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Commissioners

July 22, 2019

Docketing Division Public Utilities Commission of Ohio 180 East Broad Street Columbus OH 43215

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RE: In the Matter of the Application of Ohio Gas Company for Approval of an Alternative Rate Plan, Case No. 19-1354-GA-ALT and For Tariff Approval, Case No. 19-1355-GA-ATA.

Dear Docketing Division:

Enclosed please find the Staff Recommendation in the Matter of Ohio Gas Company, For Waiver of Certain Filing Requirements, Case No. 19-1354-GA-ALT, et al.

Tamara S. Turkenton Director, Rates and Analysis Department Public Utilities Commission of Ohio

David Lipthratt Chief, Research and Policy Division Public Utilities Commission of Ohio

Enclosure Cc: Parties of Record

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OHIO GAS COMPANY Case Nos. 19-1354-GA-ALT & 19-1355-GA-ATA

BACKGROUND

On July 29, 2015, the Commission approved through its Finding and Order, Ohio Gas Company's (Ohio Gas or Company) application seeking authority to modify its accounting so that it could record as a regulatory asset the expenses associated with a geographical information system (GIS).

On July 1, 2019, Ohio Gas filed a notice of intent to file an Application for Approval of an Alternative Rate Plan and for Tariff Approval (Application) seeking recovery of the deferred expenses associated with the implementation of the GIS. In this proceeding, the Company seeks authorization of a rider under R.C. 4929.05 to amortize the deferred asset over a period of two years through a customer charge.

For purposes of this alternative rate plan application, Ohio Gas recommends a test year based on the current calendar year, January 1, 2019 to December 31, 2019. Ohio Gas intends to normalize actual expenses and revenue and provide its budgeted expenses and revenue for the balance of the test year on Schedules C-2 and C-2.1.

SUMMARY OF WAIVER REQUEST

Because of the narrow scope of the Application and given that the Company completed an extensive audit in connection with its recently completed rate case, Case No. 17-11397-GA-AIR, the Company seeks a waiver of the exhibits required by R. C. 4909.18(A)-(D) (4909.18 Exhibits) and certain SFRs Standard Filing Requirements).

The 4909.18 Exhibits for which the Company seeks a waiver consist of a report of the property that is used and useful, an operating statement for the last fiscal year, a statement of the income and expense anticipated under the filed application to the extent that would be different than the C-2 and C-2.1 Schedules the Company has proposed to file, and a statement of financial condition.

The Company also seeks a waiver of the requirement to set a date certain in accordance with SFR Chapter 1(B)(1)(a)(iii) given that there is no need to establish a rate base determination in this matter. Additionally, the Company seeks a waiver of the S Schedules, other than the newspaper notice, as required to be included as SFR exhibits. These schedules include: five-year capital expenditures and forecasts (S-1 and 2), corporate processes (S-4.1), and management practices (S-4.2).

The Company also seeks a waiver of the requirement to provide the supplemental information with the application required by Chapter II (C) except that which is required by section (C)(6) and the information relevant to the charge required by section (C)(9).

Finally, in regard to the remaining schedules contained in the SFRs, the Company seeks a waiver of the requirement to provide the A, B, C, D, and E schedules except as discussed previously.

STAFF RECOMMENDATION

Staff reviewed the Company's waiver request, found it to be reasonable, and recommends that the waiver request be approved. However, Staff reserves the right to request additional information during the course of the audit if it is deemed necessary.