

**From:** PUCO Consumer Call Center <contactthepuco@puc.state.oh.us>  
**Sent:** Thursday, December 8, 2022 8:56 AM  
**To:** Puc Docketing  
**Subject:** RE: PUBLIC UTILITIES COMMISSION OF OHIO - Your Case #00790389 [ ref:\_00Dt0GzXt\_5008y6HKYv:ref ]

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2022 DEC -8 AM 10:22  
PUCO

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

**CASE ID:** 00790389

**COMPANY:** American Council for an Energy-Efficient Economy

**ADDRESS:** 529 14th Street Northwest, Washington, District of Columbia 20045

**SERVICE ADDRESS:** 529 14th Street Northwest, Washington, District of Columbia 20045

**AIQ:** Columbia Gas of Ohio

**NIQ:** 5172565380

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

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

**SUBJECT:** Columbia Gas of Ohio - Rates & Tariffs

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

Comments regarding Columbia Gas Case No. 21-637. I submit these comments on behalf of the American Council for an Energy-Efficient Economy (ACEEE). We as an organization ([https://puco.my.salesforce.com/apex/AFSC\\_\\_UrlCheck?id=04a0q8y000000oTM2AAM](https://puco.my.salesforce.com/apex/AFSC__UrlCheck?id=04a0q8y000000oTM2AAM) ([www.aceee.org](http://www.aceee.org))) have had the pleasure over many years of pointing to the great work by Columbia Gas in providing energy efficiency services to their customers.

We are therefore extremely surprised and disappointed to see the proposed stipulation in Case No. 21-637 that would drastically cut the energy efficiency programs provided by Columbia Gas. Here is an excerpt from the proposed stipulation:

**“D. Demand Side Management Program and Rider**

1. The Signatory Parties agree that Columbia will continue its Demand Side Management Program, as proposed in its Application and modified by the Staff Report filed in this proceeding; provided, however, that Columbia’s Demand Side Management Program shall be limited, beginning on January 1, 2023, solely to Columbia’s low-income program.... Columbia agrees to withdraw its non-low-income DSM proposal and not charge consumers for non-low-income DSM, which Columbia had proposed in its Application as at least \$102 million for five years beginning January 1, 2023, plus inflationary increases and shared savings.”

Over many years, Columbia Gas has been a great example in the Midwest of a utility providing strong energy efficiency programs for its customers. It would be such a shame for that to end...and just at a point where customers need energy efficiency more than ever. We certainly hope that this proposal is not accepted.

Moreover, and quite incredibly, the proposed stipulation attempts to go far beyond the legitimate scope of this case to include the following purported restriction on Columbia Gas’ future public pronouncements and policy positions:

Columbia agrees not to pursue (and not to support others’ pursuit of) consumer- funded, low-income and consumer-funded, non-low-income energy efficiency programs (including demand side management programs) through legislation or other regulatory initiatives until Columbia files its next base rate case.” (pp. 11-12)

That provision would seem way out-of-bounds for anything that would be officially certified by a government agency such as PUCO, and we certainly hope that any such provision would be rejected. Finally, there is one other aspect of the proposed stipulation for which we would like to note our opposition. That is the proposal for a dramatic increase in the monthly “fixed charge” that customers face. The stipulation would increase the current total fixed charge and associated riders from about \$37 to over \$56 a month. That kind of increase is unfair to customers who are trying to reduce their bill by being more energy efficient (i.e., reducing their gas usage would do nothing to reduce those high fixed charges), and would be particularly harmful for low-income customers.

In summary, we urge the PUCO to reject this proposed stipulation. It contains several provisions (as noted above) that are especially inappropriate at a time when customers are facing high natural gas prices and are particularly in need of programs to assist them in becoming more energy efficient.

Thank-you for your consideration. I would be happy to answer any questions or provide further information.

Sincerely,  
Martin Kushler, Ph.D.  
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ACEEE  
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