

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The East	)	
Ohio Gas Company d/b/a Dominion East	)	Case No. 11-6024-GA-UNC
Ohio for Approval to Implement a Capital	)	
Expenditure Program.	)	

In the Matter of the Application of The East	)	
Ohio Gas Company d/b/a Dominion East	)	Case No. 11-6025-GA-AAM
Ohio for Approval to Change Accounting	)	
Methods.	)	

**CLARIFICATION OF  
THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO  
IN RESPONSE TO  
THE OHIO CONSUMERS' COUNSEL'S SUPPLEMENTAL REPLY COMMENTS**

On October 17, 2012, the Office of the Ohio Consumers' Counsel ("OCC") filed supplemental reply comments in this case. The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO") has reviewed those comments and, solely to ensure that the record is clear, offers the following brief response.

In its latest comments, OCC recognized that DEO had stated that it would accept a monetary limit on its deferral authority, namely, that "the CAPEX Program deferral may accrue until such time as the bill impact on DEO's General Sales Service class of customers would exceed \$1.50 per month." (DEO Supp. Reply Comments at 4.) In response, OCC proposes that "unlike the Company's proposal to cap only the deferrals," the \$1.50 cap should "recognize[] the impact of **both** the deferrals and the investment." (OCC Supp. Reply Comments at 6 (emphasis sic).)

DEO is filing this comment simply to clarify that the \$1.50 cap it proposed was to recognize *only* the impact of the deferrals, and *not* the value of the investments themselves. In other words, what OCC is recommending is not what DEO was proposing. DEO would not be in

agreement with a cap of \$1.50 if that cap were to cover the rate impact of both the deferrals and the investment.

DEO is not offering any substantive response to OCC's proposal, although this lack of response should be not construed as agreement. All interested parties have now had ample opportunity to provide their comments and viewpoints to the Commission, and DEO believes that the Commission can fairly rule on DEO's application without further comments.

Dated: October 18, 2012

Respectfully submitted,

/s/ Andrew J. Campbell

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EAST OHIO

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of DEO's Response to OCC's Supplemental Reply

Comments was served to the following by electronic mail this 18th day of October, 2012:

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/s/ Andrew J. Campbell

One of the Attorneys for The East Ohio Gas  
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Summary: Comments Clarification of The East Ohio Gas Company d/b/a Dominion East Ohio in Response to the Ohio Consumers' Counsel's Supplemental Reply Comments electronically filed by Mr. Andrew J Campbell on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio