

**FILE**

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of The  
East Ohio Gas Company d/b/a Dominion  
East Ohio for Authority to Increase Rates  
for its Gas Distribution Service.**

**Case No. 07-829-GA-AIR**

**In the Matter of the Application of The  
East Ohio Gas Company d/b/a Dominion  
East Ohio for Approval of Tariffs to  
Recover Certain Costs Associated with  
Automated Meter Reading Deployment  
Through an Automatic Adjustment Clause,  
and for Certain Accounting Treatment**

**Case No. 06-1453-GA-UNC**

**PUCO**

**2008 DEC 19 PM 3:42**

**RECEIVED-BOOKETING DIV**

**MOTION TO ACCEPT PRE-FILING NOTICE OF AUTOMATED METER READING  
COST RECOVERY APPLICATION AS TIMELY FILED**

Pursuant to Rule 4901-1-12, Ohio Administrative Code, R.C. §§ 4905.04 and 4929.11 and other applicable law, The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO") requests that the Commission accept as timely filed the "pre-filing notice" of its Automated Meter Reading ("AMR") application, which was submitted on December 19, 2008. As described below, no party objects to this Motion and no party will be prejudiced if this motion is granted.

In its Opinion and Order dated October 15, 2008, the Commission approved DEO's use of an automatic adjustment mechanism to recover costs associated with the deployment of Automated Meter Reading technology. (See Order at 13.) Accordingly, DEO will file an application to recover a specified AMR charge in February 2009. (App., No. 06-1453 at p. 7; Staff Rep., p. 41.) To facilitate a timely review of the application, DEO also committed to submitting a pre-filing notice with provisional schedules supporting a preliminary estimate of an AMR charge. (App., p. 7.)

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In its initial application, DEO stated that it would submit the pre-filing notice 90 days prior to the February application. (*Id.*) Such timing would ordinarily result in the pre-filing notice being submitted in the month of November. The Opinion and Order was not issued in DEO's rate case until mid-October, however. Moreover, the Stipulation in DEO's rate case required that DEO, Staff, and OCC meet within three months of Commission approval to develop a baseline for meter reading and call center savings associated with AMR deployment. (Stipulation, p. 10.) These factors made it impractical for DEO to prepare and file a notice and corresponding schedules in November.

For these reasons, DEO is submitting its pre-filing notice today, December 19, 2008, and asks that this notice be accepted as timely. DEO has contacted the parties to Case Nos. 06-1453-GA-UNC and 07-829-GA-AIR, and no party has indicated an objection to this request.<sup>1</sup> Nor will any party be prejudiced if the notice is accepted as timely. Parties will still have approximately 60 days to review the notice and schedules before DEO files its application in February 2009. Moreover, DEO met with Staff and OCC to review these schedules on December 12, and DEO anticipates another meeting with these parties by mid-January. All parties will have a more-than-adequate opportunity to review and analyze the pre-filed schedules and to begin serving discovery on DEO prior to the February 2009 application.

For the foregoing reasons, DEO respectfully requests that its December 19, 2008 pre-filing notice be accepted as timely filed.

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<sup>1</sup> All parties were advised of this motion by emails dated December 17 and 18, 2008, and they were asked to contact DEO if they had objections. Staff, OCC, and the City of Cleveland indicated that they do not oppose this motion. No other parties responded.

Respectfully submitted,



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## CERTIFICATE OF SERVICE

I certify that a copy of the Motion to Accept Pre-Filing Notice of Automated Meter Reading Cost Recovery Application as Timely Filed was delivered to the following persons by electronic mail this 19th day of December, 2008.

  
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