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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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2004 JUL 23 AM 9:15

Application Not for an Increase in Rates,
Pursuant to Section 4909.18, Revised Code

PUCO

Application of Columbia Gas of Ohio, Inc.)
to Revise its Tariffs to Substitute an Auto-)
mated Meter Reading Charge for the Cur-)
rent Remote Index Charge.)

Case No. 04- 1166 -GA-ATA

APPLICATION
OF COLUMBIA GAS OF OHIO, INC.

1. APPLICANT RESPECTFULLY PROPOSES: (Check applicable proposals)

- | | |
|---|---|
| <input type="checkbox"/> New Service | <input type="checkbox"/> Change in Rule or Regulation |
| <input type="checkbox"/> New Classification | <input type="checkbox"/> Reduction Rates |
| <input type="checkbox"/> Change in Classification | <input type="checkbox"/> Correction of Error |
| <input checked="" type="checkbox"/> Other, not involving increase in rates: | |
| <input type="checkbox"/> Various related and unrelated textual revision, without change in intent | |

2. DESCRIPTION OF PROPOSAL:

Columbia Gas of Ohio ("Columbia") plans to discontinue the installation of remote meter indexes used to obtain readings from indoor meters, and plans to instead begin installation of automated meter reading ("AMR") devices for indoor meters. Part No. 40(g) of Columbia Gas of Ohio's ("Columbia") tariff, on sheet number 15, sets forth a \$35 charge for the installation of a remote meter index. To reflect the operational change over to AMR devices, Columbia proposes to replace the "remote index" language in Part 40(g) of its tariff with the term "automated meter reading device." Thus, Columbia proposes to offer AMR devices to customers at the same rate

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document delivered in the regular course of business
Technician Amr Date Processed 7/23/04

that is currently charged for remote indexes. The proposal is further described in Exhibit C-1 attached hereto.

3. TARIFFS AFFECTED: See Exhibit B

4. ATTACHED HERETO AND MADE A PART HEREOF ARE:

X Exhibit A - existing schedule sheets (to be superseded) if application is approved.

X Exhibit B - proposed schedule sheets.

X Exhibit B-1 – “Red-lined” tariff sheets showing changes made to existing tariffs.

X Exhibit C-1

a. if new service is proposed, describe;

b. if new equipment is involved, describe (preferably with a picture, brochure, etc.) and where appropriate, a statement distinguishing proposed service from existing services;

c. if proposed service results from customer requests, so state, giving if available, the number and type of customers requesting proposed service.

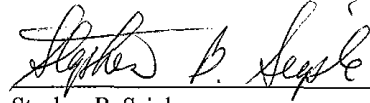
___ Exhibit C-2 - if a change of classification, rule or regulation is proposed, a statement explaining reason for change.

___ Exhibit C-3 - statement explaining reason for any proposal not covered in Exhibits C-1 or C-2.

5. This Application will not result in an increase in any rate, joint rate, toll, classification, charge or rental.

6. Columbia respectfully requests that the Commission expeditiously approve this Application and the proposed tariffs attached hereto.

Respectfully submitted by
COLUMBIA GAS OF OHIO, INC.

A handwritten signature in black ink, appearing to read "Stephen B. Seiple", is written over a horizontal line.

Stephen B. Seiple
Trial Attorney

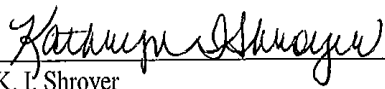
Stanley J. Sagun, Assistant General Counsel
Stephen B. Seiple, Lead Counsel
200 Civic Center Drive
P.O. Box 117
Columbus, Ohio 43216-0117
Telephone: (614) 460-4648
Fax: (614) 460-6986
Email: sseiple@nisource.com

Attorneys for Applicant
COLUMBIA GAS OF OHIO, INC.

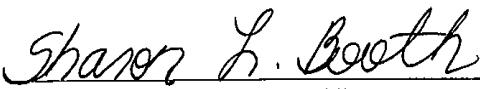
AFFIDAVIT

STATE OF OHIO)
) **ss:**
FRANKLIN COUNTY)

K. I. Shroyer, being first duly cautioned and sworn, deposes and says that she is a Vice President of Columbia Gas of Ohio, Inc., Applicant herein, that the statements and schedules submitted herewith contain proposed revisions to existing schedule sheets, establish the facts and grounds upon which this Application is based, and that the data and facts set forth herein are true to the best of her knowledge and belief.


K. I. Shroyer
Vice President

Sworn to before me and subscribed in my presence this 19th day of July 2004.


Notary Public



SHARON LEE BOOTH
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 11-09-07

AFFIDAVIT

STATE OF OHIO

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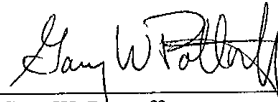
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ss:

FRANKLIN COUNTY

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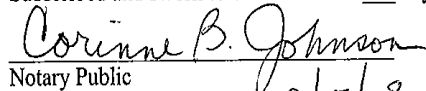
Gary W. Pottorff, being first duly cautioned and sworn, deposes and says that he is the Treasurer of Columbia Gas of Ohio, Inc., Applicant herein, that the statements and schedules submitted herewith contain proposed revisions to existing schedule sheets, establish the facts and grounds upon which this Application is based, and that the data and facts set forth herein are true to the best of his knowledge and belief.



Gary W. Pottorff
Corporate Secretary

SEAL

Subscribed and sworn to before me this 21st day of July 2004



Notary Public

My Commission Expires 2/15/08

County of Residence Lake

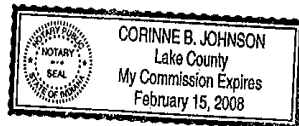


EXHIBIT A

EXISTING SCHEDULE SHEETS

COLUMBIA GAS OF OHIO, INC.

Original Sheet No. 15

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

40. (Continued)

(e) Tie-in Charge

If a tie-in is required to restore service to the same customer who had his/her service line cut and plugged as a result of repeated detection of unauthorized use of service, a charge of up to \$290.00 or actual, whichever is less, shall be assessed. Unauthorized use of service includes:

- (1) Detection of turning on meter after non-pay turn off by Company, and;
- (2) Detection of turning on meter and curb valve after non-pay turn off by Company, and;
- (3) Detection of by-passing meter inlet and outlet connections after removal of meter by Company.

(f) Meter Test Charge

If a meter is tested at the request of a customer and said test result demonstrates the meter was operating within accepted tolerances, a charge of seventeen dollars (\$17.00) shall be assessed. If the meter was not operating within accepted tolerances, there shall be no charge for the test or removal.

(g) Remote Index Installation Charge

If a customer requests that a remote index be installed at his/her premises, a charge of thirty-five dollars (\$35.00) shall be assessed.

Filed Pursuant to PUCO Entry dated October 15, 1985 in Case No. 85-1093-GA-ATA

Issued: October 26, 1994

Effective: October 16, 1985

Issued By
K. I. Shroyer, Vice President

EXHIBIT B

PROPOSED SCHEDULE SHEETS

COLUMBIA GAS OF OHIO, INC.

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

40. (Continued)

(e) Tie-in Charge

If a tie-in is required to restore service to the same customer who had his/her service line cut and plugged as a result of repeated detection of unauthorized use of service, a charge of up to \$290.00 or actual, whichever is less, shall be assessed. Unauthorized use of service includes:

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If a meter is tested at the request of a customer and said test result demonstrates the meter was operating within accepted tolerances, a charge of seventeen dollars (\$17.00) shall be assessed. If the meter was not operating within accepted tolerances, there shall be no charge for the test or removal.

(g) Automatic Meter Reading (AMR) Charge

If a customer requests that a AMR be installed at his/her premises, a charge of thirty-five dollars (\$35.00) shall be assessed.

Filed Pursuant to PUCO Entry dated

Issued:

Effective:

Issued By
J. W. Partridge, Jr., President

EXHIBIT B-1

“RED-LINED” TARIFF SHEETS

COLUMBIA GAS OF OHIO, INC.

**RULES AND REGULATIONS GOVERNING THE DISTRIBUTION
AND SALE OF GAS**

40. (Continued)

(e) Tie-in Charge

If a tie-in is required to restore service to the same customer who had his/her service line cut and plugged as a result of repeated detection of unauthorized use of service, a charge of up to \$290.00 or actual, whichever is less, shall be assessed. Unauthorized use of service includes:

- (1) Detection of turning on meter after non-pay turn off by Company, and;
- (2) Detection of turning on meter and curb valve after non-pay turn off by Company, and;
- (3) Detection of by-passing meter inlet and outlet connections after removal of meter by Company.

(f) Meter Test Charge

If a meter is tested at the request of a customer and said test result demonstrates the meter was operating within accepted tolerances, a charge of seventeen dollars (\$17.00) shall be assessed. If the meter was not operating within accepted tolerances, there shall be no charge for the test or removal.

(g) Remote Index Installation-Automatic Meter Reading (AMR) Charge

If a customer requests that a remote index-AMR be installed at his/her premises, a charge of thirty-five dollars (\$35.00) shall be assessed.

Filed Pursuant to PUCO Entry dated October 15, 1985 in Case No. 85-1093-GA-ATA

Issued: October 26, 1994

Effective: October 16, 1985

Issued By
K. I. Shroyer, J. W. Partridge, Jr., Vice-President

EXHIBIT C-1

STATEMENT EXPLAINING NEW EQUIPMENT

Approximately 400,000 of Columbia's customers currently have indoor meters. Often, there are problems associated with accessing these meters in order to obtain meter readings. In 1985, in order to address meter reading problems associated with access to indoor meters, Columbia adopted language in Part 40(g) of its tariff providing that Columbia would install remote indexes for customers for a charge of \$35. With a remote index a meter reader can obtain a meter reading without having to enter a customer's home. The remote indexes used to obtain readings from indoor meters are mechanical in nature. As a result, there is a potential for error in the readings. Readings obtained through these remote indexes, therefore, are not considered actual readings. Columbia still requires annual verification of all inside meters with remote indexes.

The installation process for remote indexes is labor intensive and typically takes two hours or more. Installation of remote index equipment necessitates a structural breach in the homes in which it is set up – i.e., a cable must be run from the indoor meter, through an exterior wall, to the remote index installed on the outside of a home.

Over time, remote index equipment has become outdated. Because readings obtained via remote indexes are not considered actual readings, Columbia must still enter the homes of customers with indoor meters annually to obtain actual meter readings. *See Sharp v. Columbia Gas of Ohio*, PUCO Case No. 02-647-GA-CSS, Opinion and Order (December 19, 2002).

As of June 2004, there were 14,270 meters for which Columbia had not been able to obtain an actual reading in over twelve months, due to inability to enter customer premises. In order to reduce the number of meters for which it has not obtained an actual reading in over twelve

months, Columbia has implemented several initiatives. These include attempts to read indoor meters during non-traditional hours and on Saturdays, as well as the scheduling of appointments for indoor meter readings. These initiatives have reduced by a third the number of meters for which an actual reading has not been obtained in over twelve months; however, Columbia must continue to maintain and enhance meter reading initiatives to keep pace with the approximately 2,500 meters per month which added to the list of meters in need of an actual meter reading.

In order to address the mechanical deficiencies of remote indexes, and in order to further reduce the number of indoor meters which have not been read within a twelve-month period, Columbia proposes to replace its remote indexes with automated meter reading ("AMR") equipment. Once Columbia begins the installation of AMR devices, it will discontinue the installation of the remote indexes.

AMR equipment consists of two main components. The first component is an encoder, recorder, transmitter ("ERT"). A picture of an ERT is attached in Appendix A to this exhibit. ERTs are installed in indoor meters. The installation process for AMR equipment takes about twenty minutes, where the installation of a remote index takes from two to three hours. ERTs contain, among other elements, a battery and a transmitting device. The transmitting device inside an ERT reads the meter and sends the reading to the second AMR component, a handheld meter-reading device. Such handheld meter reading devices are designed to be in the possession of a Columbia meter reader. ERTs transmit meter information at significant distances and are not blocked by the walls of a structure. Identification numbers for each meter are also transmitted with the data for that meter. This feature assists meter readers, and is employed so that there is no

confusing of meter readings. Thus, using AMR equipment, a Columbia meter reader can obtain a meter reading from an inside meter without having to gain physical access to the meter.

AMR equipment is also more reliable than the remote indexes. The battery life of an AMR device ranges from 18 to 21 years. Installation of such devices instead of the currently used remote index would eliminate many of the failure problems associated with the remote indexes today.

Additionally, installation of an AMR device takes approximately twenty minutes, compared to the two hours it takes to install remote index equipment. Installation of AMR devices also does not cause a structural breach in the homes in which they are installed. The AMR installation process is decidedly non-invasive and brief.

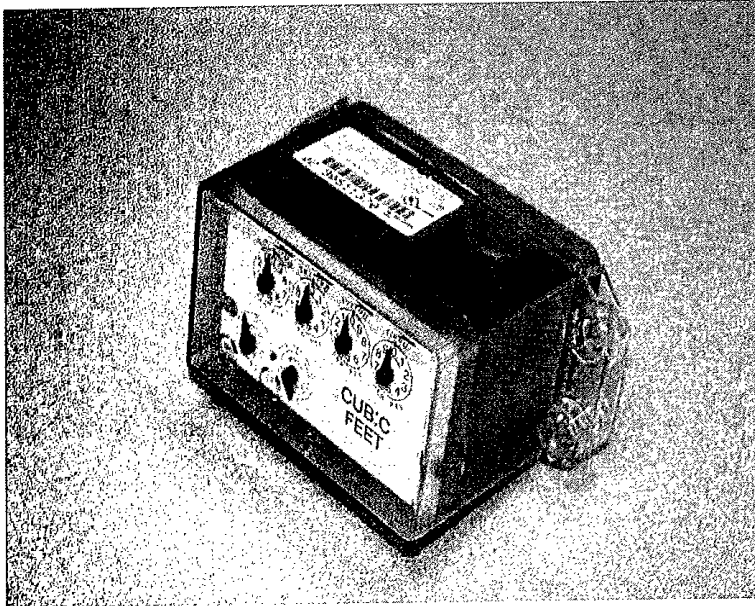
AMR devices have been shown to have a high degree of accuracy and have been accepted in many jurisdictions where they are utilized as actual meter reads. Because meter readings obtained from AMR devices are considered to be actual readings, the need to enter customer premises annually to obtain actual readings from their indoor meters will be eliminated. This arrangement provides benefits to both Columbia and its customers. The short period of time required to install AMR devices, as opposed to the lengthier time required for installation of remote index equipment, will allow Columbia to eliminate the growing request backlog for outdoor meter reading equipment in a more expeditious manner. The installation of AMR equipment will eliminate the invasive procedures associated with the installation of remote indexes, and would relieve customers of the inconvenience associated with allowing meter readers into their homes annually to read their meters.

Presently, the cost to Columbia for installing new AMR devices is greater than the \$35 charge per device listed in Part 40(g) of the tariff. However, in order to minimize the impact upon customers, Columbia at this time proposes to maintain the charge for the installation of AMR equipment at \$35 – the same charge currently applicable to the installation of remote indexes. For these reasons, Columbia respectfully requests that the term “automated meter reading device” be substituted for the term “remote index” in Part 40(g) of Columbia’s tariffs, as shown in Exhibits B and B-1 herein.

In order to allow Columbia and its customers to more quickly receive the benefits resulting from the installation of AMR devices, Columbia respectfully requests that the Commission expeditiously approve this Application.

Exhibit C-1

Appendix A



Automated Meter Reading Device – Encoder Receiver Transmitter (ERT)