

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission’s Re-)
view of its Rules of Chapters 4901:1-) Case No. 19-0052-AU-ORD
17 and 4901:1-18 of the Ohio Admin-)
istrative Code.)

**APPLICATION FOR REHEARING OF
COLUMBIA GAS OF OHIO, INC.**

Pursuant to R.C. 4903.10 and Ohio Adm.Code 4901-1-35, Columbia Gas of Ohio, Inc. (“Columbia”) respectfully files this Application for Rehearing of the Commission’s November 4, 2020 Finding and Order issued in the above-captioned proceeding.

Ohio Adm.Code 4901:1-18-16(E) – (G)

The Finding and Order adopted rule changes to the Graduate PIPP Plus Program. In the revised Ohio Adm.Code 4901:1-18-16(E) – (G), customers participating in the Graduate PIPP Plus Program have fourteen months to make twelve installments under the Graduate PIPP Plus Program. While Columbia supports the Commission’s initiative to ensure that customers have the ability to participate in the Graduate PIPP Plus Program over an extended period of time, Columbia is requesting clarification of this rule on a few points.

First, Columbia requests clarification upon when the 14-month payment cycle begins. Columbia enrolls customers in the Graduate PIPP Plus Program when the eligible customer calls the Ohio Development Services Administration to enroll in the program. This timing can happen months after a customer has ended the PIPP Plus Program.

Second, Columbia seeks clarification upon when is a customer in default on the Graduate PIPP Plus Program. For example, if a customer misses a payment in months five and six, does this mean the customer is current on the Graduate PIPP Plus Program because the customer has fourteen months to pay twelve installments? Columbia also seeks clarification on the actual billing of the twelve-month

installments. If a customer misses a payment or two, is that missed payment added to the arrearage?

Third, Columbia seeks clarification on when forgiveness is given for customers in the revised Graduate PIPP Plus Program. For example, if a customer misses a payment in the tenth month of the program and pays the current balance due in the eleventh month, how would a utility company apply arrearage forgiveness? Likewise, if a customer makes twelve installment payments in twelve months, does a utility forgive all fourteen months, even if the customer has completed the Graduate PIPP Plus Program requirements early? Columbia is unsure whether this forgiveness is applied to the current payment plan installment or on the total balance due on the bill because the customer has fourteen months to pay off charges on the Graduate PIPP Plus Program.

Finally, Columbia seeks clarification to determine when a disconnection for nonpayment may be initiated. In Ohio Adm.Code 4901:1-18-16(G), a gas company must wait fourteen months prior to disconnecting for nonpayment. If a customer enrolls in the Graduate PIPP Plus Program but fails to make any payments, must a gas company wait until the end of the 14-month period prior to disconnecting a customer?

Columbia appreciates and supports the Commission's initiative to provide additional time for Graduate PIPP Plus customers to pay back eligible arrearages, and Columbia requests the Commission to provide clarity to this rule.

Respectfully submitted,

/s/ Joseph M. Clark

Joseph M. Clark

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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 4th day of December, 2020, upon the parties listed below.

/s/ Joseph M. Clark

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Summary: Application for Rehearing of Columbia Gas of Ohio, Inc. electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.