

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission’s)	
Review of the Minimum Gas Service)	Case No. 19-1429-GA-ORD
Standards in Chapter 4901:1-13 of the)	
Ohio Administrative Code)	

Comments of the Ohio Farm Bureau Federation

The Ohio Farm Bureau Federation (“OFBF” or “Farm Bureau”) welcomes the opportunity to provide initial comments in this matter. OFBF has an extensive policy development process. Farm Bureau members support creation, development and customer participation in PUCO-approved programs with investor-owned utilities aimed at helping all ratepayers achieve energy savings (OFBF Policy 143 - Utility Deregulation). Similarly, the organization supports access to self-help natural gas aggregation programs for farmers, processors and handlers (OFBF Policy 281 – Natural Gas Utilities). Farms, green houses, food processors and other agribusinesses with access to utility infrastructure are able to participate in sanctioned customer choice programs. Contracts with PUCO Certified Aggregators and Certified Gas Suppliers provide these benefits.

Use of the Term *Contract Portability*

OFBF’s only comment as to these rule amendments relates to the use of the term “contract portability,” and OFBF is asking the Commission to consider another aspect of contract portability that is currently not addressed in the rule proposal.

“Contract portability” is newly defined in O.A.C. 4901:1-13-01 (G) as “the ability of a gas or natural gas company to allow a retail natural gas supplier to maintain contracts with customers that move to another address within the gas or natural gas company’s service territory.”

Moreover, in 4901:1-13-06 each gas or natural gas company shall maintain and make available a handbook of customer rights and obligations. As detailed in 4901:1-13-06 (C) (8), this handbook shall include “gas choice programs available to its customers, including information on slamming, contract portability and the ability to block a competitive switch.”

Under Consumer Safeguards and Information in 4901:1-13-12 (H), gas and natural gas companies providing portability must advise customers of the following provisions:

Any gas or natural gas company that provides for competitive retail natural gas service contract portability between premises will advise a customer at the time of a move request that the customer’s natural gas supply is currently served by (the name of the supplier) and that the current supplier will transfer to the customer’s new premise under the same terms and conditions. The gas or natural gas company will also advise the customer of its choice program and the commission’s energy choice website. Account numbers will be transferred to competitive retail natural gas suppliers as part of operational need once notification is provided to customers.

OFBF Suggestion to expand the term “Contract Portability”

Many agricultural operations may have an opportunity to expand their operations, resulting in locations that cannot be served by one meter. OFBF respectfully suggests that the Commission consider providing additional language that allows these customers to benefit from contract portability, and include a new meter within the same terms and conditions of the existing customer contract. Provisions should be made that if the customer works directly with the utility and contracted Certified Aggregator and/or Certified Gas Supplier to ensure additional supplies can be delivered to a new and/or expanded location within the utility service area; following all load balancing and logistical delivery requirements, then the customer has the option to incorporate the new location under a current contract.

Under the current proposed definition of “contract portability,” this situation would likely not be covered as the definition requires the customer to be moving to a new location. In this

situation, the customer is not moving from one location to another but adding additional locations. OFBF would respectfully ask the Commission to consider adding this possibility under the definition of contract portability, by amending the definition to read:

“the ability of a gas or natural gas company to allow a retail natural gas supplier to maintain existing contracts with customers that move to another address, require additional meters due to expansion, or add additional service locations within the gas or natural gas company’s service territory.”

Conclusion

For the foregoing reasons, the Ohio Farm Bureau Federation recommends that the above comment be considered by the Public Utilities Commission of Ohio as it finalizes rules in OAC 4901:1-13.

Respectfully Submitted,

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Summary: Comments of the Ohio Farm Bureau Federation electronically filed by Amy M Milam on behalf of Ohio Farm Bureau Federation