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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

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PUCO

In the Matter of the Commission's)
Investigation of the Customer Choice) Case No. 98-593-GA-COI
Program of Columbia Gas of Ohio, Inc.)

In the Matter of the Commission's)
Investigation of the Energy Choice) Case No. 98-594-GA-COI
Program of The East Ohio Gas Company.)

In the Matter of the Commission's)
Investigation of the Customer Choice) Case No. 98-595-GA-COI
Program of The Cincinnati Gas &)
Electric Company.)

COMMENTS

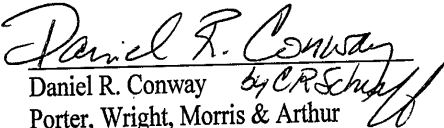
Columbia Gas Transmission Corporation ("TCO") provides the following
brief comments on the PUCO Staff Second Report on Ohio's Natural Gas Choice
Programs, filed on June 30, 1999:

The PUCO Staff suggests in its report that TCO could better serve
increasing demands in TCO Market Area 2, located in the vicinity of the City of Parma, if
the proposed Independence Project were constructed. Report at 3-10, 3-11. TCO
respectfully clarifies that the Independence Project would not cross TCO's system in
close proximity to Parma. Rather, the project would cross TCO's system approximately
30 miles south of Parma. Thus, the Parma area would not directly benefit from increased
delivery capacity from that project.

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Moreover, while the PUCO staff properly concludes that the Independence Project “would not appear on its face to be economically justified at this time as an alternate pipeline to directly feed the Parma market” (Report at 3-11), it speculates that an interconnect between TCO and the Independence Project would “provide TCO with additional support in terms of additional gas supplies and boosted operational pressures on these pipeline facilities feeding the Parma area market, especially during peak periods.” (Id.) In fact, the Independence Project would not increase TCO’s capacity or pressure in the Parma area or otherwise provide any operational benefits. Instead, any future increased demands in the Parma area could be satisfied through the relatively inexpensive expansion of TCO’s transmission system. Hence, construction of Independence’s \$650 million pipeline project would not be required.

Respectfully submitted,


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CERTIFICATE OF SERVICE

This shall certify that a true copy of Columbia Gas Transmission's Comments has been served this 2nd day of August 1999 by U. S. Postal Service to:

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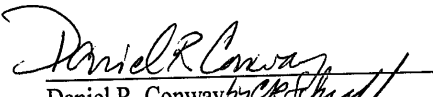
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