

September 5, 2017

Ms. Barcy F. McNeal
Director, Office of Administration
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

Re: *In re East Ohio Gas Company d/b/a Dominion Energy Ohio*, Case No. 17-820-GA-ATA

Dear Ms. McNeal,

In its supplemental application filed in this proceeding on June 27, 2017, The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO) recognized a number of issues raised in the comments of the Retail Energy Supply Association (RESA) and committed to meeting with RESA to discuss and resolve those issues. RESA and DEO have since held this meeting to discuss RESA's concerns.

DEO files this letter to inform the Commission and other interested parties of how these concerns have been resolved. RESA has indicated and authorized DEO to represent that it does not oppose the approval of DEO's application and supplemental application as currently presented to the Commission because of and subject to the following resolutions:

- 1) To assist Energy Choice suppliers in identifying incremental load customers, DEO will (a) provide suppliers with a list of zip codes in which incremental customers may reside; (b) add a code in customer lists to identify incremental customer accounts; and (c) provide a web-based portal in which suppliers may enter an account number to determine whether they may be required to accept a release of Risberg Line capacity.
- 2) DEO will also contact suppliers submitting an enrollment for an incremental load customer if the enrollment would result in a capacity release to the customer (or the supplier on its behalf) and inform them of the associated capacity release volume.

- 3) DEO now proposes for inclusion within Section 4.3 of the proposed General Terms and Conditions of Energy Choice Pooling Service (a) language clarifying that it is DEO's capacity that will be released and (b) a provision addressing "de minimis" incremental load additions, as follows:¹

Notwithstanding any other provision of these General Terms and Conditions, Suppliers serving any Customer in the Ashtabula Area that initiates or increases consumption after Upstream Pipeline facilities of R.H. energytrans, LLC or its successor companies ("the Risberg Line") are placed into service are required to accept a release of firm transportation capacity **held by East Ohio** on the Risberg Line based on East Ohio's estimate of their incremental peak day usage. In the event Supplier does not accept such capacity and utilize it to serve Customers' incremental load in the Ashtabula Area, East Ohio shall have no obligation to serve such load and may remove the Customers from Supplier's Pool. **Service to individual Customers with an incremental peak-day load of less than 5 Mcf/day shall be exempt from this provision if (a) sufficient capacity is available from other sources, (b) the cumulative impact of such exemptions does not materially affect the reliability of service to the Ashtabula Area, and (c) the individual Customer is not among a group of such Customers (e.g., a housing development or commercial park) that together exceed the threshold for exemption.**

- 4) To address supplier concerns over whether and when Risberg Line capacity shall be "utilized," DEO will provide Risberg Line capacity release and daily delivery requirements directly to incremental load customers and their suppliers on request. DEO will also post a point-specific daily target volume using its Dekaflow EBB system as it currently does with other isolated receipt points. DEO will assess the need for customers and suppliers to deliver volumes through the Risberg Line based on operating conditions across its system and in the Ashtabula area and may permit customers and suppliers to deliver those volumes at other receipt points, if DEO determines that is feasible based on operating conditions.
- 5) DEO will review the peak-day usage of incremental load customers at least annually and revise the prospective amount of capacity released, if needed, after informing the customer or supplier of the revised amount of capacity to be released and the basis for that revision. DEO will perform an additional capacity review if requested by an individual supplier or customer.
- 6) Consistent with current practice, DEO will release capacity on the Risberg Line for a term that begins when the incremental load customer initiates or increases

¹ These revisions would also be made to the parallel new Section 8.4 of the General Terms and Conditions of Transportation Service on Sheet No. F-GT&C 6.

consumption through the following March 31 and for the 12-month periods beginning April 1 thereafter.

- 7) To address RESA's concerns regarding the timing of the filing of compliance tariffs and notice of the status and in-service date of the Risberg Line, DEO now proposes to take the following actions:
- As proposed in the application, DEO will file compliance tariffs approximately 9–12 months before the anticipated in-service date; at that time, DEO will publicly provide an updated anticipated in-service date for the Risberg Line.
 - DEO will provide additional electronic notices to all suppliers approximately:
 - 90 days in advance of the anticipated in-service date.
 - 30 days in advance of the anticipated in-service date.
 - 7 days in advance of the actual scheduled in-service date.
 - Finally, DEO will file a letter in the docket on the in-service date notifying the Commission and interested parties that the line has been placed in service.

In view of the above resolutions, RESA has authorized DEO to inform the Commission that RESA's concerns raised in its comments have been resolved and that, subject to the Commission's acceptance of these proposals, it does not oppose the approval of DEO's application and supplemental application.

Please let me know if there are any questions.

Regards,

/s/ Andrew J. Campbell
Andrew J. Campbell

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Case No(s). 17-0820-GA-ATA

Summary: Correspondence regarding Resolution of RESA Comments electronically filed by Mr. Andrew J Campbell on behalf of The East Ohio Gas Company d/b/a Dominion Energy Ohio