

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

(willing to accept service by e-mail)

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In the Matter of the Review of the)
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Adm. Code Chapter 4901:1-13.)

I. INTRODUCTION

There is never a good time to compromise on consumer protections, but especially during a time of soaring energy prices, inflation, and a potential recession as consumers are presently facing. The minimum gas service standards serve the important purpose of promoting, for millions of Ohio natural gas consumers, the availability of adequate, reliable, and reasonably priced natural gas services to consumers.¹ The Public Utilities Commission of Ohio (“PUCO”) has invited comments and reply comments on its Staff’s proposed changes to these standards in the Ohio Administrative Code.² The Office of the Ohio Consumers’ Counsel (“OCC”) appreciates this opportunity to provide recommendations for improving the quality of service for natural gas customers in Ohio. The PUCO should adopt OCC’s recommendations.

¹ R.C. 4929.02(A)(1).

² *In re the Commission's Review of the Minimum Gas Service Standards in Chapter 4901:1-13 of the Ohio Administrative Code*, Case No. 19-1429-GA-ORD, Entry, (December 18, 2019).

II. RECOMMENDATIONS

- A. **O.A.C. 4901:1-13-02(D): TO MAXIMIZE CONSUMER PROTECTION, THE PUCO SHOULD REJECT THE PUCO STAFF'S PROPOSAL TO DELETE THE EXISTING RULE THAT PROVIDES THAT THE RULES IN O.A.C. CHAPTER 4901:1-13 DO NOT RELIEVE NATURAL GAS UTILITIES FROM PROVIDING ADEQUATE SERVICE AND FACILITIES AS PRESCRIBED BY THE COMMISSION AND COMPLYING WITH THE LAWS OF THIS STATE.**

The PUCO Staff proposes to delete existing Rule 4901:1-13-02(D). It provides that the rules in O.A.C Chapter 4901:1-13 do not relieve natural gas utilities from providing adequate service and facilities as prescribed by the commission and complying with the laws of this state. OCC recommends that the PUCO reject the Staff's proposed deletion and keep Rule 4901:1-13-02(D) as it is currently written.

It is axiomatic that natural gas utilities should be required to provide adequate service and facilities as directed by the PUCO and comply with Ohio law. Many Ohio consumers depend on the gas and the natural gas companies to provide adequate service for essential natural gas service for home heating, water heating, cooking, laundry, and many other uses. Further, consumers have a right to expect that the natural gas facilities that deliver their natural gas are safe and reliable and that the utilities delivering the natural gas are complying with all applicable Ohio laws. Existing Rule 4901:1-13-02(D) should not be deleted.

Perhaps the PUCO Staff is recommending deleting the rule because Ohio law (R.C. 4905.22) already requires Ohio utilities (including natural gas utilities) to furnish necessary and adequate facilities and services.³ If so, this rationale omits the key

³ R.C. 4905.22.

provision in the existing rule that natural gas services and facilities must be provided “as prescribed by the Commission.” This means that the PUCO, and not the utilities, will determine what services and facilities are necessary, reasonable, safe, and adequate. This important safeguard should not be lost. Therefore, OCC recommends that O.A.C. 4901:1-13-02(D) should not be eliminated and that the rule should be maintained as it is currently written. It should state that:

- (D) The rules in this chapter shall not relieve the gas or natural gas companies from either of the following:
 - (1) Providing adequate service and facilities as prescribed by the commission.
 - (2) Complying with the laws of this state.

B. O.A.C. 4901:1-13-02(H): TO MAINTAIN BASIC CONSUMER PROTECTION, THE PUCO SHOULD REJECT THE PUCO STAFF’S PROPOSAL TO DELETE PARTS OF THE EXISTING RULE THAT PROVIDES THAT NATURAL GAS COMPANY TARIFFS SHOULD NOT INCLUDE PROVISIONS THAT WOULD IMPOSE LIABILITIES ON CONSUMERS FOR ACTS OR FAILURE TO ACT CONCERNING NATURAL GAS FACILITIES THAT ARE BEYOND THE CONSUMER’S CONTROL.

The PUCO Staff proposes to delete parts of Rule 4901-1-13-02(H) as follows:

- (H) No tariff of a gas or natural gas company shall incorporate exculpatory clauses that purport to limit or eliminate liability on the part of the gas or natural gas company ~~to its customers or others~~ as a result of its own negligence when providing a regulated service. ~~No gas or natural gas company tariff shall incorporate provisions which purport to establish liability on the part of the gas or natural gas company's customers for acts or failures to act involving a gas or natural gas company's facilities, which are beyond the control of the customer. Any contrary provisions in a gas or natural gas company's tariff now on file with the commission shall be eliminated.~~

To preserve basic consumer protections, the PUCO should reject the Staff’s proposed deletions. Natural gas consumers obviously cannot control circumstances or happenstances beyond their control. And they should not be held liable for things beyond

their control. Therefore, the rule provisions prohibiting a natural gas utility from attempting to impose liability on consumers for actions or failures to act relating to utility facilities should be retained. The PUCO Staff's proposed deletions should be rejected, and the PUCO should maintain Rule O.A.C 4901:1-13-02(H) as it is currently written and should read as follows:

- (H) No tariff of a gas or natural gas company shall incorporate exculpatory clauses that purport to limit or eliminate liability on the part of the gas or natural gas company to its customers or others-as a result of its own negligence when providing a regulated service. No gas or natural gas company tariff shall incorporate provisions which purport to establish liability on the part of the gas or natural gas company's customers for acts or failures to act involving a gas or natural gas company's facilities, which are beyond the control of the customer. Any contrary provisions in a gas or natural gas company's tariff now on file with the commission shall be eliminated.

C. O.A.C. 4901:1-13-03(A): THE PUCO SHOULD REJECT THE STAFF'S PROPOSAL TO DELETE PART (A) OF THE EXISTING RULE THAT PROVIDES THAT EACH NATURAL GAS COMPANY SHALL MAINTAIN AND HAVE AVAILABLE FOR AUDITING AND INSPECTION ANY AND ALL UTILITY PROPERTY AND ALL ASSOCIATED EQUIPMENT.

The title of Rule 4901:1-13-03 is "Retention of records and access to records and business activities." The rule should include a general requirement that natural gas utilities should maintain and make available for auditing and inspection any and all records associated with all utility property and equipment.

Even though O.A.C. 4901:1-13-03(B) provides that "[t]he regulations governing the retention and preservation of gas or natural gas company records are set forth in the appendix to rule 4901:1-9-06 of the Administrative Code," that rule refers only to an appendix. There should still be a rule requirement in the Ohio Administrative Code that addresses records maintenance and retention of natural gas utility records that the natural

gas utilities must maintain and retain records for review and audit by the PUCO. While it is appropriate that a rule appendix sets forth what records and in what manner records should maintained, the basic requirement that natural gas utilities must maintain and retain records for PUCO review and audit should be retained. Therefore, the PUCO Staff's proposed deletion of Rule O.A.C. 4901:1-13-03(A) should be rejected. The rule should keep its existing form and should read:

- (A) Each gas and natural gas company shall maintain and have available for auditing and inspection any and all utility property and all associated equipment.
- D. O.A.C. 4901:1-13-04(B), (C), (D), (D)(2), (D)(4), (F)(1), (F)(2), (G)(1), (G)(1)(a), (G)(1)(b), (G)(1)(c), and (G)(2): TO PRESERVE CONSUMER RIGHTS AND FOR CONSUMER PROTECTION, THE PUCO SHOULD REJECT THE SUBSTANTIVE DELETIONS AND MODIFICATIONS TO THE NATURAL GAS METERING RULES RECOMMENDED BY THE PUCO STAFF.**

The PUCO Staff proposed several deletions and modifications to the wording of the Natural Gas Metering Rules contained in Rule O.A.C. 4901:1-13-04. All of the substantive deletions should be rejected.

Specifically, the PUCO Staff proposed modifying O.A.C. 4901:1-13-04 concerning requirements for natural gas metering as follows:

4901:1-13-04 Metering.

- (A) Service provided by a gas or natural gas company shall be metered, except where it is impractical to meter the gas usage, such as in street lighting and temporary or special installations. The usage in such exceptions may be calculated or billed in accordance with an approved tariff on file with the commission.
- ~~(B) A customer's usage shall be metered by commercially acceptable measuring devices. Meter accuracy shall also comply with the standards found in section 4933.09 of the Revised Code. No metering device shall be placed in service or knowingly allowed to remain in service if it violates these standards.~~

- (C) Gas or natural gas company ~~employees or~~ authorized agents ~~of a gas or natural gas company~~ shall have the right of access to metering equipment ~~for the purpose of reading, replacing, repairing, inspecting, or testing the meter, or determining that the installation of the metering equipment is in compliance with the company's requirements.~~
- (D) Meter test at customer's request. ~~Metering accuracy shall be the responsibility of the gas or natural gas company.~~
- (1) Upon request by a customer, the company shall test its meter to verify its compliance with section 4933.09 of the Revised Code, within thirty business days after the date of the request.
 - (2) The customer or the customer's representative has the right to be present when the meter test is performed at the customer's request. ~~The customer shall be informed by the company of the customer's right to be present at the meter test during the time that such meter test is being scheduled.~~
 - (3) A written explanation of the test results shall be provided to the customer within ten business days of the completed test.
 - (4) Each company shall notify the customer of applicable tariff charges prior to the test. ~~Such charges must be set forth in the company's tariff.~~
 - (5) If the accuracy of the meter is found to be outside the tolerances specified in section 4933.09 of the Revised Code, the gas or natural gas company shall do all of the following:
 - ~~(a)~~ Not charge a fee or recover any testing expenses from the customer.
 - ~~(b)~~ Provide a properly functioning meter without charge to the customer.
 - ~~(c)~~ Within thirty days, pay or credit, at the customer's discretion, any overpayment to the customer, in accordance with one of the following billing adjustments:
 - (i) When the company or customer has reasonably established the approximate period of meter inaccuracy, the overcharge shall be computed on the basis of a customer's metered usage prior and/or subsequent to such period

consistent with the rates in effect during that period.

- (ii) When the company and customer cannot reasonably establish the approximate period of meter inaccuracy, the overcharge period shall be determined to be the most recent twelve months, or the period since the date of the most recent meter test performed, whichever is less. The rates applicable shall be those in effect during the period of inaccuracy in order to determine the appropriate credit or refund.

Paragraph (D)(5) of this rule ~~shall~~does not apply in the event there has been either tampering with or unauthorized reconnection of the meter, metering equipment, or other property of the gas or natural gas company during the involved period of time, where such activity causes meter or metering inaccuracies or no measurement of service.

- (E) Each gas or natural gas company shall identify each customer meter that it owns, operates, or maintains, by serial or assigned meter numbers and/or letters, placed in a conspicuous position on the meter.
- (F) In accordance with the records retention schedules set forth in the appendix to rule 4901:1-9-06 of the Administrative Code, each gas or natural gas company shall:
 - (1) ~~M~~maintain all of the ~~following~~ meter test records for two years or until the next superseding test, whichever is longer:
 - (a) ~~— Date of customer's request for each test.~~
 - (b) ~~— Date and reason for each test.~~
 - (c) ~~— Test results.~~
 - (d) ~~— Meter reading(s) before and after each test.~~
 - (e) ~~— Accuracy "as found" and "as left."~~
 - (2) ~~Keep all of the following records for the life of the meter:~~
 - (a) ~~— Identification and location of the meter.~~
 - (b) ~~— Date of installation and removal from service.~~
 - (c) ~~— Serial or assigned meter number.~~

(G) Meter reading.

- (1) Each gas or natural gas company shall obtain actual readings of its customer meters at least once every twelve months. At a minimum, each company shall make reasonable attempts to obtain actual readings of its customer meters every other month, except where the customer and the company have agreed to other arrangements. Meter readings taken by electronic means (i.e., automated meter reading equipment) ~~shall be~~ considered actual readings. While remote meter index equipment readings may be used by a company, they do not qualify as actual meter readings. ~~When billing customers based on estimated usage, the gas or natural gas company shall calculate the amount due using the applicable rate(s) in effect during each period of estimated usage.~~ Once operationally feasible, actual meter reads shall be performed by the company on a monthly basis when automatic meter reading equipment is installed in a specific geographic area of the company.

~~(a) Each gas or natural gas company shall submit a plan to the director of the commission's service monitoring and enforcement department to read all customer meters at least once every twelve months. Plans should include the steps, notices, and measures the company intends to take in order to read each customer's meter at least once every twelve months. Each gas or natural gas company shall submit any revisions of its plan to the director of the service monitoring and enforcement department or the director's designee for review.~~

~~(b) If the director of the service monitoring and enforcement department or the director's designee rejects the plan or does not approve the company's plan within one hundred twenty days of submittal, the gas or natural gas company may file a request with the commission for a hearing seeking approval of its plan. In such event, the gas or natural gas company shall file a written report and provide documentation supporting its plan.~~

~~(c) Adherence to the procedures of a gas or natural gas company's plan, accepted under the terms of this rule, shall place that gas or natural gas company in compliance with the requirement to read each customer meter at least once every twelve months. In the event that a complaint proceeding is brought under section 4905.26 of the Revised Code, alleging that a gas or natural gas company failed to read the customer meter at least once in the twelve month period, adherence to the~~

~~company's accepted plan will also create a rebuttable presumption that the company's failure to read the customer meter at least once in the twelve month period was a matter beyond its control.~~

- (2) ~~Billing adjustments for residential customers shall comply with section 4933.28 of the Revised Code.~~ When a gas or natural gas company has undercharged any residential customer as the result of a meter or metering inaccuracy, billing problem, or other continuing problem under the gas or natural gas company's control, the company may only bill the customer for the amount of the unmetered gas rendered in the three hundred sixty- five days immediately prior to the date the company remedies the meter inaccuracy. Customers shall be notified by the gas or natural gas company of their right to have twelve months to pay, in equal installments, any undercharge for unmetered gas service.
- (3) When a gas or natural gas company has undercharged any small commercial customer as the result of a meter or metering inaccuracy, billing problem, or other continuing problem under the gas or natural gas company's control, unless the customer and the company agree otherwise, the maximum portion of the undercharge that may be billed to the small commercial customer in any billing month, based upon the appropriate rates, ~~shall be is~~ determined by dividing the amount of the undercharge by the number of months of undercharged service. The company may only bill the customer for the amount of the unmetered gas rendered in the thirty-six month period immediately prior to the date the company remedies the meter inaccuracy. Each gas or natural gas company shall state the total amount to be collected in the first bill under this rule. This paragraph ~~shall does~~ not affect the gas or natural gas company's recovery of regular monthly charges.
- (4) This rule ~~shall does~~ not apply in the event there has been either the tampering with or the unauthorized reconnection of the meter, metering equipment, or other property of the gas or natural gas company during the involved period of time, where such activity causes meter or metering inaccuracies or no measurement of service.
- (5) Upon the customer's request, and in addition to the requirements of paragraph (G)(1) of this rule, the gas or natural gas company shall provide two actual meter readings, without charge, per calendar year. The customer may only request an actual meter reading, without charge, if the customer's usage has been estimated for more than two of the immediately preceding

billing cycles consecutively or if the customer has reasonable grounds to believe that the meter is malfunctioning. Nothing in the preceding sentence is intended to limit a customer's ability to obtain a meter reading prior to transferring service to a new retail natural gas supplier or governmental aggregator as provided by paragraph (J) of rule 4901:1-29-06 of the Administrative Code.

- (6) Each gas or natural gas company is required to do an actual meter reading at the initiation and/or the termination of service if the meter has not been read within the immediately preceding seventy days and access to the meter is provided.
- (7) If a gas or natural gas company has read the meter within the immediately preceding seventy days, it shall inform the customer, when the customer contacts the company to initiate or terminate service, of the customer's right to have an actual meter read at no charge to the customer.
- (8) When a meter reading is scheduled through a menu-driven, automated, interactive answering system that allows the customer to interact electronically rather than through a live person, the gas or natural gas company shall provide confirmation (e.g., order confirmation number, written letter) to the customer by the following business day, verifying the nature of the interaction and any appointment made.
- (9) Where there is a landlord/tenant relationship and neither the gas or natural gas company nor the customer has access to the meter, the gas or natural gas company shall render notice by mail to both the landlord, when the address is available, and the tenant, summarizing its inability to obtain access to the meter for any of the provisions of this rule.

The PUCO should reject all of the substantive deletions proposed by the PUCO Staff. As noted above, it is essential that consumers have faith that the meters that measure their natural gas usage are accurate. Consumers' rights to challenge the accuracy of their meters should not be reduced. Therefore, the meter accuracy standards, requirements for natural gas utility employee access to consumer premises to confirm meter accuracy, and requirements for meter tests at consumers' requests in existing O.A.C. 4901:1-13-04(B), (C), and (D), should remain unchanged and the PUCO should

not adopt the PUCO Staff's proposed deletions. Relatedly, records of meter accuracy must be maintained to confirm accuracy when questions or concerns arise. Thus, the current language in Divisions (F)(1) and (F)(2) of O.A.C. 4901:1-13-04 should be retained without change.

Regarding the meter reading provisions in Division (G), again it is fundamental and essential that consumers have faith that the meters that determine their natural gas usage are accurate. Therefore, the PUCO should reject the PUCO Staff's recommended deletions to 4901:1-13-04(G)(1) and (G)(2). The PUCO should retain the existing requirements for natural gas utilities to submit a plan for PUCO Staff approval for reading consumer meters at least once every 12 months, and that adjustments to consumer bills must comply with R.C. 4933.28.

It is important that consumers trust the accuracy of their meters and have the ability to verify the accuracy of their meters. OCC recommends that the PUCO not adopt the substantive deletions to Rule 4901:1-13-04 outlined above. The PUCO should keep the existing rules in place to foster consumer confidence that the meters that measure their natural gas usage are accurate and that the PUCO is overseeing the accuracy of the meters.

E. O.A.C. 4901:1-13-05(E)(1) AND (E)(2): THE PUCO SHOULD NOT ADOPT THE PUCO STAFF'S RECOMMENDATIONS TO DELETE SECTIONS OF THE RULE THAT REQUIRE UTILITY NOTIFICATIONS OF FAILURE TO MEET MINIMUM SERVICE LEVELS FOR TWO CONSECUTIVE MONTHS TO IDENTIFY FACTORS THAT LED TO THE FAILURE AND REMEDIAL ACTIONS TAKEN AND FOR PUCO STAFF REVIEW OF SUCH NOTIFICATIONS.

OCC opposes PUCO Staff's proposed amendments to O.A.C. 4901:1-13-05(E)(1). The current (and proposed) rule provides that if a gas or natural gas utility does

not meet the minimum service levels set forth in Divisions (A), (B), (C), or (D) of the rule, for any two consecutive months, the utility must notify the Director of the PUCO's Service Monitoring and Enforcement Department or the Director's designee in writing within thirty days after such failure. The PUCO Staff recommends deleting a provision in the current rule that requires the natural gas utility's notice include the factors that contributed to not meeting the minimum service levels, along with remedial action taken.

The PUCO should reject this proposed deletion. If a natural gas utility does not meet the minimum service levels set forth in O.A.C. 4901:1-13-05, then the utility should report to the PUCO and/or PUCO Staff all factors that contributed to the failure and how the utility plans to correct the minimum customer service level failures. Without identifying the factors that led to the utility missing the minimum service levels and the corrective action taken, the PUCO and its Staff would not know that a utility has performed proper root cause analyses to determine the factors that caused its failure to meet the minimum service levels or what measures it has taken to remedy the failure.

Similarly, a primary and fundamental responsibility of a utility commission is to ensure that monopoly utility services and facilities meet minimum service levels. Therefore, the PUCO should not adopt the PUCO Staff recommendation to delete O.A.C. 4901:1-13-05(E)(2). It requires the PUCO Staff to review and evaluate the failure reports required by the rule and to make any necessary recommendations to the PUCO or the gas or natural gas utility on the reports. The PUCO and utility consumers should have the benefit of the PUCO Staff's review of a natural gas utility's report on its failure to meet minimum service levels for two consecutive months.

OCC proposes the following amended language remain in 4901:1-13-05:

(E) Reporting requirements.

- (1) When a gas or natural gas company does not meet the minimum service level set forth in paragraph (A), (B), (C), or (D) of this rule, for any two consecutive months, the gas or natural gas company shall notify the director of the commission's service monitoring and enforcement department or the director's designee in writing within thirty days after such failure. The notification shall include any factors that contributed to such failure, as well as any remedial action taken or planned to be taken or rationale for not taking any remedial action. Any failure to report the lack of compliance with the minimum service levels set forth in paragraph (A), (B), (C), or (D) of this rule constitutes a violation of this rule.
- (2) The commission staff shall review and evaluate the failure reports required by this rule and make any necessary recommendations to the commission or the gas or natural gas company.

F. O.A.C. 4901:1-13-06(A) AND (B): THE PUCO SHOULD NOT ADOPT THE PUCO STAFF'S RECOMMENDATION TO DELETE O.A.C. 4901:1-13-06(A) THAT REQUIRES NATURAL GAS UTILITIES TO MAINTAIN AND MAKE AVAILABLE A HANDBOOK OF CONSUMER RIGHTS AND OBLIGATIONS. AND THE PUCO SHOULD REJECT STAFF'S PROPOSAL TO DELETE THE SECTIONS OF O.A.C. 4901:1-13-06(B) THAT REQUIRES THE SUMMARY OF NATURAL GAS UTILITY CONSUMER RIGHTS BE CLEAR AND UNDERSTANDABLE AND BE SUBMITTED TO STAFF FOR REVIEW BEFORE BEING SENT TO CONSUMERS.

The PUCO should not adopt the PUCO Staff's recommendation to delete Rule 4901:1-13-06(A). It requires each natural gas utility to maintain and make available a handbook of customer rights and obligations. A handbook of consumer rights and obligations is by definition more comprehensive and detailed than a summary of such rights and obligations. Consumers should have available to them a detailed description of their rights and obligations in addition to a summary of rights and obligations. Therefore, the PUCO should reject the PUCO Staff's recommended deletion of this consumer protection rule.

Similarly, the PUCO should not adopt the PUCO Staff's proposed language to amend O.A.C 4901:1-13-06(B) that removes the requirement that the Director of the PUCO's Service Monitoring and Enforcement Department or the Director's designee to review the gas and natural gas utility's rights and obligations written summary. In OCC's view, it is important for the PUCO Staff to review each natural gas utility's written summary of its consumer rights and obligations to confirm the information in the written summary complies with Ohio's laws and the PUCO's rules. In addition, the PUCO Staff should utilize its expertise to provide feedback that improves the language in the written summary to ensure that it is understandable to consumers.

OCC proposes to maintain the following language in 4901:1-13-06(B):

- (B) Each gas or natural gas company shall prominently post on its website and shall provide new customers, upon application for service, and existing customers upon request, a written summary of their rights and obligations under this chapter. This summary information shall be in clear and understandable language and delivered to customers. Each gas or natural gas company shall submit the initial version of the summary information and notice of each subsequent amendment thereafter to the director of the commission's service monitoring and enforcement department or the director's designee in writing for review prior to the first mailing of that version of the summary information to its customers. For purposes of this rule, "new customer" means a customer who opens a new account and has not received the current version of the summary information.

G. O.A.C. 4901:1-13-07: THE PUCO SHOULD NOT ADOPT THE PUCO STAFF'S RECOMMENDATION TO DELETE THE REQUIREMENT IN THE EXISTING RULE THAT A NATURAL GAS UTILITY AGENT MUST IDENTIFY HIMSELF/HERSELF IN ADDITION TO PROVIDING A PHOTO ID PRIOR TO ENTERING A CONSUMER'S PREMISES.

The OCC opposes PUCO Staff's proposed amendments to O.A.C. 4901:1-13-07. Under the PUCO Staff's proposed language, a gas or natural gas authorized agent would not be required to identify himself/herself. But when a gas and natural gas authorized

agent is seeking access to the premise, that person should be required to identify themselves, along with all the other requirements outlined when an authorized agent requests access to a consumer's premise.

When a gas or natural gas authorized agent is seeking access to the premise, it is important for the consumer to know, at minimum, the agent's name. If a problem would arise while the agent has access to the home, the consumer would have the name of the person who gained access to their property.

Also, there are utility imposters who use the trusted name of the local utility to gain access to the home. On its website, FirstEnergy provides information on known scams that have targeted its customers.⁴ As part of the scams mentioned on its website, FirstEnergy warns consumers of criminals trying to gain access to their home, stating they work for FirstEnergy.⁵ Consumers might be reluctant to provide access to an authorized agent due to hearing about scams similar to what FirstEnergy mentions on its website, along with what they hear on the news. If a natural gas utility's authorized agent identifies themselves, the consumer will have a name to verify with the gas or natural gas company to confirm the agent is legitimate and needs access to their home. Therefore, to provide maximum information and protection to consumers, OCC proposes keeping the language in O.A.C. 4901:1-13-07 as it is currently written. The Rule should read:

Any gas or natural gas company employee or authorized agent seeking access to the customer's or landlord's premises shall, upon request, identify himself/herself, provide company photo identification, and state the reason for the visit.

⁴ FirstEnergy Corporation, *Known Scams*, April 29, 2022, <https://www.firstenergycorp.com/help/safety/scam-info/known-scams.html#door>.

⁵ FirstEnergy Corporation, *Known Scams*, April 29, 2022, <https://www.firstenergycorp.com/help/safety/scam-info/known-scams.html#door>.

H. O.A.C. 4901:1-13-10: FOR CONSUMER PROTECTION, THE PUCO SHOULD REJECT THE PUCO STAFF'S PROPOSED DELETIONS IN THE RULE THAT WOULD ELIMINATE CURRENT REQUIREMENTS THAT NATURAL GAS UTILITIES KEEP CONSUMERS APPRISED OF THE STATUS OF COMPLAINTS AND INVESTIGATIONS.

The PUCO should not adopt PUCO Staff's proposed amendments to O.A.C. 4901:1-13-10 that would eliminate current requirements that natural gas utilities keep consumers apprised of the status of complaints and investigations. It is important for consumers to receive correspondence and status reports from the gas and natural gas company during an investigation. PUCO Staff's proposed deletions remove consumer notification requirements in disconnection and emergency investigations, when an investigation is not completed within 10 business days, and after the completion of the investigation.

When a consumer initiates a complaint with the gas and natural gas company or the PUCO, the natural gas utility should keep the consumer informed throughout the process as outlined in the current rules. By providing correspondence directly to the consumer, the consumer will have a record of the investigation by and from the utility, which is especially important if the complaint relates to a disconnection or emergency case. Also, by not providing notification throughout an investigation, the consumer might experience a delay in receiving information on the complaint from the PUCO Staff because the PUCO Staff will need time to review any correspondence from the natural gas utility in addition to getting back in contact with the consumer. To keep consumers informed throughout an investigation, the OCC proposes that O.A.C. 4901:1-13-10 should be restored to its original language and Divisions (C), (D), and (E) of the rule should read as follows:

- (C) Except as ordered by the commission or directed by the commission staff in disconnection or emergency cases, each gas or natural gas company shall investigate customer/consumer complaints and, unless otherwise agreed to, provide a status report within three business days of the date of receipt of the complaint to the customer/consumer, when investigating a complaint made directly to the gas or natural gas company, and to the customer/consumer and to commission staff, when investigating a complaint referred to the gas or natural gas company by the commission or commission staff.
- (D) If an investigation is not completed within ten business days, the gas or natural gas company shall provide status reports to update the customer/consumer or update the customer/consumer and commission staff when investigating a complaint referred to the gas or natural gas company by the commission or commission staff, either orally or in writing, at five-business day intervals, unless otherwise agreed to, until the investigation is complete.
- (E) Each gas or natural gas company shall inform the customer/consumer, and commission staff when involved, of the results of the investigation, orally or in writing, no later than five business days after completion of the investigation. The customer/consumer or commission staff may request the final report to be in writing.
- I. **O.A.C. 4901:1-13-11(B) AND 4901:1-13-11(B)(24)(e): THE PUCO SHOULD REJECT THE PUCO STAFF'S PROPOSED DELETION IN RULE 4901:1-13-11(B) THAT WOULD REMOVE CURRENT LANGUAGE REQUIRING THAT NATURAL GAS UTILITY BILLS BE ACCURATE AND CONTAIN CLEAR AND UNDERSTANDABLE LANGUAGE. AND THE PUCO SHOULD ALSO REJECT STAFF'S PROPOSED DELETION IN RULE 4901:1-13-11(B)(24)(e) THAT WOULD ELIMINATE THE CURRENT REQUIREMENT THAT NATURAL GAS UTILITY BILLS MUST DISPLAY INFORMATION REQUIRED TO IMPLEMENT THE PIPP PLUS PROGRAM UNDER CHAPTER 4901:1-18 OF THE ADMINISTRATIVE CODE.**

The PUCO Staff recommends amending O.A.C. 4901:1-13-11(B) to remove language that currently requires that consumer bills must be accurate and contain clear and understandable language. This recommended deletion should not be adopted. When a consumer receives a bill from a gas and natural gas utility, the consumer has a right to expect that the information contained on the bill is accurate. In addition, the information

on the bill should be provided in clear and understandable language. Given the general complexities of natural gas billing statements and the numerous charges and riders on a bill and bill messages, it is critically important for consumer confidence and acceptance that gas and natural utility bills are as accurate and clear and understandable as possible. Therefore, OCC recommends that O.A.C. 4901:1-13-11(B) should remain unchanged.

Similarly, the OCC also recommends keeping the current language in O.A.C. 4901:1-13-11(B)(24)(e) that requires PIPP billing information required by O.A.C. 4901:1-18 to be displayed on consumer bills. The rule as it is currently written provides important information to consumers on their utility bill where PIPP billing information can be found. Therefore, OCC recommends that O.A.C. 4901:1-13-11(B)(24)(e) should remain unchanged.

OCC recommends that O.A.C. 4901:1-13-11(B) and O.A.C. 4901:1-13-11(B)(24)(e) should remain as currently written and should read:

(B) Bills issued by or for the gas or natural gas company shall be accurate and rendered at monthly intervals and shall contain clear and understandable form and language. Each bill shall display all of the following information:

(B)(24)(e) Any other information required to implement the PIPP plus program under Chapter 4901:1-18 of the Administrative Code.

J. O.A.C. 4901:1-13-11(B)(14) and 4901:1-13-11(B)(15): THE PUCO SHOULD ADD RULES TO REQUIRE NATURAL GAS UTILITIES TO CONDUCT SHADOW-BILLING AND TO MAKE SHADOW-BILLING INFORMATION AVAILABLE FOR THE PUBLIC TO HELP INFORM CONSUMERS IF THEY ARE SAVING OR LOSING MONEY BY OBTAINING THEIR NATURAL GAS SUPPLY FROM A MARKETER.

To better protect consumers, the PUCO should add a new rule 4901:1-13-11(B)(14) that requires natural gas utilities to conduct and report shadow-billing and to

make these reports publicly available. Shadow-billing compares, in aggregate, the difference between what shopping customers paid for natural gas through marketers and what those same customers would have paid had they been served through the utility standard choice offer or gas cost recovery rate. In a previous review of these rules the PUCO recognized that when shopping “many consumers base their decision on whether they will experience savings on their monthly energy bills.”⁶

It is only fair that savings information be provided to consumers. Reporting of this data provides the PUCO, OCC, and others the ability to determine the total savings that customers are obtaining through the gas choice programs or to determine the total losses customers are experiencing on gas choice programs. OCC has attached recent shadow-billing reports provided by Columbia and Duke to illustrate the value and information contained in these informative reports.

To better inform and help protect consumers from paying unnecessarily high natural gas charges, O.A.C. 4901:1-13-11(B)(14) should be added as follows:

- (14) For each natural gas utility customer shopping with a competitive retail natural gas supplier, the natural gas utility shall create a bill as if that customer were on the utility’s standard choice offer (SCO) or the gas cost recovery rate (GCR). Each year a natural gas utility shall publicly file a report with the commission detailing the aggregated customer savings or losses experienced as a result of shopping with competitive retail natural gas suppliers instead of choosing the SCO or GCR.

Shopping consumers will also benefit from being informed on their bills what their natural gas charges would have been if the consumer was served under the SCO or GCR rates. This information helps consumers on a monthly basis determine their

⁶ *In the Matter of the Commission’s Review of the Minimum Gas Service Standards in Chapter 4901:1-13 of the Ohio Administrative Code* PUCO Case No. 19-1429-GA-ORD Finding and Order at page 19 (February 24, 2021).

potential savings with a marketer. Therefore, the PUCO should add a new O.A.C.

4901:1-13-11(B)(15) that includes a shadow-billing statement on customer bills as

follows:

- (15) The following shadow-bill statement on shopping customer bills:
“Your natural gas supply costs with (Name of Supplier) were (\$ for the month). Customers who were served on the (standard choice offer “SCO”) or (gas cost recovery rate “GCR”) for the month paid (\$ for the month) for the same level of usage.”

K. O.A.C. 4901:1-13-12(A) and 4901:1-13-12(D)(2): THE PUCO SHOULD NOT ADOPT THE PUCO STAFF’S PROPOSED AMENDMENTS THAT WOULD REMOVE NATURAL GAS UTILITY’S REQUIREMENT TO MAINTAIN A LISTING OF THE CUSTOMER SERVICE TELEPHONE NUMBER, ALONG WITH A TWENTY-FOUR-HOUR EMERGENCY LINE. ALSO, CONSUMERS SHOULD BE REQUIRED TO COMPLETE AND SIGN A RELEASE FORM BEFORE THE NATURAL GAS UTILITY USES THE CONSUMER’S SOCIAL SECURITY NUMBER.

The OCC recommends that the PUCO reject PUCO Staff’s proposed amendments to O.A.C. 4901:1-13-12(A) that would remove the gas and natural gas company’s requirement to maintain a listing of the customer service telephone number, along with a twenty-four-hour emergency line. Also, consumers should be required to complete a signed release form before the gas and natural gas company uses the customer’s social security number.

Even with the current development and expansion of internet service throughout Ohio, there are still parts of Ohio where consumers do not have internet access. According to InnovateOhio, more than 300,000 households in Ohio have barriers to high-speed internet service.⁷ Also, consumers who have access to internet service could decide

⁷ InnovateOhio, Ohio Broadband Strategy, <https://innovateohio.gov/priorities/resources/broadband/>, Accessed October 27, 2022.

to go without. Consumers who do not have access to internet service rely on a telephone directory and should not be penalized from removing the requirement to list a gas or natural gas telephone number, along with the twenty-four-hour emergency telephone number. This can be especially concerning if a consumer is trying to find the 24-hour emergency telephone number in the telephone directory during a gas leak, as gas leaks can be dangerous to the consumer and their household when there is no time to spare. For no other reason, the utility should keep this information in the telephone directory due to health and safety concerns.

Also, the PUCO should maintain the language in O.A.C. 4901:1-13-12(D)(2) that requires the gas and natural gas utility to not disclose a consumer's social security number without written consent or a court order. It is important to keep social security numbers protected as it can lead to identify theft if it falls in the wrong hands. Anytime a gas or natural gas company needs to use a consumer's social security number for specified purposes stated in the MGSS rules, a consumer should have to provide written permission before the social security number is released. According to the Social Security Administration, "If someone asks for your number, you should ask why, how it will be used, and what will happen if you refuse."⁸ Consumers should have to provide permission before their social security number is used by the gas and natural gas company.

By not amending this rule, gas and natural gas consumers will need to provide permission, along with being told how their social security number is being used by the

⁸ Walker, Doug, Deputy Commissioner, Communications (April 19, 2016). *Protecting Your Social Security Number, from Identity Theft*, Social Security Administration, <https://blog.ssa.gov/protecting-your-social-security-number-from-identity-theft/>.

gas and natural gas company. OCC proposes to maintain the following rules in 4901:1-13-12:

- (A) Each gas or natural gas company shall maintain a listing including the twenty-four-hour emergency number in each local telephone service provider's directory operating in the gas or natural gas company's service territory.

and

- (D)(2) A gas or natural gas company shall not disclose a customer's social security number without the customer's written consent or without a court order, except for the following purposes (the gas or natural gas company must use the consent form described in this rule):

L. O.A.C. 4901:1-13-12(F)(3)): THE PUCO SHOULD ADD A NEW PROVISION THAT REQUIRES NATURAL GAS UTILITIES WITH A CHOICE PROGRAM TO INCLUDE FUNCTIONALITY ON THEIR WEBSITES THAT ENABLES CONSUMERS TO OPT OUT OF HAVING THEIR CUSTOMER INFORMATION SHARED WITH MARKETERS.

O.A.C. 4901:1-13-12(F)(1) provides that natural gas utilities with a choice program will “provide generic customer and usage information, in a universal file format, to other retail natural gas suppliers on a comparable and nondiscriminatory basis.”

O.A.C. 4901:1-13-12(F)(2) provides that the natural gas utilities will “provide customer-specific information to retail natural gas suppliers and governmental aggregators on a comparable and nondiscriminatory basis as prescribed in paragraph (C) of rule [4901:1-13-14](#) of the Administrative Code, unless the customer objects to the disclosure of such information.” And O.A.C. 4901:1-13-12(F)(3) currently provides that “prior to issuing any eligible-customer lists and at least four times per calendar year, provide all customers clear written notice, in billing statements or other communications, of their right to object to being included on such lists.” Division (F)(3) also specifies the language that must be included in the notice.

To maximize consumer protection and convenience, the current language in Division (F)(3) should be modified to add a requirement that natural gas utilities with a choice program must include functionality on their websites that enables consumers to opt out of having their customer information shared with marketers. American Electric Power (“AEP”) currently includes such functionality as described in these comments on its website for electric consumers. And in a settlement recently filed in Case No. 21-637-GA-AIR *et al.*, Columbia Gas of Ohio agreed to include such functionality for natural gas consumers on its website as well.

OCC recommends that all electric and natural gas consumers should have the ability to opt-off having their customer information shared with competitive natural gas and electric suppliers at utility websites. Therefore, O.A.C. 4901:1-13-12(F)(3) should be modified to read:

- (3) Prior to issuing any eligible-customer lists and at least four times per calendar year, provide all customers clear written notice, in billing statements or other communications, of their right to object to being included on such lists. Such notice shall include instructions for reporting such objection. This notice shall read as follows: "We are required to include your name, address, and usage information on a list of eligible customers that is made available to other retail natural gas suppliers or governmental aggregators. If you do not wish to be included on this list, please call _____ or write _____, or complete the appropriate form on _____ website." **This notice and functionality that enables customers to opt out of having their information provided to retail natural gas suppliers or governmental aggregators shall be included on each gas or natural gas company's website without customers having to establish or maintain and account with the gas or natural gas company.**

M. O.A.C. 4901:1-13-12(G): TO BETTER PROTECT CONSUMERS AGAINST SLAMMING, THE PUCO SHOULD ADD A NEW RULE TO REQUIRE NATURAL GAS UTILITIES TO PROVIDE CUSTOMERS WITH THE OPTION TO HAVE A BLOCK PLACED ON THEIR ACCOUNT TO PREVENT THE ACCOUNT FROM BEING SWITCHED TO A NATURAL GAS SUPPLIER.

Slamming is the unlawful practice of switching a consumer's account for the supply of natural gas without the consumer's authorization. Slamming is confusing, stressful, inconvenient, and often very expensive for consumers who have been slammed. To help protect consumers against potential slamming, a new rule O.A.C. 4901:1-13-12(G) should be added that requires natural gas companies to offer consumers the option for requesting that a switching block be placed on their accounts.

A switching block prevents gas service from being switched to a natural gas supplier until and unless customers request that the supplier block be listed. This is an important anti-slamming consumer protection that helps provide customers with peace of mind by knowing that an unscrupulous marketer is not going to be able to switch their natural gas supply service during any time that the block is in effect with the natural gas utility. Any lock could be removed with affirmative consent of the consumer.

To protect consumers against slamming, the PUCO should adopt the PUCO Staff proposed rule in O.A.C. 4901:1-13-12(G).

- (G) Each gas or natural gas company will allow any customer to request a retail natural gas supplier block be placed on the customer's account. The block will prevent the customer's commodity service provider from being switched until such time as the customer requests that the gas supplier block be removed from the account.

N. O.A.C. 4901:1-13-14(E): THE PUCO SHOULD NOT ADOPT THE PUCO STAFF'S PROPOSED DELETION THAT WOULD ELIMINATE THE CURRENT REQUIREMENT THAT NATURAL GAS UTILITIES SWITCH CUSTOMER ACCOUNTS TO OR FROM A GOVERNMENTAL AGGREGATION UNDER THE SAME PROCESSES AND TIMEFRAMES PROVIDED IN PUBLISHED TARIFFS FOR SWITCHING OTHER CUSTOMER ACCOUNTS.

The OCC opposes the PUCO Staff's proposed deletion of O.A.C. 4901:1-13-14(E). The proposed deletion removes existing protections when a consumer participates in a natural gas aggregation program, whether the consumer is switching to or from the natural gas aggregation program. It is important for natural gas utilities to provide language in their tariff on the process and timeframes for switching accounts. The tariff language provides consumers a resource to know how many days or billing cycles it will take to switch from the current rate through the Standard Choice Offer or third-party natural gas supplier rate. Also, the tariff language provides protections if there is a failure to switch the account to the natural gas aggregation program in a timely manner that is outlined in the tariff.

There is no valid reason that consumers switching from or to a governmental aggregation should not be switched under the same processes and timeframes that apply to consumers switching to or from a regular gas marketer. Therefore, OCC recommends the PUCO keep the current language in O.A.C. 4901:1-13-14. The rule should be restored to read:

- (E) The gas or natural gas company shall switch customer accounts to or from a governmental aggregation under the same processes and timeframes provided in published tariffs for switching other customer accounts, except in cases where a customer notifies the gas or natural gas company of the customer's intent to not join a governmental aggregation by returning a confirmation notice or otherwise giving notice as provided by that gas or natural gas company's tariffs.

III. CONCLUSION

OCC recommends that the PUCO should be enhancing the Minimum Gas Service Standards Rules as advocated by OCC in these Comments to protect consumers. The PUCO should not be eroding consumer protection as advocated by the rule deletions proposed by PUCO Staff. OCC understands that rules must be reviewed and sometimes streamlined. But such streamlining should recognize that the Minimum Service Standards Rules apply to monopoly natural gas utilities. Consumer protection from monopoly utility service providers should not be sacrificed in pursuit of efficiency or streamlining. Therefore, the PUCO should adopt the OCC consumer protection recommendations contained herein.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of these Comments were served on the persons stated below via electronic transmission this 2nd day of November 2022.

/s/ William J. Michael
William J. Michael
Assistant Consumers' Counsel

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

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DUKE ENERGY OHIO

GAS SHOPPING SAVINGS (TRANSPORTATION RATES) VS DEO GCR

NOTE: PIPP ACCOUNTS ARE NOT ALLOWED TO SHOP

NOTE: SUPPLIER CHARGES INCLUDE OH SALES TAX @6.5%, RIDER CCCR, AND RIDER GSR CREDIT

NOTE: GCR, GSR, AND CCCR INCLUDE 4.89% EXCISE TAX

Month	Res. Savings / Losses (-)	Com. Savings / Losses (-)	Ind. Savings / Losses (-)	OPA Savings / Losses (-)	Total Monthly Choice Savings / Losses (-)	Cumulative Savings / Losses (-)
Jan-19	-\$2,562,959	-\$937,166	-\$90,779	-\$41,183	-\$3,632,087	-\$3,632,087
Feb-19	-\$4,867,614	-\$1,712,828	-\$180,006	-\$86,159	-\$6,846,607	-\$10,478,694
Mar-19	-\$3,561,223	-\$1,218,817	-\$127,991	-\$62,708	-\$4,970,739	-\$15,449,433
Apr-19	-\$2,227,261	-\$852,191	-\$86,908	-\$35,171	-\$3,201,531	-\$18,650,965
May-19	-\$953,337	-\$406,296	-\$42,252	-\$15,082	-\$1,416,967	-\$20,067,931
Jun-19	-\$447,239	-\$184,489	-\$20,795	-\$3,802	-\$656,325	-\$20,724,256
Jul-19	-\$405,354	-\$191,263	-\$22,242	-\$4,775	-\$623,634	-\$21,347,890
Aug-19	-\$342,987	-\$156,394	-\$19,792	-\$3,235	-\$522,408	-\$21,870,298
Sep-19	-\$455,105	-\$246,022	-\$32,621	-\$6,581	-\$740,329	-\$22,610,627
Oct-19	-\$484,039	-\$225,535	-\$19,126	-\$8,382	-\$737,082	-\$23,347,709
Nov-19	-\$1,744,751	-\$628,085	-\$47,810	-\$37,844	-\$2,458,490	-\$25,806,199
Dec-19	-\$2,325,124	-\$660,626	-\$38,150	-\$23,526	-\$3,047,426	-\$28,853,625
Jan-20	-\$2,575,508	-\$698,792	-\$40,745	-\$26,528	-\$3,341,573	-\$32,195,198
Feb-20	-\$3,257,193	-\$937,393	-\$69,682	-\$46,962	-\$4,311,230	-\$36,506,428
Mar-20	-\$3,721,454	-\$1,200,967	-\$97,394	-\$62,941	-\$5,082,756	-\$41,589,184
Apr-20	-\$2,701,875	-\$978,349	-\$101,932	-\$62,175	-\$3,844,331	-\$45,433,515
May-20	-\$2,122,775	-\$739,334	-\$75,248	-\$42,833	-\$2,980,190	-\$48,413,705
Jun-20	-\$799,752	-\$297,740	-\$36,408	-\$13,983	-\$1,147,883	-\$49,561,588
Jul-20	-\$526,358	-\$237,527	-\$31,575	-\$9,838	-\$805,298	-\$50,366,886
Aug-20	-\$447,188	-\$202,360	-\$28,347	-\$8,903	-\$686,798	-\$51,053,684
Sep-20	-\$385,521	-\$140,813	-\$12,652	-\$5,698	-\$544,684	-\$51,598,368
Oct-20	-\$510,103	-\$159,041	-\$10,070	-\$8,553	-\$687,767	-\$52,286,135
Nov-20	-\$1,168,797	-\$356,106	-\$26,736	-\$21,015	-\$1,572,654	-\$53,858,789
Dec-20	-\$2,502,154	-\$756,777	-\$60,692	-\$44,151	-\$3,363,774	-\$57,222,563
Jan-21	-\$3,943,376	-\$1,232,228	-\$116,451	-\$76,257	-\$5,368,312	-\$62,590,875
Feb-21	-\$4,170,774	-\$1,296,475	-\$129,376	-\$83,631	-\$5,680,256	-\$68,271,131
Mar-21	-\$1,635,838	-\$348,527	-\$7,162	-\$8,214	-\$1,999,741	-\$70,270,872
Apr-21	-\$775,427	-\$140,506	\$10,578	-\$336	-\$905,691	-\$71,176,563
May-21	-\$667,456	-\$179,172	-\$16,645	-\$8,148	-\$871,421	-\$72,047,984
Jun-21	\$262,371	\$313,662	\$84,275	\$22,716	\$683,024	-\$71,364,960 Note 1
Jul-21	\$206,031	\$314,884	\$77,523	\$19,840	\$618,278	-\$70,746,681 Note 1
Aug-21	\$303,670	\$393,181	\$92,043	\$24,375	\$813,269	-\$69,933,413 Note 1
Sep-21	\$351,880	\$456,303	\$103,012	\$27,608	\$938,803	-\$68,994,610 Note 1
Oct-21	\$490,335	\$541,907	\$137,370	\$43,808	\$1,213,420	-\$67,781,190 Note 1
Nov-21	\$2,086,513	\$1,472,095	\$406,147	\$94,205	\$4,058,960	-\$63,722,229 Note 1
Dec-21	\$2,345,897	\$1,635,408	\$309,435	\$121,170	\$4,411,910	-\$59,310,320 Note 1
Jan-22	\$1,260,564	\$1,344,466	\$276,935	\$56,683	\$2,938,648	-\$56,371,672 Note 1
Feb-22	\$1,324,130	\$1,339,034	\$250,539	\$102,091	\$3,015,794	-\$53,355,878 Note 1

Note 1: GCR temporary increase related to February 2021 Texas weather event.

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Apr-97	\$425,351	\$43,275	\$0			\$468,626	\$335,000	\$803,626	\$335,000	\$803,626	\$468,626
May-97	\$342,846	\$39,215	\$0			\$382,061	\$305,627	\$687,688	\$640,627	\$1,491,314	\$850,687
Jun-97	\$195,327	\$28,158	\$0			\$223,485	\$59,826	\$283,311	\$700,453	\$1,774,625	\$1,074,172
Jul-97	\$87,295	\$19,242	\$0			\$106,537	\$57,698	\$164,235	\$758,151	\$1,938,860	\$1,180,709
Aug-97	\$76,251	\$11,529	\$0			\$87,780	\$49,657	\$137,437	\$807,808	\$2,076,297	\$1,268,489
Sep-97	\$83,182	\$12,863	\$0			\$96,045	\$47,863	\$143,908	\$855,671	\$2,220,205	\$1,364,534
Oct-97	\$128,462	\$13,284	\$0			\$141,746	\$68,492	\$210,238	\$924,163	\$2,430,443	\$1,506,280
Nov-97	\$395,185	\$39,517	\$0			\$434,702	\$238,592	\$673,294	\$1,162,755	\$3,103,737	\$1,940,982
Dec-97	\$579,381	\$123,876	\$0			\$703,257	\$351,824	\$1,055,081	\$1,514,579	\$4,158,818	\$2,644,239
Jan-98	\$824,159	\$263,876	\$0			\$1,088,035	\$488,246	\$1,576,281	\$2,002,825	\$5,735,099	\$3,732,274
Feb-98	\$682,159	\$154,769	\$0			\$836,928	\$539,537	\$1,376,465	\$2,542,362	\$7,111,564	\$4,569,202
Mar-98	\$595,217	\$114,732	\$0			\$709,949	\$516,279	\$1,226,228	\$3,058,641	\$8,337,792	\$5,279,151
Apr-98	\$462,581	\$80,935	\$0			\$543,516	\$405,279	\$948,795	\$3,463,920	\$9,286,587	\$5,822,667
May-98	\$374,279	\$43,982	\$0			\$418,261	\$269,582	\$687,843	\$3,733,502	\$9,974,430	\$6,240,928
Jun-98	\$197,956	\$20,984	\$0			\$218,940	\$125,985	\$344,925	\$3,859,487	\$10,319,355	\$6,459,868
Jul-98	\$93,579	\$14,839	\$0			\$108,418	\$89,153	\$197,571	\$3,948,640	\$10,516,926	\$6,568,286
Aug-98	\$86,279	\$9,524	\$0			\$95,803	\$58,426	\$154,229	\$4,007,066	\$10,671,155	\$6,664,089
Sep-98	\$83,279	\$16,842	\$0			\$100,121	\$67,518	\$167,639	\$4,074,584	\$10,838,794	\$6,764,210
Oct-98	\$154,283	\$123,849	\$0			\$278,132	\$84,159	\$362,291	\$4,158,743	\$11,201,085	\$7,042,342
Nov-98	\$786,924	\$459,627	\$0			\$1,246,551	\$241,897	\$1,488,448	\$4,400,640	\$12,689,533	\$8,288,893
Dec-98	\$1,248,953	\$815,476	\$0			\$2,064,429	\$386,295	\$2,450,724	\$4,786,935	\$15,140,257	\$10,353,322
Jan-99	\$2,841,953	\$1,524,869	\$0			\$4,366,822	\$595,015	\$4,961,837	\$5,381,950	\$20,102,094	\$14,720,144
Feb-99	\$2,692,746	\$1,362,745	\$0			\$4,055,491	\$428,931	\$4,484,422	\$5,810,881	\$24,586,516	\$18,775,635
Mar-99	\$1,792,549	\$1,198,257	\$0			\$2,990,806	\$491,930	\$3,482,736	\$6,302,810	\$28,069,251	\$21,766,441
Apr-99	\$1,295,736	\$992,843	\$0			\$2,288,579	\$420,001	\$2,708,580	\$6,722,811	\$30,777,831	\$24,055,020
May-99	\$35,928	\$305,672	\$0			\$341,600	\$171,237	\$512,837	\$6,894,048	\$31,290,668	\$24,396,620
Jun-99	-\$6,482	\$274,958	\$0			\$268,476	\$94,756	\$363,232	\$6,988,804	\$31,653,900	\$24,665,096
Jul-99	-\$5,169	\$128,965	\$0			\$123,796	\$67,171	\$190,967	\$7,055,974	\$31,844,866	\$24,788,892
Aug-99	\$323,859	\$216,852	\$0			\$540,711	\$62,777	\$603,488	\$7,118,752	\$32,448,355	\$25,329,603
Sep-99	\$301,528	\$287,495	\$0			\$589,023	\$55,638	\$644,661	\$7,174,390	\$33,093,016	\$25,918,626
Oct-99	\$547,523	\$437,053	\$0			\$984,576	\$113,827	\$1,098,403	\$7,288,217	\$34,191,419	\$26,903,202
Nov-99	\$2,924,475	\$1,350,835	\$0			\$4,275,310	\$269,173	\$4,544,483	\$7,557,390	\$38,735,902	\$31,178,512
Dec-99	\$4,287,950	\$2,184,202	\$0			\$6,472,152	\$438,838	\$6,910,990	\$7,996,228	\$45,646,892	\$37,650,664
Jan-00	\$5,411,314	\$2,833,574	\$24,986			\$8,269,874	\$696,339	\$8,966,213	\$8,692,566	\$54,613,105	\$45,920,538
Feb-00	\$2,147,364	\$1,606,382	\$0			\$3,753,746	\$699,457	\$4,453,203	\$9,392,023	\$59,066,307	\$49,674,284
Mar-00	\$2,227,071	\$1,501,788	\$0			\$3,728,859	\$457,115	\$4,185,974	\$9,849,138	\$63,252,281	\$53,403,143
Apr-00	\$1,650,460	\$866,914	\$11,678			\$2,529,053	\$120,373	\$2,649,425	\$9,969,510	\$65,901,706	\$55,932,196
May-00	\$2,044,089	\$1,000,117	\$13,276			\$3,057,481	\$150,316	\$3,207,797	\$10,119,826	\$69,109,503	\$58,989,677
Jun-00	\$1,004,800	\$554,738	\$14,060			\$1,573,599	\$68,996	\$1,642,595	\$10,188,822	\$70,752,098	\$60,563,276
Jul-00	\$710,130	\$432,868	\$11,315			\$1,154,313	\$46,821	\$1,201,134	\$10,235,643	\$71,953,232	\$61,717,589
Aug-00	\$1,567,967	\$623,002	\$20,452			\$2,211,421	\$58,508	\$2,269,929	\$10,294,151	\$74,223,161	\$63,929,009
Sep-00	\$1,549,256	\$748,851	\$17,637			\$2,315,744	\$51,350	\$2,367,095	\$10,345,502	\$76,590,255	\$66,244,753
Oct-00	\$2,706,833	\$1,056,352	\$13,042			\$3,776,227	\$121,841	\$3,898,068	\$10,467,343	\$80,488,323	\$70,020,980
Nov-00	\$6,178,117	\$2,092,866	\$38,268			\$8,309,251	\$208,106	\$8,517,357	\$10,675,449	\$89,005,680	\$78,330,231

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Dec-00	\$13,810,672	\$4,534,145	\$45,946			\$18,390,763	\$538,633	\$18,929,396	\$11,214,082	\$107,935,076	\$96,720,994
Jan-01	\$14,432,877	\$3,812,320	\$0			\$18,245,197	\$752,288	\$18,997,484	\$11,966,369	\$126,932,560	\$114,966,191
Feb-01	\$17,203,007	\$4,588,353	\$0			\$21,791,360	\$723,181	\$22,514,541	\$12,689,551	\$149,447,101	\$136,757,550
Mar-01	\$14,710,273	\$4,050,611	\$0			\$18,760,884	\$693,255	\$19,454,138	\$13,382,805	\$168,901,239	\$155,518,434
Apr-01	\$9,859,471	\$2,860,423	\$0			\$12,719,894	\$571,992	\$13,291,885	\$13,954,797	\$182,193,125	\$168,238,328
May-01	\$3,855,778	\$1,247,301	\$18,417			\$5,121,496	\$155,768	\$5,277,264	\$14,110,565	\$187,470,389	\$173,359,824
Jun-01	\$2,754,276	\$997,069	\$9,968			\$3,761,313	\$114,641	\$3,875,954	\$14,225,206	\$191,346,342	\$177,121,136
Jul-01	\$1,598,501	\$603,386	\$8,469			\$2,210,356	\$69,621	\$2,279,976	\$14,294,827	\$193,626,319	\$179,331,492
Aug-01	-\$387,396	-\$36,966	\$3,322			-\$421,041	\$48,501	-\$372,539	\$14,343,328	\$193,253,779	\$178,910,452
Sep-01	-\$541,007	-\$101,867	\$214			-\$642,660	\$44,301	-\$598,359	\$14,387,629	\$192,655,420	\$178,267,791
Oct-01	-\$903,224	-\$246,449	\$1,115			-\$1,148,558	\$95,536	-\$1,053,022	\$14,483,165	\$191,602,398	\$177,119,233
Nov-01	-\$4,785,389	-\$1,519,422	\$0			-\$6,304,811	\$166,584	-\$6,138,228	\$14,649,748	\$185,464,170	\$170,814,422
Dec-01	-\$6,417,765	-\$2,190,879	\$0			-\$8,608,644	\$241,333	-\$8,367,311	\$14,891,081	\$177,096,859	\$162,205,778
Jan-02	-\$11,213,067	-\$4,009,360	-\$24,850			-\$15,247,278	\$456,852	-\$14,790,425	\$15,347,933	\$162,306,434	\$146,958,501
Feb-02	-\$8,931,637	-\$3,242,954	-\$16,811			-\$12,191,402	\$342,231	-\$11,849,171	\$15,690,165	\$150,457,263	\$134,767,098
Mar-02	-\$6,934,816	-\$2,364,856	-\$15,592			-\$9,315,264	\$355,597	-\$8,959,667	\$16,045,761	\$141,497,596	\$125,451,834
Apr-02	-\$5,332,798	-\$1,839,321	\$0			-\$7,172,119	\$295,298	-\$6,876,821	\$16,341,060	\$134,620,775	\$118,279,715
May-02	-\$3,351,622	-\$1,404,541	-\$8,027			-\$4,764,190	\$158,107	-\$4,606,083	\$16,499,167	\$130,014,691	\$113,515,525
Jun-02	-\$2,013,498	-\$738,132	-\$5,322			-\$2,756,952	\$94,387	-\$2,662,565	\$16,593,553	\$127,352,126	\$110,758,573
Jul-02	-\$1,101,529	-\$456,628	-\$3,312			-\$1,561,469	\$50,750	-\$1,510,718	\$16,644,304	\$125,841,408	\$109,197,104
Aug-02	\$236,023	\$130,777	\$675			\$367,475	\$44,089	\$411,564	\$16,688,393	\$126,252,972	\$109,564,579
Sep-02	\$135,406	\$121,064	-\$9			\$256,461	\$41,585	\$298,046	\$16,729,978	\$126,551,017	\$109,821,040
Oct-02	\$156,437	\$113,894	-\$197			\$270,134	\$62,349	\$332,483	\$16,792,327	\$126,883,501	\$110,091,174
Nov-02	\$771,332	\$309,783	\$1,902			\$1,083,017	\$217,814	\$1,300,831	\$17,010,141	\$128,184,332	\$111,174,191
Dec-02	\$726,676	-\$6,217	\$1,461			\$721,920	\$392,134	\$1,114,055	\$17,402,276	\$129,298,386	\$111,896,111
Jan-03	\$1,102,780	-\$1,000,067	\$0			\$102,713	\$519,274	\$621,987	\$17,921,549	\$129,920,374	\$111,998,824
Feb-03	\$5,523,850	\$1,167,509	\$8,870			\$6,700,229	\$655,759	\$7,355,988	\$18,577,309	\$137,276,361	\$118,699,053
Mar-03	\$4,199,337	\$509,070	\$2,948			\$4,711,356	\$601,685	\$5,313,041	\$19,178,994	\$142,589,403	\$123,410,409
Apr-03	\$5,673,189	\$1,770,099	\$7,841			\$7,451,129	\$236,472	\$7,687,601	\$19,415,466	\$150,277,004	\$130,861,538
May-03	\$4,007,475	\$1,296,707	\$8,797			\$5,312,980	\$124,194	\$5,437,173	\$19,539,660	\$155,714,177	\$136,174,517
Jun-03	\$2,563,180	\$1,013,374	\$5,887			\$3,582,441	\$84,048	\$3,666,490	\$19,623,708	\$159,380,667	\$139,756,959
Jul-03	\$1,385,724	\$674,473	\$3,314			\$2,063,510	\$44,755	\$2,108,266	\$19,668,464	\$161,488,933	\$141,820,469
Aug-03	-\$199,255	-\$82,351	-\$218			-\$281,823	\$38,953	-\$242,870	\$19,707,417	\$161,246,063	\$141,538,646
Sep-03	-\$122,424	\$3,139	-\$212			-\$119,498	\$38,189	-\$81,310	\$19,745,605	\$161,164,753	\$141,419,148
Oct-03	-\$192,077	\$100,989	-\$697			-\$91,785	\$87,000	-\$4,785	\$19,832,605	\$161,159,968	\$141,327,363
Nov-03	-\$2,676,204	-\$786,416	-\$9,233			-\$3,471,853	\$130,215	-\$3,341,638	\$19,962,820	\$157,818,330	\$137,855,510
Dec-03	-\$5,412,084	-\$2,327,899	-\$14,949			-\$7,754,932	\$251,134	-\$7,503,798	\$20,213,955	\$150,314,533	\$130,100,578
Jan-04	-\$11,732,403	-\$4,826,612	-\$27,265			-\$16,586,279	\$369,962	-\$16,216,317	\$20,583,916	\$134,098,215	\$113,514,299
Feb-04	-\$10,668,507	-\$4,004,885	-\$17,696			-\$14,691,088	\$447,855	-\$14,243,234	\$21,031,771	\$119,854,982	\$98,823,211
Mar-04	-\$7,356,309	-\$2,355,718	-\$10,959			-\$9,722,986	\$334,371	-\$9,388,615	\$21,366,142	\$110,466,366	\$89,100,225
Apr-04	-\$5,408,848	-\$1,596,368	-\$7,561			-\$7,012,777	\$0	-\$7,012,777	\$21,366,142	\$103,453,590	\$82,087,448
May-04	-\$1,849,168	-\$361,959	-\$2,501			-\$2,213,629	\$0	-\$2,213,629	\$21,366,142	\$101,239,961	\$79,873,819
Jun-04	-\$973,902	-\$145,292	-\$1,036			-\$1,120,230	\$0	-\$1,120,230	\$21,366,142	\$100,119,732	\$78,753,590
Jul-04	-\$913,368	-\$223,736	-\$114,560			-\$1,251,664	\$0	-\$1,251,664	\$21,366,142	\$98,868,068	\$77,501,926

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Aug-04	-\$116,386	\$54,895	\$0			-\$61,491	\$0	-\$61,491	\$21,366,142	\$98,806,577	\$77,440,435
Sep-04	\$10,843	\$67,262	\$1,170			\$79,275	\$0	\$79,275	\$21,366,142	\$98,885,852	\$77,519,710
Oct-04	-\$42,681	\$137,841	\$1,460			\$96,620	\$0	\$96,620	\$21,366,142	\$98,982,472	\$77,616,330
Nov-04	-\$1,538,128	-\$436,246	-\$3,391			-\$1,977,765	\$0	-\$1,977,765	\$21,366,142	\$97,004,707	\$75,638,565
Dec-04	-\$1,502,379	-\$806,935	-\$4,559			-\$2,313,873	\$0	-\$2,313,873	\$21,366,142	\$94,690,834	\$73,324,692
Jan-05	-\$1,578,126	-\$1,005,151	-\$2,823			-\$2,586,099	\$0	-\$2,586,099	\$21,366,142	\$92,104,734	\$70,738,593
Feb-05	-\$7,501,073	-\$2,234,889	-\$14,464			-\$9,750,426	\$0	-\$9,750,426	\$21,366,142	\$82,354,308	\$60,988,166
Mar-05	-\$7,712,573	-\$2,518,040	-\$18,620			-\$10,249,233	\$0	-\$10,249,233	\$21,366,142	\$72,105,075	\$50,738,933
Apr-05	-\$1,844,632	-\$704,283	-\$5,848			-\$2,554,763	\$0	-\$2,554,763	\$21,366,142	\$69,550,312	\$48,184,170
May-05	-\$1,616,796	-\$210,553	-\$2,467			-\$1,829,816	\$0	-\$1,829,816	\$21,366,142	\$67,720,496	\$46,354,354
Jun-05	-\$845,291	-\$44,472	-\$4,230			-\$893,993	\$0	-\$893,993	\$21,366,142	\$66,826,503	\$45,460,361
Jul-05	-\$739,294	-\$31,196	-\$621			-\$771,110	\$0	-\$771,110	\$21,366,142	\$66,055,392	\$44,689,251
Aug-05	-\$78,266	\$70,916	\$0			-\$7,350	\$0	-\$7,350	\$21,366,142	\$66,048,042	\$44,681,901
Sep-05	\$210,761	\$100,586	\$1,038			\$312,384	\$0	\$312,384	\$21,366,142	\$66,360,427	\$44,994,285
Oct-05	\$847,001	-\$135,534	\$4,638			\$716,106	\$0	\$716,106	\$21,366,142	\$67,076,533	\$45,710,391
Nov-05	\$184,914	-\$1,283,433	\$10,074			-\$1,088,445	\$0	-\$1,088,445	\$21,366,142	\$65,988,088	\$44,621,946
Dec-05	\$185,165	-\$1,358,303	\$1,942			-\$1,171,195	\$0	-\$1,171,195	\$21,366,142	\$64,816,892	\$43,450,750
Jan-06	-\$961,598	-\$2,941,083	-\$150,058			-\$4,052,738	\$0	-\$4,052,738	\$21,366,142	\$60,764,154	\$39,398,012
Feb-06	-\$5,604,909	-\$3,093,449	-\$32,232			-\$8,730,590	\$0	-\$8,730,590	\$21,366,142	\$52,033,564	\$30,667,422
Mar-06	-\$11,177,508	-\$4,065,279	-\$42,318			-\$15,285,104	\$0	-\$15,285,104	\$21,366,142	\$36,748,459	\$15,382,317
Apr-06	-\$7,293,950	-\$2,287,715	-\$24,904			-\$9,606,569	\$53,181	-\$9,553,388	\$21,419,323	\$27,195,071	\$5,775,748
May-06	-\$3,926,951	-\$1,116,790	-\$12,355			-\$5,056,096	\$26,802	-\$5,029,294	\$21,446,125	\$22,165,777	\$719,652
Jun-06	-\$2,704,723	-\$598,065	-\$9,368			-\$3,312,155	\$14,795	-\$3,297,361	\$21,460,920	\$18,868,417	-\$2,592,503
Jul-06	-\$1,975,016	-\$494,379	-\$8,324			-\$2,477,718	\$8,309	-\$2,469,409	\$21,469,229	\$16,399,008	-\$5,070,221
Aug-06	-\$2,101,535	-\$420,782	-\$11,119			-\$2,533,436	\$8,075	-\$2,525,361	\$21,477,304	\$13,873,646	-\$7,603,658
Sep-06	-\$1,571,928	-\$516,412	-\$12,047			-\$2,100,387	\$8,066	-\$2,092,321	\$21,485,370	\$11,781,325	-\$9,704,045
Oct-06	-\$5,152,570	-\$1,734,363	-\$33,089			-\$6,920,021	\$17,003	-\$6,903,018	\$21,502,373	\$4,878,307	-\$16,624,066
Nov-06	-\$9,020,018	-\$2,654,434	-\$49,911			-\$11,724,363	\$40,939	-\$11,683,424	\$21,543,312	-\$6,805,117	-\$28,348,429
Dec-06	-\$12,714,226	-\$3,707,906	-\$75,247			-\$16,497,380	\$59,733	-\$16,437,647	\$21,603,046	-\$23,242,764	-\$44,845,809
Jan-07	-\$14,772,242	-\$5,844,496	-\$82,866			-\$20,699,603	\$71,970	-\$20,627,633	\$21,675,016	-\$43,870,396	-\$65,545,412
Feb-07	-\$21,638,440	-\$6,425,648	-\$62,487			-\$28,126,575	\$105,900	-\$28,020,675	\$21,780,916	-\$71,891,071	-\$93,671,988
Mar-07	-\$15,335,851	-\$5,020,217	-\$41,454			-\$20,397,523	\$91,869	-\$20,305,654	\$21,872,785	-\$92,196,725	-\$114,069,510
Apr-07	-\$13,730,839	-\$4,746,463	-\$38,360			-\$18,515,663	\$77,960	-\$18,437,702	\$21,950,745	-\$110,634,428	-\$132,585,173
May-07	-\$4,045,124	-\$1,461,868	-\$24,204			-\$5,531,196	\$41,549	-\$5,489,647	\$21,992,294	-\$116,124,075	-\$138,116,369
Jun-07	-\$1,824,264	-\$756,525	-\$6,479			-\$2,587,269	\$18,743	-\$2,568,525	\$22,011,037	-\$118,692,601	-\$140,703,638
Jul-07	-\$1,575,114	-\$666,103	-\$11,375			-\$2,252,592	\$13,759	-\$2,238,833	\$22,024,796	-\$120,931,434	-\$142,956,230
Aug-07	-\$1,548,150	-\$648,202	-\$9,630			-\$2,205,982	\$11,085	-\$2,194,897	\$22,035,882	-\$123,126,330	-\$145,162,212
Sep-07	-\$1,483,832	-\$600,649	-\$7,762			-\$2,092,243	\$11,445	-\$2,080,798	\$22,047,327	-\$125,207,128	-\$147,254,455
Oct-07	-\$2,044,185	-\$731,511	-\$6,280			-\$2,781,976	\$14,771	-\$2,767,205	\$22,062,098	-\$127,974,333	-\$150,036,431
Nov-07	-\$4,561,749	-\$1,277,436	-\$4,391			-\$5,843,575	\$49,773	-\$5,793,803	\$22,111,871	-\$133,768,135	-\$155,880,006
Dec-07	-\$8,568,268	-\$2,599,283	-\$27,095			-\$11,194,646	\$104,032	-\$11,090,614	\$22,215,903	-\$144,858,749	-\$167,074,653
Jan-08	-\$10,096,120	-\$2,931,314	-\$24,470			-\$13,051,903	\$131,676	-\$12,920,228	\$22,347,579	-\$157,778,977	-\$180,126,556
Feb-08	-\$7,024,941	-\$1,824,434	-\$10,632			-\$8,860,007	\$141,785	-\$8,718,221	\$22,489,365	-\$166,497,198	-\$188,986,563
Mar-08	-\$7,533,256	-\$2,519,223	-\$13,759			-\$10,066,238	\$142,920	-\$9,923,318	\$22,632,284	-\$176,420,516	-\$199,052,801

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Apr-08	-\$2,506,939	-\$950,180	\$2,713			-\$3,454,406	\$73,436	-\$3,380,970	\$22,705,720	-\$179,801,486	-\$202,507,206
May-08	-\$1,179,307	-\$749,652	\$856			-\$1,928,103	\$31,482	-\$1,896,621	\$22,737,202	-\$181,698,107	-\$204,435,310
Jun-08	-\$603,512	-\$565,362	-\$1,217			-\$1,170,091	\$20,328	-\$1,149,763	\$22,757,530	-\$182,847,870	-\$205,605,401
Jul-08	-\$121,880	-\$668,469	\$304			-\$790,044	\$11,537	-\$778,508	\$22,769,066	-\$183,626,378	-\$206,395,445
Aug-08	-\$920,216	-\$692,303	-\$1,841			-\$1,614,359	\$9,710	-\$1,604,649	\$22,778,777	-\$185,231,027	-\$208,009,805
Sep-08	-\$1,587,392	-\$1,011,676	-\$3,722			-\$2,602,790	\$8,792	-\$2,593,998	\$22,787,569	-\$187,825,025	-\$210,612,595
Oct-08	-\$2,969,271	-\$977,128	-\$6,760			-\$3,953,159	\$14,224	-\$3,938,935	\$22,801,793	-\$191,763,960	-\$214,565,754
Nov-08	-\$4,157,953	-\$925,308	\$4,846			-\$5,078,415	\$43,070	-\$5,035,346	\$22,844,862	-\$196,799,305	-\$219,644,169
Dec-08	-\$3,814,931	\$332,636	\$22,238			-\$3,460,056	\$92,916	-\$3,367,141	\$22,937,778	-\$200,166,446	-\$223,104,225
Jan-09	-\$28,681,170	-\$9,070,920	-\$72,169			-\$37,824,259	\$124,409	-\$37,699,849	\$23,062,188	-\$237,866,295	-\$260,928,484
Feb-09	-\$22,216,722	-\$6,779,101	-\$58,538			-\$29,054,361	\$125,729	-\$28,928,632	\$23,187,917	-\$266,794,927	-\$289,982,845
Mar-09	-\$14,231,242	-\$3,873,959	-\$28,150			-\$18,133,351	\$95,546	-\$18,037,806	\$23,283,463	-\$284,832,732	-\$308,116,196
Apr-09	-\$14,866,518	-\$4,294,526	-\$35,204			-\$19,196,248	\$14,350	-\$19,181,898	\$23,297,813	-\$304,014,630	-\$327,312,444
May-09	-\$8,101,872	-\$2,856,819	-\$18,422			-\$10,977,112	\$6,975	-\$10,970,138	\$23,304,788	-\$314,984,768	-\$338,289,557
Jun-09	-\$3,431,341	-\$1,247,366	-\$6,467			-\$4,685,174	\$3,592	-\$4,681,582	\$23,308,381	-\$319,666,350	-\$342,974,731
Jul-09	-\$2,737,380	-\$1,060,690	-\$5,052			-\$3,803,121	\$2,223	-\$3,800,898	\$23,310,604	-\$323,467,248	-\$346,777,852
Aug-09	-\$3,552,993	-\$1,512,985	-\$20,633			-\$5,086,611	\$2,092	-\$5,084,519	\$23,312,696	-\$328,551,766	-\$351,864,463
Sep-09	-\$3,368,242	-\$1,428,350	-\$19,836			-\$4,816,429	\$1,949	-\$4,814,479	\$23,314,646	-\$333,366,245	-\$356,680,892
Oct-09	-\$7,246,610	-\$2,384,038	-\$36,028			-\$9,666,676	\$4,560	-\$9,662,116	\$23,319,206	-\$343,028,362	-\$366,347,568
Nov-09	-\$11,737,467	-\$4,226,695	-\$54,205			-\$16,018,366	\$8,603	-\$16,009,764	\$23,327,808	-\$359,038,125	-\$382,365,935
Dec-09	-\$21,782,094	-\$7,865,117	-\$109,853			-\$29,757,064	\$14,783	-\$29,742,282	\$23,342,591	-\$388,780,407	-\$412,122,999
Jan-10	-\$40,572,070	-\$17,771,809	-\$190,682			-\$58,534,561	\$25,333	-\$58,509,229	\$23,367,923	-\$447,289,636	-\$470,657,560
Feb-10	-\$37,456,299	-\$17,263,379	-\$166,964			-\$54,886,642	\$23,999	-\$54,862,644	\$23,391,922	-\$502,152,279	-\$525,544,202
Mar-10	-\$29,544,799	-\$12,895,726	-\$125,155			-\$42,565,680	\$20,305	-\$42,545,375	\$23,412,227	-\$544,697,654	-\$568,109,882
Apr-10	-\$10,205,850	-\$5,302,857	-\$44,161			-\$15,552,868	\$0	-\$15,552,868	\$23,412,227	-\$560,250,522	-\$583,662,750
May-10	-\$5,030,596	-\$1,850,366	-\$11,344			-\$6,892,306	\$0	-\$6,892,306	\$23,412,227	-\$567,142,828	-\$590,555,056
Jun-10	-\$3,111,808	-\$1,367,655	-\$10,126			-\$4,489,589	\$0	-\$4,489,589	\$23,412,227	-\$571,632,417	-\$595,044,645
Jul-10	-\$2,355,905	-\$929,182	-\$4,453			-\$3,289,540	\$0	-\$3,289,540	\$23,412,227	-\$574,921,957	-\$598,334,185
Aug-10	-\$1,906,242	-\$750,001	-\$3,512			-\$2,659,755	\$0	-\$2,659,755	\$23,412,227	-\$577,581,712	-\$600,993,940
Sep-10	-\$2,515,082	-\$1,055,284	-\$11,219			-\$3,581,584	\$0	-\$3,581,584	\$23,412,227	-\$581,163,296	-\$604,575,524
Oct-10	-\$3,682,710	-\$1,296,045	-\$13,255			-\$4,992,010	\$0	-\$4,992,010	\$23,412,227	-\$586,155,306	-\$609,567,534
Nov-10	-\$8,929,195	-\$2,980,686	-\$36,259			-\$11,946,139	\$0	-\$11,946,139	\$23,412,227	-\$598,101,446	-\$621,513,674
Dec-10	-\$14,247,734	-\$4,376,832	-\$31,214			-\$18,655,779	\$0	-\$18,655,779	\$23,412,227	-\$616,757,225	-\$640,169,453
Jan-11	-\$20,178,145	-\$7,226,845	-\$66,450			-\$27,471,440	\$0	-\$27,471,440	\$23,412,227	-\$644,228,665	-\$667,640,894
Feb-11	-\$17,503,090	-\$6,663,572	-\$57,222			-\$24,223,884	\$0	-\$24,223,884	\$23,412,227	-\$668,452,549	-\$691,864,778
Mar-11	-\$15,140,570	-\$5,431,256	-\$49,063			-\$20,620,889	\$0	-\$20,620,889	\$23,412,227	-\$689,073,439	-\$712,485,667
Apr-11	-\$9,382,832	-\$2,899,984	-\$22,843			-\$12,305,658	\$0	-\$12,305,658	\$23,412,227	-\$701,379,096	-\$724,791,324
May-11	-\$5,043,450	-\$1,581,832	-\$15,485			-\$6,640,768	\$0	-\$6,640,768	\$23,412,227	-\$708,019,864	-\$731,432,092
Jun-11	-\$2,526,502	-\$908,185	-\$7,605			-\$3,442,292	\$0	-\$3,442,292	\$23,412,227	-\$711,462,156	-\$734,874,384
Jul-11	-\$1,869,945	-\$802,740	-\$6,252			-\$2,678,937	\$0	-\$2,678,937	\$23,412,227	-\$714,141,094	-\$737,553,322
Aug-11	-\$1,695,636	-\$671,399	-\$4,174			-\$2,371,209	\$0	-\$2,371,209	\$23,412,227	-\$716,512,303	-\$739,924,531
Sep-11	-\$2,030,481	-\$881,393	-\$7,308			-\$2,919,182	\$0	-\$2,919,182	\$23,412,227	-\$719,431,485	-\$742,843,713
Oct-11	-\$3,140,807	-\$1,164,355	-\$10,329			-\$4,315,491	\$0	-\$4,315,491	\$23,412,227	-\$723,746,976	-\$747,159,204
Nov-11	-\$6,997,438	-\$2,263,598	-\$34,310			-\$9,295,346	\$0	-\$9,295,346	\$23,412,227	-\$733,042,322	-\$756,454,550

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Dec-11	-\$12,557,750	-\$3,945,419	-\$64,240			-\$16,567,409	\$0	-\$16,567,409	\$23,412,227	-\$749,609,731	-\$773,021,959
Jan-12	-\$18,651,178	-\$5,916,444	-\$76,824			-\$24,644,446	\$0	-\$24,644,446	\$23,412,227	-\$774,254,177	-\$797,666,405
Feb-12	-\$20,382,726	-\$6,813,519	-\$80,778			-\$27,277,024	\$0	-\$27,277,024	\$23,412,227	-\$801,531,201	-\$824,943,429
Mar-12	-\$16,793,300	-\$5,589,328	-\$60,396			-\$22,443,024	\$0	-\$22,443,024	\$23,412,227	-\$823,974,225	-\$847,386,453
Apr-12	-\$9,349,064	-\$3,600,962	-\$45,096			-\$12,995,122	\$0	-\$12,995,122	\$23,412,227	-\$836,969,347	-\$860,381,575
May-12	-\$7,406,658	-\$2,572,108	-\$29,530			-\$10,008,296	\$0	-\$10,008,296	\$23,412,227	-\$846,977,643	-\$870,389,871
Jun-12	-\$3,202,658	-\$1,327,809	-\$13,942			-\$4,544,409	\$0	-\$4,544,409	\$23,412,227	-\$851,522,052	-\$874,934,280
Jul-12	-\$2,380,923	-\$1,043,505	-\$7,700			-\$3,432,128	\$0	-\$3,432,128	\$23,412,227	-\$854,954,180	-\$878,366,408
Aug-12	-\$1,986,608	-\$848,902	-\$8,092			-\$2,843,602	\$0	-\$2,843,602	\$23,412,227	-\$857,797,782	-\$881,210,010
Sep-12	-\$2,321,318	-\$1,044,077	-\$11,926			-\$3,377,321	\$0	-\$3,377,321	\$23,412,227	-\$861,175,104	-\$884,587,332
Oct-12	-\$3,653,559	-\$1,102,057	-\$11,358			-\$4,766,974	\$0	-\$4,766,974	\$23,412,227	-\$865,942,077	-\$889,354,306
Nov-12	-\$7,303,123	-\$2,016,031	-\$30,021			-\$9,349,175	\$0	-\$9,349,175	\$23,412,227	-\$875,291,253	-\$898,703,481
Dec-12	-\$10,718,224	-\$3,009,674	-\$34,951			-\$13,762,849	\$0	-\$13,762,849	\$23,412,227	-\$889,054,102	-\$912,466,330
Jan-13	-\$17,561,829	-\$5,237,632	-\$51,727			-\$22,851,187	\$0	-\$22,851,187	\$23,412,227	-\$911,905,289	-\$935,317,517
Feb-13	-\$18,925,582	-\$5,598,939	-\$45,406			-\$24,569,927	\$0	-\$24,569,927	\$23,412,227	-\$936,475,216	-\$959,887,444
Mar-13	-\$16,218,739	-\$4,350,721	-\$28,889			-\$20,598,350	\$0	-\$20,598,350	\$23,412,227	-\$957,073,565	-\$980,485,793
Apr-13	-\$9,824,400	-\$2,408,704	-\$10,098			-\$12,243,202	\$0	-\$12,243,202	\$23,412,227	-\$969,316,767	-\$992,728,995
May-13	-\$3,969,390	-\$1,005,427	-\$8,133			-\$4,982,951	\$0	-\$4,982,951	\$23,412,227	-\$974,299,717	-\$997,711,946
Jun-13	-\$2,415,361	-\$657,077	-\$4,765			-\$3,077,203	\$0	-\$3,077,203	\$23,412,227	-\$977,376,921	-\$1,000,789,149
Jul-13	-\$2,215,582	-\$723,016	-\$6,497			-\$2,945,095	\$0	-\$2,945,095	\$23,412,227	-\$980,322,016	-\$1,003,734,244
Aug-13	-\$2,138,758	-\$765,977	-\$8,254			-\$2,912,988	\$0	-\$2,912,988	\$23,412,227	-\$983,235,004	-\$1,006,647,232
Sep-13	-\$2,047,364	-\$639,512	-\$6,073			-\$2,692,950	\$0	-\$2,692,950	\$23,412,227	-\$985,927,954	-\$1,009,340,182
Oct-13	-\$2,815,864	-\$818,831	-\$16,192			-\$3,650,886	\$0	-\$3,650,886	\$23,412,227	-\$989,578,840	-\$1,012,991,068
Nov-13	-\$7,562,682	-\$2,155,379	-\$62,083			-\$9,780,144	\$0	-\$9,780,144	\$23,412,227	-\$999,358,984	-\$1,022,771,212
Dec-13	-\$13,763,019	-\$3,797,676	-\$51,496			-\$17,612,191	\$0	-\$17,612,191	\$23,412,227	-\$1,016,971,175	-\$1,040,383,403
Jan-14	-\$15,981,935	-\$4,344,835	-\$46,431			-\$20,373,200	\$0	-\$20,373,200	\$23,412,227	-\$1,037,344,376	-\$1,060,756,604
Feb-14	-\$8,748,912	-\$792,898	\$6,411			-\$9,535,399	\$0	-\$9,535,399	\$23,412,227	-\$1,046,879,775	-\$1,070,292,003
Mar-14	-\$15,113,887	-\$4,423,825	-\$45,744			-\$19,583,455	\$0	-\$19,583,455	\$23,412,227	-\$1,066,463,230	-\$1,089,875,458
Apr-14	-\$9,661,541	-\$2,203,349	-\$20,533			-\$11,885,423	\$0	-\$11,885,423	\$23,412,227	-\$1,078,348,653	-\$1,101,760,881
May-14	-\$4,308,980	-\$879,750	-\$7,338	\$38,047	\$34,335	-\$5,123,687	\$0	-\$5,123,687	\$23,412,227	-\$1,083,472,340	-\$1,106,884,568
Jun-14	-\$2,499,474	-\$638,593	-\$5,820	-\$5,630	\$61,031	-\$3,088,486	\$0	-\$3,088,486	\$23,412,227	-\$1,086,560,826	-\$1,109,973,054
Jul-14	-\$2,327,035	-\$625,615	-\$6,631	-\$42,096	\$59,117	-\$2,942,259	\$0	-\$2,942,259	\$23,412,227	-\$1,089,503,084	-\$1,112,915,312
Aug-14	-\$2,581,985	-\$750,265	-\$8,389	-\$63,833	\$77,033	-\$3,327,439	\$0	-\$3,327,439	\$23,412,227	-\$1,092,830,524	-\$1,116,242,752
Sep-14	-\$2,569,170	-\$632,911	-\$6,336	-\$17,212	\$67,644	-\$3,157,984	\$0	-\$3,157,984	\$23,412,227	-\$1,095,988,508	-\$1,119,400,736
Oct-14	-\$3,731,082	-\$814,930	-\$12,555	\$37,077	\$73,254	-\$4,448,236	\$0	-\$4,448,236	\$23,412,227	-\$1,100,436,744	-\$1,123,848,972
Nov-14	-\$8,519,324	-\$1,952,682	-\$35,137	\$30,825	\$67,232	-\$10,409,087	\$0	-\$10,409,087	\$23,412,227	-\$1,110,845,831	-\$1,134,258,059
Dec-14	-\$12,884,435	-\$3,090,609	-\$61,504	\$47,032	\$48,796	-\$15,940,721	\$0	-\$15,940,721	\$23,412,227	-\$1,126,786,552	-\$1,150,198,780
Jan-15	-\$24,103,802	-\$6,731,228	-\$96,765	\$101,261	\$40,306	-\$30,790,227	\$0	-\$30,790,227	\$23,412,227	-\$1,157,576,779	-\$1,180,989,007
Feb-15	-\$27,342,772	-\$7,357,262	-\$106,216	\$169,688	\$18,540	-\$34,618,022	\$0	-\$34,618,022	\$23,412,227	-\$1,192,194,801	-\$1,215,607,029

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Mar-15	-\$23,346,881	-\$6,432,525	-\$96,751	\$245,073	\$25,336	-\$29,605,747	\$0	-\$29,605,747	\$23,412,227	-\$1,221,800,548	-\$1,245,212,776
Apr-15	-\$13,206,425	-\$3,819,985	-\$60,265	\$73,304	\$18,404	-\$16,994,968	\$0	-\$16,994,968	\$23,412,227	-\$1,238,795,516	-\$1,262,207,744
May-15	-\$5,874,990	-\$1,659,536	-\$24,504	\$63,709	\$19,577	-\$7,475,743	\$0	-\$7,475,743	\$23,412,227	-\$1,246,271,259	-\$1,269,683,488
Jun-15	-\$3,022,034	-\$953,870	-\$14,081	\$6,185	\$31,353	-\$3,952,446	\$0	-\$3,952,446	\$23,412,227	-\$1,250,223,705	-\$1,273,635,933
Jul-15	-\$2,517,799	-\$838,616	-\$11,460	\$13,055	\$35,924	-\$3,318,895	\$0	-\$3,318,895	\$23,412,227	-\$1,253,542,601	-\$1,276,954,829
Aug-15	-\$2,236,562	-\$706,709	-\$12,089	-\$34,315	\$82,867	-\$2,906,808	\$0	-\$2,906,808	\$23,412,227	-\$1,256,449,408	-\$1,279,861,636
Sep-15	-\$2,421,039	-\$776,506	-\$12,446	\$3,354	\$49,646	-\$3,156,991	\$0	-\$3,156,991	\$23,412,227	-\$1,259,606,399	-\$1,283,018,627
Oct-15	-\$3,143,346	-\$990,394	-\$20,122	\$11,751	\$64,692	-\$4,077,419	\$0	-\$4,077,419	\$23,412,227	-\$1,263,683,818	-\$1,287,096,046
Nov-15	-\$6,647,549	-\$2,120,236	-\$42,765	\$32,806	\$78,831	-\$8,698,913	\$0	-\$8,698,913	\$23,412,227	-\$1,272,382,731	-\$1,295,794,959
Dec-15	-\$11,434,927	-\$3,771,764	-\$60,957	\$8,563	\$72,641	-\$15,186,444	\$0	-\$15,186,444	\$23,412,227	-\$1,287,569,175	-\$1,310,981,403
Jan-16	-\$16,112,731	-\$5,678,615	-\$94,065	-\$34,989	\$9,775	-\$21,910,625	\$0	-\$21,910,625	\$23,412,227	-\$1,309,479,800	-\$1,332,892,028
Feb-16	-\$18,597,905	-\$6,753,189	-\$119,339	-\$1,951	\$18,368	-\$25,454,015	\$0	-\$25,454,015	\$23,412,227	-\$1,334,933,815	-\$1,358,346,043
Mar-16	-\$15,872,469	-\$5,580,592	-\$102,175	\$7,502	\$13,209	-\$21,534,525	\$0	-\$21,534,525	\$23,412,227	-\$1,356,468,340	-\$1,379,880,568
Apr-16	-\$10,415,718	-\$3,156,401	-\$49,603	\$10,821	\$6,722	-\$13,604,179	\$0	-\$13,604,179	\$23,412,227	-\$1,370,072,519	-\$1,393,484,747
May-16	-\$5,964,571	-\$1,727,504	-\$24,245	-\$11,723	\$44,730	-\$7,683,313	\$0	-\$7,683,313	\$23,412,227	-\$1,377,755,832	-\$1,401,168,060
Jun-16	-\$3,487,938	-\$1,055,352	-\$14,102	-\$24,004	\$55,326	-\$4,526,070	\$0	-\$4,526,070	\$23,412,227	-\$1,382,281,902	-\$1,405,694,130
Jul-16	-\$1,991,284	-\$607,071	-\$6,338	-\$29,412	\$71,233	-\$2,562,872	\$0	-\$2,562,872	\$23,412,227	-\$1,384,844,774	-\$1,408,257,002
Aug-16	-\$2,033,848	-\$612,147	-\$6,595	-\$31,069	\$86,108	-\$2,597,551	\$0	-\$2,597,551	\$23,412,227	-\$1,387,442,325	-\$1,410,854,553
Sep-16	-\$2,009,458	-\$597,987	-\$7,340	-\$6,580	\$55,578	-\$2,565,788	\$0	-\$2,565,788	\$23,412,227	-\$1,390,008,113	-\$1,413,420,341
Oct-16	-\$2,257,699	-\$619,928	-\$10,332	\$67,158	\$80,285	-\$2,740,516	\$0	-\$2,740,516	\$23,412,227	-\$1,392,748,629	-\$1,416,160,857
Nov-16	-\$5,015,771	-\$1,363,107	-\$32,609	-\$46,694	\$1,689	-\$6,456,492	\$0	-\$6,456,492	\$23,412,227	-\$1,399,205,120	-\$1,422,617,349
Dec-16	-\$8,848,222	-\$2,602,060	-\$39,483	-\$52,895	\$77,846	-\$11,464,815	\$0	-\$11,464,815	\$23,412,227	-\$1,410,669,935	-\$1,434,082,163
Jan-17	-\$8,602,412	-\$1,932,895	-\$23,094	-\$197,580	\$16,657	-\$10,739,324	\$0	-\$10,739,324	\$23,412,227	-\$1,421,409,259	-\$1,444,821,488
Feb-17	-\$10,479,905	-\$3,212,465	-\$45,344	-\$189,553	\$20,621	-\$13,906,646	\$0	-\$13,906,646	\$23,412,227	-\$1,435,315,906	-\$1,458,728,134
Mar-17	-\$12,403,111	-\$3,981,768	-\$66,462	-\$14,808	\$13,044	-\$16,453,105	\$0	-\$16,453,105	\$23,412,227	-\$1,451,769,011	-\$1,475,181,239
Apr-17	-\$7,152,840	-\$2,079,943	-\$33,637	-\$44,992	\$20,985	-\$9,290,427	\$0	-\$9,290,427	\$23,412,227	-\$1,461,059,438	-\$1,484,471,666
May-17	-\$4,249,551	-\$1,084,496	-\$16,756	-\$19,605	\$51,743	-\$5,318,664	\$0	-\$5,318,664	\$23,412,227	-\$1,466,378,103	-\$1,489,790,331
Jun-17	-\$2,846,544	-\$749,126	-\$12,220	-\$29,457	\$67,299	-\$3,570,047	\$0	-\$3,570,047	\$23,412,227	-\$1,469,948,150	-\$1,493,360,378
Jul-17	-\$2,432,674	-\$673,504	-\$11,964	\$17,247	\$53,984	-\$3,046,912	\$0	-\$3,046,912	\$23,412,227	-\$1,472,995,062	-\$1,496,407,290
Aug-17	-\$2,371,761	-\$675,104	-\$12,487	\$2,572	\$16	-\$3,056,763	\$0	-\$3,056,763	\$23,412,227	-\$1,476,051,825	-\$1,499,464,053
Sep-17	-\$2,539,390	-\$714,249	-\$12,382	\$5,325	\$60,276	-\$3,200,419	\$0	-\$3,200,419	\$23,412,227	-\$1,479,252,244	-\$1,502,664,472
Oct-17	-\$2,648,172	-\$744,642	-\$15,885	\$22,212	\$43,730	-\$3,342,756	\$0	-\$3,342,756	\$23,412,227	-\$1,482,595,000	-\$1,506,007,228
Nov-17	-\$7,587,488	-\$1,966,136	-\$50,909	\$30,457	\$50,781	-\$9,523,295	\$0	-\$9,523,295	\$23,412,227	-\$1,492,118,295	-\$1,515,530,523
Dec-17	-\$12,595,841	-\$3,405,446	-\$73,570	-\$42,110	\$70,159	-\$16,046,808	\$0	-\$16,046,808	\$23,412,227	-\$1,508,165,103	-\$1,531,577,331
Jan-18	-\$22,918,445	-\$6,713,323	-\$115,325	\$16,576	\$56,107	-\$29,674,409	\$0	-\$29,674,409	\$23,412,227	-\$1,537,839,513	-\$1,561,251,741
Feb-18	-\$11,398,416	-\$2,573,054	-\$37,638	\$32,141	\$35,553	-\$13,941,414	\$0	-\$13,941,414	\$23,412,227	-\$1,551,780,927	-\$1,575,193,155
Mar-18	-\$13,701,257	-\$4,102,488	-\$71,874	\$97,706	\$23,532	-\$17,754,381	\$0	-\$17,754,381	\$23,412,227	-\$1,569,535,308	-\$1,592,947,536
Apr-18	-\$14,252,376	-\$4,362,801	-\$80,331	\$48,637	\$20,711	-\$18,626,161	\$0	-\$18,626,161	\$23,412,227	-\$1,588,161,468	-\$1,611,573,696
May-18	-\$6,279,749	-\$1,859,047	-\$35,776	\$20,324	\$15,933	-\$8,138,314	\$0	-\$8,138,314	\$23,412,227	-\$1,596,299,783	-\$1,619,712,011
Jun-18	-\$2,785,837	-\$866,876	-\$13,609	\$15,332	\$43,914	-\$3,607,076	\$0	-\$3,607,076	\$23,412,227	-\$1,599,906,859	-\$1,623,319,087
Jul-18	-\$2,391,788	-\$728,416	-\$12,355	\$17,243	\$71,279	-\$3,044,037	\$0	-\$3,044,037	\$23,412,227	-\$1,602,950,896	-\$1,626,363,124
Aug-18	-\$2,370,543	-\$763,545	-\$11,058	-\$8,968	\$73,229	-\$3,080,885	\$0	-\$3,080,885	\$23,412,227	-\$1,606,031,780	-\$1,629,444,009
Sep-18	-\$2,377,345	-\$747,286	-\$11,546	\$8,187	\$48,877	-\$3,079,113	\$0	-\$3,079,113	\$23,412,227	-\$1,609,110,894	-\$1,632,523,122
Oct-18	-\$3,048,855	-\$877,058	-\$21,557	-\$8,173	\$41,244	-\$3,914,399	\$0	-\$3,914,399	\$23,412,227	-\$1,613,025,293	-\$1,636,437,521

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Nov-18	-\$8,245,795	-\$2,195,153	-\$46,857	\$49,759	\$57,367	-\$10,380,680	\$0	-\$10,380,680	\$23,412,227	-\$1,623,405,972	-\$1,646,818,201
Dec-18	-\$7,107,855	-\$486,892	-\$11,127	-\$131,642	\$36,444	-\$7,701,071	\$0	-\$7,701,071	\$23,412,227	-\$1,631,107,044	-\$1,654,519,272
Jan-19	-\$14,432,062	-\$4,330,882	-\$90,482	-\$9,463	-\$117,386	-\$18,980,275	\$0	-\$18,980,275	\$23,412,227	-\$1,650,087,319	-\$1,673,499,547
Feb-19	-\$20,526,817	-\$6,533,568	-\$128,396	\$24,773	\$23,583	-\$27,140,424	\$0	-\$27,140,424	\$23,412,227	-\$1,636,251,318	-\$1,659,663,546
Mar-19	-\$17,106,315	-\$5,386,552	-\$109,858	-\$51,686	-\$1,770	-\$22,656,180	\$0	-\$22,656,180	\$23,412,227	-\$1,658,907,497	-\$1,682,319,726
Apr-19	-\$11,367,867	-\$3,623,774	-\$74,339	\$49,716	\$10,455	-\$15,005,809	\$0	-\$15,005,809	\$23,412,227	-\$1,673,913,306	-\$1,697,325,534
May-19	-\$6,410,621	-\$1,840,759	-\$28,594	\$17,288	\$30,188	-\$8,232,499	\$0	-\$8,232,499	\$23,412,227	-\$1,682,145,805	-\$1,705,558,033
Jun-19	-\$3,592,368	-\$1,200,432	-\$15,590	-\$6,574	\$26,184	-\$4,788,780	\$0	-\$4,788,780	\$23,412,227	-\$1,686,934,584	-\$1,710,346,813
Jul-19	-\$2,998,675	-\$1,087,420	-\$14,994	\$18,709	\$39,386	-\$4,042,994	\$0	-\$4,042,994	\$23,412,227	-\$1,690,977,578	-\$1,714,389,806
Aug-19	-\$2,813,061	-\$1,067,297	-\$15,342	\$18,693	\$40,760	-\$3,836,246	\$0	-\$3,836,246	\$23,412,227	-\$1,694,813,825	-\$1,718,226,053
Sep-19	-\$2,859,421	-\$1,071,283	-\$14,214	\$25,450	\$46,097	-\$3,873,371	\$0	-\$3,873,371	\$23,412,227	-\$1,698,687,196	-\$1,722,099,424
Oct-19	-\$3,348,874	-\$1,102,361	-\$19,762	\$2,084	\$44,122	-\$4,424,791	\$0	-\$4,424,791	\$23,412,227	-\$1,703,111,987	-\$1,726,524,215
Nov-19	-\$8,645,982	-\$2,655,864	-\$57,042	\$107,477	\$56,498	-\$11,194,913	\$0	-\$11,194,913	\$23,412,227	-\$1,714,306,900	-\$1,737,719,128
Dec-19	-\$16,457,094	-\$5,480,208	-\$131,140	\$96,260	\$42,802	-\$21,929,380	\$0	-\$21,929,380	\$23,412,227	-\$1,736,236,280	-\$1,759,648,508
Jan-20	-\$18,659,395	-\$6,818,494	-\$157,018	\$112,697	\$23,420	-\$25,498,789	\$0	-\$25,498,789	\$23,412,227	-\$1,761,735,069	-\$1,785,147,297
Feb-20	-\$20,153,919	-\$7,318,893	-\$164,857	\$119,648	\$8,427	-\$25,498,789	\$0	-\$27,509,594	\$23,412,227	-\$1,789,244,663	-\$1,812,656,891
Mar-20	-\$18,103,090	-\$6,385,425	-\$141,270	\$82,100	\$4,253	-\$25,498,789	\$0	-\$24,543,434	\$23,412,227	-\$1,813,788,097	-\$1,837,200,325
Apr-20	-\$13,271,864	-\$4,320,014	-\$95,686	\$60,573	\$7,402	-\$25,498,789	\$0	-\$17,619,589	\$23,412,227	-\$1,831,407,686	-\$1,854,819,914
May-20	-\$10,105,148	-\$3,022,800	-\$59,180	\$39,324	\$19,243	-\$25,498,789	\$0	-\$13,128,560	\$23,412,227	-\$1,844,536,246	-\$1,867,948,474
Jun-20	-\$4,981,287	-\$1,563,980	-\$27,330	\$26,538	\$29,521	-\$25,498,789	\$0	-\$6,516,538	\$23,412,227	-\$1,851,052,783	-\$1,874,465,012
Jul-20	-\$3,427,680	-\$1,231,796	-\$19,076	\$12,545	\$34,018	-\$25,498,789	\$0	-\$4,631,990	\$23,412,227	-\$1,855,684,773	-\$1,879,097,001
Aug-20	-\$2,885,618	-\$1,016,131	-\$16,235	\$14,923	\$37,981	-\$25,498,789	\$0	-\$3,865,080	\$23,412,227	-\$1,859,549,853	-\$1,882,962,081
Sep-20	-\$2,619,833	-\$818,632	-\$10,300	\$28,296	\$18,070	-\$25,498,789	\$0	-\$3,402,399	\$23,412,227	-\$1,862,952,253	-\$1,886,364,481
Oct-20	-\$4,316,431	-\$1,409,642	-\$24,376	\$30,873	\$40,906	-\$25,498,789	\$0	-\$5,678,670	\$23,412,227	-\$1,868,630,922	-\$1,892,043,150
Nov-20	-\$5,812,412	-\$1,607,908	-\$37,387	\$62,014	\$40,068	-\$25,498,789	\$0	-\$7,355,625	\$23,412,227	-\$1,875,986,547	-\$1,899,398,775
Dec-20	-\$11,200,126	-\$3,625,383	-\$80,765	\$106,855	\$47,245	-\$25,498,789	\$0	-\$14,752,175	\$23,412,227	-\$1,890,738,722	-\$1,914,150,950

Month	Res. Savings CAB	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Jan-21	-\$19,491,141	-\$6,666,876	-\$143,223	\$154,450	\$31,771	-\$26,115,017	\$0	-\$26,115,017	\$23,412,228	-\$1,916,853,739	-\$1,940,265,967
Feb-21	-\$21,196,479	-\$7,336,740	-\$152,312	\$156,417	\$4,674	-\$26,115,017	\$0	-\$28,524,440	\$23,412,227	-\$1,945,378,180	-\$1,968,790,408
Mar-21	-\$20,318,419	-\$7,231,681	-\$154,242	\$99,776	\$10,154	-\$26,115,017	\$0	-\$27,594,413	\$23,412,227	-\$1,972,972,592	-\$1,996,384,820
Apr-21	-\$8,209,071	-\$2,226,020	-\$40,889	\$92,010	\$9,969	-\$26,115,017	\$0	-\$10,374,000	\$23,412,227	-\$1,983,346,592	-\$2,006,758,820
May-21	-\$5,479,371	-\$1,314,604	-\$16,485	\$85,657	\$34,582	-\$26,115,017	\$0	-\$6,690,222	\$23,412,227	-\$1,990,036,814	-\$2,013,449,042
Jun-21	-\$3,289,413	-\$864,557	-\$8,249	\$44,137	\$38,264	-\$26,115,017	\$0	-\$4,079,817	\$23,412,227	-\$1,994,116,631	-\$2,017,528,860
Jul-21	-\$2,037,807	-\$387,060	\$1,995	\$33,575	\$39,901	-\$2,349,396	\$0	-\$2,349,396	\$23,412,227	-\$1,996,466,028	-\$2,019,878,256
Aug-21	-\$1,709,138	-\$246,676	\$18,741	\$35,241	\$55,692	-\$1,846,140	\$0	-\$1,846,140	\$23,412,227	-\$1,998,312,168	-\$2,021,724,396
Sep-21	-\$1,633,679	-\$144,748	\$5,963	\$44,710	\$41,065	-\$1,686,690	\$0	-\$1,686,690	\$23,412,227	-\$1,999,998,858	-\$2,023,411,086
Oct-21	-\$956,744	\$465,322	\$22,335	\$67,881	\$69,925	-\$331,282	\$0	-\$331,282	\$23,412,227	-\$2,000,330,140	-\$2,023,742,368
Nov-21	-\$513,114	\$1,426,661	\$50,748	\$156,154	\$44,599	\$1,165,047	\$0	\$1,165,047	\$23,412,227	-\$1,999,165,092	-\$2,022,577,320
Dec-21	-\$4,006,520	\$1,487,874	\$42,726	\$209,405	\$4,604	-\$2,261,910	\$0	-\$2,261,910	\$23,412,227	-\$2,001,427,003	-\$2,024,839,231
Jan-22	-\$13,714,816	-\$2,735,771	-\$51,028	\$187,499	-\$2,073	-\$16,316,189	\$0	-\$16,316,189	\$23,412,227	-\$2,017,743,192	-\$2,041,155,420
Feb-22	\$1,046,725	\$5,673,939	\$158,580	\$216,027	\$12,435	\$7,107,707	\$0	\$7,107,707	\$23,412,227	-\$2,010,635,485	-\$2,034,047,713

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Summary: Comments Comments on the Minimum Standards for Consumers'
Natural Gas Service by Office of the Ohio Consumers' Counsel electronically filed
by Mrs. Tracy J. Greene on behalf of Michael, William J.