

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION**

Pennsylvania Public Utility Commission,

v.

Docket No. R-2018-2647577

Columbia Gas of Pennsylvania, Inc.

REBUTTAL TESTIMONY

**BARBARA R. ALEXANDER
BARBARA ALEXANDER CONSULTING LLC
ON BEHALF OF
OFFICE OF CONSUMER ADVOCATE**

July 3, 2018

1 Q. PLEASE STATE YOUR NAME, ADDRESS AND OCCUPATION.

2 A. My name is Barbara R. Alexander. I am the sole member manager of Barbara Alexander
3 Consulting LLC. My address is 83 Wedgewood Dr., Winthrop, ME 04364. I appear in
4 this case as a witness on behalf of the Office of Consumer Advocate (OCA).

5 Q. WHAT IS YOUR BACKGROUND AND EXPERIENCE WITH RESPECT TO THE
6 ISSUES ON WHICH YOU ARE PROVIDING TESTIMONY IN THIS PROCEEDING?

7 A. I opened my consulting practice in March 1996, after nearly ten years as the Director of
8 the Consumer Assistance Division of the Maine Public Utilities Commission. While
9 there, I testified as an expert witness on consumer protection, customer service and low-
10 income issues in rate cases and other investigations before the Commission. My
11 consulting practice is directed to consumer protection, customer service and low-income
12 programs and policies relating to the regulation of the telephone, electric and gas
13 industries. In particular, I have focused on the changes in policies and procedures
14 required by state regulation in the transition to retail competition. I have provided expert
15 testimony and consulting services to the OCA on issues relating to the implementation of
16 retail energy competition in Pennsylvania for many years, including testimony
17 concerning retail market enhancement issues, Default Service, and consumer protection
18 regulations and policies applicable to residential electric and natural gas customers in
19 retail energy markets. My expertise is also a reflection of my over 20 years as a
20 consultant on retail energy market issues for national and state consumer advocates.

21 I am a graduate of the University of Michigan (B.A. 1968) and the University of
22 Maine School of Law (J.D. 1976).

1 My updated CV with the specific identification of my filed testimony and
2 published materials is attached as Exhibit BA-1.

3
4 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

5 A. I am filing Rebuttal Testimony on behalf of the OCA in response to the Direct Testimony
6 filed by Mr. Anthony Cusati, III, on behalf of Shipley Choice LLC and Interstate Gas
7 Supply, Inc. (“NGS Parties”) on June 7, 2018.¹ Specifically, I am responding to Mr.
8 Cusati’s concerns and recommendations with respect to Columbia’s billing practices for
9 non-commodity services.

10 Q. PLEASE SUMMARIZE MR. CUSATI’S CONCERNS AND RECOMMENDATIONS.

11 A. Mr. Cusati describes Columbia’s policy that allows two entities to include non-
12 commodity charges on Columbia’s bill. These entities are not currently formal
13 subsidiaries of Columbia, but the products and services they sell to Columbia’s customers
14 were at one time provided by Columbia and/or its subsidiaries.² These non-commodity
15 services offer repair, maintenance, and other unregulated services for the customer’s
16 natural gas appliances, water and gas line maintenance, including HVAC systems. Mr.
17 Cusati alleges that this practice is unfair and discriminatory to Natural Gas Suppliers
18 (NGSs) who may offer these same services to customers who agree to enroll with the
19 NGS for natural gas supply service, but who are unable to include the charges for non-
20 commodity services on Columbia’s bill.³ Mr. Cusati’s recommendation is that the

¹ NGS Parties’ Statement No. 2.

² Columbia Gas Response to NGS Parties, Set I-014 states that the non-commodity services that appear on Columbia’s bill are those provided by Columbia Service Partners, Inc. (CSP) and Nicor Energy Services Co. (Nicor). CSP is a former Columbia affiliate. The Nicor services were purchased from a Columbia affiliate, NiSource Retail Services, Inc. in 2013. Columbia states that these services are included on its bill because “they each purchased various retail service businesses that a Columbia affiliate provided to Columbia customers.”

³ Columbia Gas Response to NGS Parties, Set I-018. Columbia limits its Purchase of Receivables program to natural gas supply service offered by NGSs to residential and small commercial customers. This service, once

1 Commission require Columbia to allow NGSs to bill for non-commodity products and
2 services on Columbia's bill. He explains that allowing NGSs access to the Columbia bill
3 for these charges would conform to the statutory and regulatory requirement that
4 customers not be terminated for nonpayment of these charges and that partial payments
5 made by customers whose bills include these non-commodity charges would be applied
6 to regulated distribution and natural gas supply charges to ensure that charges for these
7 essential services are paid in full prior to allocation of payment to non-commodity
8 products and services.⁴

9 Q. DO YOU AGREE THAT THERE IS AN ISSUE THAT CALLS INTO QUESTION
10 COLUMBIA'S BILLING PRACTICES FOR NON-COMMODITY SERVICES?

11 A. Yes. I agree that there is an issue with Columbia being able to bill for unregulated and
12 non-commodity services and products on its regulated bill for essential distribution and
13 commodity services. The condition under which Columbia has agreed to include these
14 non-commodity charges on customer bills clearly reflects prior affiliated relationships
15 and this practice is not reflected in Columbia's tariff⁵ or any explicit Commission order.⁶
16 These services are offered in the competitive market by many commercial plumbing and
17 heating businesses, but certainly not exclusively by the entities that include their charges
18 on Columbia's bills or licensed NGSs. Neither the Commission nor any other
19 governmental entity regulates the prices for these services or their terms and conditions.⁷

purchased by Columbia, is subject to termination of service for nonpayment under the same rules and consumer protections applicable to Columbia's default supply service.

⁴ Columbia Gas Response to NGS Parties, Set 3-002, 003, 004 confirm that Columbia allocates partial payment to the customer's distribution and natural gas supply charges until those charges are paid in full and does not terminate service for nonpayment of non-commodity charges.

⁵ Columbia Gas Response to NGS Parties, Set 5-002.

⁶ Columbia Gas Response to NGS Parties, Set 5-001.

⁷ I presume that the marketing and sales practices for these services by the entities that are allowed to include their charges on Columbia's bill are subject to Pennsylvania's unfair trade practice laws enforced by the Attorney

Rebuttal Testimony of Barbara R. Alexander

On Behalf of the OCA

Page 4

1 When offered to Columbia's customers and billed by Columbia, there is a reasonable
2 assumption by customers that such services are regulated or supervised by the
3 Commission. Furthermore, when Columbia includes these charges on its bill, the bill
4 includes the non-commodity charges on the "please pay this amount" and the "amount
5 past due—pay immediately." The disclosure included on the second page of Columbia's
6 bill is not reflected in the presentation of the amount due that must be paid immediately
7 on the first page of the bill. Customers without knowledge of the details associated with
8 policies applicable to termination of service can easily assume that the total must be paid
9 to avoid collection actions.⁸ While these concerns may have been reasonable even before
10 the advent of retail energy competition, the fact that NGSs seek to bundle or offer these
11 same services, but are only allowed to include their commodity service on Columbia's
12 bill, exacerbates the appearance of unfair or discriminatory practices.

13 Q. DO YOU AGREE WITH MR. CUSATI'S RECOMMENDATION TO ALLOW NGSs
14 TO BILL FOR NON-COMMODITY SERVICES ON COLUMBIA'S BILL?

15 A. No. I do not agree with his proposal to allow NGSs to include non-commodity services
16 and products on Columbia's bill. Furthermore, based on the evidence that I have
17 reviewed to date in this proceeding, there is a concern with Columbia's implementation
18 of its current non-commodity services for these two previously affiliated entities. This

General, similar to the marketing and sales activities by other entities offering these same services but who are not allowed to be included on Columbia's bill.

⁸ Columbia Gas Response to CAUSE-PA, Set V-008, Attachment A, includes a residential customer bill with two non-commodity charges, "CSP Gas Line Plan," and "CSP Water Line Plan," with a monthly charge of \$3.75 and \$3.99, respectively. The Account Summary on the first page of the bill includes a "please pay this amount" that includes the Utility Service Balance, the "Optional Services Non-Utility Balance," "Charges for Gas Service," and "Current Charges for Optional Services (Non-Utility)." The "amount past due—pay immediately," includes the previously unpaid Optional Services as well as the previous amount due for utility service and late payment fees. The second page of the bill includes a section that explains that the Optional Services for Non-Utility Charges are provided by a third party not affiliated with Columbia Gas," and that, "Failure to pay Optional Service charges will not result in the interruption of termination of your utility service by Columbia Gas."

1 matter requires further investigation by the Commission but it is not proper to simply add
2 more non-commodity charges to customer bills. There are several reasons why this issue
3 must be further examined:

4 • First, the primary issue is that these non-commodity products and services are
5 offered in the competitive market by a wide variety of entities, only some of whom are
6 NGSs. It would be an unfair practice to require Columbia to bill for non-commodity
7 services offered by NGSs and/or their previously affiliated companies, but deny such an
8 option to other unregulated sellers of these same services. Including charges for
9 unregulated services on a utility bill with a single balance owed is a significant advantage
10 to any business, but it is not proper for the utility bill to be used as a collection tool for all
11 such unregulated products and services.

12 • Second, the current situation in which Columbia's bills include charges for non-
13 commodity services included in the total amount owed provides a significant competitive
14 advantage. In my experience, most customers focus on the total amount owed and do not
15 distinguish the various charges that are included in this total. Columbia's attempt to seek
16 collection of the non-commodity services as part of the "amount past due-pay
17 immediately" on the front page of the bill and then explain why this charge does not need
18 to be paid to avoid termination of "utility" service on the second page of the bill does not
19 assuage my concerns. In fact, many customers have enrolled in paperless billing and
20 automatic payments through their checking and/or credit card accounts, a practice that
21 results in the automated payment of the total amount owed without any obligation to
22 review the contents of the bill itself.

1 • Third, collection tools utilized by regulated public utilities often include the
2 appearance or suggestion that the charges are regulated by the Commission and that
3 payment is linked to retention of essential natural gas service. This concern is reflected
4 on Columbia's bill that includes non-commodity services because the first page of the bill
5 emphasizes the requirement to pay the non-commodity charges "immediately."

6 • Finally, it is not clear from the discovery conducted to date how these non-
7 commodity services are marketed and sold to Columbia's customers. There is no
8 information on the Columbia Gas of Pennsylvania website about these non-commodity
9 services. If, however, Columbia's service representatives market these products and
10 services to customers who call to initiate service or who call Columbia to seek
11 information about repairs and maintenance of gas appliances or if Columbia shares its
12 customer information to allow targeted mailings or marketing to its customers by the
13 formerly affiliated entities, those practices would raise significant concerns that must be
14 explored.

15 Q. ARE THE POLICIES THAT REQUIRE ALLOCATION OF PARTIAL PAYMENTS
16 AND THAT PREVENT COLUMBIA FROM TERMINATING A CUSTOMER'S
17 ACCOUNT FOR NONPAYMENT OF NON-COMMODITY SERVICES SUFFICIENT
18 TO ADDRESS THESE ISSUES?

19 A. I have considered these policies, but do not find that they are sufficient to resolve the
20 concerns I have identified. These policies do not resolve the appearance of unfair
21 practices in allowing Columbia to bill for non-commodity services for only some of the
22 merchants offering these services. Allowing NGSs to include these charges on
23 Columbia's bill does not resolve that issue. Furthermore, these policies do not respond to

1 the concern that it is likely that customers assume that charges included in the total
2 amount owed on a utility bill are approved by the Commission and should be paid in full
3 to retain essential utility services.

4 Q. HOW DO YOU RESPOND TO MR. CUSATI'S STATEMENTS ABOUT THE
5 DESIRE OF NGSs TO OFFER VALUE ADDED SERVICES AND THAT THE
6 PENNSYLVANIA NATURAL GAS COMPETITION PROGRAM SHOULD ENABLE
7 NGSs TO MARKET AND POSSIBLY BUNDLE THESE NON-COMMODITY
8 SERVICES WITH THEIR NATURAL GAS SUPPLY SERVICE?

9 A. I understand why the NGS Parties seek to gain access to Columbia's bill for non-
10 commodity services. Such an option would significantly improve the likelihood of
11 collecting non-commodity charges in addition to their natural gas supply service that is
12 purchased by Columbia and included on Columbia's bill. In addition, Mr. Cusati's
13 proposal does respond to the potentially discriminatory practice of allowing Columbia to
14 include certain preferred non-commodity services on its customer bill. However, Mr.
15 Cusati's proposal to give NGSs the right to include non-commodity charges on
16 Columbia's bills raises additional and potentially complex consumer protection issues
17 that he ignores. For example, NGSs may seek to bundle their non-commodity or what he
18 calls "value added" services to the natural gas supply service, thus eliminating the
19 customer's ability to compare the NGS's natural gas supply price with the Price to
20 Compare stated on the natural gas utility bill on an "apples to apples" basis. Another
21 concern is whether NGS marketing practices in offering these non-commodity services
22 will properly inform customers about the different collection policies governing non-
23 commodity products and services compared to natural gas supply service that is

1 purchased by the NGDC and for which the customer is liable for termination of service.
2 Mr. Cusati's recommendation only exacerbates the concern I have raised about
3 Columbia's current practice of including non-commodity services on their regulated
4 distribution services bill and including such charges on the total amount owed. Finally,
5 the overall purpose of the Natural Gas Competition Act is to allow customers to select an
6 alternative supplier for natural gas supply service, a product that is explicitly required to
7 be unbundled from the NGDC's previously bundled natural gas service. The
8 Commission should not allow NGSs to include non-commodity and unregulated services
9 on the regulated Columbia bill without a complete and more thorough investigation of the
10 costs and potential adverse impact on other competitive providers of these same products
11 and services, as well as the potential for confusion and adverse consequences on
12 residential customers.

13 Q. DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?

14 A. Yes. However, I reserve the right to supplement my testimony with future discovery
15 responses that may be relevant to these issues.

16
17 253584

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

NGS Parties – Set 1

Question No. NGS Parties 1-014:

Has Columbia ever allowed any other entity, including affiliated companies, to include non-commodity charges on Columbia's natural gas distribution service bills to customers?

- a. If the answer is anything other than "No", provide the name of the entity, the time period during which the non-commodity charges have been billed, and the nature of the charges included.

Response:

Yes. Currently, service plan charges appear on Columbia monthly billing statements for Columbia Service Partners, Inc (CSP) and Nicor Energy Services Company (Nicor).

CSP is a former Columbia affiliate. Prior to its sale in 2003, CSP provided various service plans for the repair and maintenance of customer-owned facilities (e.g., piping) to Columbia customers for 7 years. NiSource Retail Services, Inc., a Columbia affiliate, sold its retail services business assets in 2013 to Nicor. Prior to the sale, NiSource Retail Services, provided various service plans for the repair and maintenance of customer-owned heating and cooling systems, water heaters, appliances, pipes and wires to Columbia customers for 9 years. Prior to the sale of CSP and the NiSource Retail Services assets, Columbia provided on bill billing services to these affiliates.

Currently, CSP and Nicor are permitted to have the charges appear on Columbia's monthly billing statements because they each purchased various retail service businesses that a Columbia affiliate provided to Columbia customers. These billing arrangements were entered into with CSP and Nicor in order to maintain, for the convenience of Columbia customers who wished to subscribe to various Covered Products and Services, the ability to continue to have those charges appear on their monthly gas bill. No third parties, other than CSP and Nicor, have

their non-utility or non-commodity charges appear on Columbia's bills. CSP and Nicor are not natural gas suppliers or marketers on Columbia's system.

The Billing Agreements for CSP and Nicor provide them with access to Columbia utility bills for the purpose of billing of various Covered Products and Services.

Columbia provides to each company the Billing Services described below:

- Columbia provides the companies with the billing services described below (collectively, the "Billing Services") with respect to their respective covered products and services. The companies and Columbia are independent contractors. No agency, partnership, joint-venture, or other relationship exist between the companies and Columbia.
- Columbia includes a line item on its bills that reflects the charge for the companies' covered products and services subscriptions.
- Columbia remits, via wire transfer, a payment to each company that reflects the subscription revenue and any collections for appropriate taxes collected by Columbia for the preceding month. Each company is responsible for the applicable taxes on the subscription revenue that is collected and remitted.
- The payment remitted to each company does not include subscription revenue for any customer who makes payment in an amount that is insufficient to fully satisfy amounts due on such customer's Columbia utility bill, including, but not limited to, past due amounts, late charges and the like.
- Columbia may bill each company on a cost causation basis for any Billing Services that result in incremental business costs, including but not limited to excessive bill weight, additional bill pages and printing services.
- Columbia will not interrupt or discontinue service to customers solely for non-payment of amounts owed to either company.
- Fees are subject to adjustments required, directed, ordered or determined by any regulatory body with jurisdiction over the applicable Columbia.
- Columbia may increase fees for any Renewal Period upon advanced notice.

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

NGS Parties – Set 1

Question No. NGS Parties 1-018:

Please describe in detail how licensed Natural Gas Suppliers in the Commonwealth can take advantage to include non-commodity charges on Columbia's natural gas distribution service bills to our customers.

- a. If the answer is that Natural Gas Supplier cannot take advantage to include non-commodity charges on Columbia's natural gas distribution bills, please explain the reason(s.)

Response:

Columbia bills customers who choose to use a natural gas supplier in accordance with 66 Pa. C.S. § 2205(c)(iii), which states the following:

“Bills rendered by a natural gas distribution company on behalf of a supplier shall include, in a form and manner determined by the natural gas distribution company in consultation with the natural gas supplier, the following information with respect to natural gas supplier services: the name of the natural gas supplier; the rates, charges or prices of natural gas supply services billed, including adjustments to prior period billings if applicable, and taxes if applicable; and the natural gas supplier's toll free telephone number and hours of operation for customer inquiries.”

The billing of non-commodity charges is not required, and Columbia has opted not to provide this service to any natural gas supplier.

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

NGS Parties – Set 3

Question No. NGS Parties 3-002:

When customers who take advantage of the non-commodity products billing on the Columbia natural gas distribution service bills make a partial payment, please describe in detail the payment application hierarchy. In other words, how are the partial payments applied to which service that has been billed?

Response:

Partial payments would be applied to the customer's utility service balance (including distribution and commodity charges). Non-commodity products and services are paid after the utility service balance is fully satisfied.

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

NGS Parties – Set 3

Question No. NGS Parties 3-003:

What charges, and how long outstanding on the natural gas distribution service bills do charges need to remain unpaid before Columbia Gas of Pennsylvania will commence disconnect procedures?

Response:

For utility service charges (including distribution and commodity charges), Columbia will interrupt or discontinue a customer's utility service for non-payment pursuant to the Termination of Service provisions of its tariff, and in compliance with Commission Rules, Regulations, or Orders. Columbia will not interrupt or discontinue a customer's utility service for non-payment of non-commodity charges.

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

NGS Parties – Set 3

Question No. NGS Parties 3-004:

Has Columbia Gas of Pennsylvania ever disconnected a customer for non-payment of non-commodity charges that have remained unpaid?

Response:

Termination of service for non-payment of non-commodity charges is prohibited by 52 Pa. Code § 56.83(3). Columbia adheres to that regulation and has/will not interrupt or discontinue a customer's utility service for non-payment of non-commodity charges.

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

NGS Parties – Set 5

Question No. NGS Parties 5-001:

Has Columbia sought and/or received formal approval from the Pennsylvania Public Utility Commission (“Commission”) that permits it to bill non-commodity services for other entities? If so, please provide copies of any and all Orders addressing such approval.

Response:

Columbia has not received formal approval from the Pennsylvania Public Utility Commission that permits it to bill non-commodity services for other entities, nor has it requested such approval.

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

NGS Parties – Set 5

Question No. NGS Parties 5-002:

Does Columbia have any provision(s) in its tariff that allow for or provide conditions under which it will provide non-commodity billing?

- a. If yes, Identify any such provisions.

Response:

Columbia's Pa. P.U.C. Tariff No. 9 does not contain conditions under which it will provide non-commodity billing.

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

Coalition for Affordable Utility Services and Energy Efficiency
in Pennsylvania (CAUSE-PA) – Set 5

Question No. CAUSE-PA 5-008:

Please provide a sample bill which contains charges for non-commodity products and services.

Response:

Please see Attachment A to this response. Note for privacy purposes, the customer's name, address and account number has been redacted.



Account Number: [REDACTED]
Statement Date: 06/20/2018
1984
Page 1 of 3

Contact Us

Phone
Emergency Service 24/7
1-888-460-4332
For gas leaks or odors of gas

Customer Service
1-888-460-4332
7 a.m. - 7 p.m. Mon. - Fri.
8 a.m. - 12 p.m. Sat.
For bill questions or complaints
For hearing-impaired relay call 711.

Web
Make payments and access your account at ColumbiaGasPA.com

Mobile
Make payments and access your account at m.ColumbiaGasPA.com

Mail Payments
Columbia Gas of Pennsylvania
P.O. Box 742637
Cincinnati, OH 45274-2637

Authorized Payment Locations
Find locations online at ColumbiaGasPA.com

Account Profile

Customer Name: [REDACTED] **Your Contact Information:** [REDACTED] **Type of Customer:** Residential
[REDACTED] Pittsburgh PA 15227-2727 Optional Services Non-Utility

Account Number: [REDACTED]

* Is your contact information correct? Make all changes on the reverse side.

Account Summary

Previous Amount Due for Utility Service on 06/13/2018	\$37.15
Previous Amount Due for Optional Services Non-Utility on 06/13/2018	\$7.74
Late Payment Fee	+ \$0.46
Payments Received by 06/19/2018 Thank You	\$0.00
Utility Service Balance on 06/19/2018	\$37.61
Optional Services Non-Utility Balance on 06/19/2018	\$7.74
Charges for Gas Service This Period	+ \$24.16
Current Charges for Optional Services Non-Utility	+ \$7.74

Please Pay This Amount

\$77.27

Amount Past Due - Pay Immediately **\$45.35**
Current Charges Due by 07/13/2018 **\$31.92**

- If paid after 07/13/18, a late payment charge of 1.25% may be applied to your utility balance.
- For more information regarding these charges, see the Detail Charges section.

At your request, your account information has been removed from future customer lists unless you notify us otherwise. You do not need to return the enclosed form.

Budget Payment Plan
Pay \$79.00 instead of the amount due this month for your utility service, plus any charges for a security deposit, Optional Services, or Dollar Energy Fund contribution, and you'll be enrolled in the Budget Payment Plan automatically. Or log in to your account at our website to enroll online anytime if your account is current. The Budget Payment Plan is your best option to manage your winter heating bills.

Your Safety

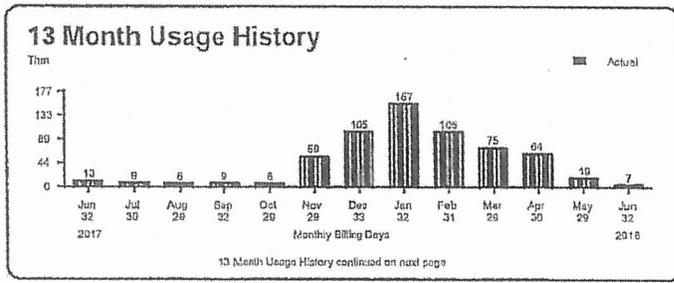
In case of an emergency, such as odor of gas, carbon monoxide or fire:

1. Leave the area immediately.
2. Leave windows and doors in their positions and avoid doing anything that could cause a spark.
3. From a safe area, call 911 and Columbia Gas at 1-888-460-4332.

Always Call 8-1-1 Before You Dig
If you're planning a home or landscaping project, call PA One Call at 8-1-1 at least three business days before digging. A representative will mark the approximate location of underground utility lines for free.



Employee Identification
All of our employees and contractors carry photo identification. If someone claims to represent us, ask to see identification. Call the police if you see suspicious activity.



Please fold on the perforation below, detach and return with your payment.

[REDACTED]
PITTSBURGH PA 15227-2727

Columbia Gas of Pennsylvania P.O. Box 742637
A NiSource Company Cincinnati, OH 45274-2637

Web
ColumbiaGasPA.com

Mobile
m.ColumbiaGasPA.com

Phone
1-888-460-4332

Account Number: [REDACTED]
Amount Due by 07/13/2018: \$77.27

Amount Enclosed: \$

00010681 01 AV 8.375 1
AUTO**SCH 5-DIGIT 16122
[REDACTED]
PITTSBURGH PA 15227-2727

Make check payable to:
COLUMBIA GAS
P.O. BOX 742637
CINCINNATI, OH 45274-2637

Account Number: [REDACTED]
Statement Date: 06/20/2018
1984
Page 2 of 3

Helpful Definitions

Customer Charge Is a flat charge to cover a portion of the cost of installing, maintaining and replacing Columbia Gas pipelines, meters and other equipment, as well as servicing your account.

Distribution Charges are the service charges for the delivery of natural gas to a retail customer from the point of receipt into the Columbia Gas distribution system.

Distribution System Improvement Charge (DSIC) Is a monthly charge to recover a portion of Columbia Gas' distribution system infrastructure costs.

Estimated Readings are calculated based on your typical monthly usage rather than on an actual meter reading.

Gas Cost Adjustment Is the amount billed or credited each month to account for the difference between Columbia's projected and actual gas supply costs.

Gas Supply Charges are the charges for basic natural gas supply service which is billed in therms.

Pass-through Charges are charges that Columbia Gas must pay to third parties for the ability to deliver natural gas to Columbia's system and universal service charges, as applicable.

Temperature Multiplier Is applied to meter readings to determine actual consumption based on standard temperature and pressure conditions.

Therm (thm) Is equal to 100,000 BTUs and is used to measure your gas usage.

Therm Multiplier Is applied to meter readings to convert the volumetric meter reading into therms for billing.

Legal Information

Public Utility Commission
The Pennsylvania Public Utility Commission (PUC) is the state regulatory agency that provides oversight, policy guidance, and direction of distribution prices and services from Columbia Gas of Pennsylvania and suppliers.

Rate Schedule
Copies of rate schedules are available for inspection upon request. Call 1-888-460-4332 for an explanation of charges and how to verify the accuracy of a bill.

Bankruptcy Notices
Mail to Columbia Gas of Pennsylvania, Revenue Recovery, PO Box 117, Columbus, OH 43216.

Other Correspondence (except payments)
Mail to Columbia Gas of Pennsylvania, P.O. Box 2318, Columbus, OH 43216-2318 or contact us at ColumbiaGasPA.com.

13 Month Usage History

continued

Meter Number:
J455483

Service Address:
Pittsburgh, PA 15229-2727

Meter Readings - 32 Billing Days

Actual Reading on 6/18		0501
Actual Reading on 5/18	-	0494
Gas Used (Ccf)		7
Temperature Multiplier	X	0.0524
Total Gas Used (Ccf)		7
Therm Multiplier	X	1.0233
Total Therms Used (thm)		7

Usage Comparison - Thm

Month	Thm	Avg Temp	Thm	Per Day
Jun 17	13	87.7 °		0.4
May 18	12	69.3 °		0.7
Jun 18	7	70.3 °		0.2

Your Average Monthly Usage = 62 thm.
Your Total Annual Usage = 625 thm.
Your next meter reading date is 07/19/2018.

Detail Charges

Rate Schedule RSS

Gas Supply Charges 7 thm at \$0.28291 per thm	\$1.97
Gas Cost Adjustment 7 thm at -\$0.00526 per thm	-\$0.03
Supply	+\$1.94
Customer Charge	\$16.75
Distribution Charges 7 thm at \$0.65316 per thm	\$3.87
Pass-through Charges 7 thm at \$0.21623 per thm	\$1.52
Distribution System Improvement Charge (DSIC)	\$0.10
Delivery	+\$22.24

Total Current Utility Charges

\$24.18

* Your bill includes \$0.26 in state taxes, not including sales tax.

Columbia Gas of Pennsylvania Price to Compare per therm \$0.30830

The Price to Compare is the price to use when comparing Columbia's gas cost to gas supply prices offered by other natural gas suppliers in the CHOICE program. This price may change in January, April, July and October each year.

Optional Services Non-Utility Charges

These charges are service plan fees which are provided to you by the third party service provider(s) referenced below. The third party service provider(s) is not affiliated with Columbia Gas. The charges appear on your utility bill per your request. Any questions about Optional Services should be directed to the service provider, not Columbia Gas. Optional Services are not regulated utility services and are not provided or guaranteed by Columbia Gas or its affiliates. Your participation in a service plan in no way affects the utility service you receive from Columbia Gas. These service plans are intended for homeowners. Failure to pay Optional Service charges will not result in the interruption or termination of your utility service by Columbia Gas.

CSP Gas Line Plan (CSP Tel. 1-888-442-7349)	\$3.75
CSP Water Line Plan (CSP Tel. 1-888-442-7349)	\$3.99

Current Optional Services Non-Utility Charges

\$7.74

CSP Gas Line Plan

Previous Balance	\$3.75
Payments Received by 06/19/2018 Thank you	\$0.00
Balance at Billing	\$3.75
Current Charges	\$3.75

Current Balance

\$7.50

Optional Services Non-Utility Charges continued on next page

Change Contact Information

By providing Columbia Gas a telephone number, it enables us to call you about your utility service, future service appointments and other important information pertaining to your account and you're agreeing to receive automated and prerecorded voice calls. Please notify us if you wish to opt out or if you no longer use this number. Thank you in advance.

Address	
City	
State	Zip Code
Phone Number	
Add or Edit Email	

Optional Services Non-Utility Charges

continued

CSP Water Line Plan	
Previous Balance	\$3.99
Payments Received by 06/19/2018 Thank you	\$0.00
Balance at Billing	\$3.99
Current Charges	\$3.99
Current Balance	\$7.98

Shopping Information

When shopping for a natural gas supplier, be prepared to provide the following:

Account Number: [REDACTED]
Rate Schedule: Residential Sales Service

If you are already purchasing gas through a supplier, be aware of your current contract terms and expiration date.

Message Board

- Enjoy the convenience of managing your account online by enrolling in Paperless Billing. Monthly email alerts, 24/7 account access and up to two years of past bills and payment history! Enroll today at ColumbiaGasPA.com/PaperlessBilling.
- Never worry about missing a payment or writing a check again by enrolling in Automatic Payment today at ColumbiaGasPA.com.
- Having trouble making ends meet? Take advantage of our special payment arrangements or energy assistance programs. Call 1-888-460-4332 to see if you're eligible.



BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2018-2647577
 :
 Columbia Gas of Pennsylvania, Inc. :

VERIFICATION

I, BARBARA ALEXANDER, hereby state that the facts set forth in my Rebuttal Testimony, OCA Statement No. 5R, are true and correct (or are true and correct to the best of my knowledge, information, and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

6/27/2018 5:30:09 PM EDT

Date

Signed: Barbara R. Alexander
Barbara Alexander