

VECTREN ENERGY DELIVERY OF OHIO, INC.
GAS RATE CASE
CASE NO. 18-0298-GA-AIR; CASE NO. 18-0299-GA-ALT
MASTER INDEX

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SECTION E
RATE AND TARIFFS
VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR; CASE NO. 18-0299-GA-ALT
TEST YEAR: 12 MONTHS ENDING SEPTEMBER 30, 2018
DATE CERTAIN: DECEMBER 31, 2017

SCHEDULES:

- E-1 CLEAN COPY OF PROPOSED TARIFF SCHEDULES
- E-2 CLEAN COPY OF CURRENT TARIFF SCHEDULES
- E-2.1B SCORED AND REDLINED COPY OF CURRENT TARIFF SCHEDULES SHOWING ALL
PROPOSED CHANGES
- E-3 NARRATIVE RATIONALES FOR TARIFF CHANGES
- E-3.1 CUSTOMER CHARGE / MINIMUM BILL RATIONALE
- E-3.2 COST OF SERVICE STUDY
- E-4 CLASS AND SCHEDULE REVENUE SUMMARY
- E-4.1 ANNUALIZED TEST YEAR REVENUES AT PROPOSED RATES VS. MOST CURRENT RATES
- E-4.3 ACTUAL TEST YEAR REVENUE AT ACTUAL RATES
- E-5 TYPICAL BILL COMPARISON

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 1 of 80
WITNESS: S.E. ALBERTSON
R.A. FEINGOLD

TARIFF SHEET IDENTIFIER: Multiple Tariff Sheets

TYPE: VARIOUS RATE SCHEDULES
AS IDENTIFIED BELOW

General Explanation of Changes (applicable to all Tariff Sheets):

Throughout the Tariff, VEDO has proposed numerous additions, corrections, revisions, or other administrative changes (e.g., to account for new defined terms or to clarify the applicability of definitions) that are not intended to affect substantive obligations under the Tariff. Such changes are identified in the scored version of VEDO's Tariff, but are not specifically discussed herein. In the event that the Commission or the Staff believes that this Schedule E-3 has failed to address any change that warranted further explanation, VEDO is willing to supplement this Schedule or provide additional support during Staff's review process.

1. Explanation of Change (applicable to Rates 310, 311, 320, and 321):

Moved previous "Terms and Conditions" language under Applicability section

Rationale for Change:

To clarify applicability of other Tariff provisions and legal authorities and do so early in the Tariff sheet.

2. Explanation of Change (applicable to Rates 310, 311, 315, 320, 321, 325, 345, and 360):

Added "(regardless of usage)" behind Monthly Charge or Customer Charge

Rationale for Change:

To further clarify nature of fixed charge.

3. Explanation of Change (applicable to Rates 310, 311, 315, 320, 321, 325, 345, and 360):

Updated fixed and volumetric charges on each Rate Schedule

Rationale for Change:

Company is proposing a higher Monthly Charge in order to recover more of Company's fixed costs through a fixed charge. Volumetric charges, applicable only to Customers to which Straight Fixed Variable rate design does not apply, are designed to recover remaining costs.

4. Explanation of Change (applicable to Rates 320, 321, 325, 345, 360, Unauthorized Gas Usage Charge, Uncollectible Expense Rider, Percentage of Income Payment Plan Rider, Exit Transition Cost Rider, Standard Choice Offer Rider, Distribution Replacement Rider and Energy Efficiency Funding Rider):

Updated references to Ccf to "Billing Ccf" for volumetric charges and affected Riders

Rationale for Change:

Under Company's proposal, volumetric charges shall be applied to Billing Ccf as reflected on Customer's Bill, to reflect implementation of Energy Conversion Factor, as proposed in Company's Alternative Rate Plan and described in Direct Testimony of Scott Albertson.

5. Explanation of Change (applicable to Rates 310, 311, 315, 320, 321, 325, 345, and 360):

Added reference to "Sheet No. 32 – Capital Expenditure Program Rider"

Rationale for Change:

New rider, proposed in Case No. 18-0049-GA-ALT, will be applicable to various Rate Schedules.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 2 of 80
WITNESS: S.E. ALBERTSON
R.A. FEINGOLD

TARIFF SHEET IDENTIFIER: Multiple Tariff Sheets

TYPE: VARIOUS RATE SCHEDULES
AS IDENTIFIED BELOW

6. Explanation of Change (applicable to Rates 310, 311, 315, 320, 321, and 325):
Removed reference to "Sheet No. 43 – Sales Reconciliation Rider - A"
Rationale for Change:
This Rider is no longer applicable to Rate Schedules.
7. Explanation of Change (applicable to Rates 310, 311, 315, 320, 321, 325, 345, and 360):
Added ", plus applicable Riders" to Minimum Monthly Charge section.
Rationale for Change:
To clarify that the minimum monthly charge includes all applicable Riders, including but not limited to Gross Receipts Excise Tax Rider, and any fixed monthly Rider charges.
8. Explanation of Change (applicable to Rates 310, 311, 315, 320, 321, and 325):
Added and/or modified "Customer Usage and Payment Information Release" section
Rationale for Change:
Ensure all applicable Rate Schedules include this section. Added to Rate Schedules which previously did not contain this language (310, 311, 320, 321), and modified existing language to those Rate Schedules that currently included the language (315, 325).

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 3 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 1

TYPE: COVER PAGE

1. Explanation of Change:

Revised the Tariff reference from P.U.C.O. Gas No. 3 to P.U.C.O. Gas No. 4

Rationale for Change:

The P.U.C.O. No. 4 Tariff for Gas Service replaces in its entirety P.U.C.O. Gas No. 3

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DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 4 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 2

TYPE: TARIFF SHEET INDEX

1. Explanation of Change:

Updated Tariff Sheet Numbers for Rate 311, 315, 320, 321, and 325

Rationale for Change:

Currently Rate 311 is Sheet No. 10.5 moving to Sheet No. 11; Rate 315 is Sheet No. 11 moving to Sheet No. 12; Rate 320 is Sheet No. 12 moving to Sheet No. 13; Rate 321 is Sheet No. 12.5 moving to Sheet No. 14; Rate 325 is Sheet No. 13 moving to Sheet No. 15.

2. Explanation of Change:

Removed Rate 341 from Index.

Rationale for Change:

This Rate Schedule is no longer needed, as the single remaining customer will be served under a General Service Rate Schedule going forward.

3. Explanation of Change:

Renamed "Rate 380 (Large General and Large Volume)" to "Rate 380 (Large Transportation Customers)".

Rationale for Change:

This new title aligns with the new naming convention of the applicable customer Rate Schedules.

4. Explanation of Change:

Renamed "Rate 385 Pooling Service (Residential & General)" to "Rate 385 Choice Supplier Pooling Service".

Rationale for Change:

This new title aligns with the new naming convention of the applicable customer Rate Schedules.

5. Explanation of Change:

Relabeled "Riders" to "Riders and Adjustments"

Rationale for Change:

Revised labeling due to addition of Energy Conversion Factor (Sheet No. 47).

6. Explanation of Change:

Added "Capital Expenditure Program Rider" as Sheet No. 32.

Rationale for Change:

Index page updated to reflect proposed new rider.

7. Explanation of Change:

Added "Energy Conversion Factor" as Sheet No. 47.

Rationale for Change:

Index page updated to reflect proposed new Rider.

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DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 5 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 2

TYPE: TARIFF SHEET INDEX

8. Explanation of Change:

Sheet No. 52 - Renamed "Pooling Service Terms and Conditions (Residential & General)" to "Choice Supplier Pooling Service Terms and Conditions".

Rationale for Change:

This new title aligns with the new naming convention for the applicable Pooling Service Rate Schedule (Rate 385).

9. Explanation of Change:

Sheet No. 70 - Removing "Curtailment Procedures" and replacing with "Extensions of Company Facilities to Multi-Family Housing Projects"

Rationale for Change:

Company's Curtailment Procedures will be on file with the Commission pursuant to OAC 4901:5-25-02(D).

Sheet No. 70 is being reused for the proposed "Extensions of Company Facilities to Multi-Family Housing Projects".

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WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 6 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 3

TYPE: LOCATIONS SERVED

1. Explanation of Change:

Removed "Lewistown" from locations served

Rationale for Change:

Company is not currently serving this unincorporated location.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 7 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 10

TYPE: RATE 310
RESIDENTIAL DEFAULT
SALES SERVICE

1. Explanation of Change:

Added the following language to Applicability section:

“electing service hereunder when, in the judgment of Company, its service facilities are adequate to render Gas Service to Customer without impairing the quality of Company’s Gas Service to other customers, and”

Rationale for Change:

Language was added in order to be consistent with existing language in the Applicability section of other Rate Schedules.

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DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 8 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 12

TYPE: RATE 315
RESIDENTIAL
TRANSPORTATION SERVICE

1. Explanation of Change:
Moved previous "Terms and Conditions" language under Applicability section and added reference to Sheet No. 52 (Choice Supplier Pooling Service Terms and Conditions)
Rationale for Change:
To clarify applicability of other Tariff provisions and legal authorities and do so early in the Tariff sheet.
2. Explanation of Change:
Modified language in second paragraph of "Character of Service"
Rationale for Change:
Clarified language regarding Company approved Choice Supplier and updated reference to Rate 385
3. Explanation of Change:
Modified language within "Terms and Conditions" under Choice Supplier Selection
Rationale for Change:
Removed certain language because details of the customer enrollment process are included in the Choice Supplier Pooling Service Terms and Conditions.
4. Explanation of Change:
Modified language within "Terms and Conditions" under Transfer to SCO Service Upon Choice Supplier Default
Rationale for Change:
Removed certain language because the details of the Choice Supplier default process are included in Sheet No. 52.
5. Explanation of Change:
Modified language within "Terms and Conditions" under Disconnection for Non-Payment of Choice Bill
Rationale for Change:
The proposed changes clarify the intent of this provision and simplify its explanation.

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WORKPAPER REFERENCE NO(S): NONE

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PAGE 9 of 80
WITNESS: S.E. ALBERTSON
R.A. FEINGOLD

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 13

TYPE: RATE 320
GENERAL DEFAULT SALES
SERVICE

1. Explanation of Change:

Added language in Applicability section "electing service hereunder" and "when, in the judgment of Company, its service facilities are adequate to render Gas Service to Customer without impairing the quality of Company's Gas Service to other Customers"

Rationale for Change:

Added language to further define which customers are eligible to receive service under the Rate Schedule and for consistency with other Rate Schedule Applicability language.

2. Explanation of Change:

Added to Volumetric Charge "(Applicable to Group 2 and Group 3 only)"

Rationale for Change:

Limitation of applicability of Volumetric Charge reflects Alternative Rate Plan proposal to transition Group 1 customers to Straight Fixed Variable rate design..

3. Explanation of Change:

Added section for "Metering"

Rationale for Change:

Added section to Rate 320 to be consistent with language currently contained in Rate 325. This provision is applicable to all General Service Customers (Rates 320, 321, and 325).

4. Explanation of Change:

Removed "Curtailment" section

Rationale for Change:

Company's Curtailment Procedures will be on file with the Commission pursuant to OAC 4901:5-25-02(D).

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 10 of 80
WITNESS: S.E. ALBERTSON
R.A. FEINGOLD

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 14

TYPE: RATE 321
GENERAL STANDARD
CHOICE OFFER SERVICE

1. Explanation of Change:

Added to Volumetric Charge “(Applicable to Group 2 and Group 3 only)”

Rationale for Change:

Limitation of applicability of Volumetric Charge reflects Alternative Rate Plan proposal to transition Group 1 customers to Straight Fixed Variable rate design.

2. Explanation of Change:

Added section for “Metering”

Rationale for Change:

Added section to Rate 321 to be consistent with language currently contained in Rate 325. This provision is applicable to all General Service Customers (Rates 320, 321, and 325).

3. Explanation of Change:

Removed “Curtailment” section

Rationale for Change:

Company’s Curtailment Procedures will be on file with the Commission pursuant to OAC 4901:5-25-02(D).

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 11 of 80
WITNESS: S.E. ALBERTSON
R.A. FEINGOLD

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 15 TYPE: RATE 325
GENERAL TRANSPORTATION
SERVICE

1. Explanation of Change:
Moved existing "Terms and Conditions" language under Applicability section and added reference to Sheet No. 52 (Choice Supplier Pooling Service Terms and Conditions)
Rationale for Change:
To clarify applicability of other Tariff provisions and legal authorities and do so early in the Tariff sheet.
2. Explanation of Change:
Modified language in second paragraph of "Character of Service"
Rationale for Change:
Clarified that Customer must enter into a contract with a Choice Supplier that has been approved by Company, and updated the description of Rate 385
3. Explanation of Change:
Added to Volumetric Charge "(Applicable to Group 2 and Group 3 only)"
Rationale for Change:
Limitation of applicability of Volumetric Charge reflects Alternative Rate Plan proposal to transition Group 1 customers to Straight Fixed Variable rate design.
4. Explanation of Change:
Modified language within "Terms and Conditions" under Choice Supplier Selection
Rationale for Change:
Removed certain language; details of the customer enrollment process are included in the Choice Supplier Pooling Service Terms and Conditions.
5. Explanation of Change:
Modified language within "Terms and Conditions" under Transfer to SCO Service Upon Choice Supplier Default
Rationale for Change:
Removed certain language; details of the Choice Supplier default process are included in Sheet No. 52.
6. Explanation of Change:
Modified language within "Terms and Conditions" under Disconnection for Non-Payment of Choice Bill
Rationale for Change:
The proposed changes clarify the intent of this provision and simplify its explanation.
7. Explanation of Change:
Modified language within "Metering" section to change "on a daily basis" to "more frequently than a monthly basis"
Rationale for Change:
If remote meter reading equipment is installed, Customer's usage information will be available on a daily basis; however Company may require the information less frequently than daily.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 12 of 80
WITNESS: S.E. ALBERTSON
R.A. FEINGOLD

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 15

TYPE: RATE 325
GENERAL TRANSPORTATION
SERVICE

8. Explanation of Change:

Removed "Curtailment" section

Rationale for Change:

Company's Curtailment Procedures will be on file with the Commission pursuant to OAC 4901:5-25-02(D).

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 13 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 16

TYPE: RESERVED FOR FUTURE
USE

1. Explanation of Change:

Removed Rate 341 Dual Fuel Standard Choice Offer Service from Tariff for Gas Service, along with references to Rate 341 throughout Tariff, including Percentage of Income Payment Plan ("PIPP") Rider (Sheet No. 40), Exit Transition Cost ("ETC") Rider (Sheet No. 41), Standard Choice Offer ("SCO") Rider (Sheet No. 44), and Distribution Replacement Rider ("DRR") (Sheet No. 45).

Rationale for Change:

This Rate Schedule is no longer needed, as the single remaining customer will be served under a General Service Rate Schedule going forward.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 14 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 17

TYPE: RATE 345
LARGE GENERAL
TRANSPORTATION SERVICE

1. Explanation of Change:

Moved previous "Terms and Conditions" language under Applicability section and added reference to Transportation Terms and Conditions (Large Transportation Service) in Sheet No. 50, the Nomination and Balancing Provisions (Large Transportation Service) in Sheet No. 51

Rationale for Change:

To clarify applicability of other Tariff provisions and legal authorities and do so early in the Tariff sheet.

2. Explanation of Change:

Added "In addition, Large Transportation Customer receiving service hereunder that has not joined a Pool will also be required to receive service under Rate 380, Pooling Service" to Applicability section.

Rationale for Change:

Additional language clarifies that provisions applicable to Pool Operator also apply to a Customer served under this Rate Schedule who has not joined a Pool.

3. Explanation of Change:

Under Character of Service, added "Interim Prepaid Supply Service as described below may also be provided under this Rate Schedule at Company's sole discretion."

Rationale for Change:

Additional language added to Character of Service section to introduce type of services available to Customers served under this Rate Schedule.

4. Explanation of Change:

Revised heading from "Additional Services Charges" to "Additional Charges" and revised language under this section

Rationale for Change:

The revised language simplifies the intent of this section.

5. Explanation of Change:

Under Contract, revised section to include:

- "and other incremental", in addition to construction costs
- cancellation provisions
- termination of service provisions

Rationale for Change:

The revised language is intended to improve and clarify alignment of Tariff, contract requirements, and Company business practice and Commission rules, including by: clarifying that a one-year contract term is required regardless of incremental costs to serve; recognizing that incremental costs to serve may justify a longer contract term; and clarifying that limitations on termination do not override Company's ability to interrupt or terminate service if otherwise permitted (such as for non-payment or safety reasons).

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 15 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 17

TYPE: RATE 345
LARGE GENERAL
TRANSPORTATION SERVICE

6. Explanation of Change:

Under Measurement Requirement, replaced language referring to telephone service to accommodate implementation of cellular service for communication of daily meter readings

Rationale for Change:

The revised language explains Company's provisions for installing cellular equipment to allow Company to receive daily meter reading, and clarifies the party responsible for the cost of communications equipment and service.

7. Explanation of Change:

Under Curtailment, revised reference to location of Company's Curtailment Procedures and added "at least" prior to four (4) hour notice

Rationale for Change:

Company's Curtailment Procedures will be on file with the Commission pursuant to OAC 4901:5-25-02(D). Addition of "at least" was added to clarify Company's intent regarding Customer notification prior to a Curtailment.

8. Explanation of Change:

Under Creditworthiness Evaluation, re-ordered references to various charges to group Company related charges separately from pipeline related charges

Rationale for Change:

The proposed change simplifies the explanation of applicable charges.

9. Explanation of Change:

Under Interim Prepaid Supply Service, revised language within section

Rationale for Change:

Proposed language clarifies the availability of the service, the process to secure such service, cost responsibility, and the term for which the service would be made available.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 16 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 18

TYPE: RATE 360
LARGE VOLUME
TRANSPORTATION SERVICE

1. Explanation of Change:

Moved previous "Terms and Conditions" language under Applicability section and added reference to Transportation Terms and Conditions (Large Transportation Service) in Sheet No. 50, the Nomination and Balancing Provisions (Large Transportation Service) in Sheet No. 51

Rationale for Change:

To clarify applicability of other Tariff provisions and legal authorities and do so early in the Tariff sheet.

2. Explanation of Change:

Added "In addition, Large Transportation Customer receiving service hereunder that has not joined a Pool will also be required to receive service under Rate 380, Pooling Service" to Applicability section.

Rationale for Change:

Additional language clarifies that provisions applicable to Pool Operator also apply to a Customer served under this Rate Schedule who has not joined a Pool.

3. Explanation of Change:

Under Character of Service, added "Interim Prepaid Supply Service as described below may also be provided under this Rate Schedule at Company's sole discretion."

Rationale for Change:

Additional language highlights that this service is available to Customers served under this Rate Schedule.

4. Explanation of Change:

Revised heading from "Additional Services Charges" to "Additional Charges" and revised language under this section

Rationale for Change:

The revised language simplifies the intent of this section.

5. Explanation of Change:

Under Contract, revised section to include:

- "and other incremental", in addition to construction costs
- cancellation provisions
- termination of service provisions

Rationale for Change:

The revised language is intended to improve and clarify alignment of Tariff, contract requirements, and Company business practice and Commission rules, including by: clarifying that a one-year contract term is required regardless of incremental costs to serve; recognizing that incremental costs to serve may justify a longer contract term; and clarifying that limitations on termination do not override Company's ability to interrupt or terminate service if otherwise permitted (such as for non-payment or safety reasons).

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 17 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 18

TYPE: RATE 360
LARGE VOLUME
TRANSPORTATION SERVICE

6. Explanation of Change:

Under Measurement Requirement, replaced language referring to telephone service to accommodate implementation of cellular service for communication of daily meter readings

Rationale for Change:

The revised language explains Company's provisions for installing cellular equipment to allow Company to receive daily meter reading, and clarifies the party responsible for the cost of communications equipment and service.

7. Explanation of Change:

Under Curtailment, revised reference to location of Company's Curtailment Procedures and added "at least" prior to four (4) hour notice

Rationale for Change:

Company's Curtailment Procedures will be on file with the Commission pursuant to OAC 4901:5-25-02(D). Addition of "at least" was added to clarify Company's intent regarding Customer notification prior to a Curtailment.

8. Explanation of Change:

Under Creditworthiness Evaluation, re-ordered references to various charges to group Company related charges separately from pipeline related charges

Rationale for Change:

The proposed change simplifies the explanation of applicable charges.

9. Explanation of Change:

Under Interim Prepaid Supply Service, revised language within section

Rationale for Change:

Proposed language clarifies the availability of the service, the process to secure such service, cost responsibility, and the term for which the service would be made available.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 18 of 80
WITNESS: S.E. ALBERTSON
P.C. EDWARDS

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 20

TYPE: RATE 380
POOLING SERVICE (LARGE
TRANSPORTATION
CUSTOMERS)

1. Explanation of Change:

Changed the Rate Schedule title from Pooling Service (Large General and Large Volume) to Pooling Service (Large Transportation Customers).

Rationale for Change:

This new title aligns with the new naming convention of the applicable customer Rate Schedules.

2. Explanation of Change:

Revised Applicability section to include:

- Pool Operators, as defined on Sheet No. 59
- Language in relation to Large Transportation Customer that does not join a Pool and manages its own gas supplies

Rationale for Change:

Revised language provides clarification that the applicability of the Rate Schedule does not distinguish between a Pool Operator and a Large Transportation Customer managing its own gas supplies. Such Large Transportation Customer is subject to the provisions applicable to Pool Operator.

3. Explanation of Change:

Moved previous "Terms and Conditions" language under Applicability section and added reference to Transportation Terms and Conditions (Large Transportation Service) in Sheet No. 50, the Nomination and Balancing Provisions (Large Transportation Service) in Sheet No. 51, as well as the applicable provisions of the Pooling Agreement.

Rationale for Change:

To clarify applicability of other Tariff provisions and legal authorities and do so early within the Tariff sheet.

4. Explanation of Change:

Under Applicability, added language previously included on Sheet No. 50 (Transportation Terms and Conditions) to Rate Schedule which states:

"Pool Operator warrants that all gas delivered by or on behalf of Transportation Customer(s) shall meet the quality, pressure, heating value and other quality specifications of the applicable FERC Gas Tariff of the interstate gas pipeline delivering said gas to Company."

Rationale for Change:

Language was removed from Sheet No. 50 to better communicate that the provisions specifically apply to Pool Operators subject to this Rate Schedule.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 19 of 80
WITNESS: S.E. ALBERTSON
P.C. EDWARDS

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 20

TYPE: RATE 380
POOLING SERVICE (LARGE
TRANSPORTATION
CUSTOMERS)

5. Explanation of Change:

Clarifying under Character of Service that this Rate Schedule is applicable to all Large Transportation Customers, Rates 345 and 360. Removed "and electing Transportation Customer".

Rationale for Change:

Rate 345 and 360 Customers are referred to collectively in this Rate Schedule as "Large" Transportation Customers. The term "electing Transportation Customer" is inaccurate since all Transportation Customers participate in a Pool, including a Pool consisting of a single customer.

6. Explanation of Change:

Removed the term "aggregated" before Pool under Character of Service

Rationale for Change:

Revision recognizes that by definition a Pool includes one or more Customers.

7. Explanation of Change:

Removed "Financial Evaluation Fee"

Rationale for Change:

Company is proposing to eliminate the Financial Evaluation Fee.

8. Explanation of Change:

Removed references to specific Related Charges and replaced with "Miscellaneous Charges"

Rationale for Change:

Rate 380 Customers are subject to the applicable Miscellaneous Charges as reflected on Sheet No. 30, not just the Late Payment Charge, Returned Check Charge, and Unauthorized Gas Usage Charge.

9. Explanation of Change:

Revised language under "PROVISIONS AND REQUIREMENTS FOR LARGE TRANSPORTATION CUSTOMER PARTICIPATION"

Rationale for Change:

Proposed change explains Large Transportation Customers, in addition to Pool Operators, shall comply with the provisions and requirements under this section.

10. Explanation of Change:

Revised "Contract" to "Agreement" and modified language under this section

Rationale for Change:

Revised language clarifies terms used in this section. Customer must execute an agreement with Company in which Customer designates its Pool Operator; this agreement is referred to in the Tariff as an agency agreement.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 20 of 80
WITNESS: S.E. ALBERTSON
P.C. EDWARDS

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 20

TYPE: RATE 380
POOLING SERVICE (LARGE
TRANSPORTATION
CUSTOMERS)

11. Explanation of Change:

Revised section for Initiation of Pooling Service and incorporated references to current provisions included in the "Transfer to a New Pool" into this section.

Rationale for Change:

Revised language clarifies how imbalances are settled prior to Customer joining or establishing a Pool.

12. Explanation of Change:

Revised language under "PROVISIONS AND REQUIREMENTS FOR POOL OPERATOR PARTICIPATION"

Rationale for Change:

Proposed changes clarify the scope and intent of this section.

13. Explanation of Change:

Revised "Contract" to "Agreement" and modified language under this section

Rationale for Change:

Revised language clarifies that the appropriate term is a Pooling Agreement that Pool Operator enters into with Company.

14. Explanation of Change:

Reorganized section for "Creditworthiness Standards and Requirements" into an outline format

Rationale for Change:

Proposed format improves readability, clarifies standards and requirements in the existing Tariff, and also refers to Pooling Agreement which contains additional details related to credit requirements.

15. Explanation of Change:

Under Curtailment, revised reference to location of Company's Curtailment Procedures

Rationale for Change:

Company's Curtailment Procedures will be on file with the Commission pursuant to OAC 4901:5-25-02(D).

16. Explanation of Change:

Removed "Termination of Pooling Service Participation" section

Rationale for Change:

Pool Operators are cashed out on a monthly basis, making this language unnecessary.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 21 of 80
WITNESS: S.E. ALBERTSON
P.C. EDWARDS

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 21 TYPE: RATE 385
CHOICE SUPPLIER POOLING
SERVICE

1. Explanation of Change:

Moved previous "Terms and Conditions" language and portions of "Character of Service" section under Applicability section.

Rationale for Change:

To clarify applicability of other Tariff provisions and legal authorities and do so early within the Tariff sheet.

2. Explanation of Change:

Revised language under "Applicability" to:

- Include reference to "Company-approved" Choice Supplier
- Include sentence "For purposes of this Rate Schedule, references to Choice Supplier also include a Governmental Aggregator delivering firm gas supplies to Company's Operational Systems on behalf of Customers receiving Residential Transportation Service under Rate 315 or General Transportation Service under Rate 325."

Rationale for Change:

- Choice Supplier must be approved by Company before participating in its programs.
- Additional sentence further clarifies that, for purposes of this Rate Schedule, a Governmental Aggregator delivering firm supplies on behalf of Customers served under Rates 315 and 325 is considered a Choice Supplier.

3. Explanation of Change:

Removed "Financial Evaluation Fee"

Rationale for Change:

Company is proposing to eliminate the Financial Evaluation Fee.

4. Explanation of Change:

Renamed section as "Choice Eligible Customer Account List Fee" and revised language under this section

Rationale for Change:

The revised name clarifies that the lists to be made available are Customer account lists, rather than Customer lists. Modified terms used throughout section, including reference to previously defined "quarterly option" to clarify Choice Supplier's options for obtaining the list beyond what is included in the annual option. Added language that Company will only provide such lists to approved Choice Suppliers and Governmental Aggregators for their use in providing gas supply services to Company's Customers.

5. Explanation of Change:

Revised language under Nomination Error Charge

Rationale for Change:

Revised language to identify the Gas Tracking System ("GTS") where Choice Suppliers submit information and to identify various scenarios in which Nomination Error Charges are and are not applicable to Choice Suppliers, in order to provide further clarity.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 22 of 80
WITNESS: S.E. ALBERTSON
P.C. EDWARDS

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 21

TYPE: RATE 385
CHOICE SUPPLIER POOLING
SERVICE

6. Explanation of Change:

Revised "Storage Non-Compliance Charge" provisions, including:

- Updated applicable charges to \$35/Dth for all occurrences.
- Added "Choice Supplier may be considered in default, at the sole discretion of Company, after the fifth occurrence."
- Changed "TCO" to "Columbia"

Rationale for Change:

Under Company's proposal,

- all occurrences are subject to the \$35/Dth charge to further ensure Choice Suppliers comply with Company specified storage requirements.
- Consideration that the Choice Supplier may be in default after the fifth occurrence further emphasizes the importance of compliance and provides Supplier with additional incentive to comply.
- Columbia is the proper name

7. Explanation of Change:

Revised "Annual Volume Reconciliation" to "Monthly Volume Reconciliation"

Rationale for Change:

Under Company's proposal, Company will Cashout Suppliers on a monthly basis, which is expected to improve the cash flows of both Company and Suppliers.

8. Explanation of Change:

Revised "Alternate Peaking Supplies" to "Peaking Supplies"

Rationale for Change:

Previously, the term "alternate" applied to Company's propane peaking assets and supplies. Those assets have been retired.

9. Explanation of Change:

Revised System Balancing Amount section

- Removed reference to Large Transportation Customers, and added reference to Choice Suppliers and SCO Suppliers
- Added sentence "The following Charges will also be credited to Choice Suppliers and SCO Suppliers: Nomination Error Charges, City Gate Allocation Non-Compliance Charges, and the non-gas portions of all imbalance Cashouts. Company will not retain amounts associated with Nomination and Balancing Provisions Charges, except as necessary to offset pipeline penalties."

Rationale for Change:

Revised language further clarifies applicability of the System Balance provisions. Any charge assessed to Pool Operators, Choice Suppliers, and SCO Suppliers is allocated back to Choice and SCO Suppliers for balancing the system.

10. Explanation of Change:

Added "Pipeline" to "Delivery Point Balancing Amount"

Rationale for Change:

The proposed language eliminates potential confusion between the terms Pipeline Delivery Point and Company Delivery Point.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 23 of 80
WITNESS: S.E. ALBERTSON
P.C. EDWARDS

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 21

TYPE: RATE 385
CHOICE SUPPLIER POOLING
SERVICE

11. Explanation of Change:

Revised "Additional Service Charges" to include "and provided that such service or customer rate may be feasibly provided."

Rationale for Change:

Revised language further clarifies that availability of a customized rate is contingent on feasibility, and that if feasible the associated implementation costs will be paid by Choice Supplier.

12. Explanation of Change:

Reformatted and revised "REQUIREMENTS FOR CHOICE SUPPLIER PARTICIPATION" section to more clearly explain participation expectations.

Rationale for Change:

Proposed changes provide a step-by-step list of requirements for participation, which is expected to improve all parties' understanding and implementation of the process. Particular costs for which Choice Supplier is responsible under Company's proposal are included in detail.

Other revisions to this section include:

- Added language regarding circumstances under which Company would refund the EDI testing deposit, in order to ensure that Choice Supplier understands its obligations and remains responsible for those costs absent approval by Company to participate and/or failure to meet Company's minimum requirements related to number of Choice Customers served by Choice Supplier.
- Moved the minimum number of Customers requirements to a separate paragraph within this section, as it is an ongoing requirement for a Company-approved Choice Supplier, rather than a requirement to qualify to participate as a Choice Supplier.
- Proposed language indicating Choice Supplier must meet the minimum requirements (number of customers or aggregate load) within 90 days of being approved or risk removal from Company's Program. This provision is designed to ensure parties applying for Choice Supplier status intend to participate in the Choice Program and provide service to customers. In this manner Company helps ensure (1) that Customers continue to have multiple options as contemplated by Choice Supplier's application to participate, and (2) Company's resources are not unduly burdened with administering participation of Choice Suppliers that are not substantially engaged in providing service to Customers.

13. Explanation of Change:

Revised "Contract" to "Agreement" and modified language under this section

Rationale for Change:

Revised language clarifies that the appropriate term is Choice Supplier Pooling Agreement that Choice Supplier enters into with Company.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 24 of 80
WITNESS: S.E. ALBERTSON
P.C. EDWARDS

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 21

TYPE: RATE 385
CHOICE SUPPLIER POOLING
SERVICE

14. Explanation of Change:

Added new language to "Contract" section to include: "Company shall have the right to terminate at any time after providing thirty (30) days written notice if Choice Supplier has not obtained or retained the minimum number of enrollments or volumes, or if Choice Supplier fails any subsequent creditworthiness evaluations and Choice Supplier has not taken the necessary steps to cure the failure."

Rationale for Change:

Company added proposed language in order to ensure Choice Supplier meets Company criteria for providing Supply service to Customers. This provision is designed to ensure parties applying for Choice Supplier status intend to participate in the Choice Program and provide service to customers. In this manner Company helps ensure (1) that Customers continue to have multiple options as contemplated by Choice Supplier's application to participate, and (2) Company's resources are not unduly burdened with administering participation of Choice Suppliers that are not substantially engaged in providing service to Customers.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 25 of 80
WITNESS: S.E. ALBERTSON
P.C. EDWARDS

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 23

TYPE: RATE 396
SCO SUPPLIER SERVICE

1. Explanation of Change:

Moved previous "Terms and Conditions" language under Applicability section and added reference to SCO Supplier Service Terms and Conditions in Sheet No. 56, as well as the applicable provisions of the SCO Supplier Pooling Agreement.

Rationale for Change:

To clarify applicability of other Tariff provisions and legal authorities and do so early within the Tariff sheet.

2. Explanation of Change:

Revised language under "Applicability" to:

- Include reference to "Company-approved" SCO Supplier
- Remove redundant references to SCO and DSS
- Remove reference to Rate 341

Rationale for Change:

- Clarifies that SCO Supplier must be approved by Company before participating in its program
- Applicable Rate Schedules are referenced; there is no need to refer also to SCO and DSS.
- Rate 341 is no longer available under Company's proposal.

3. Explanation of Change:

Removed "Financial Evaluation Fee"

Rationale for Change:

Company is proposing to eliminate the Financial Evaluation Fee.

4. Explanation of Change:

Revised language under Nomination Error Charge

Rationale for Change:

Revised language to identify the Gas Tracking System ("GTS") where SCO Suppliers submit information, and to identify various scenarios in which Nomination Error Charges are and are not applicable to SCO Suppliers, in order to provide further clarity.

5. Explanation of Change:

Revised "Storage Non-Compliance Charge" provisions, including:

- Updated applicable charges to \$35/Dth for all occurrences.
- Added "SCO Supplier may be considered in default, at the sole discretion of Company, after the fifth occurrence."
- Updated "TCO" to "Columbia"

Rationale for Change:

Under Company's proposal:

- All occurrences are subject to the \$35/Dth charge to further ensure SCO Suppliers comply with Company specified storage requirements.
- Consideration that the SCO Supplier may be in default after the fifth occurrence further emphasizes the importance of compliance and provides Supplier with additional incentive to comply.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
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WITNESS: S.E. ALBERTSON
P.C. EDWARDS

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 23 TYPE: RATE 396
SCO SUPPLIER SERVICE

6. Explanation of Change:

Revised "Annual Volume Reconciliation" to "Monthly Volume Reconciliation"

Rationale for Change:

Under Company's proposal, Company will Cashout Suppliers on a monthly basis, which is expected to improve the cash flows of both Company and Suppliers.

7. Explanation of Change:

Revised "Alternate Peaking Supplies" to "Peaking Supplies"

Rationale for Change:

Previously, the term "alternate" applied to Company's propane peaking assets and supplies. Those assets have been retired.

8. Explanation of Change:

Revised System Balancing Amount section

- Removed reference to Large Transportation Customers', and added reference to Choice Suppliers' and SCO Suppliers'
- Added sentence "The following Charges will also be credited to Choice Suppliers and SCO Suppliers: Nomination Error Charges, City Gate Allocation Non-Compliance Charges, and the non-gas portions of all imbalance Cashouts. Company will not retain amounts associated with Nomination and Balancing Provisions Charges, except as necessary to offset pipeline penalties."

Rationale for Change:

Revised language further clarifies applicability of the System Balance provisions. Any charge assessed to Pool Operators, Choice Suppliers, and SCO Suppliers is allocated back to Choice and SCO Suppliers for balancing the system.

9. Explanation of Change:

Added "Pipeline" to "Delivery Point Balancing Amount"

Rationale for Change:

The proposed language eliminates potential confusion between the terms Pipeline Delivery Point and Company Delivery Point.

10. Explanation of Change:

Reformatted and revised "REQUIREMENTS FOR SCO SUPPLIER PARTICIPATION" section participation expectations and requirements.

Rationale for Change:

Proposed changes provide a step-by-step list of requirements for participation, which is expected to improve all parties' understanding and implementation of the process. Particular costs for which SCO Supplier is responsible under Company's proposal are included in detail.

Other revisions to this section include:

- Revised language regarding SCO Supplier creditworthiness prior to participating in SCO Auction and on an ongoing basis thereafter if successful in the auction in order to ensure appropriate financial protections for Company are in place.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
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WITNESS: S.E. ALBERTSON
P.C. EDWARDS

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 23

TYPE: RATE 396
SCO SUPPLIER SERVICE

11. Explanation of Change:

Revised "Contract" to "Agreement" and modified language under this section

Rationale for Change:

Revised language clarifies that the appropriate term is an SCO Supplier Pooling Agreement that Supplier enters into with Company.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 30

TYPE: MISCELLANEOUS CHARGES

1. Explanation of Change:
Removed "Remote Meter Installation Charge"
Rationale for Change:
Because Company has installed remote meter reading devices on Customer meters, it is no longer necessary to assess this charge to Customer
2. Explanation of Change:
Increased amount for "Investigation Fee"
Rationale for Change:
The proposed amounts reflect the costs Company incurs to perform the activities related to investigations of fraudulent or damaging practices by Customer.
3. Explanation of Change:
Increased amount for "After Hours Charge"
Rationale for Change:
The proposed amount reflects the costs Company incurs to perform the connection, reconnection or disconnection of service when Customer requests the activity be performed outside of normal business hours.
4. Explanation of Change:
Increased amount for "Trip and Labor Charge – Outside of Normal Business Hours"
Rationale for Change:
The proposed amount reflects the costs Company incurs when it investigates "no gas" or "low pressure" circumstances at Customer's Premises.
5. Explanation of Change:
Added "Pool Operator, Choice Supplier, or SCO Supplier" to Late Payment Charge
Rationale for Change:
In an effort to streamline tariff provisions, references to this charge were removed from Rate 380, Rate 385, and Rate 396 and replaced with a reference to this tariff sheet.
6. Explanation of Change:
Added "the collection of undercharges under" to Late Payment Charge section
Rationale for Change:
Clarifies that the reference to ORC 4933.28 is related to the collection of undercharges.
7. Explanation of Change:
Changed "Check" to "Payment" for Returned Payment Charge
Rationale for Change:
Modified language to acknowledge forms of Customer payments other than checks.
8. Explanation of Change:
Modified section for Unauthorized Gas Usage Charge to capture differences for each Rate Schedule
Rationale for Change:
New language has been added to reflect the distinctions related to how applicable Unauthorized Usage Charges are determined for different Rate Schedules.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
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SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 30

TYPE: MISCELLANEOUS CHARGES

9. Explanation of Change:

Added "Avoided Disconnection Charge"

Rationale for Change:

The purpose of this charge is to recover the costs of Company incurs when it travels to Customer's premises for the purpose of disconnecting service, in order that other Customers are not responsible for these costs.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
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SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 32

TYPE: CAPITAL EXPENDITURE
PROGRAM RIDER

1. Explanation of Change:

Added Sheet No. 32 for new Capital Expenditure Program Rider

Rationale for Change:

Company proposes under Case No. 18-0049-GA-ALT an ongoing Rider pursuant to R.C. 4929.111(D), to be updated annually, to recover ongoing deferrals under its Capital Expenditure Program beginning in 2018.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 37

TYPE: GROSS RECEIPTS EXCISE
TAX RIDER

1. Explanation of Change:

Added "shall not be required to render payments under this Rider, provided that Customer provides appropriate documentation of the exemption to Company" to Applicability section

Rationale for Change:

Proposed language clarifies that Customer is responsible for providing appropriate documentation of his or her exemption status to Company to avoid being billed under the Rider.

2. Explanation of Change:

Updated percentage

Rationale for Change:

The proposed percentage was calculated as part of the Schedule C-3 adjustments by dividing calculated Gross Receipts Excise Tax expense, at the statutory 4.75%, by eligible Taxable Revenue. As Federal Exempt Revenue and Bad Debt Expense change between periods, the Gross Receipts Excise Tax effective rate charged to eligible revenues will change to synchronize with Gross Receipts Excise Tax expense, ensuring that dollars collected match the tax expense.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
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SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 41

TYPE: EXIT TRANSITION COST
RIDER

1. Explanation of Change:

Removed reference to "Exit Transition implementation costs" and replaced with "costs associated with Company's Choice Program and exit of the merchant function".

Rationale for Change:

"Exit Transition" is not a defined term; moreover, Company has substantially completed the "transition" phase but proposes to continue the Rider to facilitate recovery or pass back of certain costs as identified.

2. Explanation of Change:

Removed references to Rider recovery of:

- (1) Business system (e.g. information technology) development costs,
- (2) Informational and educational costs
- (3) Call center costs,
- (4) Billing costs, and
- (5) Other incremental costs incurred by Company to achieve implementation of the various Exit Program features.

Rationale for Change:

Costs associated with these items are included in proposed Test Year expenses and are included in base rates.

3. Explanation of Change:

Changed "Annual Volume Reconciliation" to "Monthly Volume Reconciliation"

Rationale for Change:

Under Company's proposal, Company will Cashout Suppliers on a monthly basis in order to improve cash flows for all parties.

4. Explanation of Change:

General clean-up of existing language, including:

- Removed reference to SSO Supplier
- Removed reference to Transportation Customer
- Removed reference to Sheet No. 70, paragraph 11.B1.(9)
- Replaced "prior Exit Program" with "ETC Rider during prior periods"
- Replaced "Choice Customers" with "Residential and General Transportation Service" for Rate 315 and 325

Rationale for Change:

- Company no longer offers SSO Service
- As defined, Pool Operator includes Transportation Customer (as a Pool consisting of a single Customer)
- Curtailment Procedures have been removed from the proposed Tariff, and will be filed with the Commission pursuant to OAC 4901:5-25-02(D).
- "Exit Program" is not a defined term
- Proposed changes will improve the consistency of terms used throughout the Tariff

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 43

TYPE: RESERVED FOR FUTURE
USE

1. Explanation of Change:

Removed Sales Reconciliation Rider – A from Tariff for Gas Service

Rationale for Change:

This Rider, which ceased after recovery of all amounts authorized for recovery in prior Cases, has reflected rates at \$0.0000 per Ccf since November 1, 2010 and is no longer necessary.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 44

TYPE: STANDARD CHOICE OFFER
RIDER

1. Explanation of Change:

Quantified the Test Year (or "standard") Btu value of 1.070 and removed language regarding the Btu value established for the annual SCO period of April 1 through March 31.

Rationale for Change:

As proposed, and related to Company's proposed Sheet No. 37, the Btu value established in this proceeding will be used in the SCO price calculation and will remain unchanged until Company's next rate case.

2. Explanation of Change:

Added reference to Retail Price Adjustment

Rationale for Change:

Proposed language clearly communicates to Customers the prevailing Retail Price Adjustment, improving Customer's ability to understand how their billing amounts are determined.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
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SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 45

TYPE: DISTRIBUTION
REPLACEMENT RIDER

1. Explanation of Change:

Updated DRR effective date through August 31, 2025

Rationale for Change:

As proposed, Company's DRR extension will include costs incurred through calendar year 2023, which will be included for recovery in the annual DRR filing made in May 2024 with associated DRR rates and charges in place for the 12 month period of September 2024 through August 2025.

2. Explanation of Change:

Removed detail under description and referenced approval under Alternative Rate Plan proceeding

Rationale for Change:

Proposed language simplifies the Tariff; Company's proposal the record in the Alternative Rate Plan proceeding, and Commission's order, will include the applicable details.

3. Explanation of Change:

Reset DRR Charges to zero

Rationale for Change:

At the time of Commission approval of rates in Company's pending rate case, costs recoverable in the DRR and incurred through calendar year 2017 will be reflected in base rates. Only the variance component of the DRR rates and charges in effect at the time new base rates are implemented would remain in the DRR at that time; those amounts and corresponding rates and charges cannot be estimated at this time, but will be reflected in the compliance tariff filed following Commission approval of new base rates in this case. Updated DRR rates and charges are expected to be implemented on September 1, 2019, reflecting costs incurred through December 2018, under Company's DRR extension proposal.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 46

TYPE: ENERGY EFFICIENCY
FUNDING RIDER

1. Explanation of Change:

Clarified language under Description to reference updated rate case

Rationale for Change:

Revised language clarifies that the procedures for updating the Rider rate will be determined in Company's pending rate case proceeding.

2. Explanation of Change:

Reset EEFR rate to zero

Rationale for Change:

At the time of Commission approval of rates in Company's pending rate case, costs recoverable in the EEFR will be reflected in base rates. Only the variance component of the EEFR rate in effect at the time new base rates are implemented would remain in the EEFR at that time; the amount and corresponding rate cannot be estimated at this time, but will be reflected in the compliance tariff filed following Commission approval of new base rates in this case.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 47

TYPE: ENERGY CONVERSION
FACTOR

1. Explanation of Change:

New Tariff Sheet to implement Energy Conversion Factor

Rationale for Change:

Reflects Company's proposal to adjust customers' usage each month for billing purposes to reflect the variability in the energy content of the gas they consume. Further detail and support is provided as part of Company's Alternative Rate Plan and the Direct Testimony of Scott Albertson.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
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SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 50

TYPE: TRANSPORTATION TERMS
AND CONDITIONS
(LARGE TRANSPORTATION
SERVICE)

1. Explanation of Change:

Under Section 1, removed subsections 1.3 through 1.6, and replaced with new subsection 1.3 related to maximum daily volume of gas. Replaced the term "Maximum Daily Delivery Obligation" with "Maximum Daily Requirement"

Rationale for Change:

Previous language in subsections 1.3 through 1.6 was consolidated into new subsection 1.3 to capture current Company's business practices.

2. Explanation of Change:

Under Section 2, replaced the term "MDDO" with "Maximum Daily Requirement"

Rationale for Change:

Revised language to capture current Company's business practices.

3. Explanation of Change:

Removed Section 4 – Scheduling and Nominating Deliveries

Rationale for Change:

Removed section due to redundancy as language is included in Sheet No. 51.

4. Explanation of Change:

Section 5 – removed "System" before Unaccounted for Gas Percentage, and added reference to Sheet No. 54

Rationale for Change:

Revised naming to synch with Sheet No. 54 and other references throughout Tariff

5. Explanation of Change:

Section 6 – Updated term from "point of delivery" to defined term "Delivery Point"

Rationale for Change:

The proposed language makes use of the appropriate defined term.

6. Explanation of Change:

Removed subsection 6.2

Rationale for Change:

Language previously included in subsection 6.2 is now addressed in applicable Rate Schedules.

7. Explanation of Change:

Removed subsection 6.3 and added language to Rate 380 which states:

"Pool Operator warrants that all gas delivered by or on behalf of Transportation Customer(s) shall meet the quality, pressure, heating value and other quality specifications of the applicable FERC Gas Tariff of the interstate gas pipeline delivering said gas to Company."

Rationale for Change:

Language was removed from Sheet No. 50 because it applies to Pool Operators who are subject to Rate 380.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
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SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 50

TYPE: TRANSPORTATION TERMS
AND CONDITIONS
(LARGE TRANSPORTATION
SERVICE)

8. Explanation of Change:
Removed Section 7 - Balancing
Rationale for Change:
Removed section due to redundancy as language is included in Sheet No. 51.
9. Explanation of Change:
Section 8 – Curtailment – revised language to state Curtailment Procedures is on file with the Commission rather than in Company’s General Terms and Conditions
Rationale for Change:
Company’s Curtailment Procedures will be on file with the Commission pursuant to OAC 4901:5-25-02(D).
10. Explanation of Change:
Section 10 – Force Majeure – Moved the second sentence to end of subsection, and added “3) force majeure or other interruptions called by either gas producers or interstate pipelines.”
Rationale for Change:
New language captures an additional condition that would not be considered a Force Majeure.
11. Explanation of Change:
Removed Section 11 – Late Payment Charge
Rationale for Change:
Removed section due to redundancy since Rate Schedules reference Sheet No. 30, Miscellaneous Charges, which include the Late Payment Charge.
12. Explanation of Change:
Removed Section 12 – Returned Check Charge
Rationale for Change:
Removed section due to redundancy since Rate Schedules reference Sheet No. 30, Miscellaneous Charges, which include the Returned (Check) Payment Charge.
13. Explanation of Change:
Removed Section 17 – Operational Flow Orders
Rationale for Change:
Removed section due to redundancy as language is included in Sheet No. 51.
14. Explanation of Change:
Section 18 – revised language under Other System Costs to reference Choice Supplier and SCO Supplier, and their applicable Service Agreements with Company
Rationale for Change:
Reference to Choice Suppliers and SCO Suppliers (as system balancers) was added since this section is applicable to these Suppliers in addition to Company.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
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SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 51

TYPE: NOMINATION AND
BALANCING PROVISIONS (LARGE
TRANSPORTATION SERVICE)

1. Explanation of Change:

Updated references to Pool Operators instead of Transporter throughout Nomination and Balancing Provisions

Rationale for Change:

Proposed language clarifies the naming convention under Company's Nomination and Balancing Provision, as Company has redefined Pool Operator throughout Tariff.

2. Explanation of Change:

Removed "Changes to City-Gate Allocations may be made effective annually after four months prior notice, unless extraordinary considerations require a shorter interval or notice period."

Rationale for Change:

This portion of the process is no longer applicable.

3. Explanation of Change:

Added "Some Pool Operators, based on Company's operational capability to serve Large Transportation Customer, may be limited to one (1) or more specific pipelines and/or city gate which may change from time to time."

Rationale for Change:

Language was added under Nomination Provisions in order to identify unique circumstances.

4. Explanation of Change:

Revised language regarding nomination process

Rationale for Change:

Proposed revisions to Sheet No. 51 provide consistency with language in Sheet No. 52 (Choice Supplier Pooling Service Terms and Conditions) and Sheet No. 56 (SCO Supplier Terms and Conditions).

5. Explanation of Change:

Added "within its reasonable discretion." Intra-day nominations must be approved in advanced by Company"

Rationale for Change:

Additional language was added to require approval of intraday nominations by Company.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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NARRATIVE RATIONALE FOR TARIFF CHANGES**

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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 51

TYPE: NOMINATION AND
BALANCING PROVISIONS (LARGE
TRANSPORTATION SERVICE)

6. Explanation of Change:

Updated Nomination Error Charge from \$0.25/Dth to \$0.50/Dth, and added the following language:

The charge also applies to the differences in volumes arising from failures to nominate including off-system Columbia storage withdrawals, and nominations indicating incorrect information, such as an incorrect pipeline, city gate or contract number. The charge will not be assessed if differences are due to the reduction of pipeline deliveries by pipeline, or volumes allocated to Pool Operator(s) by an interstate pipeline when no balancing agreement is in place between pipeline and Company. Pool Operator is responsible for identifying and correcting all nomination errors, or changes to pipeline nominations.

Rationale for Change:

Company is proposing to increase Nomination Error Charge to promote compliance. Additional language was added to identify various scenarios in which Nomination Error Charges would be applicable to Choice Suppliers.

7. Explanation of Change:

Updated City Gate Allocation Non-Compliance Charge from \$0.50/Dth to \$1.00/Dth, and removed reference to Non-Compliance Occurrences.

Rationale for Change:

Company is proposing to increase City Gate Allocation Non-Compliance Charge to promote compliance.

8. Explanation of Change:

Under Balancing Provisions, add "confirmed city gate"

Rationale for Change:

Proposed language clarifies the deliveries used in calculating any imbalance.

9. Explanation of Change:

Under Monthly Under-/Over- Delivery Imbalance sections, added new language:

Monthly Under-/Over- Delivery Imbalances shall be cashed out at 1.0 times the Monthly Under-/Over- Delivery Charge if an OFO limiting over-deliveries has been issued for more than ten (10) days in any given calendar month, or for three (3) or more days of the last seven (7) calendar days of the month or at Company's discretion.

Rationale for Change:

Proposed language eliminates the cashout premiums to Suppliers due to multiple OFOs if deliveries are helpful to Company's System.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 51

TYPE: NOMINATION AND
BALANCING PROVISIONS (LARGE
TRANSPORTATION SERVICE)

10. Explanation of Change:

Under Cold Weather OFO Days, removed language regarding Daily Balancing Provisions applied to over-deliveries during a Cold Weather OFO, and replaced with the following language:

The Daily Over-Delivery Imbalance Quantity subject to being cashed-out shall increase to 25% during a Cold Weather OFO. Pool Operator shall be paid the following:

- (1) 0.9 times the Daily Over-Delivery Charge for each Dth of Daily Over-Delivery Imbalance Quantity that is greater than 25%, up to and including 35% of Total Daily Usage; plus
- (2) 0.75 times the Daily Over-Delivery Charge for each Dth of Daily Over-Delivery Imbalance Quantity that is greater than 35% of Total Daily Usage.

Rationale for Change:

Revised language is to increase daily tolerance to 25% for helpful deliveries to Company's System, while identifying upper limits associated with the allowed over-deliveries. Company has identified the financial penalties associated with over-deliveries above these limits.

11. Explanation of Change:

Under Warm Weather OFO Days, removed language Daily Balancing Provisions applied to under-deliveries during a Warm Weather OFO, and replaced with the following language:

The Daily Under-Delivery Imbalance Quantity subject to being cashed-out shall increase to 25% during a Warm Weather OFO. Pool Operator shall pay the following:

- (1) 1.05 times the Daily Under-Delivery Charge for each Dth of Under-Delivery Imbalance Quantity that is greater than 25%, up to and including 35% of Total Daily Usage; plus
- (2) 1.2 times the Daily Under-Delivery Charge for each Dth of Daily Under-Delivery Imbalance Quantity that is greater than 35% of Total Daily Usage.

Rationale for Change:

Revised language is to increase daily tolerance to 25% for helpful deliveries to Company's System, while identifying minimum under-delivery thresholds. Company has also identified the financial penalties associated with under-deliveries below these limits.

Company has also clarified that Pool Operator's receipt of payments associated with over-deliveries are in addition to the penalties related to those over-deliveries, as identified, in order to improve clarity of the Tariff language.

12. Explanation of Change:

Under Imbalance Trading, added "with other Large Transportation Service Pool Operators in the same operating system,"

Rationale for Change:

Additional language added to provide flexibility in delivery requirements.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 51

TYPE: NOMINATION AND
BALANCING PROVISIONS (LARGE
TRANSPORTATION SERVICE)

13. Explanation of Change:

Under Imbalance Trading, section (1)(b), changing three business days to two business days to complete and submit its daily and monthly imbalance trades

Rationale for Change:

Company is proposing a change to its business practice of imbalance trading from three days to two days.

14. Explanation of Change:

Under Imbalance Trading, section (2), removed "Transporter may not trade to establish an imbalance in the opposite direction of the original imbalance."

Rationale for Change:

Company is proposing a change in its business practice.

15. Explanation of Change:

Added a new section for "System Beneficial Deliveries"

Rationale for Change:

Proposed language is added to support Company's business practice to accommodate temporary System constraints and/or delivery requirements.

16. Explanation of Change:

Under Waiver of Charges, removed "on a case-by-case basis for situations beyond the reasonable control of the Transporter. Such waivers or amendments shall be exercised on a non-discriminatory basis"

Rationale for Change:

Removed language due to redundancy within section.

17. Explanation of Change:

Under Waiver of Charges, added "Company may utilize historical and/or average daily usage to determine the impact of missing daily metered usage on the Pool's imbalances, if any, when considering a waiver request herein."

Rationale for Change:

Proposed language is added to align Tariff with current business practice.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 44 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 52

TYPE: CHOICE SUPPLIER POOLING
SERVICE TERMS AND
CONDITIONS

1. Explanation of Change:

Under Customer Enrollment, added "All Choice Supplier transactions such as Customer enrollments, drops, tax exemption changes, and rate code changes, must be in the form of EDI transactions as directed by Company. The Choice Supplier will utilize the file standards as required by Company, which may change from time to time."

Rationale for Change:

The revised language incorporates Company's current practice of using EDI transactions.

2. Explanation of Change:

Removed reference to Customer's Enrollment Processing Period, and replaced with "the rescission period which includes seven (7) business days from the postmarked date Company sends a letter indicating Customer may rescind its Choice Program enrollment with or change of Choice Suppliers. This process can take up to 12 business days."

Rationale for Change:

The term Enrollment Processing Period was previously defined within the Tariff but only used on Sheet No. 52. The proposed revised language removes the term and explains the process.

3. Explanation of Change:

Under Customer Enrollment, added ", or to DSS if Customer is ineligible for SCO Service"

Rationale for Change:

Proposed language has been added to further clarify which applicable Rate Schedules Customer will be assigned, if no Choice Supplier is selected.

4. Explanation of Change:

Under Customer Enrollment, added "Enrollments will be rejected if Customer has a pending enrollment with a different Choice Supplier."

Rationale for Change:

The proposed language incorporates Company's current practice.

5. Explanation of Change:

Renamed section for "Choice Eligible Customer Account List Fee" and revised language under this section

Rationale for Change:

The revised name properly clarifies the list to identify the charges by account, rather than by Customer.

6. Explanation of Change:

Under Pool Customer Billing Options, added "Choice Supplier may change its billing option by providing no less than three (3) months prior written notice to Company, and cannot change it more frequently than once in any thirty-six (36) month period."

Rationale for Change:

The proposed language incorporates Company's current business practice.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 45 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 52

TYPE: CHOICE SUPPLIER POOLING
SERVICE TERMS AND
CONDITIONS

7. Explanation of Change:

Added new sections for Choice Supplier Rates, Taxes, and Updating Existing Choice Supplier Rates

Rationale for Change:

The proposed language incorporates Company's current practice.

8. Explanation of Change:

Under Option 2 – Dual Billing, added "Choice Supplier shall provide Company with a bill format that is consistent with Company's bill format and billing information. Company shall approve Choice Supplier's bill format prior to the issuance of any bill to Customer"

Rationale for Change:

The proposed language clarifies the requirements of Dual Billing for Choice Supplier.

9. Explanation of Change:

Updated reference to Commission Rule 4901:1-27-13(F)

Rationale for Change:

Company updated references within Tariff to applicable Commission Rules.

10. Explanation of Change:

Under Capacity and Operating Requirements, section Comparable Firm Capacity Requirement, updated "winter months" to "Peak Season"

Rationale for Change:

The revised language properly clarifies the term.

11. Explanation of Change:

Under Capacity and Operating Requirements, section Comparable Firm Capacity Requirement, removed "alternate" from "alternate peaking supplies"

Rationale for Change:

Previously, the term "alternate" applied to Company's propane peaking assets and supplies. Those assets have been retired.

12. Explanation of Change:

Under Capacity and Operating Requirements, section Comparable Firm Capacity Requirement, removed "On a daily basis, Company will provide Choice Supplier with the revised Peak Design Day Demand for Choice Supplier's Pool effective the following day. This volume will change over time as necessary to reflect Customers joining and/or leaving Choice Supplier's Pool and any changes in Company's peak design day demand parameters."

Rationale for Change:

Change provides consistency with Company's proposed update to the forecast methodology under Company Demand Forecast in Sheet 52

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 52

TYPE: CHOICE SUPPLIER POOLING
SERVICE TERMS AND
CONDITIONS

13. Explanation of Change:

Under Capacity and Operating Requirements, section Comparable Firm Capacity Requirement, added the following language:

- Choice Supplier must submit comparable firm capacity plans to Company no later than October 31st of each year.
- Proof of comparable capacity may be provided to Company for the entire Peak Season or on a monthly basis and is due by the 25th of the preceding month for each month in the Peak Season.

Rationale for Change:

The proposed language incorporates Company's current practice.

14. Explanation of Change:

Under Capacity and Operating Requirements, section Comparable Firm Capacity Requirement, removed "2) assignment to Choice Supplier of Company's pipeline capacity"

Rationale for Change:

Company does not intend to offer this option in the future because all capacity is released to SCO and Choice Suppliers.

15. Explanation of Change:

Under Mandatory Assignment of Pipeline Capacity, added "Company may release contracts for one, or more months. Some capacity contracts may be released only to SCO Suppliers."

Rationale for Change:

The proposed change provides Company flexibility to release smaller contracts to only SCO Suppliers.

16. Explanation of Change:

Under Mandatory Assignment of Pipeline Capacity, replaced "TCO" with "Columbia Firm Storage Service ("FSS") and Storage Service Transportation ("SST")".

Rationale for Change:

The proposed changes more clearly defines the Columbia capacity being released.

17. Explanation of Change:

Under Reassignment of Capacity,

- Removed "Monthly"
- Added "However, at Company's discretion, some contracts may only be released solely to SCO Suppliers."
- Added "Reassignment of capacity may occur for terms in excess of one (1) month."

Rationale for Change:

- Company removed "monthly" since some capacity contracts released for longer than one month.
- The additional language provides Company flexibility to release smaller contracts to only SCO Suppliers.
- The additional language provides for some capacity contracts released for longer than one month.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 52

TYPE: CHOICE SUPPLIER POOLING
SERVICE TERMS AND
CONDITIONS

18. Explanation of Change:

Under Operational System Balancing,

- Replaced "TCO storage Balance" with "Columbia Inventory and nomination information."
- Added "Choice Supplier shall submit monthly agency agreements to Columbia providing such access in the manner required by Company and Columbia."

Rationale for Change:

- The proposed change more clearly defines the access required by Company to the Suppliers' Columbia storage inventory and nomination information.
- The proposed language supports Company's current business practice.

19. Explanation of Change:

Under Provider of Last Resort ("POLR") Service, added to action item 4 with regard to obtaining POLR supply, "or by coordinating the delivery of city gate delivered volumes with non-defaulting Choice and SCO Suppliers. Non-defaulting Choice and SCO Suppliers shall be compensated by Company for volumes delivered at the price agreed upon for the applicable transaction. Defaulting Choice Suppliers will reimburse Company for all costs associated with the default"

Rationale for Change:

The proposed language was added to clarify Company's intent of coordinating POLR responsibilities and reimbursement of costs to Company and non-defaulting Choice and SCO Suppliers.

20. Explanation of Change:

Revised and added language under Provider of Last Resort ("POLR") Service regarding the steps involving removal of a defaulting Choice or SCO Supplier.

Rationale for Change:

Company's proposed revisions and additions provide additional detail related to the steps it may take to remove a defaulting Choice or SCO Supplier.

21. Explanation of Change:

Under "Company Demand Forecast" section, removed:

- "Peak Design Day Demand"
- "respectively, the number of Customers in the Pool"
- "upon implementation of the Program"
- "through experience gained with the Program,"

Rationale for Change:

Change provides consistency with Company's proposed update to the forecast methodology under Company Demand Forecast in Sheet 52. The other revisions are no longer needed since Company is seasoned in managing the Program.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 52

TYPE: CHOICE SUPPLIER POOLING
SERVICE TERMS AND
CONDITIONS

22. Explanation of Change:

Under Daily Scheduling of Directed Delivery Quantities, changed:

- Changed 8:00 a.m. to 9:00 a.m.
- Changed EBB to GTS
- Added Unaccounted for Gas quantities based on Company's Unaccounted for Gas Percentage
- Removed "and shall post any interstate pipeline and/or Company operating constraints that are expected to be in effect the following day(s)."
- Removed "Absent unforeseen circumstances, four months' minimum notice will be provided on changes to the city-gate allocation tables."

Rationale for Change:

- The primary driver for the revision is the change to the timely nomination start time to the Gas Day.
- Company has replaced "EBB" with Gas Tracking System ("GTS") which better describes its current gas management system. GTS is used where applicable throughout the Tariff.
- Added language to address current Company business practice
- Removed language since Suppliers receive the same pipeline notices as Company.
- This portion of the process is no longer applicable.

23. Explanation of Change:

Under Nomination Provisions, added "Company may accept nominations submitted after the deadlines specified above within its reasonable discretion. Intra-day nominations must be approved in advance by Company. Until Choice Supplier submits the required nomination, Choice Supplier's nomination of daily quantities shall be zero. Unless otherwise permitted by Company in writing, the Nomination Period shall not exceed thirty-one (31) days."

Rationale for Change:

The additional language provides consistency with language included on Sheet No. 51 Nomination and Balancing Provisions (Large Transportation Service) and applicable to Choice Suppliers.

24. Explanation of Change:

Under Nomination Provisions, added "Choice Supplier shall be responsible for verifying and, if necessary, correcting its Daily Pipeline Nomination so that it matches Choice Supplier's confirmed pipeline deliveries and is compliant with the City Gate Allocations percentage requirements"

Rationale for Change:

The additional language provides consistency with language included on Sheet No. 51 Nomination and Balancing Provisions (Large Transportation Service) and applicable to Choice Suppliers.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 52

TYPE: CHOICE SUPPLIER POOLING
SERVICE TERMS AND
CONDITIONS

25. Explanation of Change:

Under Nomination Provisions added "Choice Supplier shall be responsible for verifying and, if necessary, correcting its Daily Pipeline Nomination so that it matches Choice Supplier's confirmed pipeline deliveries and is compliant with the City Gate Allocations percentage requirements."

Rationale for Change:

The additional language provides consistency with language included on Sheet No. 51 Nomination and Balancing Provisions (Large Transportation Service) and applicable to Choice Suppliers.

26. Explanation of Change:

Added a new section for "System Beneficial Deliveries"

Rationale for Change:

Proposed language is added to support Company's business practice to accommodate temporary system constraints and/or delivery requirements.

27. Explanation of Change:

- Under "Allocation of Peaking Supplies",
- removed "Alternate" before "peaking supplies"
 - replaced "March" with "February"

Rationale for Change:

- Previously, the term "alternate" applied to Company's propane peaking assets and supplies. Those assets have been retired.
- Properly aligns with the Peak Season months pursuant to Company's Comparable Firm Capacity Requirement

28. Explanation of Change:

Under "Allocation of Peaking Supplies", added "Choice Supplier shall pay a peaking-demand charge based on its proportionate share of assigned Peaking Supply as billed by Company during the Peak Season. Such unit-demand charge shall be equal to the total capacity costs and other fixed costs associated with Company supplied peaking resources."

Rationale for Change:

Company added proposed language to better communicate the basis for the charge.

29. Explanation of Change:

Revised "Annual Volume Reconciliation" to "Monthly Volume Reconciliation"

Rationale for Change:

Under Company's proposal and discussed with Stakeholders, Company will Cashout Suppliers on a monthly basis.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 50 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 52

TYPE: CHOICE SUPPLIER POOLING
SERVICE TERMS AND
CONDITIONS

30. Explanation of Change:

Under "Monthly Volume Reconciliation, added item 6: "Company may elect to adjust the Choice Supplier's reconciliation imbalance and/or receivables for up to twelve (12) months after the original billing date for any Choice Customers' bills at issue, for accounting or billing errors, billing disputes, or any other necessary or appropriate adjustments."

Rationale for Change:

Company added proposed language to reflect Company's current practice.

31. Explanation of Change:

Updated reference to Commission Rule 4901:1-27-13(F)

Rationale for Change:

Company updated references within Tariff to applicable Commission Rules.

32. Explanation of Change:

Under "CONSEQUENCES OF CHOICE SUPPLIER'S FAILURE TO PERFORM OR COMPLY" replaced "transfer to Standard Choice Offer Service, unless said Customers join another Choice Supplier's Pool" with "be assigned to an SCO and/or Choice Supplier pursuant to Company's Provider of Last Resort provisions as described within these Terms and Conditions"

Rationale for Change:

The proposed language was added to clarify Company's intent of coordinating POLR responsibilities and reimbursement of costs to Company and non-defaulting Choice and SCO Suppliers.

33. Explanation of Change:

Added new section for "Waiver of Charges"

Rationale for Change:

Company proposed new section to be consistent with and align with applicable provisions of current Tariff as reflected in Sheet No. 51.

34. Explanation of Change:

Under "Force Majeure" added "(3) force majeure or other interruptions called by either gas producers or interstate pipelines."

Rationale for Change:

New language captures an additional condition that would not be considered a Force Majeure.

35. Explanation of Change:

Under "Force Majeure" added ", or mitigate the impact"

Rationale for Change:

Company's proposed revision was added to provide another expectation for the party claiming a force majeure.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 51 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 54

TYPE: UNACCOUNTED FOR GAS
PERCENTAGE

1. Explanation of Change:
Reordered reference to types of Customers to which this Tariff sheet is applicable to
Rationale for Change:
Changed the order of types of Customers to how they are shown within the Tariff.
2. Explanation of Change:
Removed "Non-Pooling Transportation Customers served under Rate 345 and Rate 360"
Rationale for Change:
Proposed change properly clarifies the definition for Pool Operator as used within proposed Tariff.
3. Explanation of Change:
Clarified language under Description to reference case number
Rationale for Change:
Revised language now references the procedures approved by the Commission in this rate case proceeding. As described in VEDO's Application and the Direct Testimony of Scott Albertson, VEDO proposes an automatic-approval mechanism to update the Unaccounted For Gas Percentage, subject to Commission review.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 52 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 56

TYPE: SCO SUPPLIER TERMS AND
CONDITIONS

1. Explanation of Change:
Moved definitions to Sheet No. 59
Rationale for Change:
Company's proposal is to combine all definitions into a single location within Tariff.
2. Explanation of Change:
Eliminated definitions for "EFT", "PEPL", and "SCO Supply"
Rationale for Change:
The terms are not referenced throughout Tariff and no longer needed.
3. Explanation of Change:
Under Capacity and Operating Requirements, section Comparable Firm Capacity Requirement, updated "winter months" to "Peak Season"
Rationale for Change:
The revised language clarifies the term.
4. Explanation of Change:
Under Capacity and Operating Requirements, section Comparable Firm Capacity Requirement, removed "alternate" from "alternate peaking supplies"
Rationale for Change:
Previously, the term "alternate" applied to Company's propane peaking assets and supplies. Those assets have been retired.
5. Explanation of Change:
Under Capacity and Operating Requirements, section Comparable Firm Capacity Requirement, added "All obligations of SCO Supplier with respect to such capacity and supply shall be the sole responsibility of SCO Supplier."
Rationale for Change:
Company proposed new sentence to be consistent with and align with applicable provisions of current Tariff as reflected in Sheet No. 52.
6. Explanation of Change:
Under Capacity and Operating Requirements, section Comparable Firm Capacity Requirement, removed "On a daily basis, Company will provide SCO Supplier with the revised Peak Design Day Demand for SCO Supplier's Pool effective the following day. This volume will change over time as necessary to reflect Customers joining and/or leaving SCO Supplier's Pool and any changes in Company's peak design day demand parameters."
Rationale for Change:
Change provides consistency with Company's proposed update to the forecast methodology under Company Demand Forecast in Sheet 52.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 53 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 56

TYPE: SCO SUPPLIER TERMS AND
CONDITIONS

7. Explanation of Change:

Under Capacity and Operating Requirements, section Comparable Firm Capacity Requirement, added the following language:

- SCO Supplier must submit comparable firm capacity plans to Company no later than October 31st of each year.
- Proof of comparable capacity may be provided to Company for the entire Peak Season or on a monthly basis and is due by the 25th of the preceding month for each month in the Peak Season.

Rationale for Change:

The proposed language incorporates Company's current practice.

8. Explanation of Change:

Under Mandatory Assignment of Pipeline Capacity, added "Company may release contracts for one, or more months. Some capacity contracts may be released only to SCO Suppliers."

Rationale for Change:

The proposed change provides Company flexibility to release smaller contracts to only SCO Suppliers.

9. Explanation of Change:

Under Mandatory Assignment of Pipeline Capacity, replaced "TCO" with "Columbia Firm Storage Service ("FSS") and Storage Service Transportation ("SST").

Rationale for Change:

The proposed changes more clearly defines the Columbia capacity being released.

10. Explanation of Change:

Under Reassignment of Capacity,

- Removed "Monthly"
- Added "However, at Company's discretion, some contracts may only be released solely to SCO Suppliers."
- Added "Reassignment of capacity may occur for terms in excess of one (1) month."

Rationale for Change:

- Company removed "monthly" since some capacity contracts released for longer than one month.
- The additional language provides Company flexibility to release smaller contracts to only SCO Suppliers.
- The additional language provides for some capacity contracts released for longer than one month.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 54 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 56

TYPE: SCO SUPPLIER TERMS AND
CONDITIONS

11. Explanation of Change:

Under Operational System Balancing,

- Replaced "TCO storage Balance" with "Columbia Inventory and nomination information."
- Added "SCO Supplier shall submit monthly agency agreements to Columbia providing such access in the manner required by Company and Columbia."

Rationale for Change:

- The proposed change more clearly defines the access required by Company to the Suppliers' Columbia storage inventory and nomination information.
- The proposed language supports Company's current business practice.

12. Explanation of Change:

Added new sections for Customer Enrollments, Choice Eligible Customer Account List, Company Consolidated Billing, and Taxes

Rationale for Change:

The proposed language incorporates Company's current practice.

13. Explanation of Change:

Under Provider of Last Resort ("POLR") Service, added to action item 4 with regard to obtaining POLR supply, "or by coordinating the delivery of city gate delivered volumes with non-defaulting SCO and Choice Suppliers. Non-defaulting SCO and Choice Suppliers shall be compensated by Company for volumes delivered at the price agreed upon for the applicable transaction. Defaulting Choice Suppliers will reimburse Company for all costs associated with the default"

Rationale for Change:

The proposed language was added to clarify Company's intent of coordinating POLR responsibilities and reimbursement of costs to Company and non-defaulting Choice and SCO Suppliers.

14. Explanation of Change:

Revised and added language under Provider of Last Resort ("POLR") Service regarding the removal of a defaulting Choice or SCO Supplier.

Rationale for Change:

Company's proposed revisions and additions provide additional detailed steps in the event of the removal of a defaulting Choice or SCO Supplier.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 55 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 56

TYPE: SCO SUPPLIER TERMS AND
CONDITIONS

15. Explanation of Change:

Under "Company Demand Forecast" section,
Removed:

- "Peak Design Day Demand"
- "respectively, the number of Customers in the Pool"
- "upon implementation of the Program"
- "through experience gained with the Program,"

Added:

- "However, Company may create separate forecasts and DDQs and require separate Pools for specific market areas."

Rationale for Change:

Change provides consistency with Company's proposed update to the forecast methodology under Company Demand Forecast in Sheet 52. The other revisions are no longer needed since Company is seasoned in managing the Program. Company proposed new sentence to be consistent with and align with applicable provisions of current Tariff as reflected in Sheet No. 52.

16. Explanation of Change:

Under Daily Scheduling of Directed Delivery Quantities, changed:

- Changed 8:00 a.m. to 9:00 a.m.
- Changed EBB to GTS
- Removed "and shall post any interstate pipeline and/or Company operating constraints that are expected to be in effect the following day(s)."
- Removed "Absent unforeseen circumstances, four months' minimum notice will be provided on changes to the city-gate allocation tables."

Rationale for Change:

- The primary driver for the revision is the change to the timely nomination start time to the Gas Day.
- Company has replaced "EBB" with Gas Tracking System ("GTS") which better describes its current gas management system. GTS is used where applicable throughout the Tariff.
- Added language to address current Company business practice
- Removed language since Suppliers receive the same pipeline notices as Company.
- This portion of the process is no longer applicable.

17. Explanation of Change:

Under Nomination Provisions, added "Company may accept nominations submitted after the deadlines specified above within its reasonable discretion. Intra-day nominations must be approved in advance by Company. Until SCO Supplier submits the required nomination, SCO Supplier's nomination of daily quantities shall be zero. Unless otherwise permitted by Company in writing, the Nomination Period shall not exceed thirty-one (31) days."

Rationale for Change:

The additional language provides consistency with language included on Sheet No. 51 Nomination and Balancing Provisions (Large Transportation Service) and applicable to SCO Suppliers.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
PAGE 56 of 80
WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 56

TYPE: SCO SUPPLIER TERMS AND
CONDITIONS

18. Explanation of Change:

Under Nomination Provisions, added "Company may accept nominations submitted after the deadlines specified above within its reasonable discretion. Intra-day nominations must be approved in advance by Company. Until Choice Supplier submits the required nomination, Choice Supplier's nomination of daily quantities shall be zero. Unless otherwise permitted by Company in writing, the Nomination Period shall not exceed thirty-one (31) days."

Rationale for Change:

The additional language provides consistency with language included on Sheet No. 51 Nomination and Balancing Provisions (Large Transportation Service) and applicable to Choice Suppliers.

19. Explanation of Change:

Under Nomination Provisions added "SCO Supplier shall be responsible for verifying and, if necessary, correcting its Daily Pipeline Nomination so that it matches SCO Supplier's confirmed pipeline deliveries and is compliant with the City Gate Allocations percentage requirements."

Rationale for Change:

The additional language provides consistency with language included on Sheet No. 51 Nomination and Balancing Provisions (Large Transportation Service) and applicable to Choice Suppliers.

20. Explanation of Change:

Added a new section for "System Beneficial Deliveries"

Rationale for Change:

Proposed language is added to support Company's business practice to accommodate temporary System constraints and/or delivery requirements.

21. Explanation of Change:

- Under "Allocation of Peaking Supplies",
- removed "Alternate" before "peaking supplies"
 - replaced "March" with "February"

Rationale for Change:

- Previously, the term "alternate" applied to Company's propane peaking assets and supplies. Those assets have been retired.
- Properly aligns with the Peak Season months pursuant to Company's Comparable Firm Capacity Requirement

22. Explanation of Change:

Under "Allocation of Peaking Supplies", added "SCO Supplier shall pay a peaking-demand charge based on its proportionate share of assigned Peaking Supply as billed by Company during the Peak Season. Such unit-demand charge shall be equal to the total capacity costs and other fixed costs associated with Company supplied peaking resources."

Rationale for Change:

Company added proposed language to better communicate the basis for the charge.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 56

TYPE: SCO SUPPLIER TERMS AND
CONDITIONS

23. Explanation of Change:

Revised "Annual Volume Reconciliation" to "Monthly Volume Reconciliation"

Rationale for Change:

Under Company's proposal and discussed with Stakeholders, Company will Cashout Suppliers on a monthly basis.

24. Explanation of Change:

Under "Monthly Volume Reconciliation, added item 6: "Company may elect to adjust the SCO Supplier's reconciliation imbalance and/or receivables for up to twelve (12) months after the original billing date for any Choice Customers' bills at issue, for accounting or billing errors, billing disputes, or any other necessary or appropriate adjustments."

Rationale for Change:

Company added proposed language to reflect Company's current practice.

25. Explanation of Change:

Added new section for "Waiver of Charges"

Rationale for Change:

Company proposed new section to be consistent with and align with applicable provisions of current Tariff as reflected in Sheet No. 51.

26. Explanation of Change:

Added new section for "Force Majeure"

Rationale for Change:

Company proposed new section to be consistent with and align with applicable provisions of current Tariff as reflected in Sheet No. 51.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 59

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (DEFINITIONS)

1. Explanation of Change:
General cleanup of definitions including defining acronyms for current definitions and terms, updated naming of Rate Schedules and/or Tariff Sheets.
Rationale for Change:
Proposed language simplifies and/or clarifies references throughout the Tariff
2. Explanation of Change:
Revised definition for "Annual Usage" to reference Metered Ccf and Metered usage
Rationale for Change:
The proposed change is related to Company's proposed Energy Conversion Factor.
3. Explanation of Change:
Revised definition for "Bill" by: (1) removing reference to "itemized list", and (2) adding reference to Pool Operator
Rationale for Change:
(1) Revised definition clarifies that only the bills of Pool Operators are itemized, and (2) current definition does not reference Pool Operator Bill, however the term is used throughout Tariff
4. Explanation of Change:
Added definition for "Billing Ccf"
Rationale for Change:
The newly defined term is related to Company's proposed Energy Conversion Factor.
5. Explanation of Change:
Added "Choice Eligible Customer"
Rationale for Change:
Newly defined term defines who is eligible for Choice service and improves clarity as that term is used throughout the Tariff.
6. Explanation of Change:
Revised definition for "Choice Supplier"
Rationale for Change:
The proposed change clarifies the definition of the term and emphasizes that Company must approve Choice Supplier for participation in its program.
7. Explanation of Change:
Revised definition for "Choice Supplier's Designee" to include "and who shall take release of Choice Supplier's allocation of pipeline transportation and storage capacity"
Rationale for Change:
The proposed change adds clarification to the definition of the term.
8. Explanation of Change:
Removed definition for "Choice Tri-Party Capacity Release Agreement"
Rationale for Change:
The agreement as currently defined is no longer used by Company.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 59

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (DEFINITIONS)

9. Explanation of Change:

Added definition for "Columbia"

Rationale for Change:

Definition replaces the current term ("TCO") to improve understanding as that entity is referenced throughout the Tariff.

10. Explanation of Change:

Revised definition for "Comparable Firm Capacity Requirement" to:

- (1) include "SCO" Suppliers along with Choice Suppliers,
- (2) change from "winter months" to "Peak Season", and
- (3) change "alternate peaking supplies" to "peaking supplies"

Rationale for Change:

- (1) Company has moved definitions from Sheet No. 56 to Sheet No. 59 in order that all defined terms used in the Tariff are located in a single place, to remove any potential Customer confusion.
- (2) Revised term more accurately reflects that Comparable Firm Capacity Requirement applies only to Peak Season
- (3) Previously, the term "alternate" applied to Company's propane peaking assets and supplies. Those assets have been retired.

11. Explanation of Change:

Revised definition for "Curtailment Procedures"

Rationale for Change:

Company's Curtailment Procedures will be on file with the Commission pursuant to OAC 4901:5-25-02(D).

12. Explanation of Change:

Revised definition for "Delivered Supplies" to change "alternate peaking supplies" to "peaking supplies"

Rationale for Change:

Previously, the term "alternate" applied to Company's propane peaking assets and supplies. Those assets have been retired.

13. Explanation of Change:

Added new definition for "Delivery Point"

Rationale for Change:

The proposed language eliminates potential confusion between the terms Pipeline Delivery Point and Company Delivery Point.

14. Explanation of Change:

Revised definition for "Directed Delivery Quantity"

Rationale for Change:

Company has moved definitions from Sheet No. 56 to Sheet No. 59 in order that all defined terms used in the Tariff are located in a single place, to remove any potential Customer confusion.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
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TARIFF SHEET IDENTIFIER: Proposed Sheet No. 59

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (DEFINITIONS)

15. Explanation of Change:

Removed "Distribution Replacement Program"

Rationale for Change:

The currently defined term is not used in the Tariff.

16. Explanation of Change:

Removed "Electronic Bulletin Board (EBB or Extranet)"

Rationale for Change:

Company has replaced the term with Gas Tracking System ("GTS") which better describes its current gas management system. GTS is used where applicable throughout the Tariff.

17. Explanation of Change:

Added definition of "Electronic Data Interchange ("EDI")"

Rationale for Change:

Newly defined term as it is used in proposed Tariff sheets for Rate 385 (Choice Supplier Pooling Service) and Rate 396 (SCO Supplier Service).

18. Explanation of Change:

Added definition of "Energy Conversion Factor ("ECF")"

Rationale for Change:

To implement proposed adjustment of customers' usage each month for billing purposes to reflect the variability in the energy content of the gas they consume. Further detail and support is provided as part of Company's Alternative Rate Plan and the Direct Testimony of Scott Albertson.

19. Explanation of Change:

Removed "Enrollment Processing Period"

Rationale for Change:

The term is used currently only on Sheet No. 52. Company has removed definition and added language to proposed Sheet No. 52 which more clearly explains its related processes.

20. Explanation of Change:

Revised definition of "Expected Demand"

Rationale for Change:

Company has moved definitions from Sheet No. 56 to Sheet No. 59 in order that all defined terms used in the Tariff are located in a single place, to remove any potential Customer confusion.

21. Explanation of Change:

Added definition of "Gas Supplier"

Rationale for Change:

Newly defined term is used throughout proposed Tariff.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
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TARIFF SHEET IDENTIFIER: Proposed Sheet No. 59

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (DEFINITIONS)

22. Explanation of Change:

Added new definition for "Gas Tracking System ("GTS")"

Rationale for Change:

Company has replaced "EBB" with Gas Tracking System ("GTS") which better describes its current gas management system. GTS is used where applicable throughout the Tariff.

23. Explanation of Change:

Added definitions of "Governmental Aggregation" and "Governmental Aggregator"

Rationale for Change:

Newly defined terms are used throughout proposed Tariff.

24. Explanation of Change:

Added new definition of "International Fuel Gas Code"

Rationale for Change:

New definition reflects Company's practice of requiring Customers and certain Company installations to conform to the International Fuel Gas Code, as adopted by the State of Ohio.

25. Explanation of Change:

Revised definition of "Transportation Customer" to "Large Transportation Customer"

Rationale for Change:

The proposed change results in a more streamlined term for references to Customers served under Rates 345 and 360.

26. Explanation of Change:

Revised definition of "Load Tranche (or Tranche)"

Rationale for Change:

Company has moved definitions from Sheet No. 56 to Sheet No. 59 in order that all defined terms used in the Tariff are located in a single place, to remove any potential Customer confusion. Company has also added reference to Default Sales Service on Sheet No. 59.

27. Explanation of Change:

Revised name and definition of "Maximum Daily Delivery Obligation ("MDDO") to "Maximum Daily Requirement"

Rationale for Change:

The proposed change simplifies and clarifies the defined term; the definition itself is unchanged.

28. Explanation of Change:

Added definition of "Metered Ccf"

Rationale for Change:

The definition was added to identify the basic unit of measure related to Company's proposed Energy Conversion Factor.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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TYPE: GENERAL TERMS AND
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GAS SERVICE (DEFINITIONS)

29. Explanation of Change:

Added new definition of "Operational Balancing Agreement ("OBA")"

Rationale for Change:

The term is used throughout the Tariff and is not currently defined.

30. Explanation of Change:

Revised definition of "Operational Flow Order ("OFO")"

Rationale for Change:

The revised definition further clarifies the nature and requirements of an OFO.

31. Explanation of Change:

Revised definition of "Operational System" by change "and" to "and/or"

Rationale for Change:

The revised language clarifies that either operational or contractual limitations may require Supplier to modify its gas deliveries to Company's system; in other words, having both limitations in effect is not required in order to appropriately protect the integrity of the system and reliability of service.

32. Explanation of Change:

Revised definition of "Peak Design Day Demand" by adding reference to "Choice or SCO" Pool

Rationale for Change:

The proposed change clarifies that the defined term, as used in the Tariff, applies interchangeably to Choice and SCO Pools.

33. Explanation of Change:

Added new definition of "Peak Season"

Rationale for Change:

Company added this definition as it is a term used throughout the proposed Tariff.

34. Explanation of Change:

Added definition of "Peaking Service"

Rationale for Change:

Newly defined term is used throughout proposed Tariff.

35. Explanation of Change:

Added definition of "Peaking Supplies"

Rationale for Change:

Newly defined term is used throughout proposed Tariff.

36. Explanation of Change:

Revised the definition of "Pool"

Rationale for Change:

The proposed change simplifies the definition.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
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TYPE: GENERAL TERMS AND
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GAS SERVICE (DEFINITIONS)

37. Explanation of Change:

Revised the definition of "Pool Customer"

Rationale for Change:

The proposed change simplifies the definition.

38. Explanation of Change:

Revised the definition of "Pool Operator"

Rationale for Change:

The proposed change clarifies that the defined term also applies to a single Large Transportation Customer who has not joined a Pool (i.e. a Pool consisting of a single Customer).

39. Explanation of Change:

Revised the definition of "Pool's Usage" to change "billed Ccf" to "Metered Ccf"

Rationale for Change:

The proposed change reflects Company's proposed Energy Conversion Factor.

40. Explanation of Change:

Revised the definition of "Pooling Program" to update references to renamed Rate Schedules

Rationale for Change:

Company renamed Rate 380, Rate 385, and 396 to more clearly define to whom the Rate Schedules are applicable.

41. Explanation of Change:

Moved definition of "Retail Price Adjustment" from Sheet No. 56 to Sheet No. 59 and revised the definition to include "the winning bid resulting from... and approved by the Commission"

Rationale for Change:

Company has moved definitions from Sheet No. 56 to Sheet No. 59 in order that all defined terms used in the Tariff are located in a single place, to remove any potential Customer confusion. The revised language properly clarifies the definition.

42. Explanation of Change:

Added definition of "SCO Auction"

Rationale for Change:

The term describing Company's Standard Choice Auction is used throughout the Tariff but is not currently defined.

43. Explanation of Change:

Added definition of "SCO Phase"

Rationale for Change:

The term describing the annual period applicable to an SCO Auction is used throughout the Tariff but is not currently defined.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

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TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (DEFINITIONS)

44. Explanation of Change:

Revised definition of "SCO Supplier" to reference a "PUCO-Certified Retail Natural Gas Supplier" and one that "is approved by Company, and awarded Load Tranches in SCO Auction"

Rationale for Change:

The revised language makes clear how the defined term is used in the Tariff.

45. Explanation of Change:

Removed definition of "SCO-Supplied Gas"

Rationale for Change:

The term is not used in the proposed Tariff.

46. Explanation of Change:

Changed "SCO Tri-Party Capacity Release Agreement" to "Tri-Party Capacity Release Agreement"

Rationale for Change:

The revised defined term eliminates redundancies in the Tariff.

47. Explanation of Change:

Revised definition of "Standard Choice Offer ("SCO") Service"

Rationale for Change:

The revised language clarifies the defined term.

48. Explanation of Change:

Removed definition of "Standard Sales Offer ("SSO") Service"

Rationale for Change:

Company's SSO period was from October 2008 through March 2010. Beginning in April 2010, SCO replaced SSO; as such, the term is no longer required or used in the Tariff.

49. Explanation of Change:

Revised definition for "Supplier"

Rationale for Change:

Company has moved definitions from Sheet No. 56 to Sheet No. 59 in order that all defined terms used in the Tariff are located in a single place, to remove any potential Customer confusion. The revised language properly clarifies the definition, and reflects all applicable Rate Schedules.

50. Explanation of Change:

Renamed "SCO-Supplied Gas" as "Supplier-Delivered Gas"

Rationale for Change:

The updated definition name and definition further clarifies and simplifies the defined term and allows its use to describe gas supplied by either SCO or Choice Suppliers.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 59

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (DEFINITIONS)

51. Explanation of Change:

Revised definition of "Supplier Pooling Agreement"

Rationale for Change:

The revised definition clarifies that under this defined term, such Agreement applies only to Pooling Service for Large Transportation Customers.

52. Explanation of Change:

Removed definition of "Supply Contract or Contract"

Rationale for Change:

The defined term is not used in the Tariff.

53. Explanation of Change:

Added new definition of "Tranche (or Load Tranche)"

Rationale for Change:

The new definition of Tranche has been added so the term can be used interchangeably with "Load Tranche".

54. Explanation of Change:

Revised definition of "Unaccounted for Gas Percentage"

Rationale for Change:

Company has moved definitions from Sheet No. 56 to Sheet No. 59 in order that all defined terms used in the Tariff are located in a single place, to remove any potential Customer confusion.

55. Explanation of Change:

Revised definition for "Winter Season" to remove ", inclusive, used only for Alternate Peaking Supply purposes."

Rationale for Change:

Previously, the term "alternate" applied to Company's propane peaking assets and supplies. Those assets have been retired. The revised language of "Winter Season" properly clarifies the definition.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 60

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (MINIMUM
SERVICE STANDARDS)

1. Explanation of Change:

Under section (A) Application for Service, additional language added to the second paragraph stating:

"Company may, prior to initiating Gas Service and at other reasonable times, require Applicant to establish that Applicant is the owner or bona fide lessee of the Premises. A proper application for gas service by a non-residential customer shall further include verification that the business, corporation or nonprofit is properly registered with the Ohio Secretary of State as an entity licensed to do business in the State of Ohio and that the name in which the customer's account is to be opened is in the same name as that registered with the Ohio Secretary of State."

Rationale for Change:

The proposed addition further clarifies responsibilities of the party applying for Gas Service and enables Company to minimize fraudulent applications for service and the avoidance of payment obligations.

2. Explanation of Change:

Under Application for Service, language added to the third paragraph stating:

" , other applicable provisions of this Tariff or any contract between Company and Customer, or any applicable laws, rules, or regulations."

Rationale for Change:

The proposed addition further clarifies that a person applying for Gas Service accepts service subject to Company's Tariff and applicable legal authorities.

3. Explanation of Change:

Under section (E) Service to a New Tenant or Owner, language added stating:

" , unless the former tenant or owner continues to reside at the Premises."

Rationale for Change:

The proposed language provides additional financial protection for Company should former tenant or owner continue to reside at the Premises and enables Company to minimize the potential use of serial applications to avoid cost responsibility. A similar provision exists under the Commission's rules. See OAC 4901:1-15-27(C)(1).

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 62

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (BILLING AND
PAYMENT FOR GAS
SERVICE)

1. Explanation of Change:

Under section (A) Measurement of Gas, language added stating:

“Company will, upon request of Customer, test any meter suspected of not registering properly. If Customer desires, the meter test will be performed in Customer’s presence with a certified and sealed meter prover at a location determined by Company.”

Rationale for Change:

The proposed language is designed to eliminate potential confusion and clarify the administration of meter tests.

2. Explanation of Change:

Under section (B)(5) Billing and Meter Reading – Estimated Bills, replaced “Company’s employee or agent is unable to actually read the meter” with “Company is unable to obtain a physical or remote meter reading,”

Rationale for Change:

The revised language clarifies conditions that would require Company to estimate the quantity of gas supplied.

3. Explanation of Change:

Under section (B)(5) Billing and Meter Reading – Estimated Bills, replaced “Company shall attempt to arrange a reasonable schedule of payments if requested by Customer” with “Company shall arrange a schedule of payments in accordance with ORC 4933.28.”

Rationale for Change:

The proposed language clarifies the applicability of a statute to the determination of payment schedules in these circumstances.

4. Explanation of Change:

Under section (B)(5) Billing and Meter Reading – Estimated Bills, deleted:

“If a meter reading is not obtained for twelve (12) consecutive months, Company may install a remote meter reading device for which Customer will pay the Remote Meter Installation Charge contained on Sheet No. 30. Customer may pay this Charge immediately or Company shall add the Charge to Customer’s next monthly Bill.”

Rationale for Change:

Because Company has installed remote meter reading devices on Customer meters, it is no longer necessary to assess this charge to Customer.

VECTREN ENERGY DELIVERY OF OHIO, INC.
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TARIFF SHEET IDENTIFIER: Proposed Sheet No. 62

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (BILLING AND
PAYMENT FOR GAS
SERVICE)

5. Explanation of Change:

Under section (B)(5) Billing and Meter Reading – Estimated Bills, revised language to state:

“If Customer fails to make arrangements for Company to either obtain a meter reading or ~~install a remote meter~~ repair its remote meter reading equipment, Company may discontinue Gas Service with notice to Customer as provided in these General Terms and Conditions.”

Rationale for Change:

Because Company has installed remote meter reading devices on Customer meters, it is no longer necessary to assess this charge to Customer.

6. Explanation of Change:

Under section (B)(6) Billing and Meter Reading – Choice of Rate Schedule, added language to state:

“Copies of all Rate Schedules are available at Company's business offices and are open to public inspection during business hours, and are also available on Company's website at www.vectren.com.”

Rationale for Change:

Revised language further clarifies that Customers may review Company's Rate Schedules online.

7. Explanation of Change:

Under section (B)(7) Billing and Meter Reading – Meter Readings Not to be Combined, added language to state:

“...the individual meter readings will not be combined for billing purposes, except as may be otherwise provided by the terms of a Rate Schedule or other written agreement.”

Rationale for Change:

Modified language clarifies that a written agreement is required, protecting both Company and Customer interests.

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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 63

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO GAS
SERVICE (DISCONNECTION-
RECONNECTION OF SERVICE)

1. Explanation of Change:

Under section (A) Discontinuance of Service Because of Fraud, Loss or Damage, revised language to reference "Customer's agents or employees", and changed the term "them" to "the foregoing persons".

Rationale for Change:

The proposed language more clearly defines Company's rights to discontinue service in the event of fraud, loss or damage to its facilities.

2. Explanation of Change:

Under paragraph (A) Discontinuance of Service Because of Fraud, Loss or Damage, added "Subject to paragraph B of this Section," at the beginning of the third paragraph.

Rationale for Change:

The proposed language is intended to reaffirm that all portions of section (A) are also subject to section (B) and to clarify Company's prevailing obligation to disconnect service in the event of a dangerous condition.

3. Explanation of Change:

Under section (A) Discontinuance of Service Because of Fraud, Loss or Damage, changed "Investigation Charge" to "Investigation Fee" throughout this Tariff Sheet.

Rationale for Change:

Revisions are consistent with the term used on Sheet No. 30 (Miscellaneous Charges).

4. Explanation of Change:

Under section (A) Discontinuance of Service Because of Fraud, Loss or Damage, corrected outline numbering between Page 1 of 5 and Page 2 of 5. Revision also corrects naming convention for applicable Investigation "Fee(s)".

Rationale for Change:

Revisions are consistent with the term used on Sheet No. 30 (Miscellaneous Charges).

5. Explanation of Change:

Under section (A) Discontinuance of Service Because of Fraud, Loss or Damage, item (4), added language stating:

"If the conditions referenced in paragraph A.3.e (2), (3), or (4) above exist, Company may disconnect Customer at any time after notice is provided under paragraph A.2. of this Section."

Rationale for Change:

The proposed language clarifies the existing interplay of the various divisions and Company's prevailing right and obligation to disconnect service in the event of tampering, unauthorized reconnection, or a dangerous condition.

6. Explanation of Change:

Under section (A) Discontinuance of Service Because of Fraud, Loss or Damage, item (5), modified language.

Rationale for Change:

The proposed language further clarifies the intent of the provisions of this section.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 63

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO GAS
SERVICE (DISCONNECTION-
RECONNECTION OF SERVICE)

7. Explanation of Change:

Under section (A) Discontinuance of Service Because of Fraud, Loss or Damage, item (6), modified language to include "recordings, or physical evidence demonstrating" the fraudulent or damaging practice by Customer

Rationale for Change:

The proposed language further defines, and eliminates the potential inference of undue restrictions on, Company's means of demonstrating fraud or unsafe practices.

8. Explanation of Change:

Under section (B) Discontinuance of Service Due to Danger, modified language to include

- "applicable laws, rules, and regulations,"
- "and other applicable provisions of this Tariff"
- Removal of ", because of conditions beyond Customer's Premises" and replaced with "otherwise"

Rationale for Change:

The proposed language further clarifies Company's prevailing right and obligation to ensure that gas is used in a safe and lawful manner and simplifies these provisions.

VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 64

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (METERS AND
METERING EQUIPMENT-
LOCATION AND
INSTALLATION)

1. Explanation of Change:

Section A (Location), replaced the term "there is a likelihood of damage" with "the possibility of damage is reasonably foreseeable"

Rationale for Change:

This reference better effectuates the Tariff's intent to minimize foreseeable safety risks.

2. Explanation of Change:

Section A (Location), insertion of additional language "or if such relocation is otherwise a result of Customer's request or action"

Rationale for Change:

Inserted language further clarifies cost responsibility on the part of the party causing relocation costs.

3. Explanation of Change:

Section B (Installation) – moved statement following item 5(B)(4) to #1

Rationale for Change:

The proposed change better communicates that the installation will be completed by Company.

4. Explanation of Change:

Section B (3) for Installation, replaced "Company's booklet entitled "Information and Rules for the Installation of Gas Piping," copies of which are available upon request by contacting Company's Customer Service" with "the International Fuel Gas Code"

Rationale for Change:

The revised language incorporates Company's practice of conforming to the International Fuel Gas Code, as adopted by the State of Ohio.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
CASE NO. 18-0298-GA-AIR AND 18-0299-GA-ALT
NARRATIVE RATIONALE FOR TARIFF CHANGES**

DATA: 3 MONTHS ACTUAL AND 9 MONTHS ESTIMATED
TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 65

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (SERVICE
PIPE-LOCATION AND
INSTALLATION)

1. Explanation of Change:
Capitalized "Service Line" and used defined term of "Delivery Point" throughout Sheet No. 65
Rationale for Change:
Changes reflect the use of these defined terms.
2. Explanation of Change:
Section C (Installation) – moved current #5 to #1 and changed the term "active load" to "peak load"
Rationale for Change:
The proposed change better communicates that the installation will be completed by Company and will be based on Customer's peak demand.
3. Explanation of Change:
Section C (Installation) – revised #2 by removing reference to "Normally" and adding "unless otherwise agreed to in writing by Company"
Rationale for Change:
The revised language clarifies that exceptions must be agreed to in writing, protecting both Company's and Customer's interests.
4. Explanation of Change:
Section C (Installation) – revised #3 to add "Unless otherwise provided herein"
Rationale for Change:
The revised language clarifies that Company's responsibilities for Service Line installation may vary depending on other provisions of the Tariff.
5. Explanation of Change:
Section C (3) (Installation) - replaced "Company's booklet entitled "Information and Rules for the Installation of Gas Piping," copies of which are available upon request by contacting Company's Customer Service" with "the International Fuel Gas Code"
Rationale for Change:
The revised language incorporates Company's practice of conforming to the International Fuel Gas Code, as adopted by the State of Ohio.
6. Explanation of Change:
Section C (Installation) - #5 added "or persons authorized by it"
Rationale for Change:
The revised language clarifies that Company may use qualified contractors to perform the work

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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 65

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (SERVICE
PIPE-LOCATION AND
INSTALLATION)

7. Explanation of Change:

Section D for Changes – insertion of additional language “, subject to the following conditions and provided such change or relocation is feasible”

Rationale for Change:

Insertion of language further clarifies how Company will determine charges applicable to Customer(s) who request relocation of service lines.

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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 66

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (EQUIPMENT
ON CUSTOMER'S PREMISES)

1. Explanation of Change:
Renamed section (7)(A) title from "Responsibility After Gas is Delivered" to "Customer and Company Responsibilities"
Rationale for Change:
The proposed change more accurately describes the scope of this section.
2. Explanation of Change:
Updated term throughout sheet from "point of delivery" to defined term "Delivery Point"
Rationale for Change:
The proposed language makes use of the appropriate defined term.
3. Explanation of Change:
Section A (1), replaced "Company's booklet entitled "Information and Rules for the Installation of Gas Piping," copies of which are available upon request by contacting Company's Customer Service" with "the International Fuel Gas Code"
Rationale for Change:
The revised language incorporates Company's practice of conforming to the International Fuel Gas Code, as adopted by the State of Ohio.
4. Explanation of Change:
Capitalized the term Service Line throughout sheet
Rationale for Change:
The revisions properly use the defined term throughout the Tariff.
5. Explanation of Change:
Under section 7(A)(4), added "at Company's expense" to the end of last sentence.
Rationale for Change:
The proposed language further clarifies Company's responsibility for the installation of pressure relief devices.
6. Explanation of Change:
Revised section 7(A)(6) to:
 - Add to beginning of sentence "For all new and replaced Service Lines,"
 - Revised language to combine the last two sentences into a single sentenceRationale for Change:
The proposed language further clarifies Company's responsibility for all new and replaced Service Lines, as well as the appurtenant equipment.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 66

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (EQUIPMENT
ON CUSTOMER'S PREMISES)

7. Explanation of Change:

Under section (7)(D)(1) for Piping, Appliances and Devices Shall Conform to Codes:

- Added "and maintained"
- Removed "at all times"
- Replaced "Company's booklet entitled "Information and Rules for the Installation of Gas Piping," copies of which are available upon request by contacting Company's Customer Service" with "the International Fuel Gas Code"

Rationale for Change:

The revised language incorporates Company's practice of conforming to the International Fuel Gas Code, as adopted by the State of Ohio.

8. Explanation of Change:

Revised section (7)(E)(4) under Accommodation and Protection of Company Equipment, to add "or" between Customer or Customer's agent.

Rationale for Change:

The revised language clarifies that Customer may not engage another party to perform these actions.

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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 67

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (USE AND
CHARACTER OF SERVICE)

1. Explanation of Change:

Section (D)(1) for Use of Gas by Customer, replaced "Company's booklet entitled "Information and Rules for the Installation of Gas Piping," copies of which are available upon request by contacting Company's Customer Service" with "the International Fuel Gas Code"

Rationale for Change:

The revised language incorporates Company's practice of conforming to the International Fuel Gas Code, as adopted by the State of Ohio.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 68

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (EXTENSIONS
OF GAS DISTRIBUTION
MAINS)

1. Explanation of Change:

Under section (9)(B) for Extensions of Gas Distribution Mains, revised "one hundred (100) feet or less" to "up to one hundred (100) feet"

Rationale for Change:

The revised language clarifies that Company will install up to 100 feet of distribution main, without charge, to meet Customer's requirements. The change removes any possible interpretation that Company could provide at no charge only a portion of the required extension, even if the total extension were 100 feet or less in length.

2. Explanation of Change:

Under section (9)(C) for Extensions of Gas Distribution Mains, defined end-use "Residential" Customer, and added "Financial Assurance acceptable to Company, including but not limited to"

Rationale for Change:

The revised language clarifies that the provision is applicable only to residential Customers, and that multiple forms of financial assurance may be acceptable.

3. Explanation of Change:

Under section (9)(E) for Extensions of Gas Distribution Mains, added reference to "Residential" before real estate subdivision

Rationale for Change:

The revision further clarifies the Tariff language.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 69

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (EXTENSION
OF GAS FACILITIES TO
HOUSE TRAILER PARKS)

1. Explanation of Change:

Under section (10)(C), added "Unless otherwise provided for in a contract between Company and park owner or operator,"

Rationale for Change:

The proposed language was added to clarify the potential for Company and park owner or operator to reach agreement on different terms.

2. Explanation of Change:

Under section (10)(C), added "and maintained"

Rationale for Change:

The revised language clarifies park owner/operator responsibilities.

3. Explanation of Change:

Under section (10)(C), revised "fifty (50) feet" to be "one hundred (100) feet" and added "main" to describe distribution facilities

Rationale for Change:

The revised language removes inconsistencies between Company's main extension policies.

4. Explanation of Change:

Under section (10)(E), revised to state "Neither the number of trailers, nor the annual gas load of trailers, receiving Individual Meter Service will be considered in determining extension allowances under Section 9."

Rationale for Change:

The revised proposed language specifies Company's commitment to serve House Trailer Park gas main extensions.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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TYPE OF FILING: ORIGINAL
WORKPAPER REFERENCE NO(S): NONE

SCHEDULE E-3
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WITNESS: S.E. ALBERTSON
K.C. KELLEY

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 70

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE (EXTENSION
OF COMPANY FACILITIES TO
MULTI-FAMILY HOUSING
PROJECTS)

1. Explanation of Change:

Removed Curtailment language from Tariff

Rationale for Change:

Company's Curtailment Procedures will be on file with the Commission pursuant to OAC 4901:5-25-02(D).

2. Explanation of Change:

Added new section for Extension of Company Facilities to Multi-Family Housing Projects

Rationale for Change:

This Tariff sheet implements the Multi-Family Housing Pilot Program proposed in Company's Alternative Rate Plan and described in detail in Direct Testimony of K. Chase Kelley.

**VECTREN ENERGY DELIVERY OF OHIO, INC.
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SCHEDULE E-3
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WITNESS: S.E. ALBERTSON

TARIFF SHEET IDENTIFIER: Proposed Sheet No. 71

TYPE: GENERAL TERMS AND
CONDITIONS APPLICABLE TO
GAS SERVICE
(OPERATIONAL FLOW
ORDERS)

1. Explanation of Change:

- Changed EBB to GTS
- Added "to the extent it is available"
- Added "Restricted nominated storage injections or withdrawals"

Rationale for Change:

- Company has replaced the term with Gas Tracking System ("GTS") which better describes its current gas management system. GTS is used where applicable throughout the Tariff.
- Revised language clarifies information that will be provided when an OFO notice is posted to the extent this information is available.
- Proposed additional language clarifies and expands the OFO delivery requirements and restrictions, in order to appropriately protect the integrity of Company's system.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/30/2018 11:37:48 AM

in

Case No(s). 18-0298-GA-AIR, 18-0299-GA-ALT

Summary: Application Volume 5 (Schedule E-3) electronically filed by Ms. Rebekah J. Glover on behalf of Vectren Energy Delivery of Ohio, Inc.