

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

MICHAEL L. NICHOLSON,

Complainant,

v.

DOMINION EAST OHIO,

Respondent.

Case No. 09-78-GA-CSS

PUCO

2009 OCT 30 PM 3:18

RECEIVED-DOCKETING DIV

REPORT PURSUANT TO SEPTEMBER 30, 2009 OPINION AND ORDER

Introduction

On September 30, 2009, the Commission issued an Opinion and Order in this proceeding dismissing Complainant Michael L. Nicholson's Complaint against Respondent The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO"). The Opinion and Order additionally directed DEO to file, within 30 days, a report regarding its internal procedures for complying with the bimonthly meter reading goal provided in Rule 4901:1-13-04(G)(1).

In response to the Opinion and Order, DEO respectfully submits the attached Dominion East Ohio Meter Reading Plan (the "Plan," attached as Exhibit A) which was approved by the Commission on July 31, 2007 and remains in effect today. (See Exhibit B.) As detailed in the Plan, DEO has established procedures to attempt to read all customer meters every other month. The specific procedures for inside and outside meters discussed in the Plan have been implemented with only a minor change in timing for several communication steps and are summarized in this Report.

Inside Meter Procedures

If DEO is denied access to the inside meter during its bimonthly meter reading attempt, DEO places a "green tag" on the customer's door instructing them to contact DEO to read the

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Technician An Date Processed 10/30/09

meter or to schedule a meter reading appointment. If 4 months have passed without obtaining an actual reading, DEO automatically places an outbound call to the customer to attempt to schedule a meter reading appointment. At 8 months since the last actual reading, a letter is sent to the customer urging them to contact DEO to schedule a meter reading. This is followed at 10 or 11 months (depending if the meter is read on an even or odd-month schedule) and again at 12 months by a second and third letter informing the customer that failure to permit a meter reading could result in disconnection of service. Finally, fourteen months after the last actual reading, a "yellow tag" is placed on the customer's door and a shut off notice is included in the customer's bill instructing the customer to contact DEO to schedule the meter reading. DEO maintains an audit trail on each customer's account to ensure full compliance with these procedures.

DEO additionally notes that many of its inside meters are equipped with remote index devices. Remote index devices allow DEO to read a customer's inside meter to be read without physical entry onto the customer's property. Pursuant to the Plan, if DEO cannot obtain an actual reading of an inside meter, DEO utilizes the remote index device, where installed, to obtain the meter reading.

As further explained in the Plan, on May 24, 2007, the Commission granted DEO a five-year waiver of compliance with Rule 4901:1-13-04(G)(1) permitting DEO to treat such remote index device readings as actual readings. As approved by the Commission, to the extent there are discrepancies between remote index device readings and any future "actual" reading of a customer's inside meter, DEO will credit the customer for any overcharge and waive any right to collect an undercharge.

During the five-year waiver period, DEO has agreed to install automated meter reading ("AMR") devices on all customer meters (both inside and outside). DEO notes that the Commission considers AMR readings to be actual readings. (See Rule 4901:1-13-04(G)(1).)

DEO is currently on schedule to substantially complete its AMR installation on a system-wide basis by year-end 2011 and thus well within the five-year waiver period. As of the end of September 2009, DEO has installed 283,082 AMR devices on inside meters, or 52% of the total inside meter population of 539,304 meters.

Outside Meter Procedures

If DEO cannot read the outside meter during its bimonthly reading attempt, DEO places a "green tag" on the customer's door informing them of why the meter could not be read and instructing them to contact DEO to read the meter or to schedule a meter reading appointment. If 4 months have passed without obtaining an actual reading, DEO automatically places an outbound call to the customer to attempt to schedule a meter reading appointment. At 8 months since the last actual reading, a letter is sent to the customer urging them to contact DEO to schedule a meter reading. This is followed at 10 or 11 months (depending if the meter is read on an even or odd-month schedule) and again at 12 months by a second and third letter informing the customer that failure to permit a meter reading could result in disconnection of service. Finally, fourteen months after the last actual reading, a "yellow tag" is placed on the customer's door and a shut off notice is included in the customer's bill instructing the customer to contact DEO to schedule the meter reading. DEO maintains an audit trail on each customer's account to ensure full compliance with these procedures. As of the end of September 2009, DEO has installed 363,663 AMR devices on outside meters, or 49% of the total outside meter population of 748,445 meters.

Conclusion

The attached Plan thus provides Commission-approved procedures by which DEO attempts to obtain an actual meter reading on a bimonthly basis pursuant to the requirements of Rule 4901:1-13-04(G)(1) and related Commission orders. Accordingly, DEO is in compliance

with Commission requirements regarding actual meter readings and the instructions of the Commission in this case pursuant to its September 30, 2009 Opinion and Order.

Respectfully submitted,

A handwritten signature in dark ink, appearing to be 'Mark A. Whitt', written over a horizontal line.

Mark A. Whitt (Counsel of Record)

Joel E. Sechler

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Attorneys for Respondent The East Ohio
Gas Company d/b/a Dominion East Ohio

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Report Pursuant To September 30, 2009
Opinion and Order was served by ordinary U.S. mail, postage prepaid, to the following on this
30th day of October, 2009:

Michael L. Nicholson
715 E. Midlothian Blvd.
Youngstown, Ohio 44502



One of the Attorneys for Respondent The
East Ohio Gas Company d/b/a Dominion East Ohio

860:001:238089

DOMINION EAST OHIO METER READING PLAN

Introduction

This meter access plan is submitted to the Director of the Commission's Service Monitoring and Enforcement Department pursuant to OAC 4901:1-13-04(G)(1)(a). The plan describes Dominion East Ohio's ("DEO" or "Company") approach to complying with OAC 4901:1-13-04(G) in conjunction with the tariff changes, waiver requests and AMR deployment plan and accompanying cost recovery applications filed with the Commission. It also addresses content suggested by Staff and includes information provided to Staff at meetings held on October 3, October 31 and November 29, 2006. This revised plan reflects Commission decisions in Case Nos. 06-1454-GA-ATA and 06-1452-GA-WVR regarding certain tariff changes and waivers requested by the Company related to the minimum gas service standards.

Existing Meter Equipment Description

Approximately 556,000, or 43%, of DEO's 1,290,000 meters are located inside. Of those inside meters, 373,000 are equipped with remote index devices that have been installed over a span of 30 years. The Company evaluated the accuracy of its three major remote index types based on a sample of 19,704 devices tested between January 2005 and July 2006. Using a defect definition of a greater than +/- 3 mcf difference between the actual meter reading and the remote index device, the defect rates of the three types of devices installed at DEO were as follows:

Remote Index Device Accuracy

Remote Type	Years Installed	Population	Defect Rate
American	1977-1984	36,181	9.5%
Badger	1977-1984	18,277	21.4%
Hexagram	1986-2006	318,542	1.8%

Role of Automated Meter Reading (AMR)

As indicated in the Company's application in Case No. 06-1453-GA-UNC, DEO will deploy AMR units on all inside and outside meters over a 5-year period, provided the Commission approves DEO's application for a cost recovery mechanism, which DEO now plans to consolidate with an upcoming base rate proceeding. DEO will prioritize the replacement of American and Badger remote indexes due to their higher defect rates, with the intent of replacing them with AMR devices within two years. DEO will consult with Staff to determine the most appropriate way to balance the efficiency of a shop-by-shop AMR conversion with an initial focus on inside meters to address the most pressing

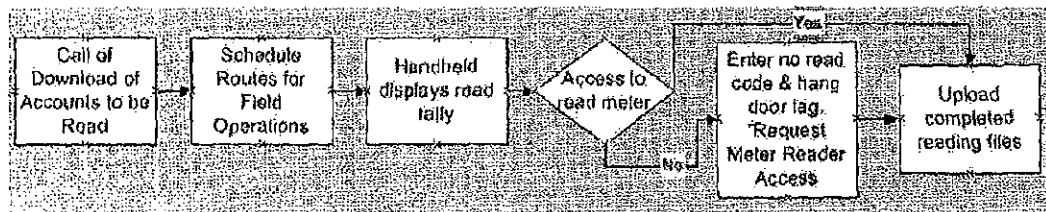


billing and access issues. In its May 2, 2007 Finding and Order in Case No. 06-1454-GA-ATA, the Commission approved proposed tariff changes that will enable DEO to install AMR devices at the customer's expense when the customer does not provide access within 12 months after being properly informed of the company's right to gain access to its metering equipment. In its May 24, 2007 Entry in Case No. 06-1452-GA-WVR, the Commission authorized a 5-year waiver of paragraph (G)(1) of Rule 4901:1-13-04, O.A.C., allowing the Company to treat remote index device reads as actual readings in recognition of DEO's agreement to hold the customers harmless for discrepancies between an actual meter reading and a reading from a remote index device.

Routine Process

Pursuant to the Commission's May 24, 2007 Entry in Case No. 06-1452-GA-WVR, DEO will treat remote device reads as actual reads for purposes of complying with OAC 4901:1-13-04(G)(1) for a period of five years. As described in the following section, DEO will mitigate the impact of back-billing issues on accounts subsequently found to have faulty index devices. The Company will attempt to read all meters, or remote index devices as applicable, every other month until AMR is deployed widely enough to support reading each meter every month. In the meantime, DEO will attempt to gain bi-monthly access to all outside meters and inside meters without a remote index device. As described in greater detail in Attachment A, the routine process to obtain an actual read for those accounts is illustrated below:

Routine Meter Reading Process Flow



Back-Billing Accounts with Faulty Remote Index Devices

In conjunction with DEO's proposed AMR deployment, accompanying cost recovery mechanism and the treatment of remote index device reads as actual reads, DEO will hold customers harmless for any discrepancy between an actual meter read and a read from a faulty remote index device. That is, the Company will not back-bill for any additional consumption indicated by an actual meter reading being above the level indicated on the remote index device when the variation between the reads is greater than 3 mcf. Should an actual meter read indicate less consumption than the remote, the Company will credit the customer's bill for the difference.

Notice After Repeated Failures to Obtain Access

As illustrated in the process flow charts and related materials included in Attachment A, DEO will employ various means of communicating with customers who have not provided access to the Company's metering equipment. Those means include two versions of door hangers, automated outbound telephone calling, letters with increasingly urgent calls to action and a termination notice printed on page 1 of the bill once a customer can be scheduled for disconnection as a result of failing to provide access. The communication plan for inside meters provides the following new notifications in addition to the current door hanger left whenever no access is provided and the letter sent after 10 or 11 months of no actual read being obtained, advising the customer that failure to provide access could result in termination of service:

- After 5 months of no actual read being obtained, an automated outbound call requesting access to the meter is made to the customer on the day before the scheduled meter read date.
- After 8 months, an initial no-access letter with no mention of potential disconnection is sent advising the customer of the number of months since the last actual read.
- After 12 months, a third letter advises the customer of prior attempts to gain access and that service may be disconnected if access is not provided by the next meter reading date. (Note: This letter follows the new 8-month letter described above and the existing letter that is currently sent after 10 or 11 months of no actual read being obtained.)
- After 14 months, a termination notice is printed on page 1 of the bill indicating that the customer is subject to disconnection if no access is provided within a specified time period.

In light of its comprehensive non-access communication with customers, the Company does not believe that an additional notice period is needed in the winter. However, as it does with credit-related terminations, DEO will exercise proper restraint in terminating service for non-access during severe cold weather conditions to avoid jeopardizing customer health and welfare.

Content of Notices

Attachment B provides samples of all current and proposed non-access communication with customers. Included in the attachment are the following:

- Door hangers referenced in all Attachment A process flows
- Current letters referenced in the Current State process flow
- Proposed letters referenced in the Proposed Inside Meter process flow
- Proposed letters referenced in the Proposed Outside Meter process flow
- Proposed termination notices referenced in both proposed process flows

DEO has discussed the content of these notices with Staff and believes that the notices in Attachment B reflect Staff's comments. As indicated in the IT plan reviewed at the November 29 meeting, the Company expects to complete implementation of the revised notice process by December 31, 2007. The Company remains committed to working

with Staff to ensure that the communications plan provides the proper notice to customers about the need to provide access and the consequences for failing to do so.

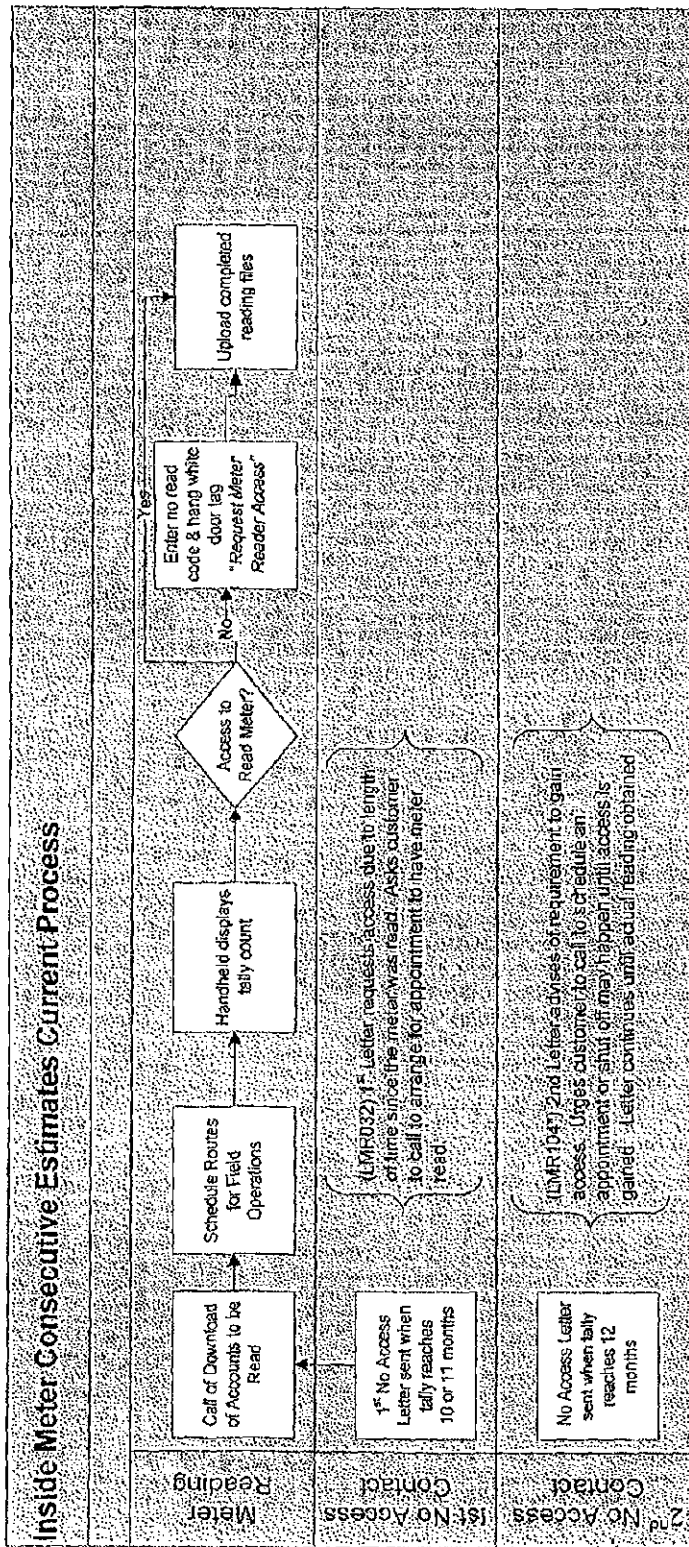
Customer Education Upon Disconnection for Non-Access

DEO will include information advising customers what to do if they are disconnected for non-access in the summary information to be provided customers pursuant to OAC 4901:1-13-06. As required in the rule, the Company has reviewed the summary of customer rights and responsibilities with Staff prior to mailing it to customers. In addition, DEO will reference the no-access requirement and disconnection rights in an annual bill insert that addresses buried house line and other compliance related items. In the event a customer's service is disconnected for non-access, DEO will leave a door hanger with the customer that provides information on how to contact the company to restore service.

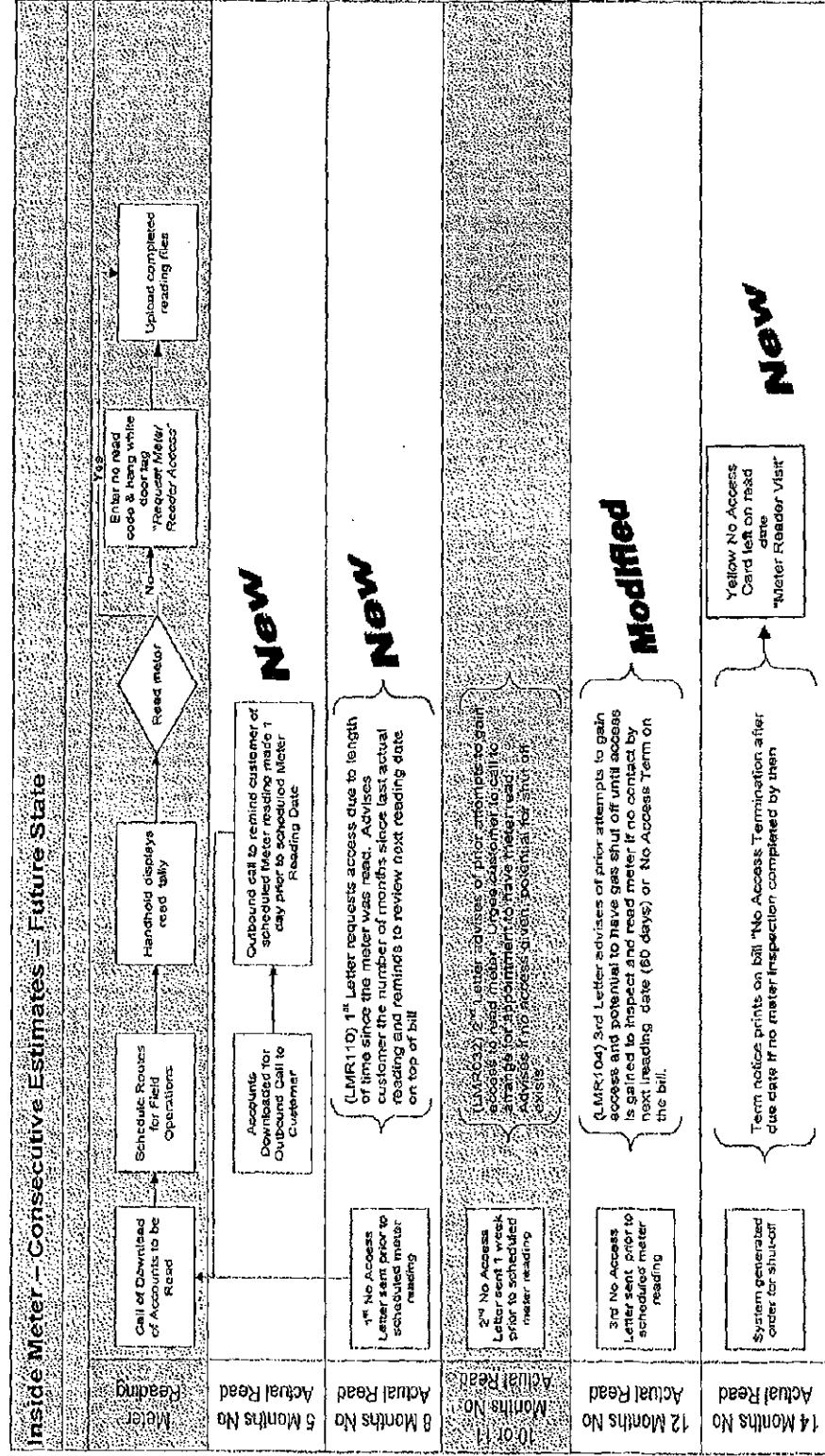
Documenting Compliance

At Staff's request, the Company will modify its Customer Care System to track all contact attempts throughout the entire sequence of customer notification including automated outbound calls, door hangers, the progression of letters and bill notices on each account. As noted in Attachment A, customer information representatives will be able to view a panel that identifies the progression of non-access related communication and pull up images of the correspondence sent to the customer. Such information will be made available to Staff to aid their resolution of customer complaints related to potential termination of service for non-access.

Current State



Proposed Inside Meter Process Flow



Proposed Changes

- ☐Reminder call to customer on day before meter is scheduled to be read
- ☐New initial no access letter sent – no threat of termination mentioned
- ☐Final no access termination notice printed on customer's bill
- ☐Include audit tracking of all notifications on customer's account
 - Outbound Call
 - Door Hanger Notice Left
 - Letter Progression

Text for Outbound Call Message

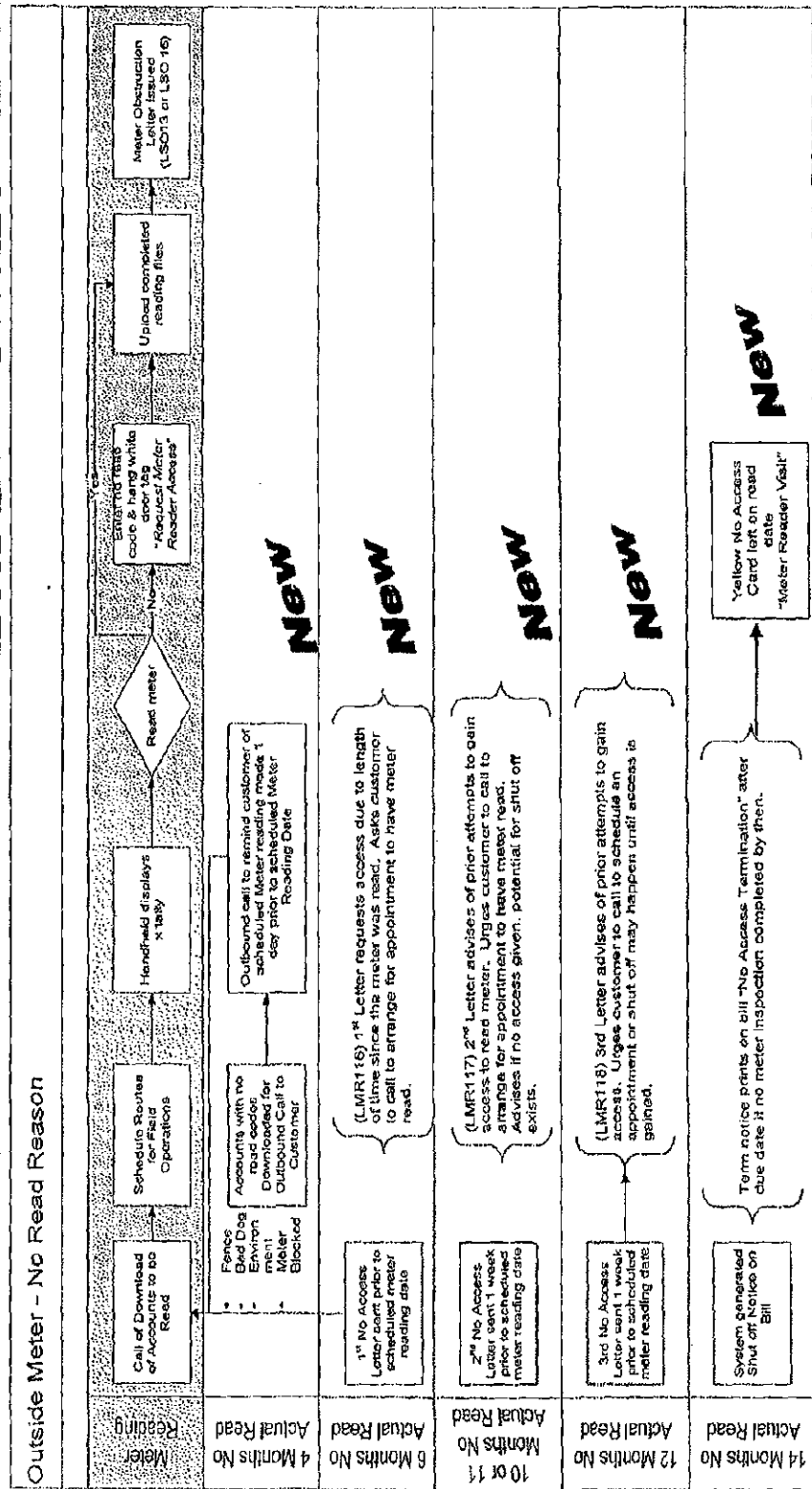
Hello, this is Dominion East Ohio.

Your inside meter has not been read or inspected at your home or business for X months. Our meter reader will be in your area tomorrow, MM/DD/YY, to read your meter between 8 and 3.

You do not need to take any action, except give our meter reader access to the gas meter.

For your safety, our company meter readers carry Dominion identification cards at all times. We encourage you to request to see the ID badge before allowing our meter reader to enter your home or business.

Proposed Outside Meter Process Flow



In the future...

- ⌘ Add Outbound Call***
- ⌘ Add Field Notice Date***
- ⌘ Series of 3 Letters***
- ⌘ Term Notice on Bill***

[illegible]

Attachment B

Contents

Door hangers referenced in all Attachment B process flows

Current letters referenced in the Current State process flow

Proposed letters referenced in the Proposed Inside Meter process flow

Proposed letters referenced in the Proposed Outside Meter process flow

Proposed termination notices referenced in both proposed process flows



Meter Reader Visit

Dominion East Ohio

Dear Customer,
A Dominion meter reader was here:

Date _____

☐ Read the outside meter reading device. We were unable to gain access to our inside meter. We need to read the actual meter inside your home or business because it measures your actual gas usage. To comply with requirements of the Public Utilities Commission of Ohio, we must be able to get to our inside meter. Please call us at 1-800-362-7557 between 7 a.m. and 7 p.m. weekdays to schedule an appointment with us.

☐ Recorded your window dial reading. Thank you.

Unable to record your meter reading because

- ☐ No access to inside meter.
- ☐ Could not locate your dial card. Please display card by proper date.
- ☐ Dial card reading seems wrong compared with last month. Please call us with your reading.
- ☐ Outside meter reading device not working. Please call us at 1-800-362-7557 between 7 a.m. and 7 p.m. weekdays to schedule an appointment to have it repaired.
- ☐ Dog prevented access.
- ☐ Meter blocked. **PLEASE CLEAR AREA AROUND METER.**
- ☐ _____

If any of the above reasons are marked, please call our automated voice response system toll-free at 1-800-362-7557 within 24 hours to record your reading. This system can be used 24 hours a day, 7 days a week. Calling with your meter reading may help to prevent you from receiving an estimated bill. See back for detailed instructions on how to read and record your meter reading accurately.

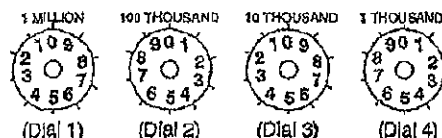
(over)

Form No. 721280 (Sep 2005)
©2005 Dominion Resources Services, Inc.

front

Step 1

To read your meter if your meter has a dial index: Using the dials below, copy the position of the dial hands exactly as they appear on the meter in your home.



If the dial is anywhere between two numbers, use the lower number. The only exception is when the dial is between the 9 and the 0. In that case, 9 is the lower number. When complete skip to Step 2.

To read your meter if your meter has a digital index: From left to right copy the numbers from the digital index exactly as they appear on the meter in your home.

1 MILLION 100 THOUSAND 10 THOUSAND 1 THOUSAND

(Digit 1) (Digit 2) (Digit 3) (Digit 4)

If the digit reading is between two numbers, use the lower number. The only exception is when the digit is between the 9 and the 0. In that case, 9 is the lower number. When complete skip to Step 2.

Step 2

To record your meter reading:

- Have your 13 digit account number available
- Call our voice response system at 1-800-362-7557
- From the main menu, select option — To enter your meter reading
- At this point, you will be prompted to enter your 13 digit account number and meter reading.

Hearing-impaired customers with Telecommunications devices for the deaf can call toll-free at 1-800-633-8903.

Dominion Phone Numbers:

Customer Information Service	1-800-362-7557
Gas Leaks, Fires and Explosions	1-877-642-2630
Hearing Impaired with TDD	1-800-633-8903
Call Before you Dig	1-800-362-2764

back



Dominion

Request Meter Reader Access

**IMPORTANT! Please call.
We MUST gain access!**

- ☐ **WE MUST READ YOUR GAS METER.** It has been over 12 months since we last read your inside meter. The Public Utilities Commission of Ohio requires that we read all gas meters at least once each year and authorizes us to shut off service if access to our meter is denied.

Please call us at 1-800-966-3354 between 7 a.m. and 7 p.m. weekdays to schedule an appointment to have your meter read.

We'll work with you to schedule a time that is convenient for you. If we don't hear from you in 10 days, we may have to issue a shut-off notice for your account. Please call us as soon as possible to avoid having your service shut off.

- ☐ **WE MUST INSPECT YOUR INSIDE METER.** This inspection is a Federal Safety requirement. We must inspect and read the inside meter soon. If we can't get to the meter, the U.S. Department of Transportation and the Public Utilities Commission of Ohio allow us to shut off your service.

Please call us at 1-800-966-3354 between 7 a.m. and 7 p.m. weekdays to schedule an appointment to have your meter inspected.

We'll work with you to schedule a time that is convenient for you. If we don't hear from you in 10 days, we may have to issue a shut-off notice for your account. Please call us as soon as possible to avoid having your service shut off.



Dominion

Request Meter Reader Access

**IMPORTANT! Please call.
We MUST gain access!**

- ☐ **WE MUST READ YOUR GAS METER.** It has been over 12 months since we last read your inside meter. The Public Utilities Commission of Ohio requires that we read all gas meters at least once each year and authorizes us to shut off service if access to our meter is denied.

Please call us at 1-800-966-3354 between 7 a.m. and 7 p.m. weekdays to schedule an appointment to have your meter read.

We'll work with you to schedule a time that is convenient for you. If we don't hear from you in 10 days, we may have to issue a shut-off notice for your account. Please call us as soon as possible to avoid having your service shut off.

- ☐ **WE MUST INSPECT YOUR INSIDE METER.** This inspection is a Federal Safety requirement. We must inspect and read the inside meter soon. If we can't get to the meter, the U.S. Department of Transportation and the Public Utilities Commission of Ohio allow us to shut off your service.

Please call us at 1-800-966-3354 between 7 a.m. and 7 p.m. weekdays to schedule an appointment to have your meter inspected.

We'll work with you to schedule a time that is convenient for you. If we don't hear from you in 10 days, we may have to issue a shut-off notice for your account. Please call us as soon as possible to avoid having your service shut off.

CURRENT VERSION:

INSIDE METER - WITH OR WITHOUT REMOTE
REMINDER TO BE SENT WHEN THERE HAS BEEN 10 OR 11 MONTHS OF ESTIMATES,
DEPENDING ON THE SCHEDULED READ. SENT ONE WEEK PRIOR TO SCHEDULED READ.

CurrDate

mail label line 1
mail label line 2
mail label line 3
mail label line 4
mail label line 5
mail label line 6

ACCOUNT NO:
+00000000000000
SERVICE ADDRESS:
AddrServiceStreet
AddrServ.CityState
METER NO: *UVar1*

Subject: We Need To Read The Meter

Despite previous notices, we have not been able to read the meter in your home for almost a year. Unfortunately, our lack of access to the meter has now reached the critical stage.

You must permit a company representative to read the meter. This can be accomplished either by:

- Granting our meter reader access to the meter. Please note that the dates when our meter reader will be in your area are printed at the top of your bill.
- Scheduling a meter reading appointment, please call *PhonCallCen*, *HoursCalCenter* Any of our Customer Information Representatives can set a time that is convenient for you.

If we don't hear from you and we still cannot reach the meter inside your home or business, the PUCO permits us to shut off service until you let us in to read and inspect our meter. The last thing we want to do is to inconvenience you with a shut-off. If we shut off service, it will not be due to your account balance - only with a lack of access to the meter.

While we continue to make attempts to read our meter, you remain obligated to pay for any billing adjustment made once we obtain a reading.

We would appreciate your prompt cooperation.

Sincerely,

Signature1CallCenter
Signature2CallCenter

lmr032

CURRENT VERSION:

INSIDE METER - WITH OR WITHOUT REMOTE
REMINDER TO BE SENT WHEN THERE HAS NOT BEEN A METER READ FOR 12 MONTHS,
DEPENDING ON THE SCHEDULED READ. SENT ONE WEEK PRIOR TO SCHEDULED READ.

CurrDate

mail label line 1
mail label line 2
mail label line 3
mail label line 4
mail label line 5
mail label line 6

ACCOUNT NO:
+0000000000000
SERVICE ADDRESS:
Addr Service Street
AddrServ.CityState

Subject: 12 Month Estimate

We have not been able to read the meter at your home for over a year. We know that you may work outside your home or have other circumstances that keep our employees from gaining access to the meter. Unfortunately, our lack of access prevents us from ensuring that our equipment is operating properly and accurately.

Because periodic reading is important, the Public Utilities Commission of Ohio requires us to read all indoor meters at least once a year. We need your help, though. We ask that you schedule a meter reading appointment. Please call *PhonCallCen* *HoursCalCenter* at your earliest convenience. We expect to hear from you within 14 business days of the date of this letter.

The meter is a mechanical device - we must read and inspect it. If we don't hear from you and we still cannot reach the meter inside your home, the PUCO permits us to shut off service until you let us in to read and inspect our meter. The last thing we want to do is to inconvenience you with a shut-off. If we shut off service, it will not be due to your account balance - only with a lack of access to the meter.

Please call us to avoid such an unpleasant situation. A shut-off would not only inconvenience you, but would cost you an additional \$20.00 to cover the expense of stopping and restoring your service. While we continue to make attempts to read our meter, you remain obligated to pay for any billing adjustment made once we obtain a reading.

We would appreciate your prompt cooperation.

Sincerely,

Signature1CallCenter

Signature2CallCenter

PROPOSED

INSIDE METER - WITH OR WITHOUT REMOTE
FRIENDLY REMINDER TO BE SENT WHEN THERE HAS NOT BEEN A METER READ FOR
8 MONTHS. SENT ONE WEEK PRIOR TO SCHEDULED READ.

CurrDate

mail label line 1
mail label line 2
mail label line 3
mail label line 4
mail label line 5
mail label line 6

ACCOUNT NO:
+0000000000000
SERVICE ADDRESS:
Addr Service Street
AddrServ.CityState
METER NO: *UVar1*

Subject: Our Meter Reader Missed You!

Our meter reader was just in your neighborhood. He or she tried to read the gas meter inside your home or business, but no adult was there. You can find the next scheduled meter reading dates at the top of your gas bill.

Even if you have reported your own meter readings or your property has a remote meter reading device, the Public Utilities Commission of Ohio's service standards require Dominion East Ohio to read the inside gas meter at least once every 12 months. This helps us to make sure your bill is accurate and to inspect the gas meter to make sure it is working the way it should.

Thank you for your cooperation.

Sincerely,

Signature1CallCenter
Signature2CallCenter

lmp110

PROPOSED

INSIDE METER - REMINDER SENT ONE WEEK PRIOR TO SCHEDULED READ.
REMINDER TO BE SENT WHEN THERE HAS BEEN 10 OR 11 MONTHS OF ESTIMATES,
DEPENDING ON THE SCHEDULED READ. SENT ONE WEEK PRIOR TO SCHEDULED READ.

CurrDate

mail label line 1
mail label line 2
mail label line 3
mail label line 4
mail label line 5
mail label line 6

ACCOUNT NO:
+00000000000000
SERVICE ADDRESS:
Addr Service Street
AddrServ.CityState
METER NO: *UVar1*

Subject: We Need To Read The Meter

We have not been able to read the gas meter at this address for almost a year. Unfortunately, our lack of access to the meter has now reached the critical stage. Even if you have reported your own meter readings or your property has a remote meter reading device, the Public Utilities Commission of Ohio's (PUCO) service standards require Dominion East Ohio to read the gas meter at least once every 12 months.

You must permit a company representative to read and inspect the meter. This can be accomplished either by:

- Granting our meter reader access to the meter. Please note that the dates when our meter reader will be in your area are printed at the top of your bill.
- Scheduling a meter reading appointment, please call *PhonCallCen*, *HoursCalCenter*

If we don't hear from you and we still cannot reach the meter, the PUCO permits us to shut off service until you let us read and inspect the meter. The last thing we want to do is to shut-off your service, which would not only inconvenience you, but would cost you an additional \$UVAR11 to restore your service. Even if your account is paid in full we can still disconnect you if we are unable to read and inspect the meter once in a twelve month period.

Your actions preventing us from reading the meter could result in large backbills requiring you to pay large sums for gas used but not billed and/or properly metered.

We would appreciate your prompt cooperation.

Sincerely,
Signature1CallCenter
Signature2CallCenter

lmr032

PROPOSED

INSIDE METER -- 3rd REMINDER TO BE SENT ONE WEEK PRIOR TO SCHEDULED READ.

CurrDate

mail label line 1

mail label line 2

mail label line 3

mail label line 4

mail label line 5

mail label line 6

ACCOUNT NO:

+00000000000000.

SERVICE ADDRESS:

Addr Service Street

AddrServ.CityState

Subject: Your Gas Service Could Be Shut Off

This is your last warning before Dominion East Ohio issues a shut-off notice on your bill because you have not allowed us to get to the gas meter. We have not been able to read the gas meter at this service address for over a year. Even if you have reported your meter readings or your property has a remote reading device, the Public Utilities Commission of Ohio's (PUCO) service standards require Dominion East Ohio to read the gas meter at least once every 12 months.

We know that you may work outside your home or have other circumstances that keep our employees from gaining access to the meter. We have made several attempts to read the meter and to contact you:

DATE	CONTACT TYPE	[THIS INFO WILL BE VARIABLES 1-10]
10/07/06	DOOR NOTICE	
12/07/06	CALL	
02/07/07	LETTER	
04/07/07	LETTER	
06/07/07	LETTER	

Unfortunately, our lack of access prevents us from ensuring that our equipment is operating properly and accurately.

We need your help. We ask that you schedule a meter reading appointment by calling *PhonCallCen* *HoursCalCenter* as soon as possible.

If we don't hear from you and we still cannot reach the meter, the PUCO permits us to shut off service until you let us read and inspect the meter. The last thing we want to do is shut-off your service, which would not only inconvenience you, but would cost you an additional \$UVAR11 to restore your service. It has been UVAR12 months since we last read the inside meter. While we continue to make attempts to read our meter, your actions preventing us from reading the meter could result in large backbills requiring you to pay large sums for gas used but not billed and/or properly metered.

Please give this matter your immediate attention.

Sincerely,

Signature1CallCenter

Signature2CallCenter

lmi104

PROPOSED

OUTSIDE METER - WITH NO READ REASON CODE

REMINDER TO BE SENT WHEN THERE HAS NOT BEEN A READ FOR 8 MONTHS DUE TO METER OBSTRUCTION. SENT ONE WEEK PRIOR TO SCHEDULED READ.

CurrDate

mail label line 1
mail label line 2
mail label line 3
mail label line 4
mail label line 5
mail label line 6

ACCOUNT NO:
+0000000000000
SERVICE ADDRESS:
Addr Service Street
AddrServ.CityState
METER NO: *UVar1*

Subject: It Is Time For A Meter Reading of the Outside Meter

It is time again for us to read our gas meter located outside of your house or building. However, our meter reader has reported problems getting to the meter. As a result, we have had to estimate your gas use for several months now. Even if you have reported your own meter readings, the Public Utilities Commission of Ohio's service standards require Dominion East Ohio to read the gas meter at least once every 12 months. This helps us to make sure your bill is accurate and to inspect the gas meter to make sure it is working the way it should.

Please help us to meet this requirement:

- 1. Let us read the meter.** Call us to arrange a day for us to read the meter.
- 2. Remove the obstruction.** Whether it's a locked gate, an overgrown bush or a dog nearby, something has prevented us from getting to the meter. Please do whatever is necessary so that the next time our meter reader is in the area, he or she can obtain a reading.

If you would like to contact us, please call *PhonCallCen*, *HoursCalCenter*

Sincerely,

Signature1 CallCenter
Signature2 CallCenter

lmr116

PROPOSED

OUTSIDE METER - WITH NO READ REASON CODE

REMINDER TO BE SENT WHEN THERE HAS NOT BEEN A READ FOR 10 MONTHS DUE TO METER OBSTRUCTION. SENT ONE WEEK PRIOR TO SCHEDULED READ.

CurrDate

mail label line 1
mail label line 2
mail label line 3
mail label line 4
mail label line 5
mail label line 6

ACCOUNT NO:
+00000000000000
SERVICE ADDRESS:
Addr Service Street
AddrServ.CityState
METER NO: *UVar1*

Subject: It Is Time For A Meter Reading of the Outside Meter

It is time again for us to read the gas meter located outside of your house or building. However, our meter reader has reported problems getting to the meter. As a result, we have had to estimate your gas use for several months now. Even if you have reported your own meter readings, the Public Utilities Commission of Ohio's (PUCO) service standards require Dominion East Ohio to read the gas meter at least once every 12 months. This helps us to make sure your bill is accurate and to inspect the gas meter to make sure it is working the way it should.

You must permit a company representative to read and inspect the meter. This can be accomplished either by:

- Granting our meter reader access to the meter. Please note that the dates when our meter reader will be in your area are printed at the top of your bill.
- Scheduling a meter reading appointment, please call *PhonCallCen*, *HoursCalCenter*

If we don't hear from you and we still cannot reach the meter, the PUCO permits us to shut off service until you let us read and inspect the meter. The last thing we want to do is to shut-off your service, which would not only inconvenience you, but would cost you an additional \$UVar11 to restore your service. Even if your account is paid in full we can still disconnect you if we are unable to read and inspect the meter at least once in a twelve month period.

While we continue to make attempts to read the meter, your actions preventing us from reading the meter could result in large backbills requiring you to pay large sums for gas used but not billed and/or properly metered.

We would appreciate your prompt cooperation.

Sincerely,
Signature1CallCenter
Signature2CallCenter

lmr117

PROPOSED

OUTSIDE METER - WITH NO READ REASON CODE

REMINDER TO BE SENT WHEN THERE HAS NOT BEEN A READ FOR 12 MONTHS DUE TO METER OBSTRUCTION. SENT ONE WEEK PRIOR TO SCHEDULED READ.

*CurrDate*mail label line 1
mail label line 2
mail label line 3
mail label line 4
mail label line 5
mail label line 6

ACCOUNT NO:
+0000000000000
SERVICE ADDRESS:
Addr Service Street
AddrServ.CityState

Subject: Your Gas Service Could Be Shut Off to the Outside Gas Meter

This is your last warning before Dominion East Ohio issues a shut-off notice on your bill because you have not allowed us to get to the gas meter. Our meter reader has reported problems getting to the meter. As a result, we have had to estimate your gas use for several months now. Even if you have reported your own meter readings, the Public Utilities Commission of Ohio's (PUCO) service standards require Dominion East Ohio to read the gas meter at least once every 12 months. This helps us to make sure your bill is accurate and to inspect the gas meter to make sure it is working the way it should.

We have made several attempts to read the meter and to contact you:

DATE	CONTACT TYPE	[THIS INFO WILL BE VARIABLES 1-10]
10/07/06	DOOR NOTICE	
12/07/06	CALL	
02/07/07	LETTER	
04/07/07	LETTER	
06/07/07	LETTER	

Unfortunately, our lack of access prevents us from ensuring that our equipment is operating properly and accurately.

We need your help. We ask that you schedule a meter reading appointment by calling *PhonCallCen* *HoursCalCenter* as soon as possible.

If we don't hear from you and we still cannot reach the meter, the PUCO permits us to shut off service until you let us read and inspect the meter. The last thing we want to do is shut-off your service, which would not only inconvenience you, but would cost you an additional \$UVAR11 to restore your service. While we continue to make attempts to read the meter, your actions preventing us from reading the meter could result in large backbills requiring you to pay large sums for gas used but not billed and/or properly metered.

Please give this matter your immediate attention.

Sincerely,
Signature1CallCenter
Signature2CallCenter

lmr118

NO ACCESS SHUTOFF

Page 1 of 2

ADDRESS

CITY, STATE ZIP

Account Number Data Prepared

Next Meter Reading

00000000000000 September 18, 2006 11/14 - 11/17/2006

For questions about Dominion East Ohio charges call 330-746-7611. Avoid an estimate-enter a read between 10/17 & 5 p.m. on 10/19/2006 at www.dom.com

***** THIS IS A SHUT-OFF NOTICE ***
FOR NOT LETTING US GET
TO OUR METER.**

SHUT-OFF NOTICE FOR NOT LETTING US GET TO OUR METER

Dominion East Ohio has made repeated attempts to read and inspect our gas meter. Because you have not given us access to our meter, we will turn off gas service no sooner than 8 a.m. on [DATE] or any business day thereafter. We will take this action regardless of your account balance.

You can avoid a loss of service if you call us before [DATE] and arrange a day for us to read and inspect our meter. If we shut off gas service, you must schedule an appointment and you will be charged a fee of \$XX.XX, which will appear on the bill after we restore service.

Please detach and return this coupon with a check made payable to Dominion East Ohio. Please see reverse side for mailing address change instructions.

Removing Yourself from Customer Listing

We are required to include your name, address and usage information on a list of eligible customers that is made available to other retail natural gas suppliers or governmental aggregators. If you do not wish to be included on this list, please call Dominion East Ohio at 1-800-382-7557 or write us at P.O. Box 26686, Richmond, VA 23261-6686, or complete the appropriate form on the www.dom.com web site.

DOMINION EAST OHIO

PO BOX 26785

RICHMOND VA 23261-6786

XXXXX
XXXXX
XXXXXXXXXX

NEW COMBINED SHUTOFF

ADDRESS

CITY, STATE ZIP

Account Number Date Prepared
00000000000000 September 18, 2006

Next Meter Reading
11/14 - 11/17/2006

For questions about Dominion East Ohio charges call 330-746-7611. Avoid an estimate-enter a read between 10/17 & 5 p.m. on 10/19/2006 at www.dom.com.

Current Gas Amount
Past Due Gas Amount
Total Payment Due by October 4, 2006

65.10
188.24
\$253.34

****** THIS IS A SHUT-OFF NOTICE ******
FOR NOT PAYING AND FOR NOT
LETTING US GET TO OUR METER.

NOTICE #1 - FOR NOT PAYING

You are not currently on a payment plan.

YOUR ACCOUNT IS PAST DUE. Unless Dominion East Ohio receives your past due payment of \$188.24 in full by October 4, 2006, the company can shut off your gas service. Partial payment will not protect you from shutoff unless you arrange one of the following payment plans with us in advance, if eligible:

Current Plus - You pay your current charges, and make one of up to six equal payments of the past-due amount, each month.

Percentage of Income Payment Plan (PIPP) - Income-eligible customers pay 10% of their monthly gross household income. Call the Ohio Department of Development at 1-800-282-0880 for an application or for the location of the nearest Community Action Agency.

One-Third Option - Between November 1 and April 15, customers can pay one third of their total bill to avoid a shutoff of service.

If the company shuts off your gas service for nonpayment, you must pay a reconnection fee of up to \$20.00 in addition to the past-due amount. Also, you must pay a security deposit of \$1.00 or have a creditworthy guarantor.

Payment Methods. Pay your over-due balance through BillMatrix day or night with an electronic check, ATM/debit card with a Pulse, Star, NYCE or Accell logo or a Visa, MasterCard, or Discover credit card. Contact BillMatrix by phone at 1-800-673-1153 or online through www.dom.com. BillMatrix charges a convenience fee of \$3.95 for each transaction. You may also pay in person at an authorized payment center. For the payment location nearest you, visit www.dom.com or call Dominion East Ohio at the number in the top right corner of this bill. Authorized payment agents charge a service fee of \$0.74 for each transaction.

Energy Assistance. If you meet income requirements, you might qualify for financial aid or weatherization services. To learn more, call the Ohio Department of Development, Office of Community Services, at 1-800-282-0880 or contact us.

Medical Certificate. A medical certification delays a shutoff when it would be especially dangerous to the health of a permanent member of your household. It allows you time to get financial help or make payment arrangements. It does not reduce the amount you owe. You can get a medical certification form by calling 1-800-950-7989. A licensed medical professional must sign the form. You can apply by phone, provided that Dominion East Ohio receives the written notification within seven days. If gas service is off, return the signed form within 21 days to restore service. Be sure to give your health care provider permission to release your medical information to us.

Failure to pay all charges for non-regulated Dominion Products & Services may result in termination of your contract.

NOTICE #2 - FOR NOT LETTING US GET TO OUR METER

Dominion East Ohio has made repeated attempts to read and inspect our gas meter. Because you have not given us access to our meter, we will turn off gas service no sooner than 8 a.m. on [DATE] or any business day thereafter. We will take this action regardless of your account balance.

You can avoid a loss of service if you call us before [DATE] and arrange a day for us to read and inspect our meter. If we shut off gas service, you must schedule an appointment and you will be charged a fee of \$XX.XX, which will appear on the bill after we restore service.

Please detach and return this coupon with a check made payable to Dominion East Ohio. Please see reverse side for mailing address change instructions.

Removing Yourself from Customer Listing

We are required to include your name, address and usage information on a list of eligible customers that is made available to other retail natural gas suppliers or governmental aggregators. If you do not wish to be included on this list, please call Dominion East Ohio at 1-800-362-7557 or write us at P.O. Box 26666, Richmond, VA 23261-8666, or complete the appropriate form on the www.dom.com web site.

DOMINION EAST OHIO

PO BOX 26785

RICHMOND VA 23261-8785

XXXXX
XXXXX
XXXXXXXXXX



The Public Utilities Commission of Ohio

Monitoring marketplaces and enforcing rules to assure safe, adequate, and reliable utility services.

Ted Strickland, Governor
Alan B. Schreiber, Chairman

Commissioners

Ronda Hartman Fergus
Donald L. Mason, Esq.
Valerie A. Lammie
Paul A. Centolosa

July 31, 2007

Jeff Murphy
Director, Pricing and Regulatory Affairs
Dominion East Ohio
1201 East 55th Street
Cleveland, OH 44103-1028

RE: Rule 4901:1-13-04 (G) (1), Ohio Administrative Code (O.A.C.)

Dear Mr. Murphy:

I am in receipt of Dominion East Ohio's (DEO's) proposed meter reading plan, dated July 20, 2007. The plan states that DEO expects to complete implementation of the revised notice process by December 31, 2007. Staff approves DEO's submitted meter reading plan, which is attached to this letter, with the understanding that no customer will be disconnected for non-access or back billed longer than 12 months, until the full implementation of the notice process is completed.

If you have any question regarding this acceptance letter, please contact Barbara Bossart at 466-0793, or myself at 614-995-0137.

Sincerely,

Doris McCarter
Director
Service Monitoring and Enforcement Dept.

EXHIBIT

B