

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**COMMENTS ON STANDARDS FOR CONSUMERS' NATURAL GAS SERVICE
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

Bruce Weston (0016973)
Ohio Consumers' Counsel

Ambrosia E. Logsdon (0096598)
Counsel of Record
David Bergmann (0009991)
Assistant Consumers' Counsel

Office of the Ohio Consumers' Counsel
65 E. State Street, 7th Floor
Columbus, Ohio 43215-3485
Telephone [Logsdon]: 614-466-1292
Telephone [Bergmann}: 614-466-9569
Ambrosia.Logsdon@occ.ohio.gov
David.bergmann@occ.ohio.gov
(willing to accept service by e-mail)

January 17, 2020

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I. INTRODUCTION

The minimum gas service standards serve the important purpose of promoting, for millions of Ohio natural gas consumers, the availability of adequate, reliable, and reasonably priced natural gas services and goods to consumers.¹ The Public Utilities Commission of Ohio (“PUCO”) has invited comments and reply comments on its Staff’s proposed changes to these standards in the Ohio Administrative Code.² The Office of the Ohio Consumers’ Counsel (“OCC”) appreciates this opportunity to provide recommendations for improving the quality of service for natural gas customers in Ohio. The PUCO should adopt OCC’s recommendations.

¹ R.C. 4929.02(A)(1).

² *In re 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, Entry, (December 18, 2019).

II. RECOMMENDATIONS

- A. **O.A.C. 4901:1-13-11(B)(13): FOR CONSUMER PROTECTION, THE PUCO SHOULD MODIFY AND ADOPT THE STAFF'S IMPORTANT PROPOSAL TO REQUIRE GAS UTILITIES TO INCLUDE A PRICE TO COMPARE ON CONSUMERS' NATURAL GAS BILLS. THIS STAFF PROPOSAL SHOULD BE ONE PART OF IMPROVED REGULATIONS FOR ENABLING GAS CONSUMERS TO SAVE MONEY BY AVOIDING MARKETER PRICES THAT ARE HIGHER THAN THE UTILITY'S OWN "STANDARD CHOICE OFFER" (OR THAN DUKE'S "GAS COST RECOVERY" RATE).**

OCC applauds the PUCO Staff for proposing that natural gas utilities finally be required to provide gas consumers with a price to compare on their natural gas bills (similar to what electric utilities have long provided to their consumers). The price to compare, which shows the consumer the utility's own price for gas on every gas bill, helps consumers assess whether their best deal for saving money is the utility's gas price or a marketer's gas price gas.

In other words, the price to compare provides consumers with the price of the utility's standard choice offer or gas cost recovery rate. A marketer would have to beat that price in order for the customer to save money.

The PUCO should approve the Staff's proposed price-to-compare statement on natural gas bills, with some changes. The Staff's proposal is to include a price to compare statement emphasizing savings compared with the utility standard service offer or gas recovery rate.

The vast majority of the gas marketer rates on the PUCO's Energy Choice website exceed the utility standard choice offer or gas cost recovery rate.³ Given this reality for Ohioans (at this point far into the history of so-called "Energy Choice"), the emphasis should be on helping consumers to save money and to avoid losing money on natural gas.⁴ Toward this goal of helping Ohioans, the Staff's proposed price-to-compare statement should be revised as follows:

4901:1-13-11(B)(13) The following price-to-compare statement:

"In order for you to save money, ~~a by selecting a competitive retail natural gas supplier would have to offer you a rate that is lower than provider,~~ your price to compare, which is the standard choice offer (SCO) rate or the gas cost recovery (GCR) rate, is (dollar amount per Mcf) for this billing month. The SCO rate or GCR rate is approved by the public utilities commission."

B. O.A.C. 4901:1-13-11(B)(14) AND 4901:1-13-11(B)(15): THE PUCO SHOULD ADD RULES TO REQUIRE NATURAL GAS UTILITIES TO CONDUCT SHADOW-BILLING AND TO MAKE SHADOW-BILLING INFORMATION PUBLIC TO HELP INFORM GAS CONSUMERS IF THEY ARE SAVING OR LOSING MONEY BY CHOOSING A SUPPLIER.

The PUCO should adopt a rule that requires natural gas utilities to conduct shadow-billing and to make such information available to the public. Shadow-billing compares the difference between what shopping customers paid for natural gas through

³ See Energy Choice Ohio, <https://energychoice.ohio.gov/>; See also Gearino, *Ohioans burned by gas "choice,"* Columbus Dispatch (April 4, 2016) A1 (attached), also available at <https://www.thisweeknews.com/content/stories/business/2016/04/05/1-customers-losing-big-on-unregulated-natural-gas-plans.html>; See attached shadow-billing data.

⁴ Based on a review of the choice offers that are available for residential customers on the Energy Choice Ohio website, very few of the offers can save money for customers. There are 286 total natural gas offers available to customers in COH, DEO, Duke, and VEDO's service territory as of January 13, 2020. Out of those offers, there are thirty-six offers (or 12.6%) that were the same or lower than the utility SCO (or GCR) rate. Excluding introductory teaser rates and variable rate offers with terms of one or two months, a total of 26 offers (or 9%) of the total statewide offers provided any opportunity for customers to save money on their natural gas (or at least not lose money).

marketers and what the customers would have paid had they been served through the utility standard choice offer or gas cost recovery rate. This data provides the ability to determine the total savings that customers are obtaining through the gas choice programs or to determine the total losses customers are experiencing on gas choice programs.⁵

To protect consumers from losing money, Ohio Adm. Code 4901:1-13-11(B)(14) should be added as follows:

(14) For each natural gas utility customer shopping with a competitive retail natural gas supplier, the natural gas utility shall create a bill as if that customer were on the utility's standard choice offer (SCO) or the gas cost recovery rate (GCR). Each year a natural gas utility shall publicly file a report with the commission detailing the aggregated customer savings or losses experienced as a result of shopping with competitive retail natural gas suppliers instead of choosing the SCO or GCR.

Shopping customers should also be informed on their bills what their natural gas charges would have been had the customer been served under the standard choice offer or the gas cost recovery rate. This helps customers make a more immediate determination if they are saving money with their marketer.

Therefore, the PUCO should add new Ohio Adm. Code 4901:1-13-11(B)(15) that includes a shadow-billing statement as follows:

(15) The following shadow-bill statement on shopping customer bills:

"Your natural gas supply costs with (Name of Supplier) were (\$ for the month). Customers who were served on the (standard choice offer "SCO") or (gas cost recovery rate "GCR") for the month paid (\$ for the month) for the same level of usage."

⁵ The shadow-billing data from Columbia Gas show, as of July 2019, that its million consumers have paid \$1.7 billion more for marketer gas (since April 1997) than had they bought gas from Columbia. (See attachment) The Columbia Gas data, showing a huge transfer of wealth from Ohioans to gas marketers, would suggest that something is broken and needs to be fixed for the protection of the public.

C. O.A.C. 4901:1-13-06(C)(8): THE PUCO SHOULD REQUIRE NATURAL GAS UTILITIES AND MARKETERS TO PROVIDE INFORMATION TO CUSTOMERS ABOUT HOW TO PROTECT THEIR RIGHT TO REASONABLY PRICED RETAIL NATURAL GAS, THEIR ABILITY TO RECOGNIZE AND AVOID UNSCRUPULOUS MARKETER SCAMS RELATED TO UTILITY SERVICES, AND TO AVOID MARKETING AND SUPPLIER CONTRACT PROVISIONS THAT CAN ADVERSELY IMPACT THEM.

Ohio Adm. Code 4901:1-13-06 includes specific information about customer rights and obligations pursuant to Ohio law and the PUCO's rules. Each natural gas company defined in O.R.C 4905.03(E) and O.A.C. 4901:1-13-01(M) as a public utility, when engaged in the business of supplying natural gas for lighting, power, or heating purposes to consumers within this state is required to maintain a handbook of customer rights and obligations and to make a written summary of this information available to current (upon request) and new customers by the gas utility website and in a written summary.

The PUCO Staff has proposed amendments in Ohio Adm. Code 4901:1-13-06(C)(8) to ensure that the utility-provided summary information includes information on slamming, contract portability, and the ability for consumers to block supplier changes. The Staff's proposed additions to the information for providing to consumers are reasonable and should be adopted by the PUCO. However, the PUCO should also require that consumers be provided with additional information about gas choice programs.

Consumers should be provided with more information in the written summary to help them assess how the price of a marketer rate compares to their utility's offer price. Ideally, this information should enable comparison of supplier rates and terms over various time frames with the standard choice offer and gas cost recovery rates. Moreover,

customers should be provided guidance in the written summary about what they could do if they notice that their natural gas charges are higher than the price to compare provided on the bill. Customers would also benefit from having information in the written summary on ways to avoid scams, selecting teaser rates, and the potential adverse impacts associated with certain competitive contracts such as automatic renewal provisions.

Scams against consumers involving their utility services are a continuing trap. The Caller ID service that the PUCO approved in the early 1990's is now subject to the spoofing of information to deceive consumers, by bad actors like Verde Energy.⁶ Spoofing should result in a permanent rescission of a marketer's certification by the PUCO.

Customers need to be informed about the potential ways they can be duped. To help protect consumers, the PUCO should modify Ohio Adm. Code 4901:1-13-06(C)(8) as follows:

(C) At a minimum, the summary information shall include the following items:

...

(8) Gas choice programs available to consumers, including, but not limited to, information on slamming-, contract portability, the ability to block an unwanted service provider switch, selecting the lowest cost supply for natural gas, known scams (including spoofing), and potentially adverse contract provisions such as automatic renewals and teaser rates.

⁶ *In re the Commission's Investigation into Commission's Investigation into Verde Energy USA Ohio, LLC's Compliance with the Ohio Administrative Code and Potential Remedial Actions for Non-Compliance*, Case No. 19-0958-GE-COI, PUCO Staff Report at 9-10 (May 3, 2019).

D. O.A.C. 4901:1-13-12(G): FOR CONSUMER PROTECTION AGAINST SLAMMING, THE PUCO SHOULD ADOPT ITS STAFF’S PROPOSED AMENDMENT PERMITTING CUSTOMERS TO REQUEST A SUPPLIER BLOCK BE PLACED ON THE CUSTOMER’S ACCOUNT.

Slamming occurs when a customer is switched to a competitive supplier without the customer’s authorization. Slamming is confusing, stressful, inconvenient, and often very expensive for consumers who have been slammed. To help protect consumers against slamming, the PUCO Staff proposed a new rule in Ohio Adm. Code 4901:1-13-12(G) that requires natural gas companies to permit customers to request a switching block be placed on their accounts.

A switching block prevents gas service from being switched to a competitive supplier without the authorization of a customer-provided code or pin number. This is an important anti-slamming consumer protection that helps provide customers with peace of mind by knowing that an unscrupulous marketer is not going to be able to switch their gas service without explicit authorization. Local telephone consumers have, since 2003, had the ability to place a block on their account, called a “preferred carrier freeze,” which prevents their selected long distance service provider from being changed without their authorization.⁷ If the PUCO adopts Staff’s proposed change (it should), gas consumers will have the same protection against slamming that local telephone consumers have had for over 16 years. The PUCO Staff is to be applauded for making this proposed change. To protect consumers against slamming, the PUCO should adopt the Staff proposed rule in Ohio Adm. Code 4901:1-13-12(G).

⁷ See Ohio Adm. Code 4901:1-6-18 Slamming and preferred carrier freezes.

E. O.A.C. 4901:1-13-12(H): THE PUCO SHOULD AMEND STAFF'S PROPOSED RULE TO PROVIDE ADDITIONAL CONSUMER PROTECTIONS REGARDING MARKETER CONTRACT PORTABILITY.

Consumers should be fully informed of their rights and the consequences of their gas supply choices when they move. The PUCO Staff proposed a new rule in Ohio Adm. Code 4901:1-13-12(H) that requires a gas utility to advise customers who are cancelling service at one address and initiating service at another address in their service territory if their gas marketer will remain the same at the new address. Based on the contract portability requirements in the Staff proposal, the gas utility would be required to inform the customer that the transfer of the marketer will occur under the same terms and conditions of their existing contract with the marketer. Also, the gas utility is required to inform customers about its choice program and the PUCO Energy Choice Website. After this notification occurs, the new account number would be provided to the marketer to facilitate the move.

To protect customers against slamming, of contract portability should be prohibited unless the practice is authorized by the PUCO. To further protect consumers who wish to move their service and since customers will likely receive new account numbers at the new address, the continuation of service from a marketer at the new address cannot occur unless the customer consents to this change and provides their account number to the marketer to authorize the change. Account numbers are important information that consumers need to protect as a safeguard in preventing slamming.

Another concern with contract portability is the risk that customers who originally enrolled on fixed rate contracts can have their contracts automatically renewed without explicit consent, and on month to month variable rates. In many instances these variable

rates are three or four times the rate being charged to standard choice offer or gas cost recovery rate customers. It is fundamentally unfair to transfer bad marketer contracts that are harmful for consumers from one address to another without first informing customers both about the rates they are being charged under the current contract, and about other choices that will protect them from overpaying.

Natural gas utilities should be required to inform customers about the rate they paid for natural gas over a twelve-month period of time compared to the rate that was charged to other standard choice offer or gas cost recovery rate customers. Therefore, OCC recommends that the Staff proposed Ohio Adm. Code 4901:1-13-12(H) should be amended as follows:

(H) Any gas or natural gas company that provides competitive retail natural gas service contract portability between premises, pursuant to an approved tariff, 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 customer has the right to determine whether to retain the current supplier ~~will transfer to~~ at 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. Additionally, the gas utility will inform customers about the rate they paid for natural gas through the supplier for each of the previous twelve months compared to the utility standard choice offer (SCO) or gas cost recovery (GCR) rate. Account numbers will can be transferred to competitive retail natural gas suppliers as part of operational need once notification is provided to customers and customers give affirmative consent to the transfer of the account number.

F. O.A.C. 4901:1-13-14(H): THE PUCO SHOULD PROTECT LOW-INCOME CONSUMERS FROM BEING ASSESSED SWITCHING FEES WHEN THEN ENROLL IN PIPP OR ARE RETURNED TO THE UTILITY’S STANDARD OFFER DUE TO NON-PAYMENT OF CHARGES FROM A MARKETER.

The PUCO Staff did not recommend any changes to current Ohio Adm. Code 4901:1-13-14. Under this current rule, customers could be charged switching fees when they are transferring back to the standard choice offer or to the gas cost recovery charge (for Duke customers) because of non-payment of marketer charges or in order to participate in the PIPP program. To protect consumer access to the utility standard choice offer or the gas cost recovery charge rate, customers who are returning to the utility standard choice offer or the gas cost recovery charge rate should not be assessed any fees or charges associated with the switch. Accordingly, Ohio Adm. Code 4901:1-13-14(H)(1) should be amended as follows:

- (1) Any customer returning to the gas or natural gas company's commodity service due to default, abandonment, slamming, ~~or~~ certification rescission of a retail natural gas supplier or governmental aggregator, non-payment of competitive supplier charges, or enrollment in PIPP will not be liable for any costs associated with the switch.

G. O.A.C. 4901:1-13-01: THE PUCO SHOULD DEFINE THE TERM “COMMODITY CHARGE, FOR CONSUMER PROTECTION AGAINST UNANTICIPATED CHARGES.”

In its draft rules, Staff proposed the addition of a new rule, 4901:1-13-11(K), that would limit the types of charges that can be included on natural gas bills.⁸ The Staff’s proposed Rule (K) permits a “commodity charge,”⁹ but does not define what this charge is. OCC agrees that the Staff proposed rule is important to help prevent natural gas bills from being misused (e.g. as the venue for collecting marketer monthly service fees, miscellaneous charges, or other charges for products and services that have nothing to do with the natural gas service being provided by the gas utility). But providing a clear definition for what a “commodity charge” includes would go one step further towards avoiding any marketplace uncertainty as to what can be on the bill. Accordingly, the PUCO should clearly define and limit the meaning of “commodity charge” in Ohio Adm. Code 4901:1-13-01.

OCC proposes the following definition for commodity charges be added in Ohio Adm. Code 4901:1-13-01: “ “Commodity Charge” includes the portion of the natural gas bill that is based on the cost of the actual natural gas supplied to the customer by either the natural gas utility or competitive retail natural gas supplier.”

⁸ Attachment A to Entry at 36 (December 18, 2019).

⁹ “(K) Natural gas residential bills are to contain only charges that are either a natural gas or competitive retail natural gas commodity charge or an approved tariffed distribution charge or service.”.

H. O.A.C. 4901:1-13-04(D): FOR CONSUMER PROTECTION, THE PUCO SHOULD PROVIDE GAS CUSTOMERS THE RIGHT TO REQUEST FREE PERIODIC METER TESTS AT LEAST ONCE EVERY THREE YEARS (SIMILAR TO THE RIGHT OF ELECTRIC CUSTOMERS).

Meters fail. And because of these known failures, there are occasions where customers rightfully question the accuracy of their natural gas meter. Under the current PUCO rules, customers can request that the gas utility test the meter if they believe it is not working properly.¹⁰ But gas utilities are allowed to charge customers for the meter test if the results of the test find the meter is within prescribed operating tolerances.¹¹

There are other consumer protections that accompany the right to request a meter test. Consumers have the right to be present during the test, to obtain a written explanation of the results of the test, and to receive notice of any applicable charges for the meter test.¹²

But because the customer is responsible for the costs of a meter test if the meter is not outside of its prescribed operating tolerance, many residential consumers may be reluctant to request a test. The following table shows the PUCO approved tariff meter testing charges for several of the larger Ohio gas utilities.

¹⁰ Ohio Adm. Code 4901:1-13-04(D).

¹¹ *Id.*

¹² *Id.*

Meter Testing Charges of the Ohio Natural Gas Utilities

Utility	Tariff Page	Amount
Columbia Gas of Ohio	Sheet 14	\$40.00
Duke Energy Ohio	Sheet 23.6	* ¹³
Vectren Energy Delivery	Sheet No. 30	\$40.00
Northeast Ohio Natural Gas	Sheet No. 57	\$25.00
Suburban	Sheet No. 10	\$40.00
Ohio Gas	Sheet No. 5	\$40.00

Although a \$40.00 meter testing charge may not dissuade all customers from requesting meter tests, these charges could discourage others from requesting a test, especially those 14% of Ohioans that live below the poverty level and struggle to eat.¹⁴ All customers should have confidence that their meter is functioning correctly and that they are being billed accurately. Providing periodic tests of the meter upon request by the customer and without fear of a charge that may not be affordable helps build that confidence.

Under the PUCO electric rules set forth in Ohio Adm. Code 4901:1-10-05(F)(4)(a), electric customers can request a meter test of their meter without a charge once every three years. Given that these rules specify the minimum service and safety standards across the natural gas industry, gas customers should have the same right. Therefore, the PUCO should adopt a similar minimum standard for testing natural gas meters.

¹³ Duke does not list a rate in its tariff, but has language asserting that the expense can be charged to consumers: "If a test of any meter is made at the request of a customer, with the result that such meter is found to be correct and accurate as defined above, the Company may charge the customer the expense of such test....However, for the first such meter test in any twelve-month period, the Company will not charge the customer."

¹⁴ ODSA, *Ohio Poverty Report* (February 2019).

OCC proposes that Ohio Adm. Code 4901:1-13-04(D)(4) be amended as follows:

(4) Each company shall notify the customer of the of applicable charges prior to the test. Such charges must be set forth in the company's tariff and must provide for one free test during a continuous 36-month period, regardless of whether the meter tested to be accurate. Any additional tests requested by the customer during the same continuous 36-month period may be subject to the charges set forth in the company's tariff.

I. O.A.C. 4901:1-13-04(F): FOR CONSISTENCY BETWEEN THE RECORD RETENTION RULES, THE PUCO SHOULD REQUIRE METER TESTING RECORDS BE MAINTAINED FOR THE LIFE OF THE METER.

The current PUCO rules contain conflicting meter testing records retention provisions. Under Ohio Adm. Code 4901:1-13-04(F) (gas metering rules), meter test records including the date of each request, date and reason for each test, test results, meter reading(s) before and after each test, and accuracy findings must be maintained only for a period of two years or the next superseding test (whichever is longer). However, Ohio Adm. Code 4901:1-13-03(C) (the gas company record retention rule) requires records to be maintained for at least three years. To further confuse matters, Ohio Adm. Code 4901:1-09-06 (which applies to all utility companies) requires records of gas meter tests to be maintained for at least two years and meter history records to be maintained for the life of the meter.

Meter testing records should be maintained for as long as necessary to demonstrate compliance with the rules. Accordingly, the PUCO should amend Ohio Adm. Code 4901:1-13-04(F)(1) and require records of meter tests to be maintained for no less than three years. This helps ensure consistency in the record-keeping requirements while aligning requirements in the minimum gas service standards.

OCC recommends the following amendment to Ohio Adm. Code 4901:1-13-04(F)(1):

- (1) Maintain all of the following meter test records for at least three ~~two~~ years or until the next superseding test, whichever is longer:
 - (a) Date of customer's request for each test.
 - (b) Date and reason for each test.
 - (c) Test results.
 - (d) Meter reading(s) before and after each test.
 - (e) Accuracy "as found" and "as left."

J. O.A.C. 4901:1-13-04(G)(2): THE PUCO SHOULD REVISE THIS RULE TO MAKE IT CONSISTENT WITH R.C. 4933.28 FOR CORRECTIONS TO NATURAL GAS BILLS.

The current PUCO rule Ohio Adm. Code 4901:1-13-04(G)(2) sets forth the consumer protection requirements for adjusting residential customer bills, consistent with R.C. 4933.28. Both that statute and PUCO rules limit the time in which billing undercharges can be back-charged to consumers.¹⁵ The PUCO rules also specify that customers must be notified by the natural gas company of their right to have twelve months in which to pay any undercharges in equal installments. However, the PUCO rules do *not* explicitly prohibit utilities from assessing interest charges on the corrected bills, nor do they permit payment terms that can be longer than 12 months. R.C. 4933.28 does.¹⁶

¹⁵ Up to the 365 days prior to the date the metering inaccuracy is corrected.

¹⁶ R.C. 4933.28 (B): No company shall recover any interest charge, service charge, or fee, whether or not a percentage is utilized for its computation, for billings made pursuant to this section. (C) Nothing in this section shall be construed to prevent the customer from paying an undercharge or any portion thereof in a time shorter than that stated in this section. Nothing in this section shall be construed to prevent a gas, natural gas, or electric light company from collecting an undercharge or any portion thereof in a time longer than that stated in this section.

This discrepancy between Ohio law and the PUCO rules is not only wrong, but is a concern for consumers, especially those who are low-income. Paying for natural gas bills that include repaying unanticipated—and usually large—undercharges can have a significant negative financial impact on consumers. The PUCO rule should be changed to provide at least as much protection to consumers as Ohio law.

OCC recommends that Ohio Adm. Code 4901:1-13-04(G)(2) be amended as follows to be consistent with consumer protection rights in Ohio law (R.C. 4933.28).

(2) Billing adjustments for residential customers shall comply with section 4933.28 of the Revised Code. When a gas or natural gas company has undercharged any residential customer as the result of a meter or metering inaccuracy, billing problem, or other continuing problem under the gas or natural gas company's control, the company may only bill the customer for the amount of the unmetered gas rendered in the three hundred sixty-five days immediately prior to the date the company remedies the meter inaccuracy. Customers shall be notified by the gas or natural gas company of their right to have at least twelve months to pay, in equal installments, and without interest, any undercharge for unmetered gas service.

K. O.A.C. 4901:1-13-04(G)(9): TO PROTECT RESIDENTIAL CONSUMERS WHO RENT, THE PUCO SHOULD LIMIT A TENANT'S RESPONSIBILITY FOR PAYING NATURAL GAS SERVICE CHARGES INCURRED, AND THROUGH NO FAULT OF THE TENANT, IF THE UTILITY IS UNABLE TO GAIN ACCESS TO THE METER TO OBTAIN A FINAL METER READING OR TO VERIFY THE ACCURACY OF THE METER.

Ohio Adm. Code 4901:1-13-04(G)(9) requires a natural gas utility to provide notice by mail to both the landlord and tenant if it is unable to obtain access to the meter. While the notice is an important consumer protection, it does not resolve other issues that are associated with a natural gas company's inability to access to the meter. For example, there are circumstances where tenants request that service be terminated on a certain date and the utility determines that a final meter read is necessary to ensure the tenant is billed

accurately for the natural gas that they used. If the tenant is subsequently unable to provide access to the meter for the final meter read because they have already vacated the premises or because the landlord controls access to the meter, the tenant could be held responsible for gas usage that occurs after the date they requested service be terminated. This is unfair to consumer tenants that have no control over the utility's access to the meter, and they should not be penalized. The PUCO should protect these consumers.

OCC recommends the following amendment to Ohio Adm. Code 4901:1-13-04(G)(9):

(9) Where there is a landlord/tenant relationship and neither the gas or natural gas company nor the ~~customer~~ tenant has access to the meter, the gas or natural gas company shall render notice by mail to both the landlord, when the address is available, and the tenant, summarizing its inability to obtain access to the meter for any of the provisions of this rule. In instances where a tenant has requested that service be terminated on a certain date or the tenant is unable to provide the natural gas company with access to the meter for any reason, the natural gas company shall not bill the tenant for the estimated or actual usage occurring after the termination date requested by the tenant. Such estimated or actual usage shall be billed to the landlord.

L. O.A.C. 4901:1-13-11(C): FOR CONSISTENCY WITH THE MINIMUM ELECTRIC SERVICE AND SAFETY STANDARDS, THE PUCO SHOULD REQUIRE THAT CUSTOMERS BE PROVIDED WITH 21 DAYS TO PAY NATURAL GAS BILLS THAT ARE MAILED FROM OUT OF STATE.

The PUCO should amend Ohio Adm. Code 4901:1-13-11(C) to be consistent with the minimum electric service and safety standards. Regardless of whether the bill is for gas or electric, those that are mailed from outside the state of Ohio are likely to take more time to deliver than bills that are mailed from within the state of Ohio. As the rules are now, consumer gas bills are treated differently from consumer electric bills due to inconsistencies between the rules.

The PUCO electric service and safety standards requires that electric bills mailed from outside the state of Ohio must have a due date that is no less than 21 days after the bill date.¹⁷ This will provide customers with ample time to receive their billing statement and make their payment after they receive their natural gas. But the current gas rule requires only that residential gas bills mailed from outside the state of Ohio must have a due date that is no less than seventeen days from the date on the bill.

To help avoid customer confusion and unfairness between gas and electric services, the natural gas service standards should afford customers the same rights as electric utility customers. Therefore, Ohio Adm. Code 4901:1-13-11(C) should be amended as follows to provide customers who receive natural gas bills that are mailed from outside Ohio with due dates that are at least twenty-one days from the date listed on the bill:

(C) All bills shall be due no earlier than fourteen days from the date of the postmark on the bill. If the bill is sent electronically, the bill shall not be due earlier than fourteen days from the date of the electronic postmark on the bill. If the bill is mailed by means that does not place a postmark on the bill (i.e., such as permit mailing), the bill shall not be due earlier than fourteen days from the date on the actual bill. All bills mailed without postmarks shall be mailed no later than the day listed on the bill. For residential bills being issued from outside the state of Ohio, the due date shall be no less than twenty-one ~~seventeen~~ days from the date on the actual bill.

¹⁷ Ohio Adm. Code 4901:1-10-22(B)(10).

M. O.A.C. 4901:1-13-11(K): THE PUCO SHOULD ADOPT THE PROPOSED STAFF RULE LIMITING THE TYPES OF CHARGES THAT CAN APPEAR ON NATURAL GAS CUSTOMERS' BILLS TO INCLUDE ONLY COMMODITY CHARGES AND TARIFF-APPROVED DISTRIBUTION CHARGES OR SERVICES.

The PUCO Staff proposed a new rule in Ohio Adm. Code 4901:1-13-11(K) that limits the charges that can be imposed on a natural gas bill to contain only natural gas company or competitive retail natural gas commodity charges and a tariff-approved distribution charge or service. The OCC commends the Staff for recommending an important consumer protection that helps limit the types of charges that can be imposed on a natural gas bill. OCC supports this Staff proposal and recommends that the PUCO adopt the Staff's proposed rule.

N. O.A.C. 4901:1-13-12(E): THE PUCO SHOULD PERMIT CUSTOMERS TO REQUEST UP TO THIRTY-SIX MONTHS OF USAGE AND PAYMENT HISTORY ON AN ANNUAL BASIS WITHOUT ADDITIONAL CHARGES OR FEES TO PROTECT AND BETTER INFORM CONSUMERS ABOUT THEIR USAGE HISTORY.

The OCC commends the Staff for proposing an amendment to Ohio Adm. Code 4901:1-13-12(E) that requires a natural gas company to provide twelve months of customers usage history and twenty-four months of payment history without charge to the customer. However, the PUCO should extend the histories to thirty-six months. Customers may require access to usage history or payment history that goes beyond the twelve month or 24-month requirements currently in the rules.

In addition, Ohio Adm. Code 4901:1-13-03 requires natural gas utilities to maintain records for at least three-years to demonstrate compliance with the rules. Therefore, customers should have access to at least three years of usage history or payment history information without incurring an additional charge or fee since the natural gas utility is required to maintain the customers' usage history for that long. Accordingly, Ohio Adm. Code 4901:1-13-12(E) should be amended to provide customers

access, without charges, to thirty-six months of usage and payment history data as follows:

- (E) Upon customer request, and at least annually, a gas or natural gas company shall timely provide thirty-six ~~twelve~~ months of a customer's usage history and ~~thirty-six months~~ ~~twenty-four months~~ of a customer's payment history to the customer without charge.

III. CONCLUSION

OCC commends the PUCO Staff for its proposed rule changes, for consumers' natural gas service. There are additional protections that Ohio gas utility consumers need and deserve, as described above. Ohio consumers deserve adequate, reliable, and reasonably priced natural gas services and goods. OCC's recommendations provide needed protections for Ohio consumers. The PUCO should adopt OCC's recommendations to protect consumers.

Respectfully submitted,

Bruce Weston (0016973)
Ohio Consumers' Counsel

/s/ Ambrosia E. Logsdon
Ambrosia E. Logsdon (0096598)
Counsel of Record
David Bergmann ((0009991)
Assistant Consumers' Counsel

Office of the Ohio Consumers' Counsel
65 E. State Street, 7th Floor
Columbus, Ohio 43215-3485
Telephone [Logsdon]: 614-466-1292
Telephone [Bergmann}: 614-466-9569
Ambrosia.Logsdon@occ.ohio.gov
David.bergmann@occ.ohio.gov
(willing to accept service by e-mail)

CERTIFICATE OF SERVICE

I hereby certify that a copy of these Comments were served on the persons stated below via electronic transmission this 17th day of January 2020.

/s/ Ambrosia E. Logsdon
Ambrosia E. Logsdon
Assistant Consumers' Counsel

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

SERVICE LIST

John.jones@ohioattorneygeneral.gov

Attorney Examiner:

Sarah.parrott@puco.ohio.gov

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Ohio customers losing big on unregulated natural gas plans – Columbus Dispatch

April 4, 2016

Dan Gearino



The chance to choose a natural gas provider continues to be a financial disaster for Columbia Gas of Ohio customers. Since the utility began allowing customers to choose an alternative supplier in 1997, the people who made that choice have paid \$1.36 billion more than those who remained with regulated prices offered by Columbia Gas, rates that are based on changing commodity prices and approved by state regulators, according to data disclosed in a recent regulatory filing.

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Since the utility began allowing customers to choose an alternative supplier in 1997, the people who made that choice have paid \$1.36 billion more than those who remained with regulated prices offered by Columbia Gas, rates that are based on changing commodity prices and approved by state regulators, according to data disclosed in a recent regulatory filing.

While some individual customers may have come out ahead, the group as a whole is on a losing streak that began in 2005 and covers every month since, a pattern that critics say raises questions about the fairness of the system.

“In the absence of sufficient information for consumers to make informed and wise choices about natural gas offers, natural gas ‘choice’ may simply not work for consumers,” Michael Haugh, an analyst for the Office of the Ohio Consumers’ Counsel, said in the same filing.

Why have the results been so one-sided? Here are some reasons suggested by consumer advocates:

- *- Consumers want the stability of fixed-rate gas contracts but do not have enough knowledge of gas markets to know when those contracts may be overpriced.
- *- Most marketer contracts automatically renew at the end of the term unless the customer decides to cancel. Sometimes the renewal terms are not as favorable as the original contract, and customers allow the new terms to take effect through inaction.
- *- Some marketers use high-pressure sales tactics to discourage comparison shopping. This is most often true for door-to-door sales in which solicitors say their offer is a good one and put pressure on the customer to sign up immediately.

As of Monday, Columbia's regulated price -- excluding taxes and fees -- is 33.3 cents per 100 cubic feet of gas, according to the Public Utilities Commission of Ohio. Consumers can compare that price to 48 listed offers from 23 suppliers at <http://energychoice.ohio.gov/>.

If a customer wants a 12-month fixed-rate deal, there are 15 options. Prices range from a low of 37.99 cents from Ambit Northeast of Dallas to a high of 66.4 cents from North American Power and Gas of Connecticut. There is a decent chance that someone buying the least-expensive contract could come out ahead if there is even a minimal increase in market prices in the next year.

And yet, too few customers are actively shopping. They have signed up for a contract and are letting it roll over each year with an automatic renewal.

The new data show that the trend of unregulated customers paying higher prices even continued through the so-called polar vortex of early 2014, when market prices were unusually volatile.

Last year, customers who chose a supplier paid \$161 million more than those who did not. Of that total, \$125 million was paid by households and the remainder was paid by businesses. Columbia has 1.3 million households in its territory, and 38 percent of them have chosen an alternative gas supplier, according to the most recent enrollment statistics.

On average, a household that chose its supplier paid roughly \$250 more last year for natural gas than those that did not, based on a comparison of enrollment data and the aggregate dollar figures.

Is this a problem?

"It's a fair question to ask," said Shawn Anderson, vice president of regulatory and finance for Columbia Gas.

Columbia makes its money from the delivery of gas, not from a markup of the gas commodity price, and transports gas for the unregulated marketing companies. This means Columbia has no financial interest in getting customers to sign up for the regulated price, or to choose unregulated prices from outside suppliers.

“I think the real story is related to the amount of competition in the marketplace and what that does to the price of natural gas,” he said.

Indeed, natural gas prices have plummeted in recent years, thanks in part to the booming supply of gas from shale formations. So, even if people on unregulated contracts are paying more than they would with the regulated service, prices are lower than they used to be.

Several gas suppliers, such as IGS Energy of Dublin, disagree with the premise that the Columbia data, and the \$1.36 billion figure, are relevant.

“It’s not really an apples-to-apples comparison,” said Matt White, general counsel for IGS. He noted that alternative suppliers offer products and services that are not available at the regulated price. For example, some suppliers let customers pay extra for a plan that is 100 percent renewable energy, or include add-ons such as programmable thermostats.

But not all suppliers agree with this.

“I don’t know how you could look at those numbers and think there’s not an issue there,” said Jerry Haines, marketing director for Volunteer Energy, a Pickerington-based supplier.

The problem, he said, is that most suppliers specialize in fixed-rate contracts, which have performed poorly compared with regulated prices for years. In part because of this, Volunteer almost exclusively sells contracts in which the prices change each month, most of which come with a guarantee of savings compared with the Columbia price.

This conversation quickly shifts to philosophical questions, such as whether the government should respond when consumers are making unfavorable choices in a free market.

So far the answer is no, according to the PUCO.

“It is important that customers do their research,” said Matt Schilling, a PUCO spokesman. “If someone wants to do a lot of research and see how the markets have been moving, that information is available.”

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Apr-97	\$425,351	\$43,275	\$0			\$468,626	\$335,000	\$803,626	\$335,000	\$803,626	\$468,626
May-97	\$342,846	\$39,215	\$0			\$382,061	\$305,627	\$687,688	\$640,627	\$1,491,314	\$850,687
Jun-97	\$195,327	\$28,158	\$0			\$223,485	\$59,826	\$283,311	\$700,453	\$1,774,625	\$1,074,172
Jul-97	\$87,295	\$19,242	\$0			\$106,537	\$57,698	\$164,235	\$758,151	\$1,938,860	\$1,180,709
Aug-97	\$76,251	\$11,529	\$0			\$87,780	\$49,657	\$137,437	\$807,808	\$2,076,297	\$1,268,489
Sep-97	\$83,182	\$12,863	\$0			\$96,045	\$47,863	\$143,908	\$855,671	\$2,220,205	\$1,364,534
Oct-97	\$128,462	\$13,284	\$0			\$141,746	\$68,492	\$210,238	\$924,163	\$2,430,443	\$1,506,280
Nov-97	\$395,185	\$39,517	\$0			\$434,702	\$238,592	\$673,294	\$1,162,755	\$3,103,737	\$1,940,982
Dec-97	\$579,381	\$123,876	\$0			\$703,257	\$351,824	\$1,055,081	\$1,514,579	\$4,158,818	\$2,644,239
Jan-98	\$824,159	\$263,876	\$0			\$1,088,035	\$488,246	\$1,576,281	\$2,002,825	\$5,735,099	\$3,732,274
Feb-98	\$682,159	\$154,769	\$0			\$836,928	\$539,537	\$1,376,465	\$2,542,362	\$7,111,564	\$4,569,202
Mar-98	\$595,217	\$114,732	\$0			\$709,949	\$516,279	\$1,226,228	\$3,058,641	\$8,337,792	\$5,279,151
Apr-98	\$462,581	\$80,935	\$0			\$543,516	\$405,279	\$948,795	\$3,463,920	\$9,286,587	\$5,822,667
May-98	\$374,279	\$43,982	\$0			\$418,261	\$269,582	\$687,843	\$3,733,502	\$9,974,430	\$6,240,928
Jun-98	\$197,956	\$20,984	\$0			\$218,940	\$125,985	\$344,925	\$3,859,487	\$10,319,355	\$6,459,868
Jul-98	\$93,579	\$14,839	\$0			\$108,418	\$89,153	\$197,571	\$3,948,640	\$10,516,926	\$6,568,286
Aug-98	\$86,279	\$9,524	\$0			\$95,803	\$58,426	\$154,229	\$4,007,066	\$10,671,155	\$6,664,089
Sep-98	\$83,279	\$16,842	\$0			\$100,121	\$67,518	\$167,639	\$4,074,584	\$10,838,794	\$6,764,210
Oct-98	\$154,283	\$123,849	\$0			\$278,132	\$84,159	\$362,291	\$4,158,743	\$11,201,085	\$7,042,342
Nov-98	\$786,924	\$459,627	\$0			\$1,246,551	\$241,897	\$1,488,448	\$4,400,640	\$12,689,533	\$8,288,893
Dec-98	\$1,248,953	\$815,476	\$0			\$2,064,429	\$386,295	\$2,450,724	\$4,786,935	\$15,140,257	\$10,353,322
Jan-99	\$2,841,953	\$1,524,869	\$0			\$4,366,822	\$595,015	\$4,961,837	\$5,381,950	\$20,102,094	\$14,720,144
Feb-99	\$2,692,746	\$1,362,745	\$0			\$4,055,491	\$428,931	\$4,484,422	\$5,810,881	\$24,586,516	\$18,775,635
Mar-99	\$1,792,549	\$1,198,257	\$0			\$2,990,806	\$491,930	\$3,482,736	\$6,302,810	\$28,069,251	\$21,766,441
Apr-99	\$1,295,736	\$992,843	\$0			\$2,288,579	\$420,001	\$2,708,580	\$6,722,811	\$30,777,831	\$24,055,020
May-99	\$35,928	\$305,672	\$0			\$341,600	\$171,237	\$512,837	\$6,894,048	\$31,290,668	\$24,396,620
Jun-99	-\$6,482	\$274,958	\$0			\$268,476	\$94,756	\$363,232	\$6,988,804	\$31,653,900	\$24,665,096
Jul-99	-\$5,169	\$128,965	\$0			\$123,796	\$67,171	\$190,967	\$7,055,974	\$31,844,866	\$24,788,892
Aug-99	\$323,859	\$216,852	\$0			\$540,711	\$62,777	\$603,488	\$7,118,752	\$32,448,355	\$25,329,603
Sep-99	\$301,528	\$287,495	\$0			\$589,023	\$55,638	\$644,661	\$7,174,390	\$33,093,016	\$25,918,626
Oct-99	\$547,523	\$437,053	\$0			\$984,576	\$113,827	\$1,098,403	\$7,288,217	\$34,191,419	\$26,903,202
Nov-99	\$2,924,475	\$1,350,835	\$0			\$4,275,310	\$269,173	\$4,544,483	\$7,557,390	\$38,735,902	\$31,178,512
Dec-99	\$4,287,950	\$2,184,202	\$0			\$6,472,152	\$438,838	\$6,910,990	\$7,996,228	\$45,646,892	\$37,650,664
Jan-00	\$5,411,314	\$2,833,574	\$24,986			\$8,269,874	\$696,339	\$8,966,213	\$8,692,566	\$54,613,105	\$45,920,538
Feb-00	\$2,147,364	\$1,606,382	\$0			\$3,753,746	\$699,457	\$4,453,203	\$9,392,023	\$59,066,307	\$49,674,284
Mar-00	\$2,227,071	\$1,501,788	\$0			\$3,728,859	\$457,115	\$4,185,974	\$9,849,138	\$63,252,281	\$53,403,143
Apr-00	\$1,650,460	\$866,914	\$11,678			\$2,529,053	\$120,373	\$2,649,425	\$9,969,510	\$65,901,706	\$55,932,196
May-00	\$2,044,089	\$1,000,117	\$13,276			\$3,057,481	\$150,316	\$3,207,797	\$10,119,826	\$69,109,503	\$58,989,677
Jun-00	\$1,004,800	\$554,738	\$14,060			\$1,573,599	\$68,996	\$1,642,595	\$10,188,822	\$70,752,098	\$60,563,276
Jul-00	\$710,130	\$432,868	\$11,315			\$1,154,313	\$46,821	\$1,201,134	\$10,235,643	\$71,953,232	\$61,717,589
Aug-00	\$1,567,967	\$623,002	\$20,452			\$2,211,421	\$58,508	\$2,269,929	\$10,294,151	\$74,223,161	\$63,929,009
Sep-00	\$1,549,256	\$748,851	\$17,637			\$2,315,744	\$51,350	\$2,367,095	\$10,345,502	\$76,590,255	\$66,244,753
Oct-00	\$2,706,833	\$1,056,352	\$13,042			\$3,776,227	\$121,841	\$3,898,068	\$10,467,343	\$80,488,323	\$70,020,980
Nov-00	\$6,178,117	\$2,092,866	\$38,268			\$8,309,251	\$208,106	\$8,517,357	\$10,675,449	\$89,005,680	\$78,330,231

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Dec-00	\$13,810,672	\$4,534,145	\$45,946			\$18,390,763	\$538,633	\$18,929,396	\$11,214,082	\$107,935,076	\$96,720,994
Jan-01	\$14,432,877	\$3,812,320	\$0			\$18,245,197	\$752,288	\$18,997,484	\$11,966,369	\$126,932,560	\$114,966,191
Feb-01	\$17,203,007	\$4,588,353	\$0			\$21,791,360	\$723,181	\$22,514,541	\$12,689,551	\$149,447,101	\$136,757,550
Mar-01	\$14,710,273	\$4,050,611	\$0			\$18,760,884	\$693,255	\$19,454,138	\$13,382,805	\$168,901,239	\$155,518,434
Apr-01	\$9,859,471	\$2,860,423	\$0			\$12,719,894	\$571,992	\$13,291,885	\$13,954,797	\$182,193,125	\$168,238,328
May-01	\$3,855,778	\$1,247,301	\$18,417			\$5,121,496	\$155,768	\$5,277,264	\$14,110,565	\$187,470,389	\$173,359,824
Jun-01	\$2,754,276	\$997,069	\$9,968			\$3,761,313	\$114,641	\$3,875,954	\$14,225,206	\$191,346,342	\$177,121,136
Jul-01	\$1,598,501	\$603,386	\$8,469			\$2,210,356	\$69,621	\$2,279,976	\$14,294,827	\$193,626,319	\$179,331,492
Aug-01	-\$387,396	-\$36,966	\$3,322			-\$421,041	\$48,501	-\$372,539	\$14,343,328	\$193,253,779	\$178,910,452
Sep-01	-\$541,007	-\$101,867	\$214			-\$642,660	\$44,301	-\$598,359	\$14,387,629	\$192,655,420	\$178,267,791
Oct-01	-\$903,224	-\$246,449	\$1,115			-\$1,148,558	\$95,536	-\$1,053,022	\$14,483,165	\$191,602,398	\$177,119,233
Nov-01	-\$4,785,389	-\$1,519,422	\$0			-\$6,304,811	\$166,584	-\$6,138,228	\$14,649,748	\$185,464,170	\$170,814,422
Dec-01	-\$6,417,765	-\$2,190,879	\$0			-\$8,608,644	\$241,333	-\$8,367,311	\$14,891,081	\$177,096,859	\$162,205,778
Jan-02	-\$11,213,067	-\$4,009,360	-\$24,850			-\$15,247,278	\$456,852	-\$14,790,425	\$15,347,933	\$162,306,434	\$146,958,501
Feb-02	-\$8,931,637	-\$3,242,954	-\$16,811			-\$12,191,402	\$342,231	-\$11,849,171	\$15,690,165	\$150,457,263	\$134,767,098
Mar-02	-\$6,934,816	-\$2,364,856	-\$15,592			-\$9,315,264	\$355,597	-\$8,959,667	\$16,045,761	\$141,497,596	\$125,451,834
Apr-02	-\$5,332,798	-\$1,839,321	\$0			-\$7,172,119	\$295,298	-\$6,876,821	\$16,341,060	\$134,620,775	\$118,279,715
May-02	-\$3,351,622	-\$1,404,541	-\$8,027			-\$4,764,190	\$158,107	-\$4,606,083	\$16,499,167	\$130,014,691	\$113,515,525
Jun-02	-\$2,013,498	-\$738,132	-\$5,322			-\$2,756,952	\$94,387	-\$2,662,565	\$16,593,553	\$127,352,126	\$110,758,573
Jul-02	-\$1,101,529	-\$456,628	-\$3,312			-\$1,561,469	\$50,750	-\$1,510,718	\$16,644,304	\$125,841,408	\$109,197,104
Aug-02	\$236,023	\$130,777	\$675			\$367,475	\$44,089	\$411,564	\$16,688,393	\$126,252,972	\$109,564,579
Sep-02	\$135,406	\$121,064	-\$9			\$256,461	\$41,585	\$298,046	\$16,729,978	\$126,551,017	\$109,821,040
Oct-02	\$156,437	\$113,894	-\$197			\$270,134	\$62,349	\$332,483	\$16,792,327	\$126,883,501	\$110,091,174
Nov-02	\$771,332	\$309,783	\$1,902			\$1,083,017	\$217,814	\$1,300,831	\$17,010,141	\$128,184,332	\$111,174,191
Dec-02	\$726,676	-\$6,217	\$1,461			\$721,920	\$392,134	\$1,114,055	\$17,402,276	\$129,298,386	\$111,896,111
Jan-03	\$1,102,780	-\$1,000,067	\$0			\$102,713	\$519,274	\$621,987	\$17,921,549	\$129,920,374	\$111,998,824
Feb-03	\$5,523,850	\$1,167,509	\$8,870			\$6,700,229	\$655,759	\$7,355,988	\$18,577,309	\$137,276,361	\$118,699,053
Mar-03	\$4,199,337	\$509,070	\$2,948			\$4,711,356	\$601,685	\$5,313,041	\$19,178,994	\$142,589,403	\$123,410,409
Apr-03	\$5,673,189	\$1,770,099	\$7,841			\$7,451,129	\$236,472	\$7,687,601	\$19,415,466	\$150,277,004	\$130,861,538
May-03	\$4,007,475	\$1,296,707	\$8,797			\$5,312,980	\$124,194	\$5,437,173	\$19,539,660	\$155,714,177	\$136,174,517
Jun-03	\$2,563,180	\$1,013,374	\$5,887			\$3,582,441	\$84,048	\$3,666,490	\$19,623,708	\$159,380,667	\$139,756,959
Jul-03	\$1,385,724	\$674,473	\$3,314			\$2,063,510	\$44,755	\$2,108,266	\$19,668,464	\$161,488,933	\$141,820,469
Aug-03	-\$199,255	-\$82,351	-\$218			-\$281,823	\$38,953	-\$242,870	\$19,707,417	\$161,246,063	\$141,538,646
Sep-03	-\$122,424	\$3,139	-\$212			-\$119,498	\$38,189	-\$81,310	\$19,745,605	\$161,164,753	\$141,419,148
Oct-03	-\$192,077	\$100,989	-\$697			-\$91,785	\$87,000	-\$4,785	\$19,832,605	\$161,159,968	\$141,327,363
Nov-03	-2,676,204	-\$786,416	-\$9,233			-\$3,471,853	\$130,215	-\$3,341,638	\$19,962,820	\$157,818,330	\$137,855,510
Dec-03	-\$5,412,084	-\$2,327,899	-\$14,949			-\$7,754,932	\$251,134	-\$7,503,798	\$20,213,955	\$150,314,533	\$130,100,578
Jan-04	-\$11,732,403	-\$4,826,612	-\$27,265			-\$16,586,279	\$369,962	-\$16,216,317	\$20,583,916	\$134,098,215	\$113,514,299
Feb-04	-\$10,668,507	-\$4,004,885	-\$17,696			-\$14,691,088	\$447,855	-\$14,243,234	\$21,031,771	\$119,854,982	\$98,823,211
Mar-04	-\$7,356,309	-\$2,355,718	-\$10,959			-\$9,722,986	\$334,371	-\$9,388,615	\$21,366,142	\$110,466,366	\$89,100,225
Apr-04	-\$5,408,848	-\$1,596,368	-\$7,561			-\$7,012,777	\$0	-\$7,012,777	\$21,366,142	\$103,453,590	\$82,087,448
May-04	-\$1,849,168	-\$361,959	-\$2,501			-\$2,213,629	\$0	-\$2,213,629	\$21,366,142	\$101,239,961	\$79,873,819
Jun-04	-\$973,902	-\$145,292	-\$1,036			-\$1,120,230	\$0	-\$1,120,230	\$21,366,142	\$100,119,732	\$78,753,590
Jul-04	-\$913,368	-\$223,736	-\$114,560			-\$1,251,664	\$0	-\$1,251,664	\$21,366,142	\$98,868,068	\$77,501,926

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Aug-04	-\$116,386	\$54,895	\$0			-\$61,491	\$0	-\$61,491	\$21,366,142	\$98,806,577	\$77,440,435
Sep-04	\$10,843	\$67,262	\$1,170			\$79,275	\$0	\$79,275	\$21,366,142	\$98,885,852	\$77,519,710
Oct-04	-\$42,681	\$137,841	\$1,460			\$96,620	\$0	\$96,620	\$21,366,142	\$98,982,472	\$77,616,330
Nov-04	-\$1,538,128	-\$436,246	-\$3,391			-\$1,977,765	\$0	-\$1,977,765	\$21,366,142	\$97,004,707	\$75,638,565
Dec-04	-\$1,502,379	-\$806,935	-\$4,559			-\$2,313,873	\$0	-\$2,313,873	\$21,366,142	\$94,690,834	\$73,324,692
Jan-05	-\$1,578,126	-\$1,005,151	-\$2,823			-\$2,586,099	\$0	-\$2,586,099	\$21,366,142	\$92,104,734	\$70,738,593
Feb-05	-\$7,501,073	-\$2,234,889	-\$14,464			-\$9,750,426	\$0	-\$9,750,426	\$21,366,142	\$82,354,308	\$60,988,166
Mar-05	-\$7,712,573	-\$2,518,040	-\$18,620			-\$10,249,233	\$0	-\$10,249,233	\$21,366,142	\$72,105,075	\$50,738,933
Apr-05	-\$1,844,632	-\$704,283	-\$5,848			-\$2,554,763	\$0	-\$2,554,763	\$21,366,142	\$69,550,312	\$48,184,170
May-05	-\$1,616,796	-\$210,553	-\$2,467			-\$1,829,816	\$0	-\$1,829,816	\$21,366,142	\$67,720,496	\$46,354,354
Jun-05	-\$845,291	-\$44,472	-\$4,230			-\$893,993	\$0	-\$893,993	\$21,366,142	\$66,826,503	\$45,460,361
Jul-05	-\$739,294	-\$31,196	-\$621			-\$771,110	\$0	-\$771,110	\$21,366,142	\$66,055,392	\$44,689,251
Aug-05	-\$78,266	\$70,916	\$0			-\$7,350	\$0	-\$7,350	\$21,366,142	\$66,048,042	\$44,681,901
Sep-05	\$210,761	\$100,586	\$1,038			\$312,384	\$0	\$312,384	\$21,366,142	\$66,360,427	\$44,994,285
Oct-05	\$847,001	-\$135,534	\$4,638			\$716,106	\$0	\$716,106	\$21,366,142	\$67,076,533	\$45,710,391
Nov-05	\$184,914	-\$1,283,433	\$10,074			-\$1,088,445	\$0	-\$1,088,445	\$21,366,142	\$65,988,088	\$44,621,946
Dec-05	\$185,165	-\$1,358,303	\$1,942			-\$1,171,195	\$0	-\$1,171,195	\$21,366,142	\$64,816,892	\$43,450,750
Jan-06	-\$961,598	-\$2,941,083	-\$150,058			-\$4,052,738	\$0	-\$4,052,738	\$21,366,142	\$60,764,154	\$39,398,012
Feb-06	-\$5,604,909	-\$3,093,449	-\$32,232			-\$8,730,590	\$0	-\$8,730,590	\$21,366,142	\$52,033,564	\$30,667,422
Mar-06	-\$11,177,508	-\$4,065,279	-\$42,318			-\$15,285,104	\$0	-\$15,285,104	\$21,366,142	\$36,748,459	\$15,382,317
Apr-06	-\$7,293,950	-\$2,287,715	-\$24,904			-\$9,606,569	\$53,181	-\$9,553,388	\$21,419,323	\$27,195,071	\$5,775,748
May-06	-\$3,926,951	-\$1,116,790	-\$12,355			-\$5,056,096	\$26,802	-\$5,029,294	\$21,446,125	\$22,165,777	\$719,652
Jun-06	-\$2,704,723	-\$598,065	-\$9,368			-\$3,312,155	\$14,795	-\$3,297,361	\$21,460,920	\$18,868,417	-\$2,592,503
Jul-06	-\$1,975,016	-\$494,379	-\$8,324			-\$2,477,718	\$8,309	-\$2,469,409	\$21,469,229	\$16,399,008	-\$5,070,221
Aug-06	-\$2,101,535	-\$420,782	-\$11,119			-\$2,533,436	\$8,075	-\$2,525,361	\$21,477,304	\$13,873,646	-\$7,603,658
Sep-06	-\$1,571,928	-\$516,412	-\$12,047			-\$2,100,387	\$8,066	-\$2,092,321	\$21,485,370	\$11,781,325	-\$9,704,045
Oct-06	-\$5,152,570	-\$1,734,363	-\$33,089			-\$6,920,021	\$17,003	-\$6,903,018	\$21,502,373	\$4,878,307	-\$16,624,066
Nov-06	-\$9,020,018	-\$2,654,434	-\$49,911			-\$11,724,363	\$40,939	-\$11,683,424	\$21,543,312	-\$6,805,117	-\$28,348,429
Dec-06	-\$12,714,226	-\$3,707,906	-\$75,247			-\$16,497,380	\$59,733	-\$16,437,647	\$21,603,046	-\$23,242,764	-\$44,845,809
Jan-07	-\$14,772,242	-\$5,844,496	-\$82,866			-\$20,699,603	\$71,970	-\$20,627,633	\$21,675,016	-\$43,870,396	-\$65,545,412
Feb-07	-\$21,638,440	-\$6,425,648	-\$62,487			-\$28,126,575	\$105,900	-\$28,020,675	\$21,780,916	-\$71,891,071	-\$93,671,988
Mar-07	-\$15,335,851	-\$5,020,217	-\$41,454			-\$20,397,523	\$91,869	-\$20,305,654	\$21,872,785	-\$92,196,725	-\$114,069,510
Apr-07	-\$13,730,839	-\$4,746,463	-\$38,360			-\$18,515,663	\$77,960	-\$18,437,702	\$21,950,745	-\$110,634,428	-\$132,585,173
May-07	-\$4,045,124	-\$1,461,868	-\$24,204			-\$5,531,196	\$41,549	-\$5,489,647	\$21,992,294	-\$116,124,075	-\$138,116,369
Jun-07	-\$1,824,264	-\$756,525	-\$6,479			-\$2,587,269	\$18,743	-\$2,568,525	\$22,011,037	-\$118,692,601	-\$140,703,638
Jul-07	-\$1,575,114	-\$666,103	-\$11,375			-\$2,252,592	\$13,759	-\$2,238,833	\$22,024,796	-\$120,931,434	-\$142,956,230
Aug-07	-\$1,548,150	-\$648,202	-\$9,630			-\$2,205,982	\$11,085	-\$2,194,897	\$22,035,882	-\$123,126,330	-\$145,162,212
Sep-07	-\$1,483,832	-\$600,649	-\$7,762			-\$2,092,243	\$11,445	-\$2,080,798	\$22,047,327	-\$125,207,128	-\$147,254,455
Oct-07	-\$2,044,185	-\$731,511	-\$6,280			-\$2,781,976	\$14,771	-\$2,767,205	\$22,062,098	-\$127,974,333	-\$150,036,431
Nov-07	-\$4,561,749	-\$1,277,436	-\$4,391			-\$5,843,575	\$49,773	-\$5,793,803	\$22,111,871	-\$133,768,135	-\$155,880,006
Dec-07	-\$8,568,268	-\$2,599,283	-\$27,095			-\$11,194,646	\$104,032	-\$11,090,614	\$22,215,903	-\$144,858,749	-\$167,074,653
Jan-08	-\$10,096,120	-\$2,931,314	-\$24,470			-\$13,051,903	\$131,676	-\$12,920,228	\$22,347,579	-\$157,778,977	-\$180,126,556
Feb-08	-\$7,024,941	-\$1,824,434	-\$10,632			-\$8,860,007	\$141,785	-\$8,718,221	\$22,489,365	-\$166,497,198	-\$188,986,563
Mar-08	-\$7,533,256	-\$2,519,223	-\$13,759			-\$10,066,238	\$142,920	-\$9,923,318	\$22,632,284	-\$176,420,516	-\$199,052,801

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Apr-08	-\$2,506,939	-\$950,180	\$2,713			-\$3,454,406	\$73,436	-\$3,380,970	\$22,705,720	-\$179,801,486	-\$202,507,206
May-08	-\$1,179,307	-\$749,652	\$856			-\$1,928,103	\$31,482	-\$1,896,621	\$22,737,202	-\$181,698,107	-\$204,435,310
Jun-08	-\$603,512	-\$565,362	-\$1,217			-\$1,170,091	\$20,328	-\$1,149,763	\$22,757,530	-\$182,847,870	-\$205,605,401
Jul-08	-\$121,880	-\$668,469	\$304			-\$790,044	\$11,537	-\$778,508	\$22,769,066	-\$183,626,378	-\$206,395,445
Aug-08	-\$920,216	-\$692,303	-\$1,841			-\$1,614,359	\$9,710	-\$1,604,649	\$22,778,777	-\$185,231,027	-\$208,009,805
Sep-08	-\$1,587,392	-\$1,011,676	-\$3,722			-\$2,602,790	\$8,792	-\$2,593,998	\$22,787,569	-\$187,825,025	-\$210,612,595
Oct-08	-\$2,969,271	-\$977,128	-\$6,760			-\$3,953,159	\$14,224	-\$3,938,935	\$22,801,793	-\$191,763,960	-\$214,565,754
Nov-08	-\$4,157,953	-\$925,308	\$4,846			-\$5,078,415	\$43,070	-\$5,035,346	\$22,844,862	-\$196,799,305	-\$219,644,169
Dec-08	-\$3,814,931	\$332,636	\$22,238			-\$3,460,056	\$92,916	-\$3,367,141	\$22,937,778	-\$200,166,446	-\$223,104,225
Jan-09	-\$28,681,170	-\$9,070,920	-\$72,169			-\$37,824,259	\$124,409	-\$37,699,849	\$23,062,188	-\$237,866,295	-\$260,928,484
Feb-09	-\$22,216,722	-\$6,779,101	-\$58,538			-\$29,054,361	\$125,729	-\$28,928,632	\$23,187,917	-\$266,794,927	-\$289,982,845
Mar-09	-\$14,231,242	-\$3,873,959	-\$28,150			-\$18,133,351	\$95,546	-\$18,037,806	\$23,283,463	-\$284,832,732	-\$308,116,196
Apr-09	-\$14,866,518	-\$4,294,526	-\$35,204			-\$19,196,248	\$14,350	-\$19,181,898	\$23,297,813	-\$304,014,630	-\$327,312,444
May-09	-\$8,101,872	-\$2,856,819	-\$18,422			-\$10,977,112	\$6,975	-\$10,970,138	\$23,304,788	-\$314,984,768	-\$338,289,557
Jun-09	-\$3,431,341	-\$1,247,366	-\$6,467			-\$4,685,174	\$3,592	-\$4,681,582	\$23,308,381	-\$319,666,350	-\$342,974,731
Jul-09	-\$2,737,380	-\$1,060,690	-\$5,052			-\$3,803,121	\$2,223	-\$3,800,898	\$23,310,604	-\$323,467,248	-\$346,777,852
Aug-09	-\$3,552,993	-\$1,512,985	-\$20,633			-\$5,086,611	\$2,092	-\$5,084,519	\$23,312,696	-\$328,551,766	-\$351,864,463
Sep-09	-\$3,368,242	-\$1,428,350	-\$19,836			-\$4,816,429	\$1,949	-\$4,814,479	\$23,314,646	-\$333,366,245	-\$356,680,892
Oct-09	-\$7,246,610	-\$2,384,038	-\$36,028			-\$9,666,676	\$4,560	-\$9,662,116	\$23,319,206	-\$343,028,362	-\$366,347,568
Nov-09	-\$11,737,467	-\$4,226,695	-\$54,205			-\$16,018,366	\$8,603	-\$16,009,764	\$23,327,808	-\$359,038,125	-\$382,365,935
Dec-09	-\$21,782,094	-\$7,865,117	-\$109,853			-\$29,757,064	\$14,783	-\$29,742,282	\$23,342,591	-\$388,780,407	-\$412,122,999
Jan-10	-\$40,572,070	-\$17,771,809	-\$190,682			-\$58,534,561	\$25,333	-\$58,509,229	\$23,367,923	-\$447,289,636	-\$470,657,560
Feb-10	-\$37,456,299	-\$17,263,379	-\$166,964			-\$54,886,642	\$23,999	-\$54,862,644	\$23,391,922	-\$502,152,279	-\$525,544,202
Mar-10	-\$29,544,799	-\$12,895,726	-\$125,155			-\$42,565,680	\$20,305	-\$42,545,375	\$23,412,227	-\$544,697,654	-\$568,109,882
Apr-10	-\$10,205,850	-\$5,302,857	-\$44,161			-\$15,552,868	\$0	-\$15,552,868	\$23,412,227	-\$560,250,522	-\$583,662,750
May-10	-\$5,030,596	-\$1,850,366	-\$11,344			-\$6,892,306	\$0	-\$6,892,306	\$23,412,227	-\$567,142,828	-\$590,555,056
Jun-10	-\$3,111,808	-\$1,367,655	-\$10,126			-\$4,489,589	\$0	-\$4,489,589	\$23,412,227	-\$571,632,417	-\$595,044,645
Jul-10	-\$2,355,905	-\$929,182	-\$4,453			-\$3,289,540	\$0	-\$3,289,540	\$23,412,227	-\$574,921,957	-\$598,334,185
Aug-10	-\$1,906,242	-\$750,001	-\$3,512			-\$2,659,755	\$0	-\$2,659,755	\$23,412,227	-\$577,581,712	-\$600,993,940
Sep-10	-\$2,515,082	-\$1,055,284	-\$11,219			-\$3,581,584	\$0	-\$3,581,584	\$23,412,227	-\$581,163,296	-\$604,575,524
Oct-10	-\$3,682,710	-\$1,296,045	-\$13,255			-\$4,992,010	\$0	-\$4,992,010	\$23,412,227	-\$586,155,306	-\$609,567,534
Nov-10	-\$8,929,195	-\$2,980,686	-\$36,259			-\$11,946,139	\$0	-\$11,946,139	\$23,412,227	-\$598,101,446	-\$621,513,674
Dec-10	-\$14,247,734	-\$4,376,832	-\$31,214			-\$18,655,779	\$0	-\$18,655,779	\$23,412,227	-\$616,757,225	-\$640,169,453
Jan-11	-\$20,178,145	-\$7,226,845	-\$66,450			-\$27,471,440	\$0	-\$27,471,440	\$23,412,227	-\$644,228,665	-\$667,640,894
Feb-11	-\$17,503,090	-\$6,663,572	-\$57,222			-\$24,223,884	\$0	-\$24,223,884	\$23,412,227	-\$668,452,549	-\$691,864,778
Mar-11	-\$15,140,570	-\$5,431,256	-\$49,063			-\$20,620,889	\$0	-\$20,620,889	\$23,412,227	-\$689,073,439	-\$712,485,667
Apr-11	-\$9,382,832	-\$2,899,984	-\$22,843			-\$12,305,658	\$0	-\$12,305,658	\$23,412,227	-\$701,379,096	-\$724,791,324
May-11	-\$5,043,450	-\$1,581,832	-\$15,485			-\$6,640,768	\$0	-\$6,640,768	\$23,412,227	-\$708,019,864	-\$731,432,092
Jun-11	-\$2,526,502	-\$908,185	-\$7,605			-\$3,442,292	\$0	-\$3,442,292	\$23,412,227	-\$711,462,156	-\$734,874,384
Jul-11	-\$1,869,945	-\$802,740	-\$6,252			-\$2,678,937	\$0	-\$2,678,937	\$23,412,227	-\$714,141,094	-\$737,553,322
Aug-11	-\$1,695,636	-\$671,399	-\$4,174			-\$2,371,209	\$0	-\$2,371,209	\$23,412,227	-\$716,512,303	-\$739,924,531
Sep-11	-\$2,030,481	-\$881,393	-\$7,308			-\$2,919,182	\$0	-\$2,919,182	\$23,412,227	-\$719,431,485	-\$742,843,713
Oct-11	-\$3,140,807	-\$1,164,355	-\$10,329			-\$4,315,491	\$0	-\$4,315,491	\$23,412,227	-\$723,746,976	-\$747,159,204
Nov-11	-\$6,997,438	-\$2,263,598	-\$34,310			-\$9,295,346	\$0	-\$9,295,346	\$23,412,227	-\$733,042,322	-\$756,454,550

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Dec-11	-\$12,557,750	-\$3,945,419	-\$64,240			-\$16,567,409	\$0	-\$16,567,409	\$23,412,227	-\$749,609,731	-\$773,021,959
Jan-12	-\$18,651,178	-\$5,916,444	-\$76,824			-\$24,644,446	\$0	-\$24,644,446	\$23,412,227	-\$774,254,177	-\$797,666,405
Feb-12	-\$20,382,726	-\$6,813,519	-\$80,778			-\$27,277,024	\$0	-\$27,277,024	\$23,412,227	-\$801,531,201	-\$824,943,429
Mar-12	-\$16,793,300	-\$5,589,328	-\$60,396			-\$22,443,024	\$0	-\$22,443,024	\$23,412,227	-\$823,974,225	-\$847,386,453
Apr-12	-\$9,349,064	-\$3,600,962	-\$45,096			-\$12,995,122	\$0	-\$12,995,122	\$23,412,227	-\$836,969,347	-\$860,381,575
May-12	-\$7,406,658	-\$2,572,108	-\$29,530			-\$10,008,296	\$0	-\$10,008,296	\$23,412,227	-\$846,977,643	-\$870,389,871
Jun-12	-\$3,202,658	-\$1,327,809	-\$13,942			-\$4,544,409	\$0	-\$4,544,409	\$23,412,227	-\$851,522,052	-\$874,934,280
Jul-12	-\$2,380,923	-\$1,043,505	-\$7,700			-\$3,432,128	\$0	-\$3,432,128	\$23,412,227	-\$854,954,180	-\$878,366,408
Aug-12	-\$1,986,608	-\$848,902	-\$8,092			-\$2,843,602	\$0	-\$2,843,602	\$23,412,227	-\$857,797,782	-\$881,210,010
Sep-12	-\$2,321,318	-\$1,044,077	-\$11,926			-\$3,377,321	\$0	-\$3,377,321	\$23,412,227	-\$861,175,104	-\$884,587,332
Oct-12	-\$3,653,559	-\$1,102,057	-\$11,358			-\$4,766,974	\$0	-\$4,766,974	\$23,412,227	-\$865,942,077	-\$889,354,306
Nov-12	-\$7,303,123	-\$2,016,031	-\$30,021			-\$9,349,175	\$0	-\$9,349,175	\$23,412,227	-\$875,291,253	-\$898,703,481
Dec-12	-\$10,718,224	-\$3,009,674	-\$34,951			-\$13,762,849	\$0	-\$13,762,849	\$23,412,227	-\$889,054,102	-\$912,466,330
Jan-13	-\$17,561,829	-\$5,237,632	-\$51,727			-\$22,851,187	\$0	-\$22,851,187	\$23,412,227	-\$911,905,289	-\$935,317,517
Feb-13	-\$18,925,582	-\$5,598,939	-\$45,406			-\$24,569,927	\$0	-\$24,569,927	\$23,412,227	-\$936,475,216	-\$959,887,444
Mar-13	-\$16,218,739	-\$4,350,721	-\$28,889			-\$20,598,350	\$0	-\$20,598,350	\$23,412,227	-\$957,073,565	-\$980,485,793
Apr-13	-\$9,824,400	-\$2,408,704	-\$10,098			-\$12,243,202	\$0	-\$12,243,202	\$23,412,227	-\$969,316,767	-\$992,728,995
May-13	-\$3,969,390	-\$1,005,427	-\$8,133			-\$4,982,951	\$0	-\$4,982,951	\$23,412,227	-\$974,299,717	-\$997,711,946
Jun-13	-\$2,415,361	-\$657,077	-\$4,765			-\$3,077,203	\$0	-\$3,077,203	\$23,412,227	-\$977,376,921	-\$1,000,789,149
Jul-13	-\$2,215,582	-\$723,016	-\$6,497			-\$2,945,095	\$0	-\$2,945,095	\$23,412,227	-\$980,322,016	-\$1,003,734,244
Aug-13	-\$2,138,758	-\$765,977	-\$8,254			-\$2,912,988	\$0	-\$2,912,988	\$23,412,227	-\$983,235,004	-\$1,006,647,232
Sep-13	-\$2,047,364	-\$639,512	-\$6,073			-\$2,692,950	\$0	-\$2,692,950	\$23,412,227	-\$985,927,954	-\$1,009,340,182
Oct-13	-\$2,815,864	-\$818,831	-\$16,192			-\$3,650,886	\$0	-\$3,650,886	\$23,412,227	-\$989,578,840	-\$1,012,991,068
Nov-13	-\$7,562,682	-\$2,155,379	-\$62,083			-\$9,780,144	\$0	-\$9,780,144	\$23,412,227	-\$999,358,984	-\$1,022,771,212
Dec-13	-\$13,763,019	-\$3,797,676	-\$51,496			-\$17,612,191	\$0	-\$17,612,191	\$23,412,227	-\$1,016,971,175	-\$1,040,383,403
Jan-14	-\$15,981,935	-\$4,344,835	-\$46,431			-\$20,373,200	\$0	-\$20,373,200	\$23,412,227	-\$1,037,344,376	-\$1,060,756,604
Feb-14	-\$8,748,912	-\$792,898	\$6,411			-\$9,535,399	\$0	-\$9,535,399	\$23,412,227	-\$1,046,879,775	-\$1,070,292,003
Mar-14	-\$15,113,887	-\$4,423,825	-\$45,744			-\$19,583,455	\$0	-\$19,583,455	\$23,412,227	-\$1,066,463,230	-\$1,089,875,458
Apr-14	-\$9,661,541	-\$2,203,349	-\$20,533			-\$11,885,423	\$0	-\$11,885,423	\$23,412,227	-\$1,078,348,653	-\$1,101,760,881
May-14	-\$4,308,980	-\$879,750	-\$7,338	\$38,047	\$34,335	-\$5,123,687	\$0	-\$5,123,687	\$23,412,227	-\$1,083,472,340	-\$1,106,884,568
Jun-14	-\$2,499,474	-\$638,593	-\$5,820	-\$5,630	\$61,031	-\$3,088,486	\$0	-\$3,088,486	\$23,412,227	-\$1,086,560,826	-\$1,109,973,054
Jul-14	-\$2,327,035	-\$625,615	-\$6,631	-\$42,096	\$59,117	-\$2,942,259	\$0	-\$2,942,259	\$23,412,227	-\$1,089,503,084	-\$1,112,915,312
Aug-14	-\$2,581,985	-\$750,265	-\$8,389	-\$63,833	\$77,033	-\$3,327,439	\$0	-\$3,327,439	\$23,412,227	-\$1,092,830,524	-\$1,116,242,752
Sep-14	-\$2,569,170	-\$632,911	-\$6,336	-\$17,212	\$67,644	-\$3,157,984	\$0	-\$3,157,984	\$23,412,227	-\$1,095,988,508	-\$1,119,400,736
Oct-14	-\$3,731,082	-\$814,930	-\$12,555	\$37,077	\$73,254	-\$4,448,236	\$0	-\$4,448,236	\$23,412,227	-\$1,100,436,744	-\$1,123,848,972
Nov-14	-\$8,519,324	-\$1,952,682	-\$35,137	\$30,825	\$67,232	-\$10,409,087	\$0	-\$10,409,087	\$23,412,227	-\$1,110,845,831	-\$1,134,258,059
Dec-14	-\$12,884,435	-\$3,090,609	-\$61,504	\$47,032	\$48,796	-\$15,940,721	\$0	-\$15,940,721	\$23,412,227	-\$1,126,786,552	-\$1,150,198,780
Jan-15	-\$24,103,802	-\$6,731,228	-\$96,765	\$101,261	\$40,306	-\$30,790,227	\$0	-\$30,790,227	\$23,412,227	-\$1,157,576,779	-\$1,180,989,007
Feb-15	-\$27,342,772	-\$7,357,262	-\$106,216	\$169,688	\$18,540	-\$34,618,022	\$0	-\$34,618,022	\$23,412,227	-\$1,192,194,801	-\$1,215,607,029

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Mar-15	-\$23,346,881	-\$6,432,525	-\$96,751	\$245,073	\$25,336	-\$29,605,747	\$0	-\$29,605,747	\$23,412,227	-\$1,221,800,548	-\$1,245,212,776
Apr-15	-\$13,206,425	-\$3,819,985	-\$60,265	\$73,304	\$18,404	-\$16,994,968	\$0	-\$16,994,968	\$23,412,227	-\$1,238,795,516	-\$1,262,207,744
May-15	-\$5,874,990	-\$1,659,536	-\$24,504	\$63,709	\$19,577	-\$7,475,743	\$0	-\$7,475,743	\$23,412,227	-\$1,246,271,259	-\$1,269,683,488
Jun-15	-\$3,022,034	-\$953,870	-\$14,081	\$6,185	\$31,353	-\$3,952,446	\$0	-\$3,952,446	\$23,412,227	-\$1,250,223,705	-\$1,273,635,933
Jul-15	-\$2,517,799	-\$838,616	-\$11,460	\$13,055	\$35,924	-\$3,318,895	\$0	-\$3,318,895	\$23,412,227	-\$1,253,542,601	-\$1,276,954,829
Aug-15	-\$2,236,562	-\$706,709	-\$12,089	-\$34,315	\$82,867	-\$2,906,808	\$0	-\$2,906,808	\$23,412,227	-\$1,256,449,408	-\$1,279,861,636
Sep-15	-\$2,421,039	-\$776,506	-\$12,446	\$3,354	\$49,646	-\$3,156,991	\$0	-\$3,156,991	\$23,412,227	-\$1,259,606,399	-\$1,283,018,627
Oct-15	-\$3,143,346	-\$990,394	-\$20,122	\$11,751	\$64,692	-\$4,077,419	\$0	-\$4,077,419	\$23,412,227	-\$1,263,683,818	-\$1,287,096,046
Nov-15	-\$6,647,549	-\$2,120,236	-\$42,765	\$32,806	\$78,831	-\$8,698,913	\$0	-\$8,698,913	\$23,412,227	-\$1,272,382,731	-\$1,295,794,959
Dec-15	-\$11,434,927	-\$3,771,764	-\$60,957	\$8,563	\$72,641	-\$15,186,444	\$0	-\$15,186,444	\$23,412,227	-\$1,287,569,175	-\$1,310,981,403
Jan-16	-\$16,112,731	-\$5,678,615	-\$94,065	-\$34,989	\$9,775	-\$21,910,625	\$0	-\$21,910,625	\$23,412,227	-\$1,309,479,800	-\$1,332,892,028
Feb-16	-\$18,597,905	-\$6,753,189	-\$119,339	-\$1,951	\$18,368	-\$25,454,015	\$0	-\$25,454,015	\$23,412,227	-\$1,334,933,815	-\$1,358,346,043
Mar-16	-\$15,872,469	-\$5,580,592	-\$102,175	\$7,502	\$13,209	-\$21,534,525	\$0	-\$21,534,525	\$23,412,227	-\$1,356,468,340	-\$1,379,880,568
Apr-16	-\$10,415,718	-\$3,156,401	-\$49,603	\$10,821	\$6,722	-\$13,604,179	\$0	-\$13,604,179	\$23,412,227	-\$1,370,072,519	-\$1,393,484,747
May-16	-\$5,964,571	-\$1,727,504	-\$24,245	-\$11,723	\$44,730	-\$7,683,313	\$0	-\$7,683,313	\$23,412,227	-\$1,377,755,832	-\$1,401,168,060
Jun-16	-\$3,487,938	-\$1,055,352	-\$14,102	-\$24,004	\$55,326	-\$4,526,070	\$0	-\$4,526,070	\$23,412,227	-\$1,382,281,902	-\$1,405,694,130
Jul-16	-\$1,991,284	-\$607,071	-\$6,338	-\$29,412	\$71,233	-\$2,562,872	\$0	-\$2,562,872	\$23,412,227	-\$1,384,844,774	-\$1,408,257,002
Aug-16	-\$2,033,848	-\$612,147	-\$6,595	-\$31,069	\$86,108	-\$2,597,551	\$0	-\$2,597,551	\$23,412,227	-\$1,387,442,325	-\$1,410,854,553
Sep-16	-\$2,009,458	-\$597,987	-\$7,340	-\$6,580	\$55,578	-\$2,565,788	\$0	-\$2,565,788	\$23,412,227	-\$1,390,008,113	-\$1,413,420,341
Oct-16	-\$2,257,699	-\$619,928	-\$10,332	\$67,158	\$80,285	-\$2,740,516	\$0	-\$2,740,516	\$23,412,227	-\$1,392,748,629	-\$1,416,160,857
Nov-16	-\$5,015,771	-\$1,363,107	-\$32,609	-\$46,694	\$1,689	-\$6,456,492	\$0	-\$6,456,492	\$23,412,227	-\$1,399,205,120	-\$1,422,617,349
Dec-16	-\$8,848,222	-\$2,602,060	-\$39,483	-\$52,895	\$77,846	-\$11,464,815	\$0	-\$11,464,815	\$23,412,227	-\$1,410,669,935	-\$1,434,082,163
Jan-17	-\$8,602,412	-\$1,932,895	-\$23,094	-\$197,580	\$16,657	-\$10,739,324	\$0	-\$10,739,324	\$23,412,227	-\$1,421,409,259	-\$1,444,821,488
Feb-17	-\$10,479,905	-\$3,212,465	-\$45,344	-\$189,553	\$20,621	-\$13,906,646	\$0	-\$13,906,646	\$23,412,227	-\$1,435,315,906	-\$1,458,728,134
Mar-17	-\$12,403,111	-\$3,981,768	-\$66,462	-\$14,808	\$13,044	-\$16,453,105	\$0	-\$16,453,105	\$23,412,227	-\$1,451,769,011	-\$1,475,181,239
Apr-17	-\$7,152,840	-\$2,079,943	-\$33,637	-\$44,992	\$20,985	-\$9,290,427	\$0	-\$9,290,427	\$23,412,227	-\$1,461,059,438	-\$1,484,471,666
May-17	-\$4,249,551	-\$1,084,496	-\$16,756	-\$19,605	\$51,743	-\$5,318,664	\$0	-\$5,318,664	\$23,412,227	-\$1,466,378,103	-\$1,489,790,331
Jun-17	-\$2,846,544	-\$749,126	-\$12,220	-\$29,457	\$67,299	-\$3,570,047	\$0	-\$3,570,047	\$23,412,227	-\$1,469,948,150	-\$1,493,360,378
Jul-17	-\$2,432,674	-\$673,504	-\$11,964	\$17,247	\$53,984	-\$3,046,912	\$0	-\$3,046,912	\$23,412,227	-\$1,472,995,062	-\$1,496,407,290
Aug-17	-\$2,371,761	-\$675,104	-\$12,487	\$2,572	\$16	-\$3,056,763	\$0	-\$3,056,763	\$23,412,227	-\$1,476,051,825	-\$1,499,464,053
Sep-17	-\$2,539,390	-\$714,249	-\$12,382	\$5,325	\$60,276	-\$3,200,419	\$0	-\$3,200,419	\$23,412,227	-\$1,479,252,244	-\$1,502,664,472
Oct-17	-\$2,648,172	-\$744,642	-\$15,885	\$22,212	\$43,730	-\$3,342,756	\$0	-\$3,342,756	\$23,412,227	-\$1,482,595,000	-\$1,506,007,228
Nov-17	-\$7,587,488	-\$1,966,136	-\$50,909	\$30,457	\$50,781	-\$9,523,295	\$0	-\$9,523,295	\$23,412,227	-\$1,492,118,295	-\$1,515,530,523
Dec-17	-\$12,595,841	-\$3,405,446	-\$73,570	-\$42,110	\$70,159	-\$16,046,808	\$0	-\$16,046,808	\$23,412,227	-\$1,508,165,103	-\$1,531,577,331
Jan-18	-\$22,918,445	-\$6,713,323	-\$115,325	\$16,576	\$56,107	-\$29,674,409	\$0	-\$29,674,409	\$23,412,227	-\$1,537,839,513	-\$1,561,251,741
Feb-18	-\$11,398,416	-\$2,573,054	-\$37,638	\$32,141	\$35,553	-\$13,941,414	\$0	-\$13,941,414	\$23,412,227	-\$1,551,780,927	-\$1,575,193,155
Mar-18	-\$13,701,257	-\$4,102,488	-\$71,874	\$97,706	\$23,532	-\$17,754,381	\$0	-\$17,754,381	\$23,412,227	-\$1,569,535,308	-\$1,592,947,536
Apr-18	-\$14,252,376	-\$4,362,801	-\$80,331	\$48,637	\$20,711	-\$18,626,161	\$0	-\$18,626,161	\$23,412,227	-\$1,588,161,468	-\$1,611,573,696
May-18	-\$6,279,749	-\$1,859,047	-\$35,776	\$20,324	\$15,933	-\$8,138,314	\$0	-\$8,138,314	\$23,412,227	-\$1,596,299,783	-\$1,619,712,011
Jun-18	-\$2,785,837	-\$866,876	-\$13,609	\$15,332	\$43,914	-\$3,607,076	\$0	-\$3,607,076	\$23,412,227	-\$1,599,906,859	-\$1,623,319,087
Jul-18	-\$2,391,788	-\$728,416	-\$12,355	\$17,243	\$71,279	-\$3,044,037	\$0	-\$3,044,037	\$23,412,227	-\$1,602,950,896	-\$1,626,363,124
Aug-18	-\$2,370,543	-\$763,545	-\$11,058	-\$8,968	\$73,229	-\$3,080,885	\$0	-\$3,080,885	\$23,412,227	-\$1,606,031,780	-\$1,629,444,009
Sep-18	-\$2,377,345	-\$747,286	-\$11,546	\$8,187	\$48,877	-\$3,079,113	\$0	-\$3,079,113	\$23,412,227	-\$1,609,110,894	-\$1,632,523,122
Oct-18	-\$3,048,855	-\$877,058	-\$21,557	-\$8,173	\$41,244	-\$3,914,399	\$0	-\$3,914,399	\$23,412,227	-\$1,613,025,293	-\$1,636,437,521

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Nov-18	-\$8,245,795	-\$2,195,153	-\$46,857	\$49,759	\$57,367	-\$10,380,680	\$0	-\$10,380,680	\$23,412,227	-\$1,623,405,972	-\$1,646,818,201
Dec-18	-\$7,107,855	-\$486,892	-\$11,127	-\$131,642	\$36,444	-\$7,701,071	\$0	-\$7,701,071	\$23,412,227	-\$1,631,107,044	-\$1,654,519,272
Jan-19	-\$14,432,062	-\$4,330,882	-\$90,482	-\$9,463	-\$117,386	-\$18,980,275	\$0	-\$18,980,275	\$23,412,227	-\$1,650,087,319	-\$1,673,499,547
Feb-19	-\$20,526,817	-\$6,533,568	-\$128,396	\$24,773	\$23,583	-\$27,140,424	\$0	-\$27,140,424	\$23,412,227	-\$1,636,251,318	-\$1,659,663,546
Mar-19	-\$17,106,315	-\$5,386,552	-\$109,858	-\$51,686	-\$1,770	-\$22,656,180	\$0	-\$22,656,180	\$23,412,227	-\$1,658,907,497	-\$1,682,319,726
Apr-19	-\$11,367,867	-\$3,623,774	-\$74,339	\$49,716	\$10,455	-\$15,005,809	\$0	-\$15,005,809	\$23,412,227	-\$1,673,913,306	-\$1,697,325,534
May-19	-\$6,410,621	-\$1,840,759	-\$28,594	\$17,288	\$30,188	-\$8,232,499	\$0	-\$8,232,499	\$23,412,227	-\$1,682,145,805	-\$1,705,558,033
Jun-19	-\$3,592,368	-\$1,200,432	-\$15,590	-\$6,574	\$26,184	-\$4,788,780	\$0	-\$4,788,780	\$23,412,227	-\$1,686,934,584	-\$1,710,346,813
Jul-19	-\$2,998,675	-\$1,087,420	-\$14,994	\$18,709	\$39,386	-\$4,042,994	\$0	-\$4,042,994	\$23,412,227	-\$1,690,977,578	-\$1,714,389,806

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1/17/2020 5:14:40 PM

in

Case No(s). 19-1429-GA-ORD

Summary: Comments Comments On Standards For Consumers' Natural Gas Service by The Office of The Ohio Consumers' Counsel electronically filed by Mrs. Tracy J Greene on behalf of Logsdon, Ambrosia E.