

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Suburban Natural Gas Company for)	Case No. 21-0105-GA-RDR
Approval of an Adjustment to its Energy)	
Efficiency Program (EEP) Rider)	

**APPLICATION OF SUBURBAN NATURAL GAS COMPANY
FOR APPROVAL OF AN ADJUSTMENT
TO ITS ENERGY EFFICIENCY PROGRAM RIDER**

Pursuant to the Finding and Order of the Public Utilities Commission of Ohio (Commission) issued on November 7, 2018 in Case No. 18-376-GA-RDR, which approved Suburban Natural Gas Company's (Suburban) application to implement a two-year Energy Efficiency Program (EEP) Pilot and rate mechanism,¹ Suburban hereby submits its annual reconciliation filing. Suburban respectfully requests approval to implement a credit for the over collection of \$2,712, and then set the EEP Rider rate to zero for all small general service customers receiving service under its Small General Service Rate Schedule pending the outcome of a subsequent motion regarding the continuation of the EEP Pilot. In support of this Application, Suburban states:

1. Suburban is a natural gas company as defined by R.C. 4905.03 and a public utility as defined by R.C. 4905.02, and as such, is subject to the jurisdiction of this Commission.
2. On March 16, 2018, as amended on May 4, 2018 and September 28, 2018, Suburban filed its application to implement an EEP Pilot and a Rider EEP rate in Case No. 18-376-GA-RDR.

¹ *In the Matter of Suburban Natural Gas Company for Approval to Initiate an Energy Efficiency Program and Rider Mechanism*, Case No. 18-376-GA-RDR, Finding and Order at ¶ 15 (November 7, 2018) (EEP Order).

3. On November 7, 2018, in Case No. 18-376-GA-RDR, the Commission approved Suburban's application to implement a two-year EEP Pilot and established a Rider EEP rate of \$0.3431 per month applicable to Suburban's Small General Service Rate Schedule accounts.²

4. Suburban filed tariffs consistent with the EEP Order, which became effective on November 8, 2018, as modified by the Commission's order in Suburban's recent rate case on September 26, 2019.³ The revised tariffs became effective on September 30, 2019. Suburban's Rider EEP, as set forth in P.U.C.O. NO. 4, Original Sheet No. 9, page 3 of 7, states: "This Rider is subject to reconciliation, including, but not limited to, increases or refunds based upon the results of audits ordered by the Commission in accordance with the November 7, 2018 Opinion and Order in Case No. 18-376-GA-RDR."⁴

5. On February 3, 2020, Suburban filed its application for an adjustment to its Rider EEP rate in Case No. 20-0353-GA-RDR. Following the first year of the EEP Pilot, the program had a balance of \$57,813. Over the second twelve months of the EEP Pilot, Suburban anticipated program costs to be \$70,000. Therefore, Suburban calculated the revised Rider EEP rate to generate \$70,000 of funding for the second year of the EEP Pilot, net of the unexpended amount of \$57,813 from the first year of the EEP Pilot.

6. On April 22, 2020, in Case No. 20-0353-GA-RDR, the Commission approved Suburban's application for an adjustment to its Rider EEP rate, and approved an adjusted Rider

² Id. at ¶ 18.

³ *In the Matter of the Application of Suburban Natural Gas Company for an Increase in Gas Distribution Rates*, Case No. 18-1205-GA-AIR, et al., Opinion and Order at ¶ 172, 176-177 (September 26, 2019) (Rate Case Order).

⁴ *Id.*; also see EEP Order at ¶ 15.

EEP rate of \$0.0574 per month applicable to Suburban's Small General Service Rate Schedule accounts.⁵

7. Although Suburban anticipated program costs for the second year of the EEP Pilot to be \$70,000 at the time of its application, Suburban, and its administrator of the EEP Pilot, Ohio Partners for Affordable Energy (OPAE), were unable to complete the predicted number of home weatherization projects due to the unexpected public health and economic crisis caused by the ongoing COVID-19 pandemic. As a result, the total expenditures for the second year of the program amounted to only \$20,685. Thus, following the second year of the EEP Pilot, the program had a balance of \$78,746. Additionally, there was an over collection of \$2,712, which was collected during a three-month period beginning November 2020 as the EEP Rider rate was inadvertently continued.

8. In order to reconcile this balance, Suburban proposes adjusting Rider EEP to refund customers the \$2,712 that Suburban inadvertently collected since November 2020. Suburban proposes to return the \$2,712 to customers over the same period that the amount was collected in the form of a credit through the Rider EEP for a three-month period. Following the three-month refund period, Suburban proposes to forego any further collection under Rider EEP and set the rider to a rate of zero. Through a subsequent filing, Suburban will also propose to continue the EEP Pilot for one additional year, subject to final reconciliation, to ensure its customers receive the intended benefits of the EEP Pilot. Suburban and its administrator hope to be able to assist customers and offer more comprehensive home weatherization projects in a safe manner as customers begin to allow projects to occur in their homes.

⁵ *In the Matter of the Application of Suburban Natural Gas Company for Approval to Adjust its Energy Efficiency Program Rider Rate*, Case No. 20-0353-GA-RDR, et al., Finding and Order at ¶ 9 (Apr. 22, 2020).

9. Therefore, pursuant to the EEP Order and the approved Rider EEP rate schedule, Suburban proposes a reconciliation adjustment, adjusting Rider EEP from a charge of \$0.0574 to a credit of \$0.05 per month for three months, applicable to Suburban's Small General Service Rate Schedule accounts. A copy of the proposed Rider EEP, P.U.C.O. NO. 4, Second Revised Sheet No. 9, page 3 of 7, is attached as Attachment A to this Application, in both proposed and redline forms. The calculation of the reconciliation and resulting credit is shown in Attachment C.

10. After the three-month refund period, Suburban proposes setting Rider EEP to \$0.0000 per month for the following period, applicable to Suburban's Small General Service Rate Schedule accounts, and subject to a final reconciliation. A copy of the proposed Rider EEP, P.U.C.O. NO. 4, Third Revised Sheet No. 9, page 3 of 7, is attached as Attachment B to this Application, in both proposed and redline forms. The accounting of the EEP Pilot collections and expenditures for the second year of the EEP Pilot is shown in Attachment D.

11. Suburban avers that five EEP weatherization projects were completed by OPAE during the second year of the EEP Pilot. All five projects leveraged both EEP funding as well as HWAP Agency funds, which reduced the overall costs of the projects to Suburban's EEP Pilot. Details of the projects completed are as follows:

- a. Project 1: The project included cleaning and tuning the furnace, miscellaneous additional repairs to the furnace, checking/tuning A coil, attic insulation, partial sidewall insulation, etc. The project resulted in an air leakage reduction: Pre-replacement equaled 10328 @ 50 cfm, post-replacement equaled 1934 @ 50 cfm.

- b. Project 2: The project included furnace cleaning and tuning and resulted in an air leakage reduction: Pre-replacement equaled 2025 @ 50 cfm, post-replacement equaled 1029 @ 50 cfm.
- c. Project 3: The project included cleaning and tuning the furnace, water heater repair, attic insulation, etc. The project resulted in an air leakage reduction: Pre-replacement equaled 4551 @ 50 cfm, post-replacement equaled 2729 @ 50 cfm.
- d. Project 4: The project included installation of a new efficient furnace, correcting duct work with supply and returns, bath exhaust with termination and installation, attic insulation, etc. The project resulted in an air leakage reduction: Pre-replacement equaled 3207 @ 50 cfm, post-replacement equaled 2235 cfm.
- e. Project 5: The project was a furnace replacement that resulted in an air leakage reduction: Pre-replacement equaled 2135 @ 50 cfm, post-replacement 1959 @ 50 cfm.

12. After reconciliation, Suburban avers that a Rider EEP credit of \$0.05 per month applicable to Suburban's Small General Service Rate Schedule accounts is just and reasonable and should be approved by the Commission.

13. Following the three-month period, Suburban avers that a Rider EEP rate of \$0.0000 per month applicable to Suburban's Small General Service Rate Schedule accounts, subject to final reconciliation, is just and reasonable and should be approved by the Commission.

WHEREFORE, Suburban respectfully requests that the Commission approve its request to implement a credit for three months to the rate set forth in the revised tariff sheet contained in

Attachment A of this Application, and subsequently set Suburban's Rider EEP rate to zero following the three-month period as set forth in the revised tariff sheet contained in Attachment B of this Application.

Respectfully submitted,

/s/ Kimberly W. Bojko

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Suburban Natural Gas Company

~~Second~~~~First~~ Revised Sheet No. 9

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P.U.C.O. NO. 4
(Cancels P.U.C.O. No. 3)
Tariff for Natural Gas Service

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION AND SALE OF
NATURAL GAS**

Energy Efficiency Program Rider

Applicability:

Applicable to all Customers served under Rate SGS.

Description:

An additional charge to fund the costs associated with the implementation of cost-effective weatherization measures made available to high usage residential Percentage of Income Plan Program (PIPP) Customers served under the Small General Service Rate Schedule.

Rate:

A ~~charge~~~~credit~~ of \$0.~~05~~~~0574~~ per month to be applied to SGS rate schedule accounts.

This Rider is subject to reconciliation, including, but not limited to, increases or refunds based upon the results of audits ordered by the Commission in accordance with the November 7, 2018 Opinion and Order in Case No. 18-376-GA-RDR.

Issued: ~~03/01/2021~~~~5-6-20~~

Effective: ~~03/01/2021~~~~5-6-20~~

In accordance with the Public Utilities Commission of Ohio Opinion and Order
and subsequent authority

Order Dated: ~~4/22/2020~~

Case No. 20-0353-GA-RDR ~~and~~.

Issued by D. Joseph Pemberton, President ~~and Chief Operating Officer~~

Suburban Natural Gas Company

Second Revised Sheet No. 9

Page 3 of 7

P.U.C.O. NO. 4
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This Rider is subject to reconciliation, including, but not limited to, increases or refunds based upon the results of audits ordered by the Commission in accordance with the November 7, 2018 Opinion and Order in Case No. 18-376-GA-RDR.

Issued: 03/01/2021

Effective: 03/01/2021

In accordance with the Public Utilities Commission of Ohio Opinion and Order
and subsequent authority

Order Dated: _____

Case Nos. 20-0353-GA-RDR and ____.

Issued by D. Joseph Pemberton, President and Chief Operating Officer

Suburban Natural Gas Company

~~Third~~ ~~Second~~ Revised Sheet No. 9

Page 3 of 7

P.U.C.O. NO. 4
(Cancels P.U.C.O. No. 3)
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A ~~credit~~-charge of \$0.~~05~~-0000 per month to be applied to SGS rate schedule accounts.

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Issued: 063/01/2021

Effective: 063/01/2021

In accordance with the Public Utilities Commission of Ohio Opinion and Order
and subsequent authority

Order Dated: _____

Case Nos. 20-0353-GA-RDR and ____.

Issued by D. Joseph Pemberton, President and Chief Operating Officer

Suburban Natural Gas Company

Third Revised Sheet No. 9

Page 3 of 7

P.U.C.O. NO. 4
(Cancels P.U.C.O. No. 3)
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An additional charge to fund the costs associated with the implementation of cost-effective weatherization measures made available to high usage residential Percentage of Income Plan Program (PIPP) Customers served under the Small General Service Rate Schedule.

Rate:

A charge of \$0.0000 per month to be applied to SGS rate schedule accounts.

This Rider is subject to reconciliation, including, but not limited to, increases or refunds based upon the results of audits ordered by the Commission in accordance with the November 7, 2018 Opinion and Order in Case No. 18-376-GA-RDR.

Issued: 06/01/2021

Effective: 06/01/2021

In accordance with the Public Utilities Commission of Ohio Opinion and Order
and subsequent authority

Order Dated: _____

Case Nos. 20-0353-GA-RDR and ____.

Issued by D. Joseph Pemberton, President and Chief Operating Officer

**SUBURBAN NATURAL GAS COMPANY
CASE NO. 21-0105-GA-RDR
ENERGY EFFICIENCY PROGRAM PILOT RIDER REFUND CALCULATION
2020**

Line No.			
1	Estimated Number of Customers	18,120	
2	Estimated Number of Monthly Bills for 3 Months	54,360	
3	Refund Amount: EEP Collection Nov 2020-Jan 2021	\$ (2,712)	
4	Refund Period	<u>3</u>	Months
5	Refund Rate (Line 3 / Line 2)	<u>\$</u> (0.05)	per Monthly bill
6	Total EEP Rider During Refund Period	<u><u>\$</u></u> <u>(0.05)</u>	per Monthly bill

**SUBURBAN NATURAL GAS COMPANY
CASE NO. 21-0105-GA-RDR
ENERGY EFFICIENCY PROGRAM PILOT RIDER REFUND CALCULATION
2020**

		Month Thirteen	Month Fourteen	Month Fifteen	Month Sixteen	Month Seventeen	Month Eighteen	Month Nineteen	Month Twenty	Month Twenty-One	Month Twenty-Two	Month Twenty-Three	Month Twenty-
1	Balance - Beginning of Month	(57,813)	(63,818)	(69,842)	(75,872)	(81,911)	(87,969)	(94,050)	(94,945)	(95,840)	(96,735)	(81,498)	(82,398)
2	Program Expenses										16,134		4,551
3	Recovery - EEP Rider	6,005	6,024	6,030	6,039	6,058	6,081	895	895	895	897	900	899
4	Balance - End of Month (1+2-3)	\$ (63,818)	\$ (69,842)	\$ (75,872)	\$ (81,911)	\$ (87,969)	\$ (94,050)	\$ (94,945)	\$ (95,840)	\$ (96,735)	\$ (81,498)	\$ (82,398)	\$ (78,746)

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2/1/2021 5:26:38 PM

in

Case No(s). 21-0105-GA-RDR

Summary: Application of Suburban Natural Gas Company for Approval of an Adjustment to its Energy Efficiency Program Rider electronically filed by Mrs. Kimberly W. Bojko on behalf of Suburban Natural Gas Company