



Public Utilities Commission

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September 21, 2021

Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus OH 43215

RE: *In the Matter of the Application of Ohio Gas Company for Approval to Amend its Rules and Regulations for Service, Case Nos. 21-0583-GA-ATA.*

Dear Docketing Division:

Enclosed please find Staff Comments in the Matter of the Application of Ohio Gas Company for Approval to Amend its Rules and Regulations for Service, Case Nos. 21-0583-GA-ATA.

Barbara Bossart
Chief, Reliability and Service Analysis Division
Service Monitoring and Enforcement Department
Public Utilities Commission of Ohio

Enclosure

Cc: Parties of Record

**COMMENTS
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF
OHIO**

I. BACKGROUND

In this application, the Ohio Gas Company (Company) is proposing to amend its Rules and Regulations to incorporate tariff changes to its gas quality standards and operational requirements for gas delivered into the Company's system. The new provisions are a response to the increase in renewable natural gas injected into the Company's distribution system.

II. COMMENTS

Staff reviewed the Company's Application and supports the tariff changes except for the following provisions:

INDEX Second Revised Sheet No. 1, Pages 2 and 3 of 3. The Company has included the new tariff provisions within the Section on Service Quality Rules and Regulations. Staff would recommend placing these new provisions with the transportation service section.

Delivery of Gas First Revised Sheet No. 1, Page 1 of 8. The Company includes a provision regarding indemnification by the local deliverer of gas. Staff would recommend the following additional disclosure regarding indemnification. "*However,*

pursuant to the Commission's opinion and order in Case No. 85-1406-AU-COI, approval of the above language by the Commission does not constitute a determination by the Commission that the limitation of liability imposed by the Company should be upheld in a court of law. Approval by the Commission merely recognizes that since it is a court's responsibility to adjudicate negligence and consequent damage claims, it is also the court's responsibility to determine the validity of the exculpatory clause."

Quality of Gas Original Sheet No. 6, Page 2 of 8. The Company includes a provision towards a future recovery of costs for periodic testing through a future rider or in base rates. Staff recommends removal of this provision. If periodic testing costs are recovered in a future proceeding, the tariff should reflect the change at the time of that proceeding.

Measurement of Gas Deliveries Original Sheet No. 6, Page 7 of 8. The Company includes a provision towards a future recovery of costs for metering through a future rider or in base rates. Staff recommends removal of this provision. If metering costs are recovered in a future proceeding, the tariff should reflect the change at the time of that proceeding.

III. RECOMMENDATION

With the recommendations stated above, Staff recommends approval of the Companies proposed rules and regulations.

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in

Case No(s). 21-0583-GA-ATA

Summary: Comments Staff Comments electronically filed by Mr. Craig E Smith on behalf of PUCO Staff