

From: [Matt Cybulski](#)
To: [Puco Docketing](#)
Subject: Case Number 18-1205-GA-AIR
Date: Monday, November 8, 2021 2:50:56 PM
Attachments: [Suburban Natural Gas.pdf](#)

Good afternoon,

Please see attached JobsOhio's public comment regarding Case Number 18-1205-GA-AIR pertaining to the Suburban Natural Gas case and application of the Used and Useful provision.

Please do not hesitate to contact me with any questions.

Thank you,

Matt Cybulski

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November 8, 2021

Public Utilities Commission of Ohio
180 East Broad St.
Columbus, OH 43215

RE: Case No. 18-1205-GA-AIR
Public Comment of JobsOhio

Madam Chair and Commissioners,

JobsOhio respectfully provides these public comments for consideration by the Public Utilities Commission of Ohio ("Commission"). Our understanding is that the Commission is considering the question of recoverability of a 2.9-mile portion of the Del-Mar Pipeline Extension installed by Suburban Natural Gas.

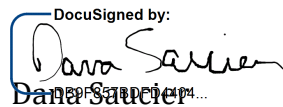
Beginning in late 2019, the Commission hosted a series of forums to discuss the critical issue of the lack of access to natural gas in various areas of the state, the ability for consumers to further leverage cheaper natural gas supplies from new interstate natural gas pipelines crossing Ohio carrying lower cost natural gas supplies from the Utica and Marcellus shale production regions. In the first two of these forums, the Commission heard from communities and economic development organizations about the detrimental impact that a lack of natural gas access has on job creation along with the cost advantages that consumers with access to local shale supply could have enjoyed making Ohio businesses even more competitive. In its presentation, JobsOhio highlighted that, when businesses look for sites to locate or expand operations, the three issues that companies focus on the most are speed, risk, and money.¹ Stated first, because it is often the most important when screening out potential sites, is speed. Speed refers to how quickly a business can hit the ground running at any given location. One of the most important considerations when determining this "speed" is how quickly a potential job creator can connect to utility service. Simply put, whether utility service is *already available* at a site is a critical factor in attracting a potential job creator.

¹ JobsOhio's presentation at the first natural gas access forum, as well as the presentations of other interested parties remain available on the PUCO's website, accessible here:
<https://puco.ohio.gov/wps/portal/gov/puco/events/first-natural-gas-access-forum-one>

The Supreme Court's decision remanding this case to you boils down to a very simple question: was the entirety of the Del-Mar Pipeline extension beneficial as of February 28, 2019. The answer to this question is yes. The pipeline was beneficial the moment that it provided economic development entities with the ability to say "there is natural gas already available at this location" when attempting to attract job creators to Delaware County.

Delaware County is one of the fastest growing areas in the State of Ohio. However, without the benefit of access to natural gas to fuel this growth, it will stagnate. This is a very real, recognizable benefit of the entire Del-Mar pipeline extension installed by Suburban. JobsOhio acknowledges the Commission only has the authority given to it by the General Assembly. However, to the extent it is allowed by law, we respectfully request that the Commission take these factors under advisement as it exercises its discretion in this case, which will impact the future installation of natural gas infrastructure, and therefore economic development in Ohio.

Respectfully,

DocuSigned by:

Dana Saudier

Vice President, Head of Economic Development
JobsOhio

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Case No(s). 18-1205-GA-AIR

Summary: Public Comment of Matt Cybulski Managing Director, Shale Energy & Petrochemicals and Dana Saucier Vice President, Head of Economic Development JobsOhio, via website, electronically filed by Docketing Staff on behalf of Docketing