

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Rule	)	
Review of Chapter 4901-7 Ohio	)	Case No. 12-2338-AU-ORD
Administrative Code Standard Filing	)	
Requirements for Rate Increases	)	

**REPLY COMMENTS OF  
VECTREN ENERGY DELIVERY OF OHIO, INC. AND  
THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO**

**I. INTRODUCTION**

In accordance with the Commission's Entry in this case on January 16, 2013, Vectren Energy Delivery of Ohio ("VEDO") and The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO") (collectively, "the Companies") file their reply comments.

**II. REPLY COMMENTS**

The Companies file these reply comments to support certain comments made by other utilities on February 15, 2013. The comments supported by the Companies divide into two groups: (1) those based on the need to comply with the recently passed House Bill 95 ("H.B. 95") and (2) those proposing the elimination of unnecessarily burdensome filing requirements. The fact that Companies do not mention a specific comment here should be interpreted as neither support for nor opposition to the unmentioned comment.

**A. The rules should be revised to achieve compliance with H.B. 95.**

First, Columbia Gas of Ohio, Inc. ("COH") filed several comments that pointed out provisions of the standard filing requirements ("SFRs") that do not reflect the revisions enacted by H.B. 95. (*See* COH Comments 2–4.) The Companies support each one of COH's comments, and given that the Commission is obligated to follow the direction of the General Assembly, COH's comments should be adopted. Moreover, the Companies agree with COH that all

necessary changes may not yet have been identified and that further collaborative process could be helpful to ensure that the rules appropriately reflect the Revised Code.

**B. The rules should be revised to eliminate unnecessary burdens.**

Several companies proposed commonsense revisions to the SFRs that would eliminate unnecessary burdens without sacrificing any substantial opportunity for review by the Commission or other interested parties. The Companies support the following proposals of COH, Ohio Power Company d/b/a AEP Ohio (“AEP”), and Duke Energy Ohio, Inc. (“Duke”):

- Notice to municipalities should be permitted to include a link to a website that would contain the required information, rather than require the sending of a hard copy or a CD. (AEP Comments at 2.)
- The requirement of a five-year forecast of income and expense should be eliminated or reduced. (AEP Comments at 4.)
- The requirement of a plant-balance build up should be limited to a five-year history. (AEP Comments at 4.)
- The rules should merely require a description of office to which municipal notices were sent, not the names of the elected officials. (COH Comments at 4–5.)
- Requirement of filing construction data should be limited to projects \$500,000 or above. (COH Comments at 5.)
- The requirement of the submission of a statistical report and the annual report should be deleted. (Duke Comments at 3.)
- The requirement of a total company payroll analysis should be modified to reflect the fact that a substantial portion of labor costs are related to service companies and affiliates. (Duke Comments at 3.)
- Only direct employees should be addressed on schedule C-9.1. (Duke Comments at 3.)
- Schedule D-5 should require only five, not ten, years of historical data. (Duke Comments at 4.)

For the reasons given by the commenters, the Companies agree that these requirements impose burdens on the Companies that are not justified by their benefits. The Commission should modify the rules accordingly.

### **III. CONCLUSION**

For the foregoing reasons, the Companies respectfully request that the Commission revise the rules as proposed above.

Dated: March 1, 2013

Respectfully submitted,

/s/ Andrew J. Campbell

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Reply Comments was served by electronic mail this 1st day of March, 2013 to the following:

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/s/ Andrew J. Campbell  
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One of the Attorneys for the Companies

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Summary: Comments Reply Comments electronically filed by Mr. Andrew J Campbell on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio and Vectren Energy Delivery of Ohio