

**From:** [PUCO Consumer Call Center](#)  
**To:** [Puco Docketing](#)  
**Subject:** PUBLIC UTILITIES COMMISSION OF OHIO - CASE #: 00776406 [ ref:\_00Dt0GzXt\_5008y5BNLD:ref ]  
**Date:** Thursday, September 1, 2022 4:13:04 PM

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**PUBLIC UTILITIES COMMISSION OF OHIO  
Consumer Service Division  
Memorandum**

**CASE ID:** 00776406  
**COMPANY:** Advocates for Basic Legal Equality, Inc.  
**CUSTOMER:** David Manor  
**ADDRESS:** 525 Jefferson Avenue, Toledo, Ohio 43604  
**SERVICE ADDRESS:** 525 Jefferson Avenue, Toledo, Ohio 43604  
**AIQ:** Columbia Gas of Ohio  
**NIQ:** 4199302340

\*\*\*To ensure your response attaches to the appropriate case, please reply to this email without changing the subject line. Thank you!\*\*\*

**DOCKETING CASE #: 21-0637-GA-AIR**

**SUBJECT:** Columbia Gas of Ohio - Protest Rate Case

Please docket the associated customer comment and/or attached in the case number referenced above under "Public Comments". This information was received by the Consumer Services Division through alternate channels and is being forwarded to be filed formally. This information is not the opinion of Staff and should not be viewed as such.

- ○ Description (1/3): August 29, 2022

Ms. Tanowa Troupe  
Public Utilities Commission of Ohio  
180 East Broad Street

Columbus, Ohio 43215

Re: Case Nos. 21-0637-GA-AIR, et al.

STATEMENT OF LOW INCOME CUSTOMERS AGAINST  
PROPOSED RATE INCREASE

Dear Ms. Troupe:

Advocates for Basic Legal Equality, Inc. (ABLE) is a non-profit law firm that provides legal assistance in civil matters to help low-income individuals and groups in Ohio. ABLE works to make systematic changes to positively impact the lives of low-income community members. ABLE strives to help those who are the most vulnerable in our society obtain a voice to advocate for social and systematic change, and to bring light to the struggles and needs of those who are unable to represent themselves. In an effort to represent the interests of the communities that we represent, ABLE submits these comments on the proposed application to increase rates, submitted by Columbia Gas of Ohio, Inc.

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- Columbia Gas of Ohio proposes a \$212 million rate increase, which would be approximately a 27% increase to the present rates for residents of Ohio. This rate increase proposal includes a charge of 11% profit to consumers by Columbia Gas of Ohio. Many of the proposed rate changes would be for the delivery, not the supply, of natural gas. These flat charges for delivery would be the same regardless of actual usage. Columbia Gas of Ohio's proposal would result in the current fixed monthly distribution rate being raised from \$16.75 to \$46.31 , thus tripling the monthly gas bill for those members of the community which rely upon this service. This rate would be set to continually increase, resulting in a fixed monthly rate of \$80 in five years. These rate increases would put undue burden on those who have low and fixed incomes, straining Ohioans access to natural gas.
- Columbia Gas of Ohio's proposal is an unreasonable increase. The current proposal is flawed in three different and distinct ways. Firstly, it puts far too high of a burden upon the low and fixed income communities. Secondly, the proposal comes at a time when Ohioans are already struggling as the economy recovers from the Covid-19 virus. Finally, the proposal is flawed in that it uses a test year which has incredibly high and potentially unsustainable inflation. For these reasons ABLE stands strong with other community partners, against this unreasonable request for a rate increase.

- The current proposal puts an undue and unreasonable burden upon low and fixed income families. Without natural gas, it becomes virtually impossible for most Ohioans to cook, use a dryer, or heat water for bathing. The price of Natural Gas directly impacts people's ability to feed themselves and bath. It is not a utility that Ohioans can easily reduce their usage of. Sanitary conditions and the ability to cook food are fundamental requirements for sufficient living conditions. Yet, the most fundamental reason natural gas price increase will have an extreme impact upon Ohioans is the weather. The current season has undoubtedly made considerations of the need for heating a secondary thought. It is fundamental, however, to consider the negative effects that an increase such as this will have upon those of a fixed and low income during the winter season.
- Those who are on the fixed monthly rate may suffer the most from this rate increase. The rate would be almost tripled from \$16.75 to \$46.31, yet this is not the end result. In a five year time span the rates would continue to increase until they reach 4.77X what they were prior to this proposal, when the rates increase to \$80. Many low and fixed income families are already struggling, and simply cannot afford an increase of this size. It is unreasonable to ask for any bill to have this level of increase. It is also important to remember that this proposal would result in consumers being charged 11% profit. It is unreasonable to ask low and fixed income individuals to support a profit increase for Columbia Gas of Ohio, by tripling rates for those on the fixed monthly plan at this time.
- - Over the course of 2022 inflation rates have already reached 8.6%. This is 6.14X the 2019 inflation rate of 1.4%. With the lifting of the moratorium on evictions, the decreased availability of stimulus funds, and the already high pricing for electricity of gasoline, Ohioans simply cannot afford another major rate increase. The economy is still struggling to recover from the events of the pandemic. To force a rate increase of this magnitude upon the people would be simply unreasonable. Those in low and fixed income situations especially cannot afford more rate increase and inflation at this time. Not only is the proposal from Columbia Gas of Ohio unreasonable, it also comes at an unreasonable time.
  - The proposal by Columbia Gas of Ohio is inherently flawed, as the test year in question is noted for extreme levels of inflation. A test year should be representative of coming economic trends and the current economic state. The year 2021 fails to

meet this criterion. During 2021 there was a 7.4% rate of inflation for nondurable goods, 10.6% rate increase for durable goods, and a 4.3% increase for services. The Consumer Price Index measured a 7.1% rate of inflation across the board, and a staggering 29% increase in the inflation rate for energy related costs. While there are a plethora of reasons for such a high inflation rate during 2021, the most important consideration is that because there was such a high rate of inflation, it is unreasonable to use 2021 as a test year for the raising of rates.

- The prices of natural gas overall went up very significantly compared to previous years, making it appear as though a rate increase were needed. The reality is that the year 2021 may not be an accurate estimation of coming market trends. The increased inflation is a cause of great concern among many scholars. It should be expected that the federal government will act to lower the staggering rate of inflation our nation is suffering from, as many scholars predict dangerous implications for the US economy if this trend continues.
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- Allowing Columbia Gas of Ohio to increase rates when the test period uses extreme inflation would skew the results of the test year in the favor of Columbia Gas of Ohio. The extreme rates of inflation show that numbers presented by Columbia Gas of Ohio may be overly inflated, and that in a few years, as inflation hopefully declines, the numbers could result in a much higher level of profit than would normally be considered acceptable and reasonable. This decision must be looked at through a lens of economic skepticism, with the knowledge that the US Economy is going through a time of major upheaval. To do anything else would be to allow Columbia Gas of Ohio to take advantage of the increased rate of inflation and economic difficulties present during the nations recovery from the pandemic.
- The mass amount of inflation in the previous few years have resulted in untold hardships by the people of Ohio. The year 2020 was a difficult time, full of fear and an uncertain future. The year 2021 was a time of economic hardship, as we began to emerge from our fear and rebuild a nation suffering. The path to rebuilding is a long and arduous one, that can only be successful through mutual trust and understanding for our fellow human beings. While some areas have begun to return to normalcy, many more are still struggling in the wake of the events of Covid-19. Many low-income neighborhoods and fixed income individuals are still struggling to pay their bills. The people of Ohio have weathered so much, it is not

reasonable to ask them to take on another, so extreme, hardship. The year of 2021 is not conducive to discussing a rate increase, for it was a year of extreme economic inflation. The people of Ohio are already suffering under such heavy burdens, a increasing the fixed monthly gas rate by three times what it is at present is an unreasonable request for any utility bill, let alone for a natural gas bill. The increase would create an especially egregious burden upon those of low and fixed income households. For all of the reasons stated above, and on behalf of all those in the communities served by ABLE that have no voice, we stand adamantly opposed to the unreasonable proposal by Columbia Gas of Ohio, and humbly submit this letter for your consideration.

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- Respectfully Submitted,

- /s/David Manor                    
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**in**

**Case No(s). 21-0637-GA-AIR, 21-0638-GA-ALT, 21-0639-GA-UNC, 21-0640-GA-  
AAM**

Summary: Public Comment Regarding the Rate Case filed by David Manor, via  
website, electronically filed by Docketing Staff on behalf of Docketing