

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The East)
Ohio Gas Company d/b/a Dominion East Ohio)
for Approval of an Alternative Form of) Case No. 15-362-GA-ALT
Regulation.)

**OHIO PARTNERS FOR AFFORDABLE ENERGY'S
POST HEARING BRIEF**

Ohio Partners for Affordable Energy ("OPAE") herein respectfully submits to the Public Utilities Commission of Ohio ("Commission") this post-hearing brief in this proceeding to address the application of The East Ohio Gas Company d/b/a Dominion East Ohio ("Dominion") for approval of an alternative rate plan under R.C. 4929.05 to implement an accelerated pipeline replacement program in Dominion's service territory.

OPAE does not object to the extension of the Pipeline Infrastructure Replacement ("PIR") program for another five years. OPAE also agrees that all Operation and Maintenance ("O&M") cost savings from the program should be passed along to customers via an adjustment of the PIR revenue requirement.

A Stipulation and Recommendation ("Stipulation") signed by Dominion and the Staff of the Commission has been introduced in the record of this case. Joint Exhibit 1. The Office of the Ohio Consumers' Counsel ("OCC") presented the testimony of its witness Daniel E. O'Neill who objected to the Stipulation. The Stipulation grants Dominion's request to increase the cap on the monthly bill increment that funds the PIR program. Mr. O'Neill testified that the current \$1.40 per month rate cap should be retained. OCC Ex. 1 at 4. He believes that the Stipulation's 25-year timeline for the PIR program is unnecessarily arbitrary and that the program should proceed at a pace that accommodates the current \$1.40 rate

cap. He also believes that past cost increases experienced by Dominion in the program are likely to subside. OCC Ex. 1 at 14. Customers should not be required to fund an accelerated program with accelerated costs. Even though customers can now take advantage of low gas commodity prices, that does not mean it is appropriate to increase other charges on their gas bills. Mr. O'Neill testified that the Stipulation allows for arbitrarily increasing rates with little justification, which does not benefit ratepayers or the public interest.

OPAE agrees with OCC's witness that there may now be less strain on resources to implement the PIR program so that the costs of the program are likely to subside in the future. There is no reason to believe that the past cost increases will continue. Under the circumstances, the increases in the cost cap are not necessary for the cost-effective management of the PIR program. OPAE agrees with OCC's witness that a full audit of Dominion's cost management process for the PIR program should be conducted before any increase is made to the rate cap. OCC Ex. 1 at 21. Cost increases should not be passed along to customers without Dominion providing proof that its investments were prudent. To prevent unnecessary rate increases to customers, the Commission should require an audit of the costs of the program before the current rate cap is increased.

Respectfully submitted,

/s/Colleen Mooney

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CERTIFICATE OF SERVICE

A copy of this Post-Hearing Brief will be served electronically on this 15th day of March 2016 by the Public Utilities Commission of Ohio's Docketing Division upon the persons identified below who are all electronically subscribed to this proceeding.

/s/Colleen Mooney
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Summary: Brief electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy