

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's
Review of the Minimum Gas Service
Standards In Chapter 4901:1-13 of
the Ohio Administrative Code

Case No. 19-1429-GA-ORD

COMMENTS OF SUBURBAN NATURAL GAS COMPANY

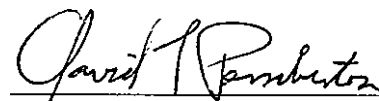
Pursuant to the Commission's Entry entered in the Journal on December 18, 2019 in the above-docketed proceeding, Suburban Natural Gas Company, hereinafter referred to as "Suburban", files the following comments.

Suburban is a "natural gas company" as defined in Section 4905.03 of the Revised Code and a "public utility" as defined in Section 4905.02 of the Revised Code and subject, as such, to the jurisdiction of the Commission serving nearly 18,000 residential, commercial, and industrial customers in portions of Delaware, Henry, Lucas, Marion, and Wood Counties, Ohio. For purposes of Chapter 4901:1-13 of the Ohio Administrative Code, Suburban is defined as a "small natural gas company." Suburban's interest in this proceeding is limited to the amendments identified as 4901:1-13-11(B)(13) and 4901:1-13-12(F) in Attachment A to the subject entry.

4901:1-13-11(B)(13) would require Suburban to include a "price to compare statement" in its customer bills and 4901:1-13-12(F) would require Suburban to provide both generic and customer-specific information to retail natural gas suppliers and/or governmental aggregators as well as to periodically issue eligible-customer lists and customer notices regarding their inclusion on such lists and of their right to object to their inclusion on such lists. Since Suburban does not offer a customer choice program, compliance with these requirements would not serve other retail natural gas providers, governmental aggregators, or Suburban's customers but, instead, would create confusion as to Suburban's service offerings.

Suburban suggests and requests, therefore, that the following qualifying language be added to these proposed amendments: "Any gas or natural gas company that provides for competitive retail natural gas service will..." This language is already included in the proposed amendment identified as 4901:1-13-12(H).

Respectfully submitted,
Suburban Natural Gas Company


David L. Pemberton, Chairman & CEO

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