

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Vectren	)	
Energy Delivery of Ohio, Inc. for a Waiver	)	Case No. 14-2289-GA-WVR
of Certain Rules in Chapter 4901:1-18, Ohio	)	
Administrative Code.	)	

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**APPLICATION**

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In accordance with Ohio Adm. Code 4901:1-18-02(B)(3), Vectren Energy Delivery of Ohio, Inc. (VEDO or the Company) files this application to request temporary waivers from Ohio Adm. Code 4901:1-18-14(A) and (B) and 4901:1-18-15(G) until April 30, 2015. In support of this Application, VEDO states:

1. VEDO is an Ohio corporation engaged in the business of supplying natural gas to approximately 315,000 customers in central and western Ohio. The Company is a “public utility” and “natural gas company” in accordance with R.C. 4905.02(A) and 4905.03(E), respectively. Consequently, the Company is subject to the Commission’s jurisdiction.

2. VEDO’s temporary waiver request pertains to certain rules contained in Ohio Adm. Code Chapter 4901:1-18 (Termination of Residential Service). These rules were recently amended in Case No. 13-274-AU-ORD. As explained in detail below, VEDO will need sufficient time to complete the reprogramming and testing necessary to implement the revised rules. Therefore, the Company expects that it may not have completed implementation when the revised rules go into effect.

3. Under newly revised Ohio Adm. Code 4901:1-18-01(O) and -14(A), a public utility shall provide PIPP Plus and Graduate PIPP Plus customers certain incentive credits in return for making “on-time payments,” which means a payment received “prior to the date the

next bill is issued.” Under newly revised Ohio Adm. Code 4901:1-18-14(B), if a PIPP Plus customer’s account balance becomes a credit balance, that customer will no longer be eligible for incentive credits until such time as the account balance is no longer a credit.

4. The revisions to Ohio Adm. Code 4901:1-18-15(G) require public utilities to offer a new payment arrangement to PIPP Plus customers who, under certain conditions, close accounts with arrearages. Under the new arrangement, the payment “shall be no more than the total accumulated arrearage divided by sixty,” and “[e]ach time the former PIPP Plus customer makes his or her payment by the due date, the public utility shall reduce the account arrearage by one-twelfth.” *Id.*

5. For the following reasons, good cause exists for the requested temporary waivers of Ohio Adm. Code 4901:1-18-14(A) and (B) and 4901:1-18-15(G):

6. Initially, VEDO intends to confirm with Commission Staff the precise import of these revisions, to ensure that its systems are programmed properly. Once this is ascertained, VEDO must then undertake a substantial reprogramming effort, including changes to its information technology systems.

7. The revisions to Ohio Adm. Code 4901:1-18-14(A) and (B) will require reprogramming to modify VEDO’s current credit processing and the process that determines incentive credit eligibility.

8. Revised Ohio Adm. Code 4901:1-18-15(G) will also require substantial reprogramming efforts. It requires a payment plan unlike any that VEDO currently offers; unlike the PIPP program, payments under the new plan would not be calculated as a percentage of monthly income, and unlike traditional payments plans, the new plan will trigger incentive crediting. Bill presentment also presents challenges, as VEDO must determine how to present

affected customers with numerous items of information in a clear and understandable manner, including the payment plan balance, the actual balance, incentive credits, and the monthly amount due. Therefore, VEDO must also modify its bill print process to effectively communicate the inclusion of this new information. Consequently, VEDO must create a new code to (1) bill customers who are no longer active, (2) determine eligibility for the payment plan, and (3) calculate the payment amount and incentive credit.

9. The Company intends to complete the reprogramming required by both rules as one collective effort in order to minimize functionality testing. Based on initial estimates, and subject to confirmation of the scope of the rule changes with Staff, VEDO expects that at least 1200 hours of programming will be required, with an additional 300 hours for system testing. At this time, VEDO does not expect the necessary programming to be completed until April 30, 2015, and it respectfully requests a waiver of these rules until that time.

WHEREFORE, VEDO respectfully requests that the Commission approve VEDO's application for the waivers described above and grant it all other necessary and proper relief.

Dated: December 18, 2014

Respectfully submitted,

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Summary: Application for a Waiver of Certain Rules in Chapter 4901:1-18, Ohio Administrative Code electronically filed by Mr. Gregory L. Williams on behalf of Vectren Energy Delivery of Ohio, Inc.