

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Columbia Gas of Ohio, Inc. for)
Approval to Change Accounting) Case No. 20-1104-GA-AAM
Methods.)

**MEMORANDUM CONTRA
OF COLUMBIA GAS OF OHIO, INC.**

On May 29, 2020, Columbia filed an Application for authority to modify its accounting procedures.¹ On June 10, 2020, the Public Utilities Commission of Ohio Staff (“Staff”) filed its review and recommendation of Columbia’s Application² and then OCC filed its comments on July 9, 2020.³ The Public Utilities Commission of Ohio (the “Commission”) issued its Finding and Order on July 15, 2020, granting Columbia’s Application with certain clarification and guidance.⁴ On August 14, 2020, OCC filed an Application for Rehearing from the July 15, 2020 Finding and Order.⁵

The Commission should deny OCC’s Application for Rehearing in its entirety. As a threshold matter, OCC raises nothing new for the Commission’s

¹ *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval to Change Accounting Methods*, Case No. 20-1104-GA-AAM, Application of Columbia Gas of Ohio, Inc. (May 29, 2020) (“Application”).

² *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval to Change Accounting Methods*, Case No. 20-1104-GA-AAM, Staff Review (June 10, 2020) (“Staff Review”).

³ *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval to Change Accounting Methods*, Case No. 20-1104-GA-AAM, Comments of the Ohio Consumers’ Counsel (July 9, 2020) (“OCC Comments”).

⁴ *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval to Change Accounting Methods*, Case No. 20-1104-GA-AAM, Finding and Order (July 15, 2020) (“Finding and Order”).

⁵ *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval to Change Accounting Methods*, Case No. 20-1104-GA-AAM, Application for Rehearing (Aug. 14, 2020) (“Application for Rehearing”).

consideration that OCC hasn't already raised in its July 9, 2020 comments.⁶ For this reason alone the Commission should deny OCC's Application for Rehearing.

Even if the Commission chooses to address OCC's substantive arguments, the Commission has already rejected the arguments raised by OCC and should again reject OCC's substantive arguments.

First, OCC again argues that Columbia's Application should be rejected because it does not demonstrate that Columbia's revenues are insufficient.⁷ This is not so. Staff stated that the costs included in rates are insufficient, although the deferral's exact amount is currently unknown,⁸ and the Commission found Staff's plan to be reasonable.⁹ The Commission stated that the exact amount of recovery will be reviewed and addressed in a future proceeding.¹⁰ The OCC has offered no new reasons for the Commission to alter its previous decision. The Commission should therefore again reject OCC's argument.

Second, OCC again argues that Columbia's Application fails to demonstrate that the costs that Columbia seeks to defer are material.¹¹ Staff stated that at this time, it cannot be determined if costs are material, but that it is reasonably probable that the costs will be material.¹² The Commission found that Staff's approach was reasonable.¹³ OCC offers no reason for the Commission to change course.

Third, OCC again argues that Columbia's Application fails to demonstrate that Columbia's costs have increased or that these increases will cause Columbia harm.¹⁴ Staff found that there is a realistic chance that Columbia would experience financial harm¹⁵ and the Commission found Staff's approach was reasonable.¹⁶ The Commission should therefore once again reject OCC's argument.

⁶ OCC Comments at 4-5 (July 9, 2020).

⁷ Application for Rehearing at 3 (August 14, 2020); OCC Comments at 8 (July 9, 2020).

⁸ Staff Review at 3 (June 10, 2020).

⁹ Finding and Order at 9 (July 15, 2020).

¹⁰ Finding and Order at 10 (July 15, 2020).

¹¹ Application for Rehearing at 4 (August 14, 2020); OCC Comments at 4-5 (July 9, 2020).

¹² Staff Review at 3 (June 10, 2020).

¹³ Finding and Order at 6 (July 15, 2020).

¹⁴ Application for Rehearing at 5 (August 14, 2020); OCC Comments at 5 (July 9, 2020).

¹⁵ Staff Review at 3 (June 10, 2020).

¹⁶ Finding and Order at 6 (July 15, 2020).

In conclusion, the Commission already approved Columbia's Application and found Staff's approach to be reasonable.¹⁷ Further, the Commission has already directed Columbia to track costs due to the emergency, track avoided costs due to the emergency, and the deferred amounts will be reviewed in a future proceeding.¹⁸ The Commission has adeptly shown its ability to exercise its proper authority to help customers during the emergency while also balancing the impacts to Ohio's utilities. OCC offers no reason for the Commission to change its mind.

For these reasons, the Commission should deny OCC's Application for Rehearing.

Respectfully submitted,
COLUMBIA GAS OF OHIO, INC.

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¹⁷ Finding and Order at 9 (July 15, 2020).

¹⁸ Finding and Order at 10 (July 15, 2020).

CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 24th day of August, 2020, upon the parties listed below.

/s/ Joseph M. Clark

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Summary: Memorandum Contra of Columbia Gas of Ohio, Inc. electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.