

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of the       )  
Minimum Gas Service Standards in       )       Case No. 22-809-GA-ORD  
Ohio Adm.Code Chapter 4901:1-13.       )

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

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On October 5, 2022, the Public Utilities Commission of Ohio (the “Commission”) directed that interested parties file comments to Staff’s proposed changes to Ohio Adm.Code 4901:1-13 (the “Rules”). Columbia Gas of Ohio, Inc. (“Columbia”) provides these Initial Comments for the Commission’s consideration in its efforts to reduce the number of regulatory restrictions contained in the Rules.<sup>1</sup>

**I.       4901:1-13-05 Minimum Customer Service Levels**

Staff’s proposed changes to Ohio Adm.Code 4901:1-13-05(A)(1) and (A)(2) delete language stating “and all necessary tariff and regulatory requirements have been met” from the provisions outlining the deadline for service line installations. Columbia recognizes that this language is presumably redundant given other requirements in the Administrative and Revised Codes requiring regulated distribution companies to follow tariffs and regulatory requirements. However, the presence of this language in the Administrative Code provides Columbia with protection from presumptive violations of the deadlines prescribed by these provisions in instances when the installation of a service line would violate a provision of a company’s tariff. If the Commission deletes this language, such an action could be understood to require the installation of service lines even if doing so would be in violation of a tariff or other regulatory requirement. Columbia respectfully requests that the Commission reject the deletion of this clause.

In addition to retaining the language proposed to be removed, Columbia proposes that “company standards” be added to the language of the rule. This

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<sup>1</sup> See R.C. 121.951(A)(1).

additional language ensures that distribution companies would not be in violation of the deadlines outlined in this chapter for delaying installation in order to avoid installing a service line when such installation would violate an internal company standard.

This request might best be explained using a relevant example. Customer service line installation requests sometimes come in prior to the completion of construction related to a residential property. In certain instances, considerable construction or earthen back-filling work may still be required in the area above where the service line is to be installed. Installing prior to the completion of this work would violate Columbia's internal safety standards as the movement could damage a newly installed service line. Such an instance might be considered a violation of the deadline for the timely installation of service lines under the rule without Columbia's proposed modification.

(A) Service initiation and upgrades. Each gas or natural gas company shall complete the installation of new service as set forth in this paragraph.

Percentages shall be calculated as monthly averages.

(1) Ninety per cent of residential and small commercial new service requests requiring no installation of gas pipelines shall comply with either one of the following requirements:

(a) Requests will be completed within three business days after the gas or natural gas company has been notified that the customer's service location is ready for service and all necessary tariff, [company](#), and regulatory requirements have been met.

(b) Requests will be completed by the requested installation date, when a customer requests an installation date more than three business days after the customer's service location is ready for service and all necessary tariff, [company](#), and regulatory requirements have been met.

(2) Ninety per cent of residential and small commercial new service requests requiring installation of the service line, including the setting of the meter, shall comply with either one of the following requirements:

(a) Requests will be completed within twenty business days after the gas or natural gas company has been notified that the customer's service location is ready for service and all necessary tariff, [company](#), and regulatory requirements have been met.

(b) Requests will be completed by the requested installation date, when a customer requests an installation date more than twenty business days after the customer's service location is ready for

service and all necessary tariff, [company](#), and regulatory requirements have been met.

Columbia also seeks additional clarity for meter testing that occurs for the small set of non-residential customers that operate boilers. R.C. Chapter 4104 governs this set of customers, who are responsible for their own testing of facilities.<sup>2</sup> In these instances, industrial customers are acting as the “operator” for regulatory purposes. However, a plain reading of Ohio Adm.Code 4901:1-13-05(A) might present confusion in this situation. In order to ensure that compliance with R.C. 4104 does not create an inadvertent violation of Ohio Adm.Code 4901:1-13-05, Columbia respectfully requests the below language be added to Ohio Adm.Code 4901:1-13-05(A)(3):

(3) Prior to initial operation or reestablishment of residential or nonresidential gas service (including after an outage), the gas piping downstream of the meter shall be tested to determine that no leaks exist. Testing may be accomplished by pressure testing or dial testing as set forth in paragraphs (A)(3)(a) to (A)(3)(d) of this rule, [or, as applicable, in accordance with section 4101.41 of the Revised Code](#).

Finally, a practical reality presents compliance issues for Ohio Adm.Code 4901:1-13-05(D). This section mandates an “end of the next day” deadline for the repair of services lines that have been shut down as the result of a leak. However, there are sometimes incidents when Columbia is unable to repair a service line in a timely manner due to a lack of marking of other utility facilities in the area around the service line. Before repairing, Columbia, like any other responsible excavator, calls 811 to seek the location of any underground facilities near the shut-off service line. For obvious safety reasons, Columbia’s standards and procedures do not permit the repair of underground facilities until these locates occur. If other utilities are unable to mark their underground facilities prior to “the end of the next day,” Columbia is placed in the untenable position of either violating this section of the Rules or potentially damaging an underground utility facility.

Because the underground utility facility provisions of the Revised Code<sup>3</sup> provide a forty-eight-hour window for locating underground facilities, Columbia respectfully requests that a twenty-four-hour window for repairs begin after surrounding facilities

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<sup>2</sup> See R.C. 4104.42(A)(1), which requires that testing for “power piping or process piping system(s)” be in compliance with “the B31 standards contained in the code for pressure piping, published by the American society of mechanical engineers”

<sup>3</sup> See R.C. 3781-28.

are located. Because Columbia is not ever certain of the moment that every facility will be located, and for the sake of simplicity, Columbia recommends that a seventy-two-hour requirement replace the current language of the rule. This can be effectuated with the following language:

(D) If the gas or natural gas company repairs customer service lines, the company shall complete the repair of service-line leaks that require service shutoff ~~by the end of the next day~~ within seventy-two hours, excluding Saturdays, Sundays, and legal holidays, after the service has been shut off for residential and small commercial customers, unless the company is unable to perform the repair or replacement due to lack of access or unsafe working conditions. At the customer's request, the customer and the company may agree upon a mutually acceptable timeframe for the completion of repairs or replacement requiring either a discontinuance of service or a scheduled discontinuation. On an average monthly basis, each gas or natural gas company shall complete ninety-five per cent of these repairs ~~by the end of the next day after the service has been shut off~~ as proscribed in this Chapter.

Columbia appreciates the opportunity presented by the Commission to offer these suggestions and respectfully requests that it consider the recommendations presented herein.

**COLUMBIA GAS OF OHIO, INC.**

/s/ John R. Ryan

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**This foregoing document was electronically filed with the Public Utilities  
Commission of Ohio Docketing Information System on**

**11/2/2022 4:06:19 PM**

**in**

**Case No(s). 22-0809-GA-ORD**

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