**BEFORE**
**THE PUBLIC UTILITIES COMMISSION OF OHIO**

| | | |
|---|---|---|
| In the Matter of the Application of Columbia Gas of Ohio, Inc. for Authority to Amend its Filed Tariffs to Increase the Rates and Charges for Gas Services and Related Matters. | ) ) ) ) ) | Case No. 21-637-GA-AIR |
| In the Matter of the Annual Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Form of Regulation. | ) ) ) | Case No. 21-638-GA-ALT |
| In the Matter of the Application of Columbia Gas of Ohio Inc. for Approval of a Demand Side Management Program for its Residential and Commercial Customers. | ) ) ) ) | Case No. 21-639-GA-UNC |
| In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval to Change Accounting Methods. | ) ) ) ) ) | Case No. 21-640-GA-AAM |

---

**DIRECT TESTIMONY OF MATTHEW WHITE**
**ON BEHALF OF INTERSTATE GAS SUPPLY, INC.**

**AND**

**THE RETAIL ENERGY SUPPLY ASSOCIATION**

---

**May 13, 2022**

## TABLE OF CONTENTS



## EXHIBITS

## I. INTRODUCTION

**Q. Please state your name and business address.**

A. My name is Matthew White. My business address is 6100 Emerald Parkway, Dublin, Ohio 43016.

**Q. On whose behalf are you testifying?**

A. I am testifying on behalf of Interstate Gas Supply, Inc. ("IGS Energy" or "IGS") and the Retail Energy Supply Association ("RESA"). Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. My testimony for RESA represents the position of RESA as an organization but may not represent the views of any particular member of the Association.

**Q. Please describe your work history and educational background.**

A. In 2002, I graduated from Ohio University. In 2007, I earned a JD/MBA degree from the College of William & Mary, and began working at the law firm of Chester, Wilcox & Saxbe as an energy and utilities lawyer. At Chester Wilcox, I participated in numerous regulatory proceedings relating to utility matters, including natural gas and electric rate cases and electric power siting cases. I also have worked on power and gas sales transactions. At the beginning of 2011, I was hired by IGS Energy. At my time at IGS, I have worked at various roles throughout the organization supporting the legal, regulatory and business needs of the Company. I am currently Executive Vice President and Chief Legal Officer for IGS Energy. In my current position, I serve on the IGS Executive Team, which is responsible for setting and effectuating IGS's overall business strategy. I also oversee all of IGS Energy's legal, regulatory and legislative activities throughout the country, as well as IGS Energy's home warranty and solar businesses.

**Q. Have you previously submitted testimony in any regulatory proceedings?**

A. Yes. I have testified before the Public Utilities Commission of Ohio ("Commission" or "PUCO") in several cases. I have also submitted written testimony on utility related matters in numerous regulatory proceedings in Pennsylvania, Maryland, Michigan, Kentucky, West Virginia, and Illinois.

**Q. What is the purpose of your testimony?**

A. The purpose of my testimony is to support the Objections to the Staff Report of Investigation filed by IGS Energy and support certain Objections filed by RESA on May 6, 2022. Specifically, I recommend that the Commission reject Columbia's proposed Carbon Reduction Rider ("CRR") and Staff's recommendation for a carbon reduction service. I also offer testimony recommending the removal of OCC/PUCO assessments from distribution rates. Additionally, I provide testimony to support eliminating discriminatory switching fees. Lastly, I offer testimony that Columbia should exit the merchant function.

## II. CARBON REDUCTION RIDER

**Q. Can you please describe the Carbon Reduction Rider program?**

A. Yes. Through the Direct testimony of Melissa Thompson, Columbia Gas of Ohio ("Columbia") proposes a carbon offset rider. Ms. Thompson's testimony describes the Carbon Reduction Rider (CRR) as an opt-in rider where customers would pay Columbia an additional fixed monthly fee to be used toward purchasing carbon offsets.[1] Carbon offsets paired with natural gas are very similar to renewable energy credits on the electric side.

**Q. How is Columbia proposing to recover the costs of the program?**

A. Columbia plans to bill the CRR as a separate line item on a customer's bill. Columbia does not provide information on how it plans to recover costs associated with information technology, administrative, and other costs necessary to provide this billing service to customers.[2]

**Q. Should CRR proposal be approved?**

A. No. There is no need for Columbia to offer this program to customers because this product is already abundantly available to customers through the competitive market. It is inappropriate for a monopoly utility to provide a competitive service and otherwise use the resources of the distribution rate base to offer a competitive service. Columbia exited the merchant function several years ago. In so doing, Columbia transferred to competitive suppliers the obligation to provide competitive retail natural gas service to customers. Just like renewable energy credits are part of proving competitive retail electric service, carbon offsets are inextricably linked with competitive retail natural gas service. In effect, then, authorization of the CRR would permit Columbia to reenter the market for retail natural gas service. Under the current legal structure affecting Columbia and all other natural gas distribution utilities, it is inappropriate for Columbia to attempt to re-enter the competitive

[1] Application, Prepared Direct Testimony of Melissa Thompson on Behalf of Columbia Gas of Ohio, Inc. at 33 (June 14, 2021).

[2] Ex. MW-1 (Columbia Gas of Ohio, Inc. Response to Interstate Gas Supply, Inc.'s Interrogatory Dated September 17, 2021. Interrogatory Set 2, No. 11).

retail natural gas service ("CRNGS") market. Additionally, the proposed program lacks definition, but it will almost assuredly rely on subsidies embedded in distribution rates. As I noted above, some portion of the costs associated with the carbon offset program will be underwritten by all distribution customers. Thus, Columbia's proposal runs afoul of Ohio law and policy. Specifically, under the CRR proposal, neither Columbia nor the third-party vendor faces the risk of customer default faced by other vendors, but rather such risk will be absorbed by all distribution rate payers regardless of whether they take advantage of Columbia's offer. Finally, to my knowledge Columbia has not conferred with any suppliers who are already offering this product in the market before proposing a competitive program that will be billed on the utility bill.[3] To the extent Columbia had a desire to encourage customers to purchase carbon off-sets, they could have sought a more competitive means to do so.

**Q Do suppliers provide similar products to what Columbia is proposing here?**

A. Yes. Several suppliers, including IGS, provide natural gas products that are paired with carbon off-sets. Indeed, all of IGS' current residential CRNGS offerings are carbon neutral. Thus, given the abundance of carbon neutral products on the market, there is no need for Columbia to provide this same offering to customers, given the anti-competitive and subsidization concerns I discuss in my testimony.

**Q. Do you have any concerns that the utility is seeking to compete with suppliers that also provide these products for customers?**

A. Yes. Allowing Columbia, a monopoly utility, to offer a competitive product in the market will push other renewable energy products out of the market, unnecessarily harming

[3] Application, Prepared Direct Testimony of Melissa Thompson on Behalf of Columbia Gas of Ohio, Inc. at 33 (June 14, 2021).

competition to the detriment of customers. Whenever Columbia leverages its distribution monopoly, to offer a competitive product in the market, it is a deterrent for other suppliers to offer that service, because those suppliers do not have an advantage of a subsidized rate-base. This example is even more egregious, because there is no need for Columbia's participation in the sale of carbon-neutral products. Carbon-neutral products are already available in the competitive market. Thus, Columbia's proposal if authorized will harm the CRNGS market and customers.

**Q. Will Columbia be offering its product to competitive supply customers?**

A. Ms. Thompson's testimony does not mention limitations to default service customers or any subgroup. Rather, it is likely that Columbia will market to IGS or another supplier's customers, which is problematic from a supplier's perspective because IGS customers are already being provided this service, and IGS has spent significant time and resources cultivating that relationship with its customers.

**Q. Why would it be problematic to allow Columbia to market to customers?**

A. Columbia is a monopoly service provider in the business of the distribution of natural gas and all natural gas distribution companies start out with all the customers and the exclusive means to leverage that relationship via the bill and bill inserts, etc. Suppliers begin with no customers and must devote significant effort to winning customers away from default service and enroll them. The same is true for products such as the carbon offset offering here, to a certain extent, because the utility has the monthly bill as a means of communication that every customer will open every month. No supplier has that advantage, and it is inherently unfair and anti-competitive for Columbia or any distribution company to use that advantage to capture market share discriminates against other participants in the market. Indeed, the Ohio legislature has recognized the inherent harm of a utility monopoly from participating in competitive offerings and has prohibited such offering in statute.[4]

Q: **Does the Staff Report address the Carbon Reduction Rider?**

A: Yes. The Staff Report recommended denial of Columbia Gas' rider proposal. Staff correctly recommends that default risk should fall on Columbia or its vendor.[5] However, the Staff Report wrongly recommended that Columbia implement the program as a nonregulated service under the existing "OPTIONAL SERVICES" tariff.[6]

**Q. Do you have any concerns with Staff's discussion of the Carbon Reduction Rider?**

A: Yes, the Staff Report relabeling the program as an optional non-jurisdictional service does not remedy the structural problems associated with it. First, it is not a non-jurisdictional service. The purpose of the rider is to offer customers an opportunity to reduce the greenhouse gas emissions associated with their natural gas usage. Just like renewable energy credits are a part of competitive retail electric service, carbon offsets are inextricably entwined with competitive retail natural gas service. As a result, authorization of the rider would allow Columbia to reenter into competitive retail natural gas service, which they have already exited under Ohio statute, which also prohibits them from re-entering into the market for the sale of natural gas. Second, there are process issues with the rider as well because it discriminates against other competitive carbon neutral products

[4] Ohio Revised Code 4929.29.

[5] Staff Report at 50-51.

[6] Columbia has raised its own objection of recommendation to implement the program as a nonregulated service under the Optional Services tariff because the tariff is limited to products billed for third parties. See Objections of Columbia Gas of Ohio, Inc. at 60 (May 6, 2022).

in the market. The third-party vendor is selected by Columbia without competitive bidding and receives the benefits of both Columbia and Commission endorsement. This is contrary to Columbia's tariffs and Ohio law which prohibits it from favoring one competitive entity in the marketplace over another.

**Q. What do you recommend?**

**A.** I recommend that the Commission reject Columbia's Carbon Reduction Rider. However, if the Commission decides to approve a carbon reduction program for Columbia, the program should limit Columbia's participation so that it is not a market participant, directly or by implication. Columbia's role should be limited to educating customers of the availability of carbon product offered in the competitive market and administering supplier eligibility.

## III. PUCO AND OCC ASSESSMENTS

**Q. What did the Staff Report recommend with respect to the PUCO/OCC assessment?**

Staff Report recommends that that the entire PUCO and OCC assessment expense be rebundled into distribution rates. For reasons that are unexplained, the Staff Report "finds that the total amount [of the PUCO and OCC assessments] should be recovered through base rates."[7]

**Q. Should Staff's recommendation be adopted**.

No. Most importantly what Staff is proposing directly contradicts at least the spirit of Ohio law. While rebundling all of the OCC and PUCO assessment is bad policy, as I will explain further in my testimony, Ohio Revised Code Section 4905.10 directs that the PUCO and

[7] Staff Report at 24 and Ohio Revised Code 4905.10 and 4911.18

OCC assessment cannot be recovered from competitive suppliers until the Commission "has removed from the base rates of the natural gas company the amount of assessment …that is attributable to the value of commodity sales service… in base rates paid by those customers of the company that do not purchase that service from the natural gas company." The intent was clearly to recover the assessments in a way that did not distort the assignment of the assessments. The statute also recognizes that assessments for gas supply should be recovered separately from those associated with distribution so that proper cost assignment is advanced. Despite this explicit language in Ohio statute that shopping customers cannot pay for the PUCO and OCC assessment attributable to default service revenue in their base rates, Staff is asking the Commission to put back in the PUCO and OCC assessment which would be paid for by SCO customers in base rates.

**Q. Did the Commission unbundle the SCO Revenue percentage of the PUCO and OCC assessments from distribution rates in Columbia's most recent distribution rate case proceeding?**

A. Yes, as a result of a settlement adopted by the Commission in an application of Columbia to increase rates in 2008, Columbia has recovered a portion of the PUCO and OCC assessments assignable to default supply service through a rider applicable to only those customers that secure natural gas through Columbia's default service.[8] Columbia proposed to continue the allocation methodology in its application in the current case.[9]

**Q. Would it be bad policy to adopt Staff's recommendations?**

---

[8] *In the Matter of the Application of Columbia Gas of Ohio, Inc., for Authority to Amend Filed Tariffs to Increase the Rates and Charges for Gas Distribution Service*, Case Nos. 08-72-GA-AIR, et al., Stipulation at 6 (Oct. 24, 2008) and Opinion and Order at 7 (Dec. 3, 2008).

[9] Application, Prepared Direct Testimony of Bryan Trapp on Behalf of Columbia Gas of Ohio, Inc. at 8 (June 14, 2021).

A. Yes. In additions to my objections stated above it is not appropriate to make one class of customers (i.e. shopping customers) pay for the costs directly attributable to another class of customers (i.e. default service). Presumably the Ohio legislature understood this principal and that is why it enacted legislation prohibiting such a practice.

**Q. Is there a direct relationship between SCO sales and the amount Columbia must collect to cover the PUCO and OCC assessments?**

A. Yes. For example, consider two scenarios. Under Ohio law, an entity's PUCO and OCC assessments are determined in proportion to the entity's intrastate gross earnings. In the first scenario, assume Columbia collected a total of $600 million: $300 million for distribution and $300 million for the SCO suppliers. In the second scenario, Columbia collected a total of $300 million for distribution because all customers shopped for natural gas. All else being equal, in the second scenario, Columbia's PUCO/OCC assessment would be 50% lower due to the reduction in its intrastate revenues. Thus, there is a direct link between the company's natural gas default service revenues and the amount the company is assessed.

**Q. Is it harmful for Columbia to collect the PUCO and OCC assessments as part of the distribution rates?**

A. Yes. The recommendation would directly shift costs to shopping customers that are being expressly caused by customers that are on default service. By spreading the cost of the assessments related to the SCO to all distribution customers, the cost of the SCO is reduced, and the cost of distribution rates are increased. Mathematically, the effect of the recommendation would be to lower the cost of service to SCO customers while correspondingly increasing the costs shopping customers must pay for gas service, thus penalizing customers for exercising their right to shop for gas. The proposal also harms competition. Competitive suppliers must pay the assessments based on their revenue but can only recover the costs of the assessment through their shopping customers. They do not have the ability to recover those costs in base rates. Therefore, a competitive supplier is placed at a cost disadvantage by the proposal contained in the Staff Report. Effectively Staff's proposal is merely favoring CRNG suppliers of the SCO (because they would not have to pay for the assessment) at the expense of other suppliers in the market that do have to pay the assessment. Finally, as Columbia has pointed out in its objections, customers taking service from competitive suppliers will be charged twice for some portion of the PUCO and OCC assessments,[10] thus adding another injury that is inflicted solely on the supply side of the gas distribution business.

**Q. Is there any explanation in the Staff Report for the Staff's rejection of terms that it agreed to and that the Commission approved in the 2008 rate case?**

A. No. Thus, I cannot address the basis the Staff now believes justifies this material rejection of the terms of the prior Stipulation and the Commission's prior order.

**Q. What do you recommend?**

A. I recommend rejecting Staff's recommendation and requiring Columbia to continue the unbundling of the PUCO/OCC assessment expenses related to the SCO revenue as ordered by the Commission in the last rate case proceeding. The Commission should find that Staff's recommendation is unjust and unreasonable for several reasons. First, its directly contradictory to Ohio law explicitly prohibiting such practice. Second, shopping customers (through their distribution rates) will be subsidizing costs that are directly related to default

[10] Objections of Columbia Gas of Ohio, Inc. at 38 (May 6, 2022).

service commodity revenue. And Third, the effect of the subsidy will have the effect of understating the cost of the default commodity service and provide an unreasonable and unfair price advantage to the default standard offer relative to other sources of retail commodity service.

## IV. SWITCHING FEES

**Q. Does Columbia Gas of Ohio assess a fee against a CRNGS supplier when a customer switches to that CRNGS supplier?**

A. Yes. A CRNG provider is assessed a $5 fee every time a customer enrolls with that CRNGS supplier.[11] The fee does not apply if the customer returns to the SCO for any reason.

**Q. Does the Staff Report examine the switching fee?**

A. No.

**Q. Do you oppose the assessment of this fee?**

A. Yes. It is unjust and unreasonable to continue the assessment of this fee on CRNGS suppliers because the fee amount has not been substantiated and its assessment is discriminatory against shopping customers.

**Q. Has this fee been substantiated?**

A. No. Columbia Gas did not demonstrate that it incurs any costs associated with switching a customer's commodity service, and the Staff Report did not question or analyze this fee.

**Q. How is the switching fee discriminatory?**

The switching fee is unreasonably discriminatory by penalizing customers who exercise their right to choose a CRNGS. Columbia Gas does not assess this fee to customers returning to SCO. Assessing customers only when switching to a CRNGS supplier, but not

[11] Section VII, Fourth Revised Sheet No. 25, para. 25.3, Section VII, Fifth Revised Sheet No. 27, para. 27.3, and Section VII, Ninth Revised Sheet No. 28, para. 28.3

when switching to SCO is blatantly discriminatory and this practice should be terminated by the Commission in this proceeding.

**Q. What do you recommend?**

A. I recommend elimination of this unreasonable and discriminatory fee, or, in the alternative, it should also be applied to customers that elect to return to the SCO. No justification has ever been provided to continue this unreasonable penalty on choice customers.

## <u>V. EXIT THE MERCHANT FUNCTION</u>

**Q. Did the Staff Report evaluate whether Columbia should take additional steps to exit the merchant function?**

A: No, it did not. I expected that the Staff Report would evaluate whether Columbia should take additional steps to exit the merchant function. But it did not do so.

**Q: Can you provide background on Columbia's exit the merchant function?**

A: Yes, Columbia has been in the process of leaving the merchant function since 2008. *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of a General Exemption of Certain Natural Gas Commodity Services or Ancillary Services*, Case No. 08-1344-GA-EXM, Notice of Intent to File an Application Pursuant to Section 4929.04 of the Revised Code (Dec. 31, 2008). In an amended stipulation, the Commission approved a five-year plan[12] that included a process for Columbia to exit fully the merchant function for commercial and industrial customers upon the attainment of a customer shopping participation threshold of 70% for three consecutive months. *In the Matter of the Joint Motion to Modify the December 2, 2009 Opinion and Order and the September 7, 2011*

[12] Although the plan had a five-year term, it also contains a provision to continue the plan until it is modified following the five year term. *In the Matter of the Application to Modify, in Accordance with R.C. 4929.08, the Exemption Granted Columbia Gas of Ohio, Inc., in Case No. 08-1344-GA-EXM*, Case No. 12-2637-GA-EXM, Entry (Nov. 7, 2018).

*Second Opinion and Order* in Case No. 08-1344-GA-EXM, Case No. 12-2637-GA-EXM, Amended Joint Motion to Modify Orders Granting Exemption (Nov. 27, 2012), Opinion and Order (Jan. 9, 2013), and Entry on Rehearing (Mar. 20, 2013).

**Q: Has Columbia taken steps to transition away from the merchant function?**

A. No, it has not. Because the 70% level of shopping was not attained, a significant portion of the commercial and industrial customers are still being served by the variable standard choice offer rate. Although the reasons for Columbia's exit of the merchant function are as strong as they were in 2013 due to market conditions and circumstances warranting a change from the current exit plan exist, the Application and the Staff Report fail to advance that outcome in this proceeding.

**Q. What is the policy of the State of Ohio with respect to natural gas competition?**

A. Among other things, Ohio Revised Code Section 4929.02(A)(7) states that it is the policy of the State to "*promote an expeditious transition to the provision of natural gas services and goods in a manner that achieves effective competition and transactions between willing buyers and willing sellers to reduce or eliminate the need for regulation of natural gas services*." (Emphasis added.) In enacting this statute, the General Assembly reinforced a policy already being implemented by the Commission on a more limited scale of pursuing gas choice. That policy was predicated on the understanding that effective competition requires willing buyers and willing sellers to engage in the natural gas market and that reducing or eliminating regulation for natural gas services benefits customers.

**Q. Is the SCO an effective means of moving customers toward choice, i.e., willing buyers and willing sellers to engage in transactions?**

A. No. While the policy of the State is for willing buyers and willing sellers to engage in natural gas transactions, the SCO, otherwise known as "default service," encourages the exact opposite. The Commission has previously found that assigning customers to the SCO, without a willing transaction, was a barrier to the development of retail choice.[13] The Commission has determined that the SCO is "negatively affecting all Ohioans by hindering the development of a fully-competitive marketplace."[14] For Dominion East Ohio's commercial and industrial customers, the Commission eliminated the availability of the SCO to fulfill the state's policy objectives, including developing the competitive market for natural gas services.

**Q. Is the SCO affecting customers?**

A. As demonstrated by the testimony of Paul Leanza, we are entering a period of natural gas volatility that we have not experienced since 2008 when Columbia initially took steps to exit the merchant function. This price volatility has translated into the some of the highest and most volatile SCO rates we have seen.

**Q. What is your recommendation?**

A. The SCO is clearly hindering the development of the competitive market in Columbia's service territory. The lack of development is working against the interest of commercial and industrial customers. The Commission has previously identified that allowing the natural gas company to exit the merchant function for nonresidential customers will encourage innovation, both in how services are provided and in the variety of available

[13] *See In re the Application to Modify, in Accordance with R.C. 4929.08, the Exemption Granted to The East Ohio Gas Company d/b/a Dominion Energy Ohio* in Case No. 07-1224-GA-EXM, Case No. 12-1842- GA-EXM, Opinion and Order (Jan. 9, 2013) ("2013 Order") at 8.

[14] *Id.*

products.[15] Because it has not been and will not be in the public interest for Columbia to remain the default provider of gas supply for commercial and industrial customers, the Commission should direct in this proceeding that Columbia exit the merchant function and that the provisions for doing so set out in the amended stipulation in Case No. 12-2367-GA-EXM be implemented.

**Q. Do you have any further testimony?**

A. No, but I reserve the right to modify or supplement this direct testimony.

[15] *2013 Order* at 15.

## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Direct Testimony of Matthew White on Behalf of Interstate Gas Supply, Inc. and the Retail Energy Supply Association* was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on May 13, 2022. The Commission's e- filing system will electronically serve notice of the filing of this document upon the following parties listed below.

*/s/ Stacie Cathcart*
Stacie Cathcart

## SERVICE LIST

| | |
|---|---|
| **Citizens' Utility Board of Ohio** | Trent Dougherty<br>trent@hubaydougherty.com |
| **Environmental Law & Policy Center** | Janean R. Weber<br>jweber@elpc.org |
| **Columbia Gas of Ohio** | Joseph M. Clark<br>John R. Ryan<br>Melissa L. Thompson<br>josephclark@nisource.com<br>johnryan@nisource.com<br>mlthompson@nisource.com<br>Eric B. Gallon<br>Mark Stemm<br>L. Bradfield Hughes<br>Devan K. Flahive<br>Porter, Wright, Morris & Arthur LLP<br>egallon@porterwright.com<br>mstemm@porterwright.com<br>bhughes@porterwright.com<br>dflahive@porterwright.com |
| **The Kroger Company** | Angela Paul Whitfield<br>Carpenter Lipps & Leland LLP<br>paul@carpenterlipps.com |

| | |
|---|---|
| **Northeast Ohio Public Energy Council** | Devin D. Parram<br>BRICKER & ECKLER LLP<br>dparram@bricker.com<br><br>Glenn S. Krassen<br>gkrassen@nopec.org |
| **Office of the Ohio Consumers' Counsel** | Angela D. O'Brien<br>William J. Michael<br>Assistant Consumers' Counsel<br>angela.obrien@occ.ohio.gov<br>william.michael@occ.ohio.gov |
| **Ohio Energy Group (OEG)** | Michael L. Kurtz, Esq. Kurt J. Boehm, Esq.<br><br>Jody Kyler Cohn, Esq.<br>BOEHM, KURTZ &<br>LOWRY<br><br>mkurtz@BKLlawfirm.com<br>kboehm@BKLlawfirm.com<br>jkylercohn@BKLlawfirm.c<br>om |
| **Ohio Manufacturers' Association Energy Group** | Kimberly W. Bojko<br>Jonathan Wygonski<br><br>Carpenter Lipps & Leland<br>LLP<br>Bojko@carpenterlipps.com<br>Wygonski@carpenterlipps.<br>com |
| **Ohio Partners for Affordable Energy** | Robert Dove<br><br>Kegler Brown Hill + Ritter<br>Co., L.P.A.<br>rdove@keglerbrown.com |
| **Ohio School Council** | Glenn S. Krassen<br>BRICKER & ECKLER LLP<br><br>gkrassen@bricker.com<br>Dane Stinson<br><br>BRICKER & ECKLER LLP<br><br>dstinson@bricker.com |

| | |
|---|---|
| **Retail Energy Supply Association** | Michael J. Settineri<br>Gretchen L. Petrucci<br><br>Vorys, Sater, Seymour and<br>Pease LLP<br>mjsettineri@vorys.com<br>glpetrucci@vorys.com |
| **IEU-Ohio** | Matthew Pritchard<br>Bryce Mckenney<br>MCNEES WALLACE & NURICK LLC<br>mpritchard@mcneeslaw.com<br>bmckenney@mcneeslaw.com |

PUCO Case Nos. 21-0637-GA-AIR, et al.
Staff Data Request Set 1, No. 47
Respondent: Melissa L. Thompson

**COLUMBIA GAS OF OHIO, INC.**
**RESPONSE TO STAFF'S DATA REQUEST SET ONE**
**DATED AUGUST 18, 2021**

**Data Request No. 47:**

Please provide Staff with answers to the following questions pertaining to the Carbon Reduction Rider:

1. Under what legal authority is the company proposing to implement the Carbon Reduction Rider, i.e., which provision of the Ohio Revised Code?
2. What are current market prices for carbon offsets? Based on current market conditions, for customers who opt-in to pay the $5 monthly charge, how many metric tons of carbon dioxide emissions will be reduced each month for each participating customer?
3. Does the entire $5 go towards the purchase of carbon offsets, or is there an administrative fee/component charged by the carbon offset organization?
4. As referenced in Melissa Thompson's testimony, what are the differences, if any, between the major carbon standards, i.e., Verified Carbon Standard (VCS), the American Carbon Registry (ACR), the Climate Action Reserve (CAR), and Gold Standard (GS)?
5. Will the charges associated with participating in the program and the applicable carbon offsets purchased (type and quantity) pursuant to the program show up on participating customers' bills?
6. Please describe the specific services the Company plans to negotiate into a contract for the third-party implementing the Carbon Reduction Rider program.
7. Does the company plan to issue a request for proposal (RFP) to select the third-party vendor that will implement the program? If the company doesn't plan to issue an RFP, then has the company selected a preferred third-party vendor to implement the program?
8. If the Company has selected a third-party vendor, who is the vendor that was selected?
9. How will Company employee time be accounted for? For employees that work on implementation of the program, will their time be charged to the rider?

10. Are competitive retail natural gas suppliers currently offering carbon offset products and services?
11. Does the company have any projection of how many customers may participate in the program?
12. Does the company plan to market the program, e.g., direct mail, website ads, etc.? If so, how will marketing costs be recovered?
13. Does the Company, its parent, or any of its affiliate companies own any facilities that may receive revenue for the sale of carbon offset credits?
14. What metrics or measurables has the Company put into place to measure the projected milestones and goals of the program for the Company?
15. How long is the Company projecting the $5 fixed charge to remain in effect? Could the $5 monthly opt-in charge increase or decrease in the future outside of the initial start-up period for customers?
16. In the event customers who opted-in to the program wish to exit the program, would those customers be assessed fees for opting out after opting in? If so, what would be the magnitude of the fees assessed to the customer and will there be language within the rider that ascertains to those customers who chose to opt out of the program after they've opted into the program?
17. What was the basis for the $5 customer opt-in charge? How was that opt-in charge determined?

**Response:**

1. Columbia is proposing to adopt the Carbon Reduction Rider under R.C. 4909.18. The Carbon Reduction Rider further meets the policies contained in R.C. 4929.02(A)(3), 4929.02(A)(4), and 1551.18.

2. Market prices for carbon offsets are variable. Currently, Columbia is negotiating with Bluesource, LLC, to purchase the carbon offsets for Columbia customers.

3. The $5 will flow directly to Bluesource, LLC to purchase the carbon offsets and to cover Bluesource, LLC's administrative costs. None of the $5 per month rate will offset any of Columbia's costs to administer this program.

4. Columbia plans to work with a vendor to purchase carbon offsets that have been third–party verified and registered via one of the major carbon standards. The examples listed are some of the standards that verify carbon offsets. A few links explaining the different standards can be found here:
http://www.offsetguide.org/understanding-carbon-offsets/carbon-offset-programs/comparisons-of-offset-programs/program-administration-and-authority/

https://www.offsetguide.org/understanding-carbon-offsets/carbon-offset-programs/comparisons-of-offset-programs/general-features-of-offset-programs/

https://www.offsetguide.org/understanding-carbon-offsets/carbon-offset-programs/voluntary-offset-programs/

5. Yes, if a customer chooses to opt-in to the Carbon Reduction Rider, it will show up on a customer's bill.

6. Columbia is currently negotiating with Bluesource, LLC, to purchase the carbon offsets for Columbia customers. At this time, Columbia anticipates the contract will be limited to Bluesource, LLC utilizing the Carbon Reduction Rider proceeds to purchase carbon offsets.

7. Columbia did not issue an RFP, but is currently negotiating with Bluesource, LLC.

8. Columbia is currently negotiating with Bluesource, LLC, to purchase the carbon offsets for Columbia customers.

9. Columbia employees will not be charging their time to the Carbon Reduction Rider.

10. Columbia is does not know whether some or all of the competitive retail natural gas suppliers in its service area are offering carbon reduction products.

11. Columbia does not have a projection as to how many customers it believes will opt into the proposed rider.

12. At this time, Columbia does not have any plans to market the Carbon Reduction Rider. In the event such marketing is done in the future, Columbia

does not anticipate recovering the cost of such marketing through the Carbon Reduction Rider.

13. No, Columbia, its parent, or any of its affiliate companies do not own any facilities that may receive revenue for the sale of carbon offset credits.

14. At this time, Columbia does not have any metrics to measure the success of the customer opt-in Carbon Reduction Rider.

15. At this time, Columbia does not plan to adjust the $5 rate of the Carbon Reduction Rider.

16. If a customer chooses to opt-out of the Carbon Reduction Rider, there will not be a fee assessed.

17. Columbia set the $5 rate as a reasonable rate for customers interested in making an optional, environmentally conscious choice to offset their carbon output on a monthly basis.

**COLUMBIA GAS OF OHIO, INC.**
**RESPONSE TO THE RETAIL ENERGY SUPPLY ASSOCIATION'S INTERROGATORIES**
**DATED APRIL 15, 2022**

**Interrogatory Set 2, No. 14.**

How will customers "opt-in" to fund a reduction to their carbon output through the proposed Carbon Reduction Rider?

**Response:**

Because the Carbon Reduction Rider is a new mechanism, Columbia is in the preliminary stages of developing the rider and, as such, Columbia has not developed processes for how customers will opt-in to the Carbon Reduction Rider.

**COLUMBIA GAS OF OHIO, INC.**
**RESPONSE TO THE RETAIL ENERGY SUPPLY ASSOCIATION'S INTERROGATORIES**
**DATED APRIL 15, 2022**

**Interrogatory Set 2, No. 16.**

How will the funds generated by the proposed Carbon Reduction Rider be booked by Columbia?

**Response:**

All funds received from the Carbon Reduction Rider will be recorded as a debit to Cash and credit to a liability. When funds are dispersed to purchase carbon offsets the net entry will be debit to liability and credit to cash.

**COLUMBIA GAS OF OHIO, INC.**
**RESPONSE TO THE RETAIL ENERGY SUPPLY ASSOCIATION'S INTERROGATORIES**
**DATED APRIL 15, 2022**

**Interrogatory Set 2, No. 22.**

What companies have low-carbon natural gas supplies available in Ohio?

**Response:**

Objection. Columbia objects in so much as RESA has neither provided definitions for "low-carbon natural gas supplies," nor "companies" for this interrogatory. As a result, this request is overly broad and unduly burdensome. Further, this interrogatory seeks information that is irrelevant to the subject matter of these proceedings and is not reasonably calculated to lead to the discovery of admissible evidence.

**COLUMBIA GAS OF OHIO, INC.**
**RESPONSE TO THE RETAIL ENERGY SUPPLY ASSOCIATION'S INTERROGATORIES**
**DATED APRIL 15, 2022**

**Interrogatory Set 2, No. 26.**

Referring to the provision of "optional services" on Tariff Sheet 44, paragraph 14, identify all optional services that Columbia offers to its customers today and to which customer class each optional service is offered? If the optional service is actually provided by a third party, identify the third party.

**Response:**

The Optional Services Third-Party Billing program is offered to residential and small commercial customers. With this program, customers have the option to enroll in service protection plans that provide warranty coverage for items such as heating and cooling systems, gas lines, and water and sewer lines.

These services are provided by the following third-party vendors:

Interstate Gas Supply (IGS)
Pivotal Home Solutions
Columbia Service Partners (HomeServe)

**COLUMBIA GAS OF OHIO, INC.**
**RESPONSE TO INTERSTATE GAS SUPPLY INC.'S INTERROGATORY**
**DATED SEPTEMBER 17, 2021**

**Interrogatory Set 2, No. 5:**

Please indicate whether Columbia performed a customer survey, study, or analysis to evaluate customer interest in the proposed Carbon Reduction Rider prior to introducing the tariff offering in this case. If so, identify all associated documents.

**Response:**

Columbia has not performed a customer survey, study, or analysis to evaluate customer interest in the proposed Carbon Reduction Rider.

**COLUMBIA GAS OF OHIO, INC.**
**RESPONSE TO INTERSTATE GAS SUPPLY INC.'S INTERROGATORY**
**DATED SEPTEMBER 17, 2021**

**Interrogatory Set 2, No. 8:**

Staff Data Request One; Data Request No. 47, Question 12, asked "Does the company plan to market the program, e.g., direct mail, website ads, etc.? If so, how will marketing costs be recovered?" In response, Columbia indicated that "[a]t this time, Columbia does not have any plans to market the Carbon Reduction Rider. In the event such marketing is done in the future, Columbia does not anticipate recovering the cost of such marketing through the Carbon Reduction Rider." Regarding this response:

a. Identify Columbia's definition of "market"
b. Identify how Columbia plans to generate awareness of the existence of the rider if it does not intend to "market" to customers.
c. Please indicate why Columbia does not plan to market its Carbon Reduction Rider.
d. To the extent that Columbia does market the rider, how will Columbia recover the cost of such marketing?

**Response:**

a – b. Columbia does not have any plans to market, being defined as paid advertisements, the Carbon Reduction Rider, and, as such, does not currently have any plans as to how it would generate awareness of the existence of the Carbon Reduction Rider.
c. Because the Carbon Reduction Rider is a new mechanism, Columbia is in the preliminary stages of developing the rider and, as such, Columbia does not currently have a plan to market the Carbon Reduction Rider.
d. Because Columbia currently does not have any plans to market the Carbon Reduction Rider, Columbia cannot speculate as to how it would recover the cost of any such potential marketing.

**COLUMBIA GAS OF OHIO, INC.**
**RESPONSE TO INTERSTATE GAS SUPPLY INC.'S INTERROGATORY**
**DATED SEPTEMBER 17, 2021**

**Interrogatory Set 2, No. 9:**

Staff Data Request One; Data Request No. 47, Question 9, asked "[h]ow will Company employee time be accounted for? For employees that work on implementation of the program, will their time be charged to the rider?" In response, Columbia indicated "Columbia employees will not be charging their time to the Carbon Reduction Rider." Regarding this response:

a. Please indicate whether any Columbia employees will participate in the administration of the Carbon Reduction Rider.
b. If your answer to (a) is yes, please identify the number of employees that will participate in the Rider's development and administration and identify the accounting treatment of those costs.
c. If your answer to (a) is yes, identify whether Columbia will recover the cost of such employees through distribution rates, as well as the amount of cost associated with those employees proposed for recovery through distribution rates.

**Response:**

a. Yes.

b. – c. The Ohio Regulatory Team will be working on the Carbon Reduction Rider, and these employees recover their time through distribution rates.

**COLUMBIA GAS OF OHIO, INC.**
**RESPONSE TO INTERSTATE GAS SUPPLY INC.'S INTERROGATORY**
**DATED SEPTEMBER 17, 2021**

**Interrogatory Set 2, No. 11:**

Staff Data Request One; Data Request No. 47, Question 5, asked "[w]ill the charges associated with participating in the program and the applicable carbon offsets purchased (type and quantity) pursuant to the program show up on participating customers' bills?" In response, Columbia indicated, "[y]es, if a customer chooses to opt-in to the Carbon Reduction Rider, it will show up on a customer's bill." Regarding this response:

(a) indicate whether Columbia plans to bill the carbon-neutral natural gas rider as a separate charge or line item on customer bills.

(b) If the answer to (a) is yes, identify the total information technology, administrative, and other costs necessary for Columbia to provide this billing service to customers, and the mechanism that Columbia proposes to use (e.g. Rider, rate, etc.) to recover those costs.

**Response:**

a. Columbia plans to bill the Carbon Reduction Rider as a separate line item on a customer's bill.

b. Because the Carbon Reduction Rider is a new mechanism, Columbia is in the preliminary stages of developing the rider and, as such, Columbia does not currently have information to respond to this interrogatory.

PUCO Case Nos. 21-0637-GA-AIR, *et al.*
IGS Interrogatory Set 2, No. 17
Respondent: Melissa L. Thompson

**COLUMBIA GAS OF OHIO, INC.**
**RESPONSE TO INTERSTATE GAS SUPPLY INC.'S INTERROGATORY**
**DATED SEPTEMBER 17, 2021**

**Interrogatory Set 2, No. 17:**

Referring to the proposed Carbon Reduction Rider, please state whether Columbia intends to purchase actual renewable gas or just the environmental attributes of this gas? If Columbia intends to purchase actual renewable gas, how much Columbia will pay per ton for each offset?

**Response:**

Because the Carbon Reduction Rider is a new mechanism, Columbia is in the preliminary stages of developing the rider and, as such, Columbia does not currently intend to purchase renewable gas or the environmental attributes of renewable gas.

**COLUMBIA GAS OF OHIO, INC.**
**RESPONSE TO INTERSTATE GAS SUPPLY INC.'S INTERROGATORY**
**DATED SEPTEMBER 17, 2021**

**Interrogatory Set 2, No. 24:**

Please provide Columbia's estimate of the marketing costs associated with the proposed Carbon Reduction Rider and identify how Columbia proposes to recover such costs.

**Response:**

Please see Columbia's Response to IGS Interrogatory Set 2, No. 8.