

# THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE MOTION OF  
COLUMBIA GAS OF OHIO, INC. TO  
SUSPEND CERTAIN PROCEDURES AND  
PROCESS DURING THE COVID-19 STATE  
OF EMERGENCY AND RELATED MATTERS.

CASE NO. 20-637-GA-UNC

## SUPPLEMENTAL FINDING AND ORDER

Entered in the Journal on June 17, 2020

### I. SUMMARY

{¶ 1} The Commission approves, in part, the plan of Columbia Gas of Ohio, Inc. to terminate the waiver of certain provisions of the Ohio Administrative Code and corresponding provisions of its tariff and to return to pre-COVID-19 activities and operations, consistent with this Supplemental Finding and Order.

### II. DISCUSSION

#### A. *Procedural History*

{¶ 2} Columbia Gas of Ohio, Inc. (Columbia or Company) is a natural gas company and a public utility, as defined in R.C. 4905.03 and 4905.02, respectively. Therefore, Columbia is subject to the jurisdiction of this Commission.

{¶ 3} R.C. 4909.16 provides, in part, that, in the event of an emergency, when the Commission finds it necessary to prevent injury to the business or interests of the public or of any public utility, it may temporarily alter, amend, or suspend any existing rates or schedules.

{¶ 4} On March 9, 2020, the governor signed Executive Order 2020-01D (Executive Order), declaring a state of emergency in Ohio to protect the well-being of Ohioans from the dangerous effects of COVID-19. As described in the Executive Order, state agencies are required to implement procedures consistent with recommendations from the Department of Health to prevent or alleviate the public health threat associated with COVID-19. Additionally, all citizens are urged to heed the advice of the Department of Health regarding

this public health emergency in order to protect their health and safety. The Executive Order was effective immediately and will remain in effect until the COVID-19 emergency no longer exists. The Department of Health is making COVID-19 information, including information on preventative measures, available via the internet at [coronavirus.ohio.gov/](https://coronavirus.ohio.gov/).

{¶ 5} Pursuant to R.C. 3701.13, the Ohio Department of Health has supervision of “all matters relating to the preservation of the life and health of the people” and the “ultimate authority in matters of quarantine and isolation.” On March 12, 2020, the Director of the Ohio Department of Health issued an Order indicating that “all persons are urged to maintain social distancing (approximately six feet away from other people) whenever possible.” On March 22, 2020, and as amended on April 2, 2020, the Director of the Ohio Department of Health issued an Order directing that from March 23, 2020, until May 1, 2020, with certain outlined exceptions, “all individuals currently living within the State of Ohio are ordered to stay at home or at their place of residence except as allowed in [the] Order. \* \* \* All persons may leave their homes or place of residence only for Essential Activities, Essential Governmental Functions, or to participate in Essential Businesses and Operations,” as defined in the Order.

{¶ 6} On March 12, 2020, the Commission initiated Case No. 20-591-AU-UNC and directed all utility companies in this state to review their disconnection procedures in light of the state of emergency. *In re the Proper Procedures and Process for the Commission's Operations and Proceedings During the Declared State of Emergency and Related Matters*, Case No. 20-591-AU-UNC (*Emergency Case*), Entry (Mar. 12, 2020) at ¶ 7. On March 13, 2020, the Commission extended its winter reconnection order through May 1, 2020, and directed all utility companies in this state to review their reconnection procedures. *Emergency Case*, Entry (Mar. 13, 2020) at ¶ 6. In the March 12, 2020, and March 13, 2020 Entries, the Commission also directed all utility companies to promptly seek any necessary approval, for the duration of the emergency, to suspend otherwise applicable disconnection or reconnection requirements that may impose a service continuity or service restoration hardship on residential and non-residential customers or create unnecessary COVID-19

risks associated with social contact. The Commission determined that such filings shall be deemed approved on an emergency basis for a period of at least 30 days effective as of the filing date or until such date as the Commission may otherwise specify, which shall not be less than 30 days.

{¶ 7} On March 18, 2020, in the above-captioned case, Columbia filed a motion to suspend certain provisions of the Ohio Administrative Code and the corresponding provisions of its tariff, to avoid otherwise applicable disconnection or reconnection requirements that may impose a service continuity hardship on customers and to avoid unnecessary social contact between Columbia personnel, Columbia customers, contractors, and the general public.

{¶ 8} On March 20, 2020, in the *Emergency Case*, the Commission directed all utility companies to suspend in-person, actual meter readings in circumstances where a meter is located inside a customer's home or similar location, as well as all other non-essential functions that may create unnecessary COVID-19 risks associated with social contact, including, but not limited to, in-home energy efficiency audits, weatherization programs, in-premises inspections not prompted by an identified safety-related concern, and other similar initiatives. The Commission also clarified that requests for accounting authority or incremental cost recovery related to the emergency will be addressed in each utility's individual case by subsequent entry. *Emergency Case*, Entry (Mar. 20, 2020) at ¶¶ 10- 11, 13.

{¶ 9} On May 11, 2020, Columbia filed a motion for extension of the suspension requested in its motion filed on March 18, 2020.

{¶ 10} By Entry issued May 14, 2020, Columbia's motion for an extension of its rule and tariff suspension filed March 18, 2020, was granted for an additional 30 days or until the Commission specifically orders otherwise.

{¶ 11} On May 20, 2020, the Commission granted, in part, the motion of Columbia for waiver of certain provisions of the Ohio Administrative Code and corresponding

provisions of the Company's tariff, consistent with Staff's recommendations and modifications, and consistent with the Finding and Order. Further, in recognition of the state's relaxation of social distancing restrictions, the Commission directed Columbia to work with Staff to develop a single, comprehensive plan to resume activities and operations, including timelines, and file the plan at least 45 days prior to resuming such activities and operations. Interested persons were directed to file comments within ten days after the filing of the plan.

{¶ 12} On May 29, 2020, Columbia filed its plan to resume pre-emergency operations and activities in compliance with specific provisions of the Ohio Administrative Code and related provisions of the Company's tariff.

{¶ 13} On June 8, 2020, the Ohio Consumers' Counsel (OCC) and Ohio Partners for Affordable Energy (OPAE) filed comments on Columbia's transition plan.

{¶ 14} On June 12, 2020, Columbia filed a motion to continue the suspension of the Percentage of Income Payment Plan Plus (PIPP) and Graduate PIPP program requirements in Ohio Adm.Code 4901:1-18-12(C) and (D), 4901:1-18-16(D), and 4901:1-18-17(A) and (B) and related provisions of its tariff, until July 28, 2020.

## ***B. Review of Columbia's Emergency Transition Plan and the Comments***

### **1. RESUMPTION OF ACTIVITIES SUSPENDED DUE TO SOCIAL CONTACT**

{¶ 15} In the transition plan, Columbia states that the Company has acquired personal protective equipment (PPE) for all field employees that work with customers and the Company is requiring all contractors to wear appropriate PPE. Further, Columbia states that its policies and procedures for employees and contractors who interact with customers comply with all applicable guidelines issued by the Ohio Department of Health and the governor's office, including the Director of the Ohio Department of Health's April 30, 2020 Order, as amended on May 20, 2020 (Stay Safe Order) and the governor's Responsible RestartOhio protocols. Columbia states that, on June 1, 2020, the Company will resume

meter testing, upon a customer's request, and repairs of service line leaks consistent with Ohio Adm.Code 4901:1-13-04(D) and 4901:1-13-05(D), respectively, and, on June 15, 2020, resume compliance with new service request requirements, telephonic response times, and scheduled customer appointments pursuant to Ohio Adm.Code 4901:1-13-05(D). Meter reading, for meters inside a customer premise, will resume on July 13, 2020, consistent with the requirements of Ohio Adm.Code 4901:1-13-04(G). On June 17, 2020, Columbia will resume remediation of grade 2 leaks, pursuant to Ohio Adm.Code 4901:1-16-04(I).

{¶ 16} According to the Company's plan, effective as of July 13, 2020, Columbia will resume its energy efficiency programs and work with its contractors to resume in-home energy efficiency audits and weatherization programs. On that same date, Columbia will resume inside inspections for leakage and atmospheric corrosion of meters and related appurtenances. For customers who do not permit Columbia inside access to its facilities, Columbia will leave a disconnection notice at the premise. In addition, Columbia states it will send additional correspondence to these customers noticing a disconnection for lack of access to Columbia's equipment and property. Columbia will not disconnect customers for lack of access until July 29, 2020. Acknowledging a backlog and delay with inside inspections, and the subsequent delay of disconnections for lack of access, Columbia requests that the Commission provide Columbia until March 31, 2021, to catch up, and come into current compliance, with the requirements related to in-premise inspections not prompted by an identified safety-related concern.

{¶ 17} OCC comments that Columbia's plan as to meter testing and the repair of service pipeline leaks is reasonable, considering public safety and the relaxation of social distancing restrictions. However, OCC contends Columbia's proposal to resume in-home energy efficiency programs, beginning July 13, 2020, is premature, is not essential to the provision of safe gas service, and creates an unnecessary risk of transmitting the virus. Therefore, OCC recommends that in-home energy efficiency programs be suspended until a reasonable time after the state of emergency ends.

{¶ 18} In regard to energy efficiency programs, including in-home energy audits and weatherization, the Commission finds that Columbia's plan includes appropriate PPE and precautions to resume the aforementioned activities in light of the state's relaxation of social distancing restrictions. The Commission acknowledges that, even with the precautions Columbia has outlined, some customers will nonetheless refuse access. Columbia shall offer to contact such customers at a later date, perhaps in three to six months, to offer an opportunity to receive energy efficiency services. In all other respects, the Commission finds Columbia's plan to resume meter testing, meter reading, new service requests, repairs of service line activities, and related performance standards to be reasonable and, therefore, the Company's request to resume compliance with the requirements of Ohio Adm.Code 4901:1-13-04(D) and (G), 4901:1-13-05(A) through (D), 4901:1-16-04(I), and related tariff provisions, should be granted. Further, as Columbia requests, the Company shall have until March 31, 2021, to catch up on and come into compliance with requirements related to in-premise inspections not associated with an identified safety concern. Columbia shall file a letter in this docket when the Company has caught up on its in-premise inspections if sooner than March 31, 2021.

## 2. DISCONNECTIONS AND RECONNECTION ACTIVITIES

{¶ 19} Columbia states that the Company will issue termination notices for non-payment on customer bills commencing with Unit 1 of the June bill (May 29, 2020). In July 2020, Columbia collectors will reach out to inform customers of the bill payment assistance options available, will resume collection activity, and will visit customer premises to attempt to collect delinquent accounts. Significantly, Columbia states that the Company will begin to disconnect customers for non-payment on July 29, 2020, and will also resume the collection of late fees, reconnect fees, and delinquent charges prior to reconnecting service. Effective with July and August 2020 billings, Columbia will offer customers, on the bill, the option to enroll on Columbia's one-ninth payment plan to repay arrearages incurred. Further, Columbia states it will continue to work with residential and commercial customers to establish agreeable payment plans.

{¶ 20} As part of its plan to resume operations and activities, Columbia will resume full compliance with the rules detailing reconnection requirements for small commercial and residential customers pursuant to Ohio Adm.Code 4901:1-13-08(E) and 4901:1-18-07(A) through (C), respectively.

{¶ 21} OPAE submits that July 29, 2020, is too soon to resume the disconnection of gas utility service as Ohioans remain unemployed and struggling financially. OPAE argues that utilities have mechanisms to recover bad debt and will not suffer a loss of revenue over the long term. OPAE recommends that the moratorium on disconnections be continued until the winter reconnect order is issued in October 2020.

{¶ 22} Similarly, OCC submits that the resumption of disconnections, on July 29, 2020, is premature and forces customers with limited financial resources to prioritize their needs. OCC restates its recommendation that service disconnections be suspended indefinitely, for a reasonable period of time after the end of the declared emergency. Accordingly, OCC reasons Columbia's proposal is unreasonable and should be rejected.

{¶ 23} In regard to Columbia's option to enroll on the one-ninth payment plan, OPAE argues that Columbia should first be required to work out a customized mutually agreeable payment plan with a customer pursuant to the considerations and requirements of Ohio Adm.Code 4901:1-18-05(A) to make reasonable extensions or other extended payment plans. OPAE states that most customers are not savvy when negotiating with a utility. OPAE also advocates that the existing payment plans be supplemented to include a 24-month plan as it is not known when the pandemic will end and what businesses will survive.

{¶ 24} Further, OPAE recommends that the Commission direct Columbia, and all utilities, to provide to Staff, OCC, and interested parties, such as OPAE and legal aid organizations involved in serving payment-troubled customers, disconnection data by zip code to facilitate the analysis of data in comparison with census information to determine "hot spots" of disconnections. OPAE advocates that this type of data will allow local non-

profit organizations to target communities for additional services such as weatherization and will permit the Commission to ensure that disconnection policies are color blind and that people of color are not being singled out for disconnection of essential utility services. OP&E argues that Ohio needs to ensure that disconnections of energy services are equitably enforced after families have had sufficient time to recover from this recession.

{¶ 25} In regard to reconnection, OP&E notes that reconnection provisions for PIPP program participants require, pursuant to Ohio Adm.Code 4901:1-12(D)(2)(b), that the PIPP customer make payment in the amount sufficient to cure the default, including all amounts due for missed PIPP installments up to the arrearage balance. OP&E advocates continuing the waiver of Ohio Administrative Code provisions, which OP&E believes to be in the best interest of Columbia's customers, particularly considering the drastic increase in unemployment as a result of the pandemic. OP&E suggests that unpaid PIPP installments due be rolled into the customer's arrearage and be subject to the arrearage crediting incentive to ensure that low-income customers have access to essential energy services.

{¶ 26} In regard to disconnections, OCC and OP&E argue that July 29, 2020, is too soon to resume disconnections and request that the prohibition on disconnections for non-payment continue indefinitely until after the emergency ends or until the winter reconnect order is issued in October 2020, respectively. The Commission recognizes that many customers may continue to experience financial stress as a result of COVID-19 despite the reopening of businesses throughout the state. We note, however, that the options provided residential customers in the winter reconnect order in Case No. 19-1472-GE-UNC, to reconnect service or avoid the disconnection of service, were extended until May 1, 2020. *Emergency Case*, Entry (Mar. 13, 2020) at ¶ 8. In addition, pursuant to the Finding and Order issued May 20, 2020, and before, Columbia deferred the collection of delinquent charges, deposits, and fees to avoid service continuity hardships for customers and will employ its collectors to inform customers of the bill payment assistance options available, including PIPP. We acknowledge that, pursuant to Ohio Adm.Code 4901:1-18-05(A), Columbia is required to offer a customized payment plan when contacted by a customer with a

delinquent account, taking into account certain considerations. Under the current circumstances, the option to enroll in the one-ninth extended payment plan does not supersede the requirements of Ohio Adm.Code 4901:1-18-05(A) but offers an efficient option for customers. The Commission finds a 24-month payment plan to be far too long for a payment plan, in general. Columbia may consider a 24-month payment plan, in light of the amount of the account delinquency. Accordingly, the Commission finds Columbia's option to offer, on the bill, an opportunity to enroll in the one-ninth payment plan to be an effective method to reach customers who may need some flexibility to pay their utility bills but may be reluctant to contact the Company. Further, the Commission strongly encourages Columbia's customer service representatives and collectors to continue to provide customers with delinquent accounts or who wish to avoid a delinquent account with the extended payment plan options, including PIPP, as set forth in Ohio Adm.Code 4901:1-18-05, and information regarding other payment assistance. Except as to Ohio Adm.Code 4901:1-18-07(A) as it applies to PIPP participants, the Commission finds Columbia's plan, in all other respects, to resume disconnection and reconnection activities and operations to be reasonable, particularly in light of the advanced notice to be provided and extended payment options. Accordingly, Columbia should reinitiate compliance with the requirements of Ohio Adm.Code 4901:1-13-08(E) and 4901:1-18-07(A) through (C), and related tariff provisions. Reconnection requirements for PIPP program participants will be addressed with the other PIPP program issues discussed below.

{¶ 27} In regard to OPAE's data request, we note that utilities under the Commission's jurisdiction provide data to Staff, including information regarding disconnections, by utility, in the aggregate, on a monthly basis. While the Commission is mindful that utility policy and procedures may be applied in a discriminatory manner, the Commission is not aware of and has no reason to believe that Columbia or any other utility under the jurisdiction of the Commission has applied disconnection requirements, policies, or procedures in an unjust or discriminatory manner. If evidence to the contrary is brought to the Commission's attention, the Commission will address the issue appropriately.

Furthermore, the Commission finds OP&E's request for disconnection data, by zip code, to be outside the scope of Columbia's plan to resume pre-emergency operations and activities. Accordingly, at this time, we see no reason to impose an additional data requirement on the utilities, as requested by OP&E.

**3. PERCENTAGE OF INCOME PAYMENT PLAN PLUS AND GRADUATE PERCENTAGE OF INCOME PAYMENT PLAN**

{¶ 28} In its plan filed May 29, 2020, Columbia proposes to resume application of the requirements of the PIPP programs pursuant to Ohio Adm.Code 4901:1-18-12, 4901:1-18-16, and 4901:1-18-17. However, as previously noted, on June 12, 2020, Columbia filed a motion to continue the suspension of the PIPP and Graduate PIPP program requirements in Ohio Adm.Code 4901:1-18-12(C) and (D), 4901:1-18-16(D), and 4901:1-18-17(A) and (B) and related provisions of its tariff, until July 28, 2020. In its motion, Columbia states its rule suspension expires on June 16, 2020, and the Company wishes to extend the suspension of the PIPP program requirements to prevent PIPP participants from being dropped from the PIPP program through June and July billing. Further, the Company notes that, consistent with its transition plan filed May 29, 2020, Columbia had forgone the collection of all outstanding delinquent charges prior to reconnecting a customer's service and had applied such practice equally to PIPP participants during the pandemic. Columbia proposes to resume the collection of late fees and reconnect charges from customers prior to reconnecting service, effective July 29, 2020, and return to its pre-COVID-19 activities and operations.

{¶ 29} OP&E notes that amendments to the rules in Ohio Adm.Code Chapter 4901:1-18, which includes the rules regarding the PIPP programs, are currently pending before the Commission in Case No. 19-52-AU-ORD. OP&E advocates that the provisions of Ohio Adm.Code 4901:1-18-12(D)(2) and (3), which require that the PIPP participant be current on his or her payment and make up any missed payments as of the participant's anniversary date, be waived until a final decision is issued in Case No. 19-52-AU-ORD or until the end

of the upcoming winter heating season, March 31, 2021. OPAE asserts that the negative impact of these requirements on low-income families is discussed in the rule proceeding.

{¶ 30} OCC argues that PIPP program participants, as well as other customers, will continue to struggle with unemployment and lost wages and are likely to have a difficult time meeting the payment obligations of the PIPP programs to avoid the disconnection of service. Therefore, OCC requests that the Commission deny Columbia's proposal for PIPP program participants to make payments strictly in accordance with the program requirements or be shut off. OCC laments that Columbia's approach is too harsh and will exacerbate the financial distress of PIPP participants.

{¶ 31} As OPAE notes, Case No. 19-52-AU-ORD, *In the Matter of the Commission's Review of Ohio Adm.Code Chapters 4901:1-17 and 4901:1-18*, is currently pending before the Commission. However, we see no need to delay compliance with PIPP program requirements until the issuance of a decision in the rule review proceeding. The rule review proceeding is not directly related to any utility's emergency motion or Columbia's transition plan to return to pre-COVID-19 activities and operations. Furthermore, if there are amendments to the rules in Ohio Adm.Code Chapters 4901:1-17 and 4901:1-18, such amendments may not become effective for some time. We remind OPAE that, pursuant to Ohio Adm.Code 4901:1-18-12(C)(4), all PIPP program participants are obligated to notify the local agency designated by the Ohio Development Services Agency within 30 days of any change in income, including lost wages and unemployment, or household size. Accordingly, the PIPP participant's installment payment due can be adjusted appropriately.

{¶ 32} In regard to Columbia's motion to continue the suspension of the provisions of Ohio Adm.Code 4901:1-18-12(C) and (D), 4901:1-18-16(D), and 4901:1-18-17(A) and (B) and related provisions of its tariff, until July 28, 2020, the Commission finds that, by the Finding and Order issued May 20, 2020, the Commission clarified and denied Columbia's motion for suspension of Ohio Adm.Code 4901:1-18-12(C), and granted Columbia's motion for suspension of Ohio Adm.Code 4901:1-18-12(D)(1) through (3), 4901:1-18-16(D), and

4901:1-18-17(A) and (B), until the Commission specifically ordered otherwise. May 14, 2020 Entry at ¶ 11, May 20, 2020 Finding and Order at ¶¶ 34-35. Accordingly, contrary to the interpretation of Columbia, the Company's prior motion, granted, in part, on May 20, 2020, does not expire on June 16, 2020, but continues until otherwise ordered by the Commission.

{¶ 33} Nonetheless, the Commission grants Columbia's motion to extend the suspension of Ohio Adm.Code 4901:1-18-12(C)(2) and (D)(1) through (3), 4901:1-18-16(D), and 4901:1-18-17(A) and (B), as modified and clarified in this Supplemental Finding and Order. As discussed in the May 20, 2020 Finding and Order, to the extent that Ohio Adm.Code 4901:1-18-12(C)(2) requires the PIPP participant to accept weatherization for which the customer is eligible, we recognize that PIPP participants, even with the PPE and other precautions taken, may not be comfortable permitting weatherization personnel in their residence and refuse access. Until the state of Ohio has determined that COVID-19 is no longer a health emergency, PIPP participants may elect not to accept weatherization, without recourse to their eligibility to participate in or to continue participation in the PIPP programs. All other provisions of Ohio Adm.Code 4901:1-18-12(C)(1), (3), and (4), Ohio Adm.Code 4901:1-18-12(D)(1) through (3), 4901:1-18-16(D), and 4901:1-18-17(A) and (B) are suspended, as requested by Columbia, through July 28, 2020, subject to the following modifications. We note that, during this state of emergency, the local community action agencies have implemented procedures to facilitate the processing of PIPP applications, including reverification. However, so as not to cause an immediate hardship to PIPP participants, the Commission directs that any PIPP participant, who otherwise would have been required to reverify their eligibility while these rules were suspended, shall be afforded 30 days after July 29, 2020, or until August 28, 2020, to come into compliance with Ohio Adm.Code 4901:1-18-12(D)(1) and 4901:1-18-17(A) and (B). Further, as to Ohio Adm.Code 4901:1-18-12(D)(2) and (3) and 4901:1-18-16(D), which require that the PIPP participant be current on his/her income-based payment due by the participant's anniversary date, or within one billing cycle after the anniversary date, the Commission directs that PIPP income-based payments due or billed to the PIPP participant as of March 12, 2020 through

July 28, 2020, which have not been paid by July 29, 2020, shall be added to the PIPP or Graduate PIPP participant's arrearage. If the customer is no longer eligible for PIPP or does not wish to be enrolled in Graduate PIPP, Columbia should offer the customer the extended payment plans as discussed and approved in this Supplemental Finding and Order. We strongly encourage Columbia to recognize the former PIPP participant's financial circumstances and to be flexible with the extended payment plan offered. PIPP and Graduate PIPP participants for whom installment payments are added to the participant's arrearage shall not be eligible for the incentive pursuant to Ohio Adm.Code 4901:1-18-14, in association with the number of payments added to the arrearage.

#### **4. COLLECTION OF LATE FEES, RECONNECT FEES, AND ARREARAGES**

{¶ 34} As part of its plan to return to pre-COVID-19 activities and operations, Columbia states the Company will begin to disconnect customers for non-payment commencing July 29, 2020, and resume the collection of late fees, reconnection fees, and arrearages from customers prior to reconnecting service. Columbia will waive deposits for the reconnection of residential and small commercial customers until November 1, 2020.

{¶ 35} OCC asks that the Commission reject Columbia's proposal to resume the collection of fees and arrearages prior to reconnecting service. OCC advocates that the Commission require Columbia to continue the process approved in the emergency motion for waiver, to defer delinquent charges, deposits, and fees to a later bill throughout the emergency and for a reasonable period afterward. OCC argues payment of delinquent charges should not be a pre-condition to service reconnection or to maintaining existing service in these difficult times.

{¶ 36} The Commission finds Columbia's request to resume the collection of delinquent charges, late fees, and reconnect fees to be reasonable, particularly in light of the Company's option for customers to enroll in the one-ninth extended payment plan and the waiver of deposits until November 1, 2020. As previously stated, the Commission strongly encourages Columbia's customer service representatives and collectors to continue to

provide customers with delinquent accounts with the extended payment plan options, including PIPP, as set forth in Ohio Adm.Code 4901:1-18-05, and information regarding other payment assistance. We do not wish for customer bills to continue to accrue unpaid delinquent charges to the point that the utility bill becomes an insurmountable debt. Resuming Columbia's reconnection requirements, including fees and charges, as proposed in Columbia's plan, with the payment plans outlined in Ohio Adm.Code 4901:1-18-05, represents a reasonable plan to transition to pre-emergency activities, operations, and customer obligations. Accordingly, the Commission finds this aspect of Columbia's plan to be reasonable and, therefore, it should be adopted.

**C. Commission Conclusion**

{¶ 37} Upon thorough review of Columbia's plan to resume pre-emergency activities and operations and intervenors' comments, the Commission finds that the plan should be approved, in part, consistent with this Supplemental Finding and Order.

**III. ORDER**

{¶ 38} It is, therefore,

{¶ 39} ORDERED, That Columbia's plan to resume activities and operations pursuant to certain provisions of the Ohio Administrative Code and related tariff requirements be approved, consistent with this Supplemental Finding and Order. It is, further,

{¶ 40} ORDERED, That Columbia take all necessary steps to carry out the terms of this Supplemental Finding and Order. It is, further,

{¶ 41} ORDERED, That a copy of this Supplemental Finding and Order be served upon all interested persons and parties of record.

**COMMISSIONERS:**

*Approving:*

Sam Randazzo, Chairman

M. Beth Trombold

Lawrence K. Friedeman

Daniel R. Conway

Dennis P. Deters

GNS/hac

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Summary: Finding & Order approving, in part, the plan of Columbia Gas of Ohio, Inc. to terminate the waiver of certain provisions of the Ohio Administrative Code and corresponding provisions of its tariff and to return to pre-COVID-19 activities and operations, consistent with this Supplemental Finding and Order. electronically filed by Ms. Mary E Fischer on behalf of Public Utilities Commission of Ohio