



21 East State Street • 17th Floor • Columbus, OH 43215-4288
Tel: 614.469.8000 • Fax: 614.469.4653

Matthew R. Pritchard
(614) 719-2842—Direct Dial
mpritchard@mcneeslaw.com

November 21, 2019

Ms. Tanowa M. Troupe
Secretary - Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

RE: PUCO Case No. 19-1354-GA-ALT

Dear Secretary Troupe,

On July 1, 2019, Ohio Gas Company ("Company") filed a Notice of Intent to File an Application for Approval of an Alternative Rate Plan ("Application"). The Company also filed a Motion for Waivers of Certain Filing Requirements. Among the items not sought to be waived was newspaper notice of the Company's Application. The Company subsequently filed its Application on August 29, 2019, and Staff completed its review of the Application, which is reflected in a Review and Recommendation filed on November 7, 2019.

In its Review and Recommendation, Staff recommended two adjustments to the Company's application. Initially, Staff notes that during the course of its review, Staff and the Company identified expenses totaling \$385, including carrying costs that were incorrectly charged to the GIS deferral. The Company agreed in discovery that these costs were incorrectly charged to the GIS deferral and agrees with Staff's recommendation to remove the amount from the final authorized amount to be recovered through the GIS Rider. This change does not alter the rate but will be accounted for in the final true-up of the GIS Rider.

Staff also recommended that carrying charges cease accruing on the GIS deferral balance once the deferral begins to be amortized through the GIS Rider. The Company accepts this recommended adjustment to the Company's application. The effect of this recommendation is to reduce the Company's proposed GIS Rider rate from \$0.82/month to \$0.79/month (both amounts are before the effect of the gross receipts tax).

Accordingly, the Company requests that the Commission approve the Company's Application, subject to the two Staff recommendations and authorize the Company to implement the GIS Rider with a rate of \$0.79/month, grossed-up for the gross receipts tax.

www.McNeesLaw.com

HARRISBURG, PA • LANCASTER, PA • SCRANTON, PA • STATE COLLEGE, PA • YORK, PA • COLUMBUS, OH • FREDERICK, MD • WASHINGTON, DC

Furthermore, although in its motion for waivers the Company did not seek to waive the newspaper notice requirement that is required in traditional rate cases, the Company has subsequently discovered that newspaper notice is not required in this proceeding. Although the Company has not filed a traditional newspaper notice, the Company did, however, serve its notice of intent on the mayors and legislative authorities within the Company's service area, as reflected on PFN Exhibit 2. The Company believes it has met all filing requirements and requests that the Commission confirm as much in its order approving the Company's Application, as modified by the Staff recommendations.

Respectfully submitted,



Matthew R. Pritchard
MCNEES WALLACE & NURICK LLC
21 East State Street, 17th Floor
Columbus, OH 43215-4228
614-719-2855 (T)/614-469-4653 (F)
mpritchard@mcneeslaw.com

MP/es

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/21/2019 1:58:13 PM

in

Case No(s). 19-1354-GA-ALT

Summary: Correspondence Correspondence Accepting Staff Recommendations electronically filed by Mr. Matthew R. Pritchard on behalf of Ohio Gas Company