

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of North Coast Gas    )  
Transmission, LLC for Authority to    )  
Operate as an Ohio Natural Gas    )    Case No. 21-1029-GA-ATA  
Company.                                    )

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**INITIAL COMMENTS OF  
COLUMBIA GAS OF OHIO, INC.**

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Pursuant to the Attorney Examiner’s Entry in this docket on December 2, 2021, Columbia Gas of Ohio, Inc. (“Columbia”) hereby files these Initial Comments on the Application filed on October 4, 2021, by North Coast Gas Transmission, LLC (“North Coast”). Columbia seeks to ensure that existing agreements, approved by the Public Utilities Commission of Ohio (the “Commission”), are unaffected by this case.

As stated in its Motion to Intervene, filed on November 12, 2021, Columbia is a customer of North Coast. More specifically, Columbia and North Coast have entered into agreements regarding the transportation of natural gas, which is eventually delivered to Columbia’s distribution customers (the “Agreements”). The Agreements are within the jurisdiction of, and were approved by,<sup>1</sup> the Commission pursuant to R.C. 4905.31. The Commission recently approved a joint application to amend the Agreements.<sup>2</sup>

The Agreements were negotiated in good faith by Columbia and North Coast, were reviewed and authorized by the Commission, and are critical to the safe and reliable service that Columbia provides to its customers. If the Commission approves, or modifies and approves, the Application filed in this case, Columbia respectfully requests that the Commission order that the terms of the

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<sup>1</sup> See *In re North Coast Gas Transmission LLC*, Case No. 08-1164-PL-AEC, Entry (October 29, 2008) and *In re North Coast Gas Transmission LLC*, Case No. 16-2248-PL-AEC, Finding and Order (March 22, 2017).

<sup>2</sup> *In the Matter of the Joint Application of North Coast Gas Transmission LLC and Columbia Gas of Ohio, Inc. for Approval of Amendments to Two Natural Gas Transportation Service Agreements*, Case No. 21-743-PL-AEC, Finding and Order (August 25, 2021).

Agreements govern in any instance where a conflict exists between the terms of North Coast's tariff and the Agreements.

Columbia's request could be effectuated by adding additional language to North Coast's proposed tariff, specifically Section II, Sub-part A on Original Sheet 9:

**Subject to PUCO Rules and Regulations:** These Rules and Regulations are subject to and include as part thereof all orders, rules and regulations applicable to the Company from time to time issued or established by the Public Utilities Commission of Ohio under its powers with respect to all Customers, including orders approving reasonable arrangements under Section 4905.31 of the Ohio Revised Code, the terms of which supersede any provision contained in these Rules and Regulations. Such service provided by the Company is also subject to all applicable federal laws, and to the orders, rules and regulations of any federal agency having jurisdiction thereof. A Service Agreement may modify these Rules and Regulations unless otherwise prohibited by law, and shall control in the event of any conflict with these Rules and Regulations.

Adopting the above-suggested language, or similar language with the same effect, will prevent future uncertainty and will ensure that previous Commission orders are respected.

Respectfully submitted by,

**COLUMBIA GAS OF OHIO, INC.**

/s/ John R. Ryan

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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 January, 2022, upon the parties listed below.

/s/ John R. Ryan

John R. Ryan

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Summary: Comments Initial Comments of Columbia Gas of Ohio electronically filed  
by Mr. John R. Ryan on behalf of Columbia Gas of Ohio