does not allow for the relitigation of resolved issues. Specifically, the Commission has held that when parties are disputing a legal issue that was subject to an adjudicative determination in a prior proceeding wherein the same parties were involved, the doctrine of *res judicata* bars relitigation of those same issues.²⁴ This precedent is important, as it ensures that parties are not subjected to an endless spiral of repeated litigation of the same issues.

III. OBJECTIONS THAT SHOULD BE STRICKEN

Suburban requests that several identified objections be stricken pursuant to the Commission’s rules and precedent. Suburban addresses each objection specifically below.

A. OCC Objection No. 4

OCC’s fourth objection is that the Staff Report recommended that Small General Service customers, including residential customers, pay a higher percentage of distribution costs than

²³ Ohio Adm. Code 4901-1-28(B).

²⁴ See *In the Matter of the Complaint of Union Rural Electric Cooperative, Inc. v. The Dayton Power and Light Company*, Case No. 88-947-EL-CSS, Rehearing Entry at ¶¶ 7-10 (September 27, 1988).

they currently pay without relying on a cost of service study to support that determination.²⁵ As OCC concedes, Suburban sought and received a waiver of the requirement to file a cost of service study along with its Application.²⁶ Suburban sought that waiver on September 19, 2018; nearly three weeks after OCC first intervened in the case.²⁷ Importantly, OCC did not oppose this request for a waiver at the time it was filed by Suburban and did not ask the Commission for rehearing under R.C. 4903.10 or Ohio Adm. Code 4901-1-35 upon its issuance of an Entry granting Suburban's request. Accordingly, this objection is barred by the doctrine of *res judicata* as it has been applied by the Commission in its Entry on Rehearing in *In the Matter of the Complaint of Union Rural Electric Cooperative, Inc. v. The Dayton Power and Light Company*, Case No. 88-947-EL-CSS (September 27, 1988).

The issue of whether a cost of service study was required for the fixation of reasonable rates in this proceeding was addressed last fall. When Suburban requested a waiver of the cost of service study requirement and OCC failed to object, the Commission determined that, as a matter of law, a cost of service study was not required. In other words, Suburban put its arguments regarding the necessity of this study before the Commission, all parties (including OCC) had an opportunity to respond to those arguments, the Commission issued a decision on the merits, and no party asked for rehearing of that decision.

The Commission should bar OCC from arguing that which it failed to argue when this legal issue was properly before the Commission in September and October of 2018 under the *res judicata* doctrine. The Commission already addressed this issue specifically in this proceeding, and both OCC and Suburban were parties to the proceeding when the issue was addressed. The

²⁵ OCC Objections at 6.

²⁶ *Id.*; see also Motion of Suburban Natural Gas Company for a waiver of a Standard Filing Requirement (September 19, 2018); Entry (October 10, 2018).

²⁷ See Motion to Intervene (August 30, 2018).

elements of *Union Rural* are met in this case and *res judicata* applies. To allow OCC to assert this objection now would unfairly prejudice Suburban by requiring it to defend the lack of inclusion of a cost of service study when the reason such a study was not included was that the Commission determined it would not be necessary and that Suburban was not required to file a cost of service study. For these reasons, OCC's fourth objection should be stricken.

B. OCC Objection No. 5

OCC's fifth objection should also be stricken under the *res judicata* doctrine. Here, OCC attempts to relitigate an issue that it contested, and lost, in a previous Suburban rate proceeding in Case No. 17-594-GA-ALT by arguing that the Commission should adopt a volumetric distribution charge to cover any rate increase rather than addressing such a rate increase through the fixed customer charge.²⁸ The majority of this objection recounts already-rejected arguments against straight fixed variable (SFV) ratemaking.²⁹

Suburban implemented a SFV rate design pursuant to the Commission's November 1, 2017 order issued in Case No. 17-594-GA-ALT.³⁰ OCC was granted intervention in that proceeding by the Commission.³¹ As a full party of record, OCC had the opportunity to raise any arguments it desired to raise in opposition to Suburban's request to establish SFV rates. OCC does not identify any way in which its interests have changed since the case where the SFV rates were established. Instead, it now asserts arguments that properly would have been asserted when the transition to a SFV rate design was approved by the Commission and established. By asserting those arguments in this proceeding instead, OCC is asking the Commission to reopen

²⁸ OCC Objections at 7-8.

²⁹ Id.

³⁰ See *In the Matter of the Application of Suburban Natural Gas Company for Approval of an Alternative Form of Regulation to Initiate a Revenue Decoupling Mechanism*, Case No. 17-594-GA-ALT (SFV Case), Finding and Order (November 1, 2017).

³¹ SFV Case, Entry at ¶ 7 (June 21, 2017).

an issue that was litigated and decided fewer than two years ago in a proceeding to which OCC was a party and only fully implemented when the second phase of the SFV rates were put into effect on November 1, 2018. Thus, this objection is barred by *res judicata* and the Commission should strike OCC's fifth objection.

Suburban should not be required to relitigate the issue of its basic rate design and rate methodology for the second time in two years. The Commission reviewed and considered issues related to SFV rate design in Case No. 17-594-GA-ALT and made a decision that SFV is appropriate and approved SFV rates for Suburban. This decision was consistent with Staff's recommendation in Suburban's previous rate case, where Staff stated "it should be noted that the Commission Staff would like to see the Applicant move towards a 'Straight Fixed Variable Costing' methodology for future customer charge calculation."³² The Commission has also approved the SFV rate design for other utilities.³³ OCC's attempt to revisit these decisions is improper and should be stricken under the doctrine of *res judicata*.

C. OPAE Objection No. 1

OPAE's first objection is similar to OCC's fifth in that it takes issue with the SFV ratemaking concept. Accordingly, it is similarly objectionable for attempting to address a matter that was addressed in a prior proceeding rather than one that is at issue here. Additionally, OPAE's objection should be stricken for failing to meet the Commission's specificity requirements for objections to the Staff Report. As explained previously, in order for an objection to a Staff Report to be valid and heard, it must be specific and relate to the

³² *In the Matter of the Application of the Suburban Natural Gas Company for Authority to Increase its Rates and Changes in Certain Areas of Its Service Territory*, Case No. 07-689-GA-AIR, Staff Report at 22 (January 9, 2008).

³³ See *In the Matter of the Application of Eastern Natural Gas Company for Approval of an Alternative Rate Plan Proposing a Revenue Decoupling Mechanism, et al.*, Case Nos. 08-940-GA-ALT, et al., Opinion and Order at 2, 14-16 (June 16, 2010).

investigation of the rate application.³⁴ A vague objection about the merits of SFV rate design is insufficient to satisfy Ohio Adm. Code 4901-1-28(B).

Notably, OPAE's objection states that the Staff Report fails to "Consider Alternatives to the Recovery of the Entire Revenue Requirement from Small General Service Customers through a High Fixed Customer Service Charge."³⁵ In its explanation of this objection, OPAE does not articulate specific alternatives and appears to only take some sort of general issue with the fixed customer charge. Moreover, factual errors undermine the very premise of OPAE's objection.

OPAE never proposes an alternative means for Suburban to meet its revenue requirement.³⁶ In fact, OPAE even concedes that alternatives may not be available.³⁷ It appears that, like OCC, OPAE does not support the idea of customer charges in general. That lack of support, without any proposed alternative, however, is not a proper objection to the Staff Report, which simply used the SFV rate design that had been recently approved by the Commission to make its recommendations. It is unclear what OPAE is suggesting Staff should have recommended in its report.

Finally, the assertion that the Staff Report recommends that Suburban collect its entire revenue requirement from Small General Service customers through a fixed customer charge is incorrect. Clearly, Staff does not recommend that one customer class be responsible for the entire revenue requirement, or that the entire revenue requirement be fulfilled through a fixed customer charge. Staff instead recommends a revenue distribution that divides responsibility for

³⁴ Ohio Adm. Code 4901-1-28(B).

³⁵ OPAE Objections at 1.

³⁶ See id. at 1-3.

³⁷ Id. at 3 ("If there is no alternative to this process of ever increasing high fixed customer charges...").

the revenue among customer classes in a manner similar to that has already been approved and that is currently being used by Suburban.³⁸

D. OPAE Objection No. 2

OPAE's second objection similarly fails to meet the specificity requirements for Staff Report objections set forth in Ohio Adm. Code 4901-1-28(B). OPAE vaguely objects that the Staff Report fails to recommend additional assistance for low-income customers, but does not state, with specificity, why the current funding level is insufficient, or any other specific concerns with the current level, or any law or precedent to support OPAE's objection and alleged need for additional assistance.³⁹ OPAE also does not state what kind of assistance is needed and how that assistance will be funded. Just as it failed to identify alternative approaches to a fixed customer charge, OPAE fails to demonstrate what sort of assistance that the Staff Report should have recommended for low-income customers. In fact, most of the explanation of this objection is devoted to explaining a low-income assistance program that is already being implemented by Suburban that was approved by the Commission in a separate, prior proceeding.

OPAE has not adequately conveyed the recommendation or objection that it is trying to place at issue in this case. As OPAE has not identified any program for assistance that should have been recommended by the Staff Report, Suburban is unable to ascertain what error OPAE is even asserting occurred in the Staff Report, and cannot adequately prepare to address any such purported error at hearing.

OPAE's objection appears to be a collateral attack on the Energy Efficiency Program ("EEP") pilot that Suburban implemented pursuant to the Commission's November 1, 2017

³⁸ Staff Report at 26-27.

³⁹ OPAE Objections at 4-5.

order issued in Case No. 17-594-GA-ALT.⁴⁰ OPAE participated in the design of the EEP pilot program in that proceeding and Suburban is using OPAE as the administrator of the program. OPAE had the opportunity to raise any arguments it desired to raise in opposition to Suburban's request to establish the EEP in the prior rate proceeding, but it choose not to. OPAE does not identify any way in which its interests have changed since the case where the EEP was established. Instead, it now asserts arguments that would have been more properly asserted when the EEP pilot was first established. By asserting those arguments in this proceeding instead, OPAE is asking the Commission to reopen an issue that was decided fewer than two years ago in a prior proceeding. Thus, this non-specific objection is barred by *res judicata* and it should be stricken.

E. OPAE Objection No. 4

OPAE's fourth objection should be stricken because it fails to specifically identify an error in the Staff Report, as OPAE's recommendation appears to be consistent with the Staff Report. OPAE objects to the \$125 "Theft of Service/Tampering Investigation Charge."⁴¹ OPAE does not challenge that the amount of that charge was set using cost-based data or that it is consistent with Ohio Adm. Code 4901:1-18-07(E)(1), which creates a rebuttable presumption that the person in possession or control of a meter at the time of tampering is the party obligated to pay for the service.

Instead, OPAE objects that the Theft of Service/Tampering Investigation Charge should only be levied if tampering is found to have taken place.⁴² The Staff Report does not find that

⁴⁰ See *In the Matter of the Application of Suburban Natural Gas Company for Approval of an Alternative Form of Regulation to Initiate a Revenue Decoupling Mechanism*, Case No. 17-594-GA-ALT (SFV Case), Finding and Order at ¶ 31 (November 1, 2017).

⁴¹ Id. at 7-8.

⁴² Id. at 8.

this charge could be levied when tampering has not occurred, nor does it provide that the rebuttable presumption provided by the Commission's rules does not apply here. In fact, a review of Suburban's proposed tariffs for this charge shows that it is only levied when an investigation occurs *after* tampering has already occurred; the investigation is not to determine whether tampering occurred as OPAE implies.⁴³ Thus, it is unclear what error OPAE has identified with the Staff Report regarding the Theft of Service/Tampering Investigation Charge and the objection should be stricken for failing to state grounds with specificity pursuant to Ohio Adm. Code 4901-1-28(B).

F. OPAE Summary of Major Issues

Finally, OPAE's "Summary of Major Issues" should be stricken in its entirety. OPAE states that it is asserting this Summary of Major Issues pursuant to R.C. 4903.083,⁴⁴ but that provision does not require or allow a Summary of Major Issues to be included with objections to the Staff Report. Thus, the list of eight purported major issues should be construed as additional objections.

Looking at these eight issues, none is stated with sufficient particularity to conform to the Commission's requirements for objections as required by Ohio Adm. Code 4901-1-28(B).⁴⁵ In fact, none of the statements even addresses the Staff Report or offers a position on how those issues should be resolved. Additionally, items 5 through 8 cannot be viewed as even being tangentially related to the objections identified by OPAE. Nowhere in the objections does OPAE discuss the appropriate rate of return, level of test-year revenues, level of operating and

⁴³ See Application at Proposed Tariffs Original Sheet No. 10, page 2 of 6 (August 31, 2018).

⁴⁴ OPAE Objections at 9.

⁴⁵ See *id.*

maintenance expenses, or the level of rate base. Accordingly, the Commission should strike the “Summary of Major Issues” portion of OPAE’s objections.

IV. CONCLUSION

The Commission should strike the objections raised by OCC and OPAE that have been identified herein for the reasons specified above. Doing so will allow for a proper framing of the issues at the hearing regarding Suburban’s Application for an Increase in Rates consistent with Ohio Adm. Code 4901-1-28. The hearing process should be focused on precise issues and arguments rather than one that merely relitigates resolved issues or discusses vague preferences without specific proposals.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon the following parties via electronic mail on March 25, 2019.

/s/ Kimberly W. Bojko

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