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February 13, 2017

PUCO

Docketing Division Public Utilities Commission of Ohio 180 East Broad Street Columbus, Ohio 43215

RE: In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval of a Revision to its Unaccounted For Gas Percentage, Case No. 17-333-GA-ATA.

Enclosed please find the Staff's Comments regarding Vectren Energy Delivery's application to revise its Unaccounted For Gas percentage in Case No. 17-333-GA-ATA.

Respectfully submitted,

Tamara S. Turkenton

Chief, Regulatory Services Division

Public Utilities Commission of Ohio

David Lipthratt

Chief, Research and Policy Division Public Utilities Commission of Ohio

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Vectren Energy Delivery of Ohio, Inc. Case No. 17-333-GA-ATA

SUMMARY

In Case No. 07-1080-GA-AIR, the Commission authorized Vectren Energy Delivery of Ohio, Inc. (VEDO or Company) to establish tariff provisions for Unaccounted For Gas (UFG) percentage to coincide with the Company's Annual Standard Choice Offer (SCO) period. VEDO's Tariff Sheet No. 54 requires the Company to periodically adjust its UFG percentage to reflect changes in the system unaccounted for percentage.

On January 31, 2017, VEDO filed an application seeking approval to revise the UFG percentage shown on VEDO's Tariff Sheet No. 54. The UFG percentage reflects the difference between the amount of gas brought into VEDO's distribution system and the amount of gas measured at customers' meters. Natural gas marketers supplying gas into VEDO's system must supply their customers' estimated usage, plus an additional amount to reflect the UFG percentage.

The Company requested a revision to the UFG from 1.4% to 1.6%, which is based on the results of Vectren's most recent annual review of its UFG. The UFG is applicable to Choice Suppliers, Pool Operators, SSO Suppliers, and to non-Pooling Transportation customers served under Rates 345 and 360. The percentage change in the UFG does not increase any rate.

STAFF REVIEW

Staff conducted its review by re-calculating the data provided in the Company's application and by reviewing documentation obtained through a data request.

STAFF RECOMMENDATION

At this time, Staff does not propose any further adjustments to VEDO's calculations, supports the Company's attachments filed on January 31, 2017, and believes that VEDO's application appropriately calculates the UFG percentage.

Staff recommends to the Commission that the proposed UFG of 1.6% be approved.