

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Adoption of Ohio Adm. )	
Code Chapter 4901:1-43 Concerning Rules )	Case No. 15-871-GA-ORD
Involving Natural Gas Company Infrastruc- )	
ture Development to Implement R.C. )	
4929.16 to 4929.167. )	

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**INITIAL COMMENTS OF  
DUKE ENERGY OHIO, INC. AND  
COLUMBIA GAS OF OHIO, INC.**

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**I. INTRODUCTION**

To promote economic development in Ohio, the General Assembly enacted House Bill 319 (“HB 319”) in 2014. HB 319 provides gas utilities the ability to fund infrastructure build out for economic development and to recover costs through an infrastructure development rider.

Staff’s proposed rules provide a structure for economic development and certified site project approval similar to the Ohio Power Siting Board. Once these projects are approved, gas utilities may then seek to recover project costs through the infrastructure development rider. Though Staff’s proposed rules incorporate a great deal of HB 319, the rules could hinder the ability of gas utilities to fully realize the economic development potential intended by the General Assembly. In order to encourage statewide infrastructure build out, Columbia Gas of Ohio, Inc. and Duke Energy Ohio, Inc. (the “Companies”) request that the Commission adopt the changes set forth herein to ensure that gas utilities may fully utilize the structure set forth in Chapter 4929 of the Ohio Revised Code.

**II. INFRASTRUCTURE DEVELOPMENT RIDER AND RATE ADJUSTMENTS**

Staff proposes a structure, through both Ohio Admin. Code 4901:1-43-03 and 4901:1-43-04, that establishes a rider rate based on a cadence of rider adjustments with *each* project application. The economic development or certified site

project application requires a schedule detailing “the initial costs estimated, amount of costs recovered to date, and amount of costs remaining to be recovered” for every previously-approved project.<sup>1</sup> Further, Staff’s proposed Template A suggests including a copy of proposed tariff schedules, summary of proposed rates, typical bill comparisons, and reconciliation adjustments for each project application. In addition to these requirements, proposed Ohio Admin. Code 4901:1-43-04(E) states that:

(E) If at anytime during the period between the annual update filings, the natural gas company or staff determines that costs are or will be *substantially different than the amounts authorized* as the result of the natural gas company’s previous application, the natural gas company should file, on its own initiative or by order of the commission, *an interim application to adjust the infrastructure development rider* in order to avoid excessive rate impacts for the following update filing.

By using project applications to frequently update the rider rate, Staff’s proposed process lessens the regulatory lag for recovery of project costs. While the Companies support timely recovery of costs, the structure in the proposed rules introduces more frequent rider rate fluctuation and less predictability for customers, imposes a burden upon utilities to track a moving target for a rider rate capped at \$0.25 per month, and may not be considered as set forth in the statute.

The recovery of costs is defined in Revised Code Chapter 4929. The costs are detailed and reviewed with the annual report filed with the Commission, pursuant to R.C. § 4929.165, and, subsequently, the rider’s annual rate is then established based on these costs in the annual report, pursuant to R.C. § 4929.165(B). Similar to other Commission-approved rider adjustments (e.g., PIPP Rider, UEX Rider, etc.), the infrastructure development rider rate is adjusted one time during a twelve-month period.<sup>2</sup>

In contrast to this structure, the proposed rules will result in the rider rate constantly fluctuating with each economic development and certified site project application. This is evidenced both by the proposed tariff schedules and bill comparisons required for each project application, as well as the project application detailing the costs recovered to date and costs remaining to be recovered.<sup>3</sup> The

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<sup>1</sup> See Ohio Admin. Code 4901:1-43-03(A)(5)(c) and 4901:1-43-03(D)(3)(c).

<sup>2</sup> See R.C. § 4929.165(B).

<sup>3</sup> See Ohio Admin. Code 4901:1-43-03(A)(5)(c) and (D)(3)(c).

proposed rules further require a rider adjustment when a project's costs "are or *will be* substantially different than the amounts authorized...."<sup>4</sup>

The proposed structure may overly burden utility and Staff resources when filing an application, especially in light of the statutory recovery caps. The recovery of all infrastructure development costs is capped at a \$3 *flat rate*, per customer, per year. For any gas utility, this equates to a *maximum* monthly charge to each customer of \$0.25. Therefore, for every residential, commercial, or industrial customer, a utility cannot recover more than a quarter per month, per customer. When recovery is capped at a quarter, adjusting and reconciling the rider with each project application places an overly burdensome requirement on utilities and Commission Staff for a minimal, monthly rate.

The statute provides a method to track and recover costs on an annual basis. Similar to the PIPP and UEX Riders, the infrastructure development rider rate should be adjusted one time during a twelve-month period.

Therefore, the Companies recommend the following changes:

#### **4901:1-43-03 Project Information and Approval Process**

(A)(5) The level of infrastructure investment anticipated by the natural gas company. This description shall contain the following information:

....

~~(c) For each project currently approved for the applicant natural gas company, the initial costs estimated, amount of costs recovered to date, and amount of costs remaining to be recovered. In addition, the cumulative balance of all approved projects in relation to the two dollar cap.~~

(B)(2) The amount of infrastructure development costs to be ~~incurred~~recovered by the company....

(D)(3) The level of infrastructure investment anticipated by the natural gas company. This description shall contain the following information:

....

~~(c) For each project currently approved for the applicant natural gas company, the initial costs estimated, amount of costs recovered to date, and~~

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<sup>4</sup> See Ohio Admin. Code 4901:1-43-04(E) (emphasis added).

~~amount of costs remaining to be recovered. In addition, the cumulative balance of all approved projects in relation to the one dollar cap.~~

(E)(2) The amount of infrastructure development costs to be ~~incurred~~ recovered by the company....

#### **4901:1-43-04 Cost Recovery Rider Process**

(A) Each natural gas company which seeks recovery of economic development project costs shall first file an application with the commission's docketing division for an infrastructure development rider pursuant to R.C. § 4929.161. The initial application shall include all information set forth upon forms as may be prescribed by the commission.

(B) Each natural gas company with an approved infrastructure development rider shall update the rider rate on an annual basis pursuant to an annual report as schedule set forth by commission order. Each ~~application~~ annual report to update the infrastructure development rider shall include all information set forth upon forms as may be prescribed by the commission. Pursuant to R.C. § 4929.165, the annual report shall do both of the following:

(1) Detail the infrastructure development costs related to the applicable economic development project or projects; and,

(2) Set forth the rider rate for the twelve months following the annual report.

....

~~(E) If at anytime during the period between the annual update filings, the natural gas company or staff determines that costs are or will be substantially different that the amounts authorized as the result of the natural gas company's previous application, the natural gas company should file, on its own initiative or by order of the commission, an interim application to adjust the infrastructure development rider in order to avoid excessive rate impacts for the following update filing.~~

#### **TEMPLATE A      APPLICATION**

The following should be filed, if applicable to any given project, in an application with the Commission's Docketing Division under Case Code "EDP," for economic development plans, or "CSP," for certified site projects:

....

~~5. Copy of proposed tariff schedules.~~

....

**7. Summary of proposed rates**

~~For each rate class, provide the proposed infrastructure development rider rate calculation~~

~~Include the rationale and components for the calculation~~

~~Provide all necessary support for the rate calculations~~

**8. Typical bill comparisons**

~~Provide a typical bill comparison for each rate schedule affected by the proposed adjustments to the infrastructure development rider~~

**9. Reconciliation adjustment:**

~~For each rate class, provide the proposed infrastructure development rider adjustment calculation~~

~~Include the rationale for each component of the calculation~~

~~Provide all necessary support for the reconciliation adjustment calculations~~

**TEMPLATE B**

**ANNUAL ~~UPDATE APPLICATION~~ REPORT**

The following should be filed, if applicable to any given project, in an application with the Commission's Docketing Division ~~under Case Code "EDP", for economic development plans, or "CSP", for certified site projects:~~

....

**B-1 Summary of total projected economic development costs/revenues**

Provide the total actual cost/revenue ~~for each cost component~~

Include all infrastructure development rider costs and related revenues organized according to each FERC account

....

**D-2 Provide monthly infrastructure development rider revenues collected from each rate schedule**

**III. PROJECT APPLICATION REQUIREMENTS**

Staff proposes a structure for economic development and certified site project approval similar to that of the Ohio Power Siting Board. The Companies support this structure, and believe this is the right approach for approving project applications to ensure vested parties and stakeholders are aware of the benefits of economic development projects. The individual project applications should focus

on the merits of each economic development or certified site project, as well as a review of the anticipated costs.

The proposed rules provide this structure, but include a few minor requirements that the Companies suggest be removed or clarified. First, the economic development project rules require a description of the project to include the state and local taxable base increase from the project. A gas utility will not know the local and state tax impact from an economic development project on a broad scale, and will likely only be exposed to limited valuations associated with its utility infrastructure. This information resides with the taxing authorities and is not provided for a utility's analysis to determine whether a contribution in aid of construction is required for infrastructure. Similarly, the Companies recommend wording clarification of Ohio Admin. Code 4901:1-43-03(A)(4) to require utilities, if able, to provide information about competing locations for a project, rather than other economic development projects that could use the HB 319 funding.

The Companies also propose several revisions to Template A. These revisions further align the project application with Ohio Power Siting Board applications. This includes limiting the newspaper notification to the project area and deleting the identification of a utilities' service area. The Companies, likewise, recommend removing the requirement for testimony, as the project application should include all information necessary for approval. Moreover, if the application does not provide sufficient information, Staff has the ability to suspend approval for forty-five days, for good cause, to request testimony or additional information, if needed in any particular case.<sup>5</sup>

On a final note, Staff proposes Templates A and B to the rules. The Entry and proposed rules are silent regarding the purpose of the templates. Though the Companies propose changes to both, it appears that these templates are intended to be Staff guidelines. With this understanding, the Companies request that utilities be only required to provide items that are applicable to each individual project application (Template A) or the annual report (Template B).

Therefore, the Companies propose the following revisions:

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<sup>5</sup> See Ohio Admin. Code 4901:1-43-03(C) and (F).

## 4901:1-43-03 Project Information and Approval Process

(A)(3) The level of total investment and capital expenditure by the subject company and the economic development impact. This description shall contain the following information:

~~(a) State and local taxable base increase.~~

....

(A)(4) A description of other proposed projects locations, if known, that may compete with the proposed project location, ~~including the type, location, and time frame of competing projects.~~

### TEMPLATE A APPLICATION

The following should be filed, if applicable to any given project, in an application with the Commission's Docketing Division under Case Code "EDP," for economic development plans, or "CSP," for certified site projects:

....

~~1. Testimony in support of the application~~

~~2. Identification of service areas~~

3. A proposed legal notice in a newspaper of general circulation of the county in which the project will be built.

~~A summary of the effect of the application on ratepayers.~~

....

4. A certificate of service of the application for the chief executive of each municipal corporation, the board of township trustees of each township, the board of county commissioners of each county in which the ~~affected customers are~~ funded infrastructure is located, and each party to the applicant's last ~~rate or surcharge~~ infrastructure development rider annual report case.

## IV. ANNUAL REPORT, FINANCIAL AUDIT AND HEARING REQUIREMENTS

In Ohio Admin. Code 4901:1-43-04 and 4901:1-43-05, Staff proposes rules to govern the filing of the annual report, the option for a financial audit of the infrastructure development rider, and the ability for a hearing, if necessary, for the project applications. The Companies generally agree with the approach taken by Staff, and propose several minor edits to further clarify the rules.

Ohio Rev. Code § 4929.167 authorizes the Commission “to conduct a financial audit” to determine if “the infrastructure development costs incurred by the natural gas company and collected pursuant to the rider are in conformance with the commission’s orders.” In contrast, proposed Ohio Admin. Code 4901:1-43-04(C) permits the Commission to hire consultants “to conduct prudence and/or financial reviews of the costs incurred and recovered through the infrastructure development rider.” The statute only authorizes a financial audit to ensure that costs incurred are consistent with Commission orders. Furthermore, the Commission will be conducting a prudency review of costs during the annual report to set the twelve-month rider rate. Separate prudency reviews by a consultant seem unnecessary and only would increase costs to customers included within the infrastructure development rider.

The Companies also recommend that the rider’s annual accounting of costs be termed an annual report, rather than an annual application. The annual report, itself, would provide a detailed accounting of the costs and set the rider rate, similar to the PIPP and UEX Riders. Finally, the Companies recommend moving Staff’s proposed seventy-five day automatic approval of rates from the hearing rule to the rider rules for clarity and consistency.

Therefore, the Companies propose the following revisions:

#### **4901:1-43-04 Cost Recovery Rider Process**

(C) The commission may order that consultants be hired, with costs billed to the natural gas company, to conduct ~~prudence and/or~~ financial reviews of the costs incurred and recovered through the infrastructure development rider.

(D) Each annual ~~application-report~~ to update the infrastructure development rider should be made not less than seventy-five days prior to the proposed effective date of the updated rider rate. Proposed rates will become effective on the seventy-sixth day subject to reconciliation adjustments following any hearing, if necessary, or in its subsequent filing.

....

(F) For the annual report, ~~a~~Affected parties may file a motion to intervene and submit comments on any issues concerning ~~any application~~ the annual report filed under this rule within forty days of the natural gas company filing ~~of the application~~ annual report.



#### **4901:1-43-05 Hearings.**

Unless otherwise ordered, the commission shall approve the application or set the matter for hearing pursuant to divisions (B) or (D) of rule 4901:1-43-03 of the Administrative Code. ~~Proposed rates will become effective on the seventy-sixth day subject to reconciliation adjustments following any hearing, if necessary, or in its subsequent filings.~~

#### **V. CONCLUSION**

The Companies appreciate Commission Staff's comments and recognize the distinct challenge in adapting a rule structure for a construct not previously utilized in this state, and in which gas utilities have not been previously active. The Companies support the Commission Staff's initial steps to adopt a process by which gas utilities will be able to meaningfully participate in economic development statewide. To further develop the rules that will allow infrastructure development to flourish, the Companies respectfully request that the Commission adopt the Companies' recommended proposed changes to proposed Ohio Admin. Code 4901:1-43-03, 4901:1-43-04, and 4901:1-43-05, which are detailed herein and in the attached mark up.

Respectfully submitted by,

**COLUMBIA GAS OF OHIO, INC.**

/s/ Brooke E. Leslie

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**The Companies' Proposed Rule Mark-up**  
**Ohio Adm. Code 4901:1-43-01, et seq.**

**4901:1-43-01 Definitions**

(A) "Application" means an application for natural gas infrastructure development rider pursuant to this chapter.

(B) "Commission" means public utilities commission of Ohio.

(C) "Infrastructure Development" shall have the meaning set forth in division (A) of section 4929.16 of the Revised Code.

(D) "Infrastructure Development Costs" shall have the meaning set forth in division (A) of section 4929.16 of the Revised Code.

(E) "Natural Gas Company" means a company that meets the definition of a natural gas company set forth in section 4905.03 of the Revised Code and that also meets the definition of a public utility under section 4905.02 of the Revised Code.

(F) "Staff" means the staff of the commission or its authorized representative.

**4901:1-43-02 Purpose and Scope**

(A) This chapter authorizes a natural gas company to file an application with the commission for approval of an infrastructure development rider to recover prudently incurred infrastructure development costs of one or more economic development projects approved under section 4929.163 or 4929.164 of the Revised Code.

(B) The commission may, upon an application or a motion filed by a party, waive any requirement of this chapter, other than a requirement mandated by statute, for good cause shown.

**4901:1-43-03 Project Information and Approval Process**

(A) Pursuant to division (A) of section 4929.163 of the Revised Code, a natural gas company may file, prior to beginning construction, for approval of an economic development project through an economic development project application notice with the commission's docketing division. This notice shall contain the following information:

- (1) The name and location of the project.

(2) A background of the subject company of the economic development project.

(3) The level of total investment and capital expenditure by the subject company and the economic development impact. This description shall contain the following information:

~~(a) State and local taxable base increase.~~

(b) Anticipated number of new jobs created and jobs retained by the project.

(c) Description of the community served and the benefits to that community.

(4) A description of other proposed projects locations, if known, that may compete with the proposed project location, ~~including the type, location, and time frame of competing projects.~~

(5) The level of infrastructure investment anticipated by the natural gas company. This description shall contain the following information:

(a) A description of how the infrastructure development costs are projected to generate a return less than the most recently authorized rate of return.

(b) A description of how the utility will not exceed the two dollar cap on an annual basis.

~~—(c) For each project currently approved for the applicant natural gas company, the initial costs estimated, amount of costs recovered to date, and amount of costs remaining to be recovered. In addition, the cumulative balance of all approved projects in relation to the two dollar cap.~~

(6) A description of additional funding for the project including other alternative sources, any incentives with conditions and amount of funding and any additional information.

(B) Following its review of the information set forth in paragraph (A) of this rule, and any other information consistent with section 4929.163 of the Revised Code, the commission may approve a project if both of the following apply:

(1) The infrastructure development costs for the project are projected to generate a return on the company's investment that is less than the most recently authorized rate of return.

(2) The amount of infrastructure development costs to be ~~incurred~~recovered by the company per calendar year, for the project and all other projects previously approved under this section, is not projected to exceed the product of two dollars multiplied by the aggregate number of the company's customers in this state.

(C) An application notice filed pursuant to division (A) of section 4929.163 of the Revised Code shall be subject to automatic approval not later than thirty days after the date of the application filing unless the application is suspended by the commission for good cause shown. If the application is suspended, the commission shall approve, deny, modify, or hold a hearing on the application not later than forty-five days after the date that the suspension begins.

(D) Pursuant to division (A) of section 4929.164 of the Revised Code, a natural gas company may file with the commission's docketing division a certified site project application notice for approval of an economic development project that has been certified by or submitted to the director of development services under the "SiteOhio" certification program. This notice shall contain the following:

(1) The name and location of the project site.

(2) A description and background of the site along with the anticipated impact to the community.

(3) The level of infrastructure investment anticipated by the natural gas company. This description shall contain the following information:

(a) A description of how the infrastructure development costs are projected to generate a return less than the most recently authorized rate of return.

(b) A description of how the utility will not exceed the one dollar cap on an annual basis.

~~—(c) For each project currently approved for the applicant natural gas company, the initial costs estimated, amount of costs recovered to date, and amount of costs remaining to be recovered. In addition, the cumulative balance of all approved projects in relation to the one dollar cap.~~

(4) A copy of any “SiteOhio” applications, approvals or any other relevant materials.

(E) Following its review of the information set forth in paragraph (D) of this rule, and any other information consistent with section 4929.164 of the Revised Code, the commission may approve a project if both of the following apply:

(1) The infrastructure development costs for the project are projected to generate a return on the company’s investment that is less than the most recently authorized rate of return.

(2) The amount of infrastructure development costs to be ~~incurred~~recovered by the company per calendar year, for the project and all other projects previously approved under this section, is not projected to exceed the product of one dollar multiplied by the aggregate number of the company’s customers in this state.

(F) An application filed pursuant to division (A) of section 4929.164 of the Revised Code shall be subject to automatic approval not less than ninety days after the date of the application filing unless the application is suspended by the commission for good cause shown. If the application is suspended, the commission shall approve, deny, modify, or hold a hearing on the application not later than forty-five days after the date that the suspension begins.

#### **4901:1-43-04 Cost Recovery Rider Process**

(A) Each natural gas company which seeks recovery of economic development project costs shall first file an application with the commission’s docketing division for an infrastructure development rider pursuant to R.C. § 4929.161. The initial application shall include all information set forth upon forms as may be prescribed by the commission.

(B) Each natural gas company with an approved infrastructure development rider shall update the rider rate on an annual basis pursuant to an annual report as schedule set forth by commission order. Each ~~application~~ annual report to update the infrastructure development rider shall include all information set forth upon forms as may be prescribed by the commission. Pursuant to R.C. § 4929.165, the annual report shall do both of the following:

(1) Detail the infrastructure development costs related to the applicable economic development project or projects; and,

(2) Set forth the rider rate for the twelve months following the annual report.

(C) The commission may order that consultants be hired, with costs billed to the natural gas company, to conduct ~~prudence and/or~~ financial reviews of the costs incurred and recovered through the infrastructure development rider.

(D) Each annual ~~application~~ report to update the infrastructure development rider should be made not less than seventy-five days prior to the proposed effective date of the updated rider rate. Proposed rates will become effective on the seventy-sixth day subject to reconciliation adjustments following any hearing, if necessary, or in its subsequent filing.

~~(E) If at anytime during the period between the annual update filings, the natural gas company or staff determines that costs are or will be substantially different than the amounts authorized as the result of the natural gas company's previous application, the natural gas company should file, on its own initiative or by order of the commission, an interim application to adjust the infrastructure development rider in order to avoid excessive rate impacts for the following update filing.~~

(F) For the annual report, ~~a~~Affected parties may file a motion to intervene and submit comments on any issues concerning ~~any application~~ the annual report filed under this rule within forty days of the natural gas company filing ~~of the applica-~~ tion annual report.



#### **4901:1-43-05 Hearings.**

Unless otherwise ordered, the commission shall approve the application or set the matter for hearing pursuant to divisions (B) or (D) of rule 4901:1-43-03 of the Administrative Code. ~~Proposed rates will become effective on the seventy-sixth day subject to reconciliation adjustments following any hearing, if necessary, or in its subsequent filings.~~

TEMPLATE A	APPLICATION
	<p align="center"><b>Schedule Name and Required Data for <u>Applications filed pursuant to Ohio Adm.Code 4901:1-43-03</u></b></p> <p>The following should be filed, <u>if applicable to any given project</u>, in an application with the Commission's Docketing Division under Case Code "EDP", for economic development plans, or "CSP", for certified site projects:</p>
	<del>1. Testimony in support of the application</del>
	<del>2. Identification of service areas</del>
	<p>3. A proposed legal notice <u>in a newspaper of general circulation of the county in which the project will be built.</u></p> <ul style="list-style-type: none"> <li><del>• A summary of the effect of the application on ratepayers</del></li> <li>• The name, case number, and filing date of the proceeding before the Commission</li> <li>• A statement that interested parties may request a copy of the application from the applicant or may obtain a copy from the Commission's web site, along with a toll-free telephone number for the applicant and the web site address for the Commission.</li> <li>• A statement that comments may be provided to the Commission. A space should be left in the statement so that the Commission can insert the deadline for filing comments.</li> </ul>
	<p>4. A certificate of service of the application for the chief executive of each municipal corporation, the board of township trustees of each township, the board of county commissioners of each county in which the <del>affected customers are</del> <u>funded infrastructure is</u> located, and each party to the applicant's <u>last infrastructure development rider annual report</u> <del>rate or surcharge</del> case.</p>
	<del>5. Copy of proposed tariff schedules</del>
	<p>6. Summary of the total projected economic development costs/revenues</p> <ul style="list-style-type: none"> <li>• Provide the total projected cost/revenue <del>for each cost component</del></li> <li><del>• Include all costs and related revenues organized according to each FERC account</del></li> <li><del>• Explain the rationale for each cost/revenue component included in the infrastructure development rider</del></li> </ul>
	<p><del>7. Summary of proposed rates</del></p> <ul style="list-style-type: none"> <li><del>• For each rate class, provide the proposed infrastructure development rider rate calculation</del></li> <li><del>• Include the rationale and components for the calculation</del></li> <li><del>• Provide all necessary support for the rate calculations</del></li> </ul>
	<p><del>8. Typical bill comparisons:</del></p> <ul style="list-style-type: none"> <li><del>• Provide a typical bill comparison for each rate schedule affected by the proposed adjustments to the infrastructure development rider</del></li> </ul>
	<p><del>9. Reconciliation adjustments:</del></p> <ul style="list-style-type: none"> <li><del>• For each rate class, provide the proposed infrastructure development rider adjustment calculation</del></li> <li><del>• Include the rationale for each component of the calculation</del></li> <li><del>• Provide all necessary support for the reconciliation adjustment calculations.</del></li> </ul>

TEMPLATE B	ANNUAL <del>UPDATE APPLICATION</del> <u>REPORT</u>
<p style="text-align: center;"><b>Schedule Name and Required Data <u>for</u> <u>Infrastructure Development Rider</u> <u>Annual Report</u></b></p> <p>The following should be filed, <u>if applicable to any given project</u>, in an application with the Commission's Docketing Division <del>under Case Code "EDP", for economic development plans, or "CSP", for certified site projects:</del></p>	
A-1 Copy of proposed tariff schedules	
A-2 Copy of redlined current tariff schedules	
<p>B-1 Summary of total projected economic development costs/revenues</p> <ul style="list-style-type: none"> <li>• Provide the total actual cost / revenue <del>for each cost component</del></li> <li>• Include all <u>infrastructure development rider</u> costs and related revenues organized according to each FERC account</li> <li>• Provide a list of all of the company's approved notices for applications in cases with codes "EDP" and "CSP" included in the costs.</li> </ul>	
<p>B-2 Summary of current and proposed rates</p> <ul style="list-style-type: none"> <li>• For each rate class, provide the current infrastructure development rider rate and proposed infrastructure development rider rate, the dollar difference and percentage change</li> </ul>	
<p>B-3 Typical Bill Comparisons</p> <ul style="list-style-type: none"> <li>• Provide a typical bill comparison for each rate schedule affected by the proposed adjustments to the infrastructure development rider.</li> </ul>	
<p>C-1 Actual economic development rider costs/revenues</p> <ul style="list-style-type: none"> <li>• For each cost/revenue component, include the monthly actual infrastructure development rider costs/revenues by FERC account</li> </ul>	
C-2 For each rate schedule, provide the monthly actual cost	
<p>C-3 Actual rate calculation</p> <ul style="list-style-type: none"> <li>• Provide the actual infrastructure development rider rate calculations</li> <li>• Provide all necessary support for the rate calculations</li> </ul>	
<p>D-1 Reconciliation adjustment</p> <ul style="list-style-type: none"> <li>• Provide actual infrastructure development rider costs for each component used to calculate reconciliation adjustment</li> </ul>	
D-2 Provide monthly <u>infrastructure development rider</u> revenues collected from each rate schedule.	
D-3 Provide monthly over- and under-recovery calculations.	
D-3a....z Include all additional and necessary schedules for support.	

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**Case No(s). 15-0871-GA-ORD**

Summary: Comments of Duke Energy Ohio, Inc. and Columbia Gas of Ohio, Inc.  
electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc. and Duke  
Energy Ohio, Inc.