BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of an Adjustment to its Uncollectible Expense Rider Rate.

Case No. 13-319-GA-UEX

APPLICATION

The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO") respectfully requests approval of an adjustment to its Uncollectible Expense Rider ("UEX Rider") rate. In support of this Application, DEO states as follows:

1. DEO is an Ohio corporation engaged in the business of providing natural gas service to approximately 1.2 million customers in northwest, western, and southeast Ohio. As such, DEO is a "natural gas company" and "public utility" as defined by R.C. 4905.03(E) and 4905.02.

2. In its Finding and Order dated December 17, 2003 ("2003 Order"), in Case No.

03-1127-GA-UNC, the Commission approved a UEX Rider for DEO and several other natural gas companies.

3. In the 2003 Order, the Commission directed DEO and the other companies subject to that order to file a yearly report that identifies amounts recovered, deferred and/or amortized pursuant to the UEX Rider. The Commission Staff, in its report filed March 9, 2004, in Case No. 03-2573-GA-ATA, recommended that the information be provided in the format of Attachment C to that report. DEO's annual report, in that format, is Attachment 1 to this Application.

4. By Entry dated March 17, 2004, in Case No. 03-2573-GA-ATA, the Commission approved DEO's initial UEX Rider tariffs, and DEO filed final tariffs consistent with that Entry on April 2, 2004, effective as of that date.

5. The Commission approved subsequent adjustments to the UEX Rider, and DEO filed final tariffs consistent with the Entries, in the following cases:

Case No.	Date of Entry
04-570-GA-UEX	May 19, 2004
05-672-GA-UEX	June 14, 2005
06-729-GA-UEX	June 28, 2006
07-659-GA-UEX	August 1, 2007
08-655-GA-UEX	July 2, 2008
09-457-GA-UEX	July 1, 2009
10-319-GA-UEX	June 30, 2010
11-319-GA-UEX	July 15, 2011
12-319-GA-UEX	July 02, 2012

6. DEO is proposing an updated UEX Rider rate of \$0.1683 per Mcf for all customers in its service territory subject to the UEX Rider. The rate comprises (*a*) the balance of deferred uncollectible-accounts expense net of rider and customer recoveries and late-payment charges as of March 31, 2013, and (*b*) an estimate of uncollectible-accounts expense net of customer recoveries and late-payment charges for the 12 months ending March 31, 2014. The UEX Rider rate components are further described in paragraphs 8, 9, 10, and 11 below. The calculation of the revised rate is shown on Attachment 2 to this Application.

7. The proposed UEX Rider rate reflects an increase of 0.0158 from the currently effective rate of 0.1525. This net increase is attributable to (*a*) an under-recovery of previously deferred uncollectible expenses in the amount 3.328,380.54 as of March 31, 2013, compared

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with an under-recovery of \$975,709.93 included in last year's calculation, and (*b*) an increase in the estimated net uncollectible expense for the 12 months ending March 31, 2014, compared with the estimate included in last year's calculation.

8. The UEX Rider states that "East Ohio shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over- or under-collections." The portion of the proposed UEX Rider rate that is attributable to under-collection as of March 31, 2013, is \$0.0207, calculated by dividing the deferred uncollectible-accounts expense balance at that date by applicable annual volumes, and which changed the current UEX Rider rate by more than 10 percent.

9. The portion of the proposed UEX Rider rate attributable to estimated uncollectible expense net of applicable customer-arrearage payments and late-payment charges for the 12 months ending March 31, 2014, is \$0.1476, calculated by dividing the net estimated dollar amount by annual volumes.

10. The proposed UEX Rider calculation reflects a reduction in deferred uncollectible expense in the amount of \$7,453,764.97 from late-payment charges billed to customers for the period from April 2012 through March 2013, as agreed to in the Stipulation and Recommendation filed in DEO's last base rate case, Case No. 07-829-GA-AIR. In addition, the same amount was used as the estimate of late-payment charges to be credited to deferred uncollectible expense for the 12 months ending March 31, 2014.

11. Consistent with the currently effective rider rate approved in Case No. 12-319-GA-UEX, DEO has calculated the per Mcf rate in this application using planned volumes based on normal weather for the prospective twelve-month period ending March 31, 2014.

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12. The resulting rate of \$0.1683 per Mcf for all DEO customers subject to the UEX Rider is just and reasonable and should be approved. Copies of the proposed and scored current tariff sheets are Attachment 3 to this Application.

WHEREFORE, DEO respectfully requests that the Commission approve the adjustment of DEO's Uncollectible Expense Rider as proposed in this Application and grant any other necessary and proper relief.

Dated: May 17, 2013

Respectfully submitted,

/s/ Andrew J. Campbell Mark A. Whitt (Counsel of Record) Andrew J. Campbell WHITT STURTEVANT LLP The KeyBank Building 88 East Broad Street, Suite 1590 Columbus, Ohio 43215 Telephone: (614) 224-3911 Facsimile: (614) 224-3960 whitt@whitt-sturtevant.com campbell@whitt-sturtevant.com

ATTORNEYS FOR THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO

DOMINION EAST OHIO Uncollectible Expense Rider Annual Balance Reconciliation - 2013

Attachment 1 Page 1 of 2

		January		February		March		YTD Q1 Total 2013	
(1)	Balance - Beginning of Month	\$	19,268,752.94	\$	13,922,344.00	\$	8,079,675.27	<u>\$</u>	19,268,752.94
(2)	Bad Debts Written Off		2,519,060.58		1,614,907.00		2,018,436.00		6,152,403.58
(3)	Commission-Ordered UEX Audit		-		-		-		-
(4)	Recovery - Base Rates		-		-		-		-
(5)	Recovery - Bad Debt Rider		4,304,655.17		4,361,717.33		3,865,349.97		12,531,722.47
(6)	Recovery - Other		3,564,844.01		3,098,014.76		2,905,567.74		9,568,426.51
(7)	Incremental Bad Debt [(2)+(3)-[(4)+(5)+(6)]]		(5,350,438.60)		(5,844,825.09)		(4,752,481.71)		(15,947,745.40)
(8)	Balance Subtotal [(1) + (7)]		13,918,314.34		8,077,518.91		3,327,193.56		3,321,007.54
(9)	Carrying Charges [[(1)+(8)]/2 x (d)]		4,029.66		2,156.36		1,186.98		7,373.00
(10)	Cumulative Balance for Recovery	<u>\$</u>	13,922,344.00	<u>\$</u>	8,079,675.27	<u>\$</u>	3,328,380.54	\$	3,328,380.54
(d)	Monthly Carrying Charge Rate Annualized short-term debt rate		0.02428% 0.448330%		0.01960% 0.361908%		0.02081% 0.384214%		

DOMINION EAST OHIO Uncollectible Expense Rider Annual Balance Reconciliation - 2012

		January	February	March	April	May	June	July	August	September	October	November	December	Total 2012
(1) Balance - Beginning of Month	<u>s</u>	<u>6,773,777.65</u> <u>\$</u>	5,513,324.29 \$	3,322,000.24 \$	975,709.93 \$	1,215,867.44 \$	3,322,669.81 \$	5,431,509.08 \$	10,328,447.53 \$	13,330,264.90 \$	15,223,666.94 \$	13,715,646.08 \$	9,714,718.35 §	6,773,777.65
(2) Bad Debts Written Off		3,351,194.00	2,700,268.02	2,513,924.98	2,874,859.20	4,206,862.95	4,230,446.36	7,203,209.23	5,145,137.47	3,871,557.97	1,808,762.91	516,913.91	17,286,477.37	55,709,614.37
(3) Commission-Ordered UEX Audit		-	-	-			-		-		-	-	-	-
(4) Recovery - Base Rates		-	-	-	-	-	-	-	-	-		-		-
(5) Recovery - Bad Debt Rider		706,325.67	653,687.65	463,973.01	295,635.46	189,501.35	94,976.53	362,189.30	414,603.15	489,756.97	939,243.57	2,026,229.16	3,073,373.83	9,709,495.65
(6) Recovery - Other		3,906,892.76	4,238,918.13	4,396,751.20	2,339,317.92	1,911,098.02	2,027,656.40	1,946,104.40	1,731,807.69	1,491,988.39	2,381,387.88	2,494,674.91	4,662,986.08	33,529,583.78
(7) Incremental Bad Debt [(2)+(3)-[(4)+(5)+(6)]]		(1,262,024.43)	(2,192,337.76)	(2,346,799.23)	239,905.82	2,106,263.58	2,107,813.43	4,894,915.53	2,998,726.63	1,889,812.61	(1,511,868.54)	(4,003,990.16)	9,550,117.46	12,470,534.94
(8) Balance Subtotal [(1) + (7)]		5,511,753.22	3,320,986.53	975,201.01	1,215,615.76	3,322,131.01	5,430,483.24	10,326,424.61	13,327,174.16	15,220,077.51	13,711,798.40	9,711,655.92	19,264,835.81	19,244,312.59
(9) Carrying Charges [[(1)+(8)]/2 x (d)]		1,571.07	1,013.71	508.92	251.68	538.80	1,025.84	2,022.92	3,090.74	3,589.43	3,847.68	3,062.43	3,917.13	24,440.35
(10) Cumulative Balance for Recovery	<u>s</u>	5,513,324.29 \$	3,322,000.24 \$	975,709.93 \$	1,215,867.44 \$	3,322,669.81 \$	5,431,509.08 \$	10,328,447.53 \$	13,330,264.90 \$	15,223,666.94 \$	13,715,646.08 \$	9,714,718.35 \$	19,268,752.94 \$	19,268,752.94
(d) Monthly Carrying Charge Rate Annualized short-term debt rate		0.02558% 0.472171%	0.02295% 0.423682%	0.02369% 0.437280%	0.02297% 0.424066%	0.02375% 0.438392%	0.02344% 0.432726%	0.02568% 0.474000%	0.02613% 0.482420%	0.02514% 0.464208%	0.02659% 0.490983%	0.02614% 0.482660%	0.02703% 0.499084%	

Attachment 1 Page 2 of 2

DOMINION EAST OHIO Uncollectible Expense Rider Calculation 2013

Attachment 2

	Amount			nit Rate/ Mcf
Balance of Deferred Uncollectible Accounts Expense @3/31/2013	\$	3,328,380.54	\$	0.0207
Estimated Uncollectible Accounts Expense for Twelve Months Ending 3/31/2014				
Charge-offs, Net of Customer Recoveries	\$	31,132,032.72		
Late Payment Charges	\$	(7,453,764.97)		
Net Amount	\$	23,678,267.75	<u>\$</u>	0.1476
Total to be Collected	\$	27,006,648.29		
Revised UEX Rider Rate			\$	0.1683
Approved Rate Implemented Effective July 12, 2012			\$	0.1525
Uncollectible Expense Rider Adjustment			<u>\$</u>	0.0158

Projected Volumes April 2013 - March 2014

160,473,005

Uncollectible Expense Rider

Applicability

Issued:

Applicable to all Customers responsible for payment of East Ohio's Interim Emergency and Temporary PIP Plan Rider.

An additional charge of \$0.1683 per Mcf shall be applied to all volumes for service rendered under the applicable rate schedules to recover the cost associated with uncollectible accounts arising from those Customers responsible for paying the Uncollectible Expense Rider. East Ohio shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over- or under-collections.

Uncollectible Expense Rider

Applicability

Applicable to all Customers responsible for payment of East Ohio's Interim Emergency and Temporary PIP Plan Rider.

An additional charge of \$0.1525–1683 per Mcf shall be applied to all volumes for service rendered under the applicable rate schedules to recover the cost associated with uncollectible accounts arising from those Customers responsible for paying the Uncollectible Expense Rider. East Ohio shall file an application with the Public Utilities Commission of Ohio requesting approval to change the rate if the Company determines that an adjustment of more than plus or minus ten percent is needed to adjust for prior period over- or under-collections.

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Case No(s). 13-0319-GA-UEX

Summary: Application for Approval of an Adjustment to its Uncollectible Expense Rider Rate electronically filed by Mr. Andrew J Campbell on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio