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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Amendment of Certain)
Rules to Revise Language Requirements on)
Utility Bills and Other Documents.)

Case No. 07-1042-AU-ORDO

**JOINT APPLICATION FOR REHEARING, MEMORANDUM IN SUPPORT
AND REVISED BILL FORMATS OF
VECTREN ENERGY DELIVERY OF OHIO, INC. AND OHIO GAS COMPANY**

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December 20, 2007

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THE PUBLIC UTILITIES COMMISSION OF OHIO**

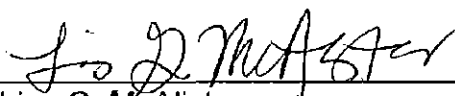
In the Matter of the Amendment of Certain) Rules to Revise Language Requirements on) Utility Bills and Other Documents.)	Case No. 07-1042-AU-ORD
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JOINT APPLICATION FOR REHEARING

Pursuant to Section 4903.10, Revised Code and Rule 4901-1-35, Ohio Administrative Code, Vectren Energy Delivery of Ohio, Inc. ("VEDO") and Ohio Gas Company ("Ohio Gas") hereby submit their Joint Application for Rehearing and Memorandum in Support of the Public Utility Commission of Ohio's ("Commission") November 20, 2007 Finding and Order under the following point of error:

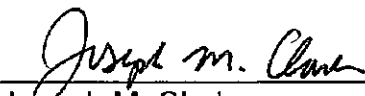
1. Rules 4901:1-13-11(B)(5) and 4901:1-18-05(A)(5), Ohio Administrative Code ("O.A.C."), require natural gas companies to include duplicative language multiple times if they use the same format for bills and disconnection notices, causing redundancies and potential customer confusion.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

I. INTRODUCTION

On October 3, 2007, the Commission issued an Entry containing proposed amendments to its rules regarding contact information for the Commission and the Ohio Consumers' Counsel ("OCC") in customer communications. The Commission invited comments on the proposed amendments, which were in response to a change in state law that removed the restrictions on OCC's operation of a call center. After initial and reply comments were received, the Commission issued a November 20, 2007 Finding and Order ("Finding and Order") that approved the reinsertion of OCC's contact information, amended the Commission's call center hours and revised descriptions of reasons to contact the Commission and OCC into a number of rules regarding communications from utilities to customers, including bills and the provision of customer rights and obligations. Specifically, among other things, the Commission: 1) set forth the language required to be contained in customer communications; 2) found that the Commission's contact information should be contiguous with OCC's contact information (without requiring the Commission's and OCC's contact information to be on the same page); 3) granted automatic waivers of the revised rules for 90 days after the effective date of the rules in order for utility companies to deplete their current paper stock, and;

4) required all utility companies to file their revised bill formats in this docket within 30 days (while noting that separate bill format proceedings would not be required).

II. REQUEST FOR REHEARING

There is a potential redundancy embedded in Rules 4901:1-13-11(B)(5) and 4901:1-18-05(A)(5), O.A.C., inasmuch as they require natural gas companies that use the same format for bills and disconnection notices to include duplicative language multiple times. Specifically, Rule 4901:1-13-11(B)(5), O.A.C., requires natural gas companies to include the following language on bill formats (emphasis added for comparison purposes):

"If your complaint is not resolved after you have called (name of utility), or for general utility information, residential and business customers may contact the Public Utilities Commission of Ohio for assistance at 1-800-686-7826 (toll free) or for TTY at 1-800-686-1570 (toll free) from 8:00 a.m. to 5:00 p.m. weekdays, or at www.puco.ohio.gov.

Residential customers may also contact the Ohio Consumers' Counsel for assistance with complaints and utility issues at 1-877-742-5622 (toll free) from 8:00 a.m. to 5:00 p.m. weekdays, or at www.pickocc.org."

However, on disconnection notices for natural gas and electric companies, Rule 4901:1-18-05(A)(5), O.A.C., requires the following, slightly different language (emphasis added for comparison purposes):

"If you have a complaint in regard to this disconnection notice that can not be resolved after you have called (name of utility), or for general utility information, residential and business customers may contact the Public Utilities Commission of Ohio for assistance at 1-800-686-7826 (toll free) or for TTY at 1-800-686-1570 (toll free) from 8:00 a.m. to 5:00 p.m. weekdays, or at www.puco.ohio.gov.

Residential customers may also contact the Ohio Consumers' Counsel for assistance with complaints and utility issues at 1-877-742-5622 (toll free) from 8:00 a.m. to 5:00 p.m. weekdays, or at www.pickocc.org."

Because VEDO and Ohio Gas use identical formats for the backs of all bills and disconnection notices, the above-referenced rules appear to require VEDO and Ohio Gas to print nearly identical language twice, at least on disconnection notice bills, in order to comply with both rules.

Accordingly, VEDO and Ohio Gas respectfully seek rehearing of the Commission's Finding and Order to make Rules 4901:1-13-11(B)(5) and 4901:1-18-05(A)(5), O.A.C., uniform.¹ Specifically, VEDO and Ohio Gas request that the Commission modify Rule 4901:1-18-05(A)(5)(d), O.A.C. as follows:

(d) The following statement:

~~"If you have a complaint in regard to this disconnection notice that cannot be~~ is not resolved after you have called (name of utility), or for general utility information, residential and business customers may contact the Public Utilities Commission of Ohio for assistance at 1-800-686-7826 (toll free) or for TTY at 1-800-686-1570 (toll free) from 8:00 a.m. to 5:00 p.m. weekdays, or at www.puco.ohio.gov.

Residential customers may also contact the Ohio Consumers' Counsel for assistance with complaints and utility issues at 1-877-742-5622 (toll free) from 8:00 a.m. to 5:00 p.m. weekdays, or at www.pickocc.org."

The requested change would eliminate the redundancy for natural gas companies that use the same format for bills and disconnection notices. Further, it would eliminate the potential of customer confusion resulting from duplicative language. It would also save space on bills and disconnection notices for other important information. The requested change would not materially impact the information

¹ While the Commission's Finding and Order did not modify the language underlined in the rules above, VEDO and Ohio Gas did not identify the potential redundancy until they began preparing bill formats to comply with the Commission's rule changes. As the Commission undertakes rule reviews only once every five years, VEDO and Ohio Gas thought it was appropriate to raise the issue in the context of this rulemaking proceeding rather than seek waivers of the rules as needed.

provided to customers or in any way impair the ability of customers to contact either the Commission or OCC. The aforementioned problems caused by the differing language, in combination with the clarity and simplicity gained from a consistent contact information requirement, counsel in favor of amending the promulgated rules.

Wherefore, VEDO and Ohio Gas respectfully request that the Commission adopt the requested revision to Rule 4901:1-18-05(A)(5), O.A.C.

III. Revised Bill Formats

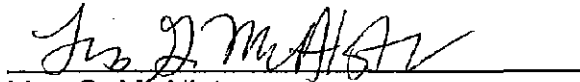
Concurrent with the Joint Application for Rehearing and Memorandum in Support, VEDO and Ohio Gas respectfully submit their revised bill formats (as Exhibits A and B, respectively) for the Commission's review and approval pursuant to the Commission's November 20, 2007 Finding and Order that revised the contact information for OCC and the Commission in various Commission rules regarding customer communications. Both VEDO and Ohio Gas use identical formats for the backs of both bills and disconnection notices. As such, while the revised bill formats do not technically comply with the rules for the reasons identified in the Joint Application for Rehearing and Memorandum in Support, they substantially comply with all Commission rules.

If the Commission finds that the revised backings submitted by VEDO and Ohio Gas substantially comply with the Commission's rules, as promulgated on November 20, 2007 and filed at the Joint Committee on Agency Rule Review ("JCARR") on November 27, 2007, then VEDO and Ohio Gas respectfully withdraw their Joint Application for Rehearing.

IV. CONCLUSION

For the reasons set forth above, VEDO and Ohio Gas respectfully request that the Commission grant rehearing for the purposes discussed herein or find that the respective revised bill formats of VEDO and Ohio Gas substantially comply with the Commission's rules.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Joint Application for Rehearing, Memorandum in Support and Revised Bill Formats of Vectren Energy Delivery of Ohio, Inc. and Ohio Gas Company* were served upon the following individuals this 20th day of December 2007 via electronic transmission and/or U.S. Mail.



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Important Vectren Energy Delivery Numbers

Customer Service Number: 1-800-227-1376

Ohio Relay Service: 1-800-750-0750

Call Before You Dig: 1-800-362-2764

General Information

24 Hour Emergency Service: Call 1-800-227-1376 if you smell a gas odor or if all of your gas appliances are out.

Customer Service Questions or Concerns: To contact Vectren Energy Delivery (Vectren) about your bill or service, call 1-800-227-1376 between 7 a.m. and 7 p.m., Monday through Friday. Authorized pay sites are available in your neighborhood for your convenience. To locate an authorized pay site nearest you, visit www.vectren.com or call 1-800-227-1376. You can pay your bill through a checking or savings account for free at www.vectren.com or by calling 1-800-227-1376. If you would like to write to Vectren, please send correspondence to P.O. Box 209, Evansville, IN 47702-0209 or visit our web site at www.vectren.com. If you are a Vectren Choice Advantage participant and have questions regarding your gas supply charges, please refer to the gas supplier and toll free number listed on the front of your bill in the "Important Information" section. The nonpayment of charges for ancillary service unrelated to regulated distribution service shall not result in the disconnection of regulated gas distribution service.

Customers with billing or service issues or concerns regarding a disconnect notice should contact Vectren prior to contacting the Public Utilities Commission of Ohio (PUCO). If your complaint is not resolved after having contacted Vectren, or for general utility information, residential and business customers may contact the PUCO for assistance at 1-800-686-7826 (toll-free) or for TTY at 1-800-686-1570 (toll-free) from 8:00 a.m. to 5:00 p.m. weekdays, or at www.puco.ohio.gov.

Residential customers may also contact the Ohio Consumers' Counsel (OCC) for assistance with complaints and utility issues at 1-877-742-5622 (toll-free) from 8:00 a.m. to 5:00 p.m. weekdays, or at www.pickocc.org.

Terms and Definitions

Distribution and Service Charges - Charges billed each month for the delivery of gas consumed.

Customer Charge - Charges billed each month to recover a portion of the ongoing fixed costs of providing service to the customer. This includes metering, meter reading, service delivery facilities, billing and recordkeeping. The Customer Charge is a fixed charge and does not vary with gas consumption.

Gas Cost Recovery (GCR) - This is the average cost (per hundred cubic feet) of gas purchased by Vectren Energy Delivery for sale to its customers. This portion of the bill reflects the market cost of purchasing natural gas.

Gas Supplier (also referred to as a gas marketer) - A person or company who is certified by the Public Utilities Commission of Ohio (PUCO) to sell natural gas in a competitive retail market.

CCF (100 Cubic Feet) - Gas consumption is measured by your meter in hundreds of cubic feet.

Gas Supply Charges - Charges billed each month for the consumption of natural gas supplied by a retail gas supplier.

Miscellaneous Charges - Examples of miscellaneous charges may include but are not limited to reconnect fees, labor charges and returned check charges.

Multiplier - Factor used to calculate consumption on meters with higher than the standard delivery pressure. A multiplier greater than 1 indicates a delivery pressure that is greater than Vectren's standard delivery pressure.

PIPP - The Percentage of Income Payment Plan (PIPP) is available if your total income is at or below 150 percent of the Federal poverty level. This program does not reduce or waive energy costs; it only establishes a payment plan to allow you to maintain your utility service.

A Medical certification is available to our residential consumers whose health would be impaired by termination of gas service to their residence. Under this program, if a licensed physician or local board of health physician certifies that termination of gas service to the permanent residence of the consumer would pose a special danger to the consumer's health, the gas service cannot be disconnected the thirty days following certification. Certification can be renewed two additional times for thirty days each. Application forms for the medical certification program are available at Ohio Gas Company at 200 W. High Street, Bryan, Ohio 43506, telephone 1-800-331-7396 or 419-636-1117.

ADDITIONAL CHARGES

If your gas service is disconnected for nonpayment, you must pay the following charges prior to reconnection:

1. Pay your account in full
2. Pay the \$20.00 reconnection charge
3. Pay the appropriate security deposit

Extended Payment Plan Options

1. A plan appropriate for both the customer and the company
2. A plan that requires six equal monthly payments on the arrearages in addition to full payment on current bill.
3. A plan that requires payment of one-third of the balance due each month (arrearages plus current bill). This plan is available during the winter heating season.
4. Percentage of Income Plan (PIPP) – A plan that allows a customer whose household income is 150% of the federal poverty level or less to pay 10% of their monthly household income to the utility company providing the main heating source and 5% to the utility company providing the secondary heating source.

PAYMENT ASSISTANCE - If you receive a disconnect notice between November 1 and April 15, contact an Ohio Gas Customer Service Representative for a listing of agencies in your area who assist in payment of past due utility bills.

CUSTOMER-OWNED PIPING NOTIFICATION

The customer is responsible for the maintenance of all gas piping from the gas meter to all gas appliances. Buried gas piping which is not maintained may be subject to the potential hazards of corrosion and leakage. For your safety, all buried piping should be periodically inspected for leaks. If the buried piping is metallic, it should also be periodically inspected for corrosion. If an unsafe condition is found, the gas piping will need to be promptly repaired. When digging near buried gas piping, the piping should be located in advance and digging done by hand. Plumbers and heating contractors can assist in location, inspecting and repairing customer's buried piping. This notice required by recent United States Department of Transportation Regulation 49 CFR 192.16.

FOR YOUR SAFETY

Gas Odor: Natural gas has a distinctive odor added to it to alert you to a leak in or around your home. If you smell gas leave the building immediately. Leave the door open and don't use any light switches, phones or matches. Call our 24-hour emergency number 1-800-331-7396 or 419-636-3642 from a nearby phone and wait for our personnel to arrive and assess the situation.

Call Before You Dig - If you're planning a home construction or landscaping project, call the Ohio Utility Protection Service (OUPS) at 1-800-362-2764 or 811 before you start to dig. A representative of Ohio Gas will mark the approximate location of underground gas lines up to the meter on your property at no cost. If you don't call, you are liable for damages and injuries.

Employee Identification - All of our employees carry identification. If someone claims to be from the gas company, ask to see identification, and call our office if you're unsure before letting the person into your home.

UNDERSTANDING YOUR GAS BILL

GCR: The cost of the gas you used during this billing period.
CCF: Is the amount of gas used during this billing period in hundred cubic feet
(1 CCF = 100 cubic feet)
A: Actual meter read
E: Estimated meter read

Meter Tampering is Illegal - Tampering with a gas meter is illegal and can cause property damage and serious personal injury. If you suspect that a meter has been tampered with, please report it to us. Your call will be kept confidential.

Questions or Complaints

Customers with billing or service issues or concerns regarding a disconnect notice should contact Ohio Gas prior to contacting the Public Utilities Commission of Ohio (PUCO). If your complaint is not resolved after having contacted Ohio Gas, or for general utility information, residential and business customers may contact the PUCO for assistance at 1-800-686-7826 (toll free) or for TTY at 1-800-686-1570 (toll free) from 8:00 a.m. to 5:00 p.m. weekdays, or at www.puco.ohio.gov.

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