

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Motion to Modify the)	
Exemption Granted to The East Ohio)	Case No. 18-1419-GA-EXM
Gas Company d/b/a Dominion Energy)	
Ohio.)	

**DIRECT TESTIMONY OF
DAVID C. RINEBOLT
ON BEHALF OF OHIO PARTNERS FOR AFFORDABLE ENERGY**

November 1, 2019

1 Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

2 A. My name is David C. Rinebolt. My business address is PO Box 1793, Findlay,
3 Ohio 45839-1793. I am Executive Director of Ohio Partners for Affordable
4 Energy ("OPAE") and I appear in this case as a witness on its behalf.

5
6 Q. PLEASE DESCRIBE YOUR BACKGROUND AND QUALIFICATIONS FOR
7 YOUR TESTIMONY IN THIS PROCEEDING.

8 A. My career has covered a broad spectrum of activities in human services
9 programs and the energy industry, including policy analysis and program
10 management at both the federal and state levels. I served as Deputy Director of
11 the State of Minnesota Washington Office from 1983 through 1985, focusing on
12 human services, energy and environmental issues. Between 1985 and 1988 I
13 served as Senior Research Associate for Energy with the Coalition of
14 Northeastern Governors Policy Research Center, focusing on low income energy
15 assistance programs, new energy technologies, and wholesale markets and
16 regulation. I was Director of Research for the National Wood Energy Association
17 and Counsel to the Solar Energy Industries Association from 1988 through 1990,
18 working on research and development, regulatory issues, and siting and
19 permitting of renewable energy projects. I also served as Legislative Director for
20 Representative Collin Peterson of Minnesota from 1991 through 1993, and was
21 Director of Programs for the National Association of State Energy Officials from
22 1994 through 1996.

1 I became executive director of Ohio Partners for Affordable Energy (OPAE) in
2 1996. In this capacity I was actively involved in the development and passage of
3 legislation regulating electric and natural gas utilities, which required working
4 knowledge of wholesale markets, regional transmission organizations (RTOs),
5 renewable energy technologies, energy efficiency, and consumer protection
6 issues. During my tenure with OPAE, I created a purchasing cooperative which
7 aggregated members to purchase natural gas. The cooperative was also one of
8 the first retail vendors of Renewable Energy Certificates (RECs) in Ohio.

9
10 After leaving OPAE in at the end of June 2016, I served as the Program Manager
11 for the Weatherization Assistance Program at the U.S. Department of Energy
12 rejoining OPAE in June 2018.

13
14 I have a Bachelor of Liberal Studies from Bowling Green State University and a
15 Juris Doctor degree from the Columbus School of Law at The Catholic University
16 of America (1981). My professional career has focused on policy and consumer
17 advocacy, the development, funding, and operation of demand side management
18 (DSM) programs – particularly low-income energy assistance programs;
19 renewable energy development programs; and, utility regulation including rate
20 design, cost of service, forecasting, and related issues. These concentrations
21 require a broad-based knowledge of the energy and utility sectors of the U.S.
22 economy and related regulatory regimes.

1 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE OHIO PUBLIC UTILITIES
2 COMMISSION ("PUCO" OR "COMMISSION")?

3 A. Yes. I have testified on behalf Ohio Partners for Affordable Energy in litigation
4 involving Duke Energy Ohio, Case No. 11-3549-EL-SSO; The Dayton Power and
5 Light Company, Case Nos. 12-426-EL-SSO, et.al.; Duke Energy Ohio, Case No.
6 13-753-EL-RDR, Case No. 14-1297-EL-SSO which involved FirstEnergy
7 distribution companies; Case No. 15-1046-EL-USF, a proceeding to set the
8 Universal Service Fund Rider; Case No.18-298-GA-AIR, et al., Vectren Energy
9 Delivery Ohio's rate case; Case Nos. 18-1205-GA-AIR, et al., Suburban Natural
10 Gas; and Case No. 18-501-EL-FOR, et.al., AEP Ohio's forecasting case
11 involving renewable energy purchase agreements.

12
13 Q. PLEASE DESCRIBE THE PURPOSE OF YOUR TESTIMONY.

14 A. The purpose of my testimony is to support the need to cancel the Market
15 Variable Rate (MVR) program for residential and commercial customers, and to
16 make the Standard Choice Offer (SCO) once again available to commercial
17 customers as the default service option.

18
19 Q. PLEASE PROVIDE A SUMMARY OF YOUR REASONS FOR PROPOSING A
20 RETURN TO A STANDARD CHOICE OFFER.

21 A. The goal of alternative regulation is to substitute competition for regulation where
22 possible. When utilities are vertically-integrated monopolies, regulators focus on
23 mimicking the discipline provided by market forces. Policymakers investigated

1 optional approaches to utilities and, in some states, changed the regulatory
2 framework for pricing retail sales of natural gas, substituting competition for
3 regulation. Today every customer of the major Ohio gas distribution utilities,
4 Dominion East Ohio, Columbia Gas, and Vectren, is served by a Competitive
5 Retail Natural Gas Supplier ("CRNGS" or "marketer"), including the transitional
6 customer on sales service priced by the SCO auction. Every price paid by a
7 residential or nonresidential customer, except for the Market Variable Rate
8 ("MVR") at issue here, is set by the competitive market. Whether a customer is
9 on the SCO or a 3-year fixed rate contract, it is a retail contract between the
10 customer and a CRNGS responsible for delivering gas to serve the customer to
11 the City Gate. We have achieved the goal set by the General Assembly to
12 substitute competition for regulation in setting retail prices and securing gas
13 supply.

14
15 Q. WHY IS EXITING THE MERCHANT FUNCTION NOT THE ULTIMATE GOAL IN
16 CREATING A COMPETITIVE MARKET?

17 A. The policy of the state of Ohio is contained in R.C. 4929.02. While it includes
18 many things, it does not mention exiting the merchant function. First, such a
19 move is impractical. Dominion, as the distribution utility, still provides commodity
20 service to sales customers as a provider of last resort, and also balances and
21 manages the distribution system. This all requires the purchase and sale of
22 natural gas. Exiting the merchant function is not a realistic possibility.

1 State policy also does not specify the types of competition the Commission
2 should authorize to eliminate the need for price regulation; indeed, it “encourages
3 innovation and market access for cost-effective supply- and demand-side natural
4 gas services and goods....” R.C. 4929.02(A)(4). The State policy notes that this
5 should be accomplished by recognizing “the continuing emergence of
6 competitive natural gas markets through the development and implementation of
7 flexible regulatory treatment.” R.C. 4929.02(A)(6). As alternative approaches to
8 price regulation have evolved, numbers of approaches have been used to
9 achieve the goal of using market forces rather than regulation to determine
10 prices. Evolution does not always produce the best outcome. As the
11 Commission noted in the 2013 Order, “when changed circumstance no longer
12 provides any potential for further exploration of the benefits of market-based
13 pricing for natural gas services,” it is time to move on. Order, Case No. 12-1842-
14 GA-EXM, January 9, 2013. (“2013 Order”) at 8.

15
16 It is clear that Dominion and the CRNGS’ view the exit of the merchant function
17 as the competitive end state, but thinking something is preordained does not
18 make it so. The Commission and the Supreme Court have both cautioned
19 against viewing the exit of the merchant function as an inevitable outcome under
20 Ohio law. Competition can be harnessed in such a way that customers, for
21 whom utility service is a necessity of life, can meet their need for energy services
22 at the lowest competitive price. The SCO is the perfect example. It is not costly
23 to hold the declining clock auction. Bidders make assurances that it can serve

1 the loads they want to obtain. And, there are no marketing or other costs such
2 as those incurred in securing some bilateral contracts. Government
3 aggregations minimize the cost to CRNGS in the same way, with the reduced
4 costs passed on to customers through a competitive process.

5
6 The MVR, on the other hand, is an experiment that has reached the end of its
7 useful life. Thirty-six percent (36%) of Dominion's customers purchase natural
8 gas through government aggregations. Forty percent (40%) of residential
9 customers purchase through bilateral contracts, as do 52.8 percent of
10 nonresidential customers. Few residential customers are on the MVR – 0.26
11 percent on average; they appear to go back to the SCO after leaving a contract
12 or an aggregation. However, a relatively large group – 7.66 percent -- of
13 nonresidential customers have remained on MVR service for two years or more.
14 See Exhibit A. The MVR is no longer needed to get residential customers to
15 shop, and it is no longer a useful tool to convince additional nonresidential
16 customers to shop.

17
18 Ohio should abandon the MVR, recognizing it as a strategy that achieved part of
19 the goal by encouraging residential customers to shop. When a residential
20 customer chooses to make a phone call to Dominion to be placed on the SCO
21 rate, that family has definitely shopped and has chosen to avail itself of what is
22 generally the lowest competitive market price available. Every marketer with
23 adequate capital and skill has a right to bid to supply tranches of the SCO, and

1 through that tranche serve that family as a retail customer. And marketers can
2 and do compete with the SCO on a price basis.

3
4 There remain approximately 6,626 commercial customers that have not shopped
5 for over a year. The MVR approach appears not to have moved them to action.
6 Perhaps more targeted advertising directly from CRNGS could convince them to
7 shop, because it is a relatively few customers. Otherwise, those choosing not to
8 choose should default to the SCO.

9
10 Ohio policymakers have chosen to use utilities as a vehicle for economic
11 development activities funded through riders on almost all ratepayers, never
12 failing to include the small customers, to benefit job creation and retention.
13 Reviving the SCO as the default option for natural gas supply would also provide
14 a boost to businesses large and small, helping them remain profitable and
15 competitive.

16
17 Forcing customers to shop and choose, as an exit from the merchant function
18 does, imposes a burden. With that burden comes a loss of freedom, the freedom
19 not to choose. Instead, mandating choice requires a person to spend valuable
20 time parsing offers and options, or risk the consequences of a random
21 assignment process like the MVR. The market can be used to set a reasonable
22 price through the SCO auction process. It is not always an efficient use of

1 customers' resources to teach and force them to choose. Exiting the merchant
2 function is a double hit for the customer: higher prices and less freedom.

3
4 Q. PLEASE EXPLAIN THE STANDARD FOR SUBMITTING AND SUPPORTING A
5 MOTION TO MODIFY A MOTION GRANTING AN EXEMPTION.

6 A. Ohio Revised Code ("R.C." Section 4929.08(A), provides that the Commission
7 may modify any order granting an exemption upon its own motion or upon the
8 motion of any person adversely affected by such exemption. The statute states
9 that the exemption order may be modified if the "Commission determines that the
10 findings upon which the order was based are no longer valid and that the
11 abrogation or modification is in the public interest." R.C. 4929.08(A)(1). The
12 "abrogation or modification" cannot be "made more than eight years after the
13 effective date of the order, unless the affected natural gas company consents."
14 R.C. 4929.08(A)(2). In addition, "if the commission determines that a natural gas
15 company granted such as exemption or alternative rate regulation is not in
16 substantial compliance with...[state] policy...the commission, after a hearing,
17 may abrogate the order granting such an exemption or alternative rate
18 regulation." R.C. 4929.08(B).

19
20 Q. WHAT IS THE EXEMPTION ORDER OPAE IS REQUESTING TO MODIFY?

21 A. OPAE has filed a motion, refiled in this docket on September 14, 2018, to modify
22 the 2013 Order issued on January 9, 2013. The 2013 Order was justified,
23 according to the Commission, because the exemption order issued on June 18,

1 2008, in Case No. 07-1224-GA-EXM (“2008 Order”) was no longer valid as it “no
2 longer provides any potential for further exploration of the benefits of market-
3 based pricing for natural gas services,” 2013 Order at 8.

4
5 The 2013 Order approved a Stipulation filed marketers, Staff of the Public
6 Utilities Commission (“Staff”), and the Office of the Ohio Consumers’ Counsel
7 (“OCC”). The Stipulation continued the use of the MVR as the default supplier
8 option for residential customers and required assignment of customers that did
9 not chose to establish a bilateral contract with a marketer or take retail service
10 from a marketer through a government aggregation. A customer is assigned to a
11 provider with no consideration of price, rather than establishing an agreement
12 between a “willing buyer and willing seller” as required by Ohio law. R.C.
13 4929.02(A)(7). Under the MVR, residential customers are assigned to any
14 marketer that is willing to serve customers at its lowest posted variable rate
15 published on the Apples-to-Apples chart maintained on the Commission’s
16 website. It is a month-to-month agreement with no termination fee. Residential
17 customers can also opt to be served by the SCO, but it is not the default option;
18 the customer must contact Dominion East Ohio directly to enroll in that retail
19 product. It appears that a concerted consumer education effort undertaken by
20 the media in Northeast Ohio has been successful in guiding consumers to the
21 SCO rate based on data provided by Dominion to Staff in PUCO Data Request
22 No. 1, Question 5. (See Exhibit B.)
23

1 The Stipulation also eliminated access to the SCO for nonresidential customers,
2 establishing the MVR as the sole default service. This denied the nonprofit
3 agencies that make up OPAE's membership the opportunity to purchase gas at
4 what is generally the lowest price. The Stipulation defines nonresidential
5 customers as General Sales Service – Nonresidential (GSS-NR), Large Volume
6 General Sales Service (LVGSS), Energy Choice Transportation Service –
7 Nonresidential (ECTS-NR), and Large Volume Energy Choice Transportation
8 Service (LVECTS) customers. New nonresidential customers, those without
9 portable service, or those that were disconnected and have reconnected to
10 service, receive Dominion's Standard Service Offer ("SSO", a price and supply
11 determined through the SCO auction), for up to two months. If the nonresidential
12 customer fails to choose a supplier, it is assigned to a marketer participating in
13 the MVR program at a variable rate determined by the marketer, a rate that can
14 be arbitrary and virtually unaffected by market prices. For example, during the
15 past year the two highest prices offered by MVR providers, Verde at \$9.25 and
16 Ohio Gas and Electric at \$6.50 have not changed in the past year, and the
17 listings note that the companies are not accepting enrollments other than through
18 the MVR. (See Apples to Apples Chart Archive at:
19 [https://www.puco.ohio.gov/be-informed/apples-to-apples-chart-](https://www.puco.ohio.gov/be-informed/apples-to-apples-chart-archive/?dirPath=Gas%2FDominion%5FEnergy%5FOhio%2FResidential%2F2019%5C)
20 [archive/?dirPath=Gas%2FDominion%5FEnergy%5FOhio%2FResidential%2F20](https://www.puco.ohio.gov/be-informed/apples-to-apples-chart-archive/?dirPath=Gas%2FDominion%5FEnergy%5FOhio%2FResidential%2F2019%5C)
21 [19%5C](https://www.puco.ohio.gov/be-informed/apples-to-apples-chart-archive/?dirPath=Gas%2FDominion%5FEnergy%5FOhio%2FResidential%2F2019%5C) or Exhibit A.
22

23 Under the Stipulation, the signatory CRNGS and other parties, other than
24 Dominion, committed to not filing a motion to exit the merchant function for

1 residential customers prior to April 1, 2015, though that commitment had several
2 exceptions.

3
4 The Stipulation was ultimately approved by the Commission and upheld by the
5 Supreme Court. *In Re Application to Modify, in Accordance with R.C. 4929.08,*
6 *the Exemption Granted to E. Ohio Gas Co.*, 144 Ohio St.3d 265, 2015-Ohio-
7 3627.

8
9 Q. DID THE COMMISSION RETAIN OVERSIGHT OF EFFORTS TO EXIT THE
10 MERCHANT FUNCTION?

11 A. It did. In the 2013 Order, the Commission notes, in clarification, “that nothing
12 precludes us from reestablishing the SCO or any other pricing mechanism, if we
13 determine that DEO’s exit is unjust or unreasonable for any customer class.”
14 2013 Order at 16-17. The Commission also indicated that it “believes that
15 allowing DEO to exit the merchant function for nonresidential customers provides
16 the Commission with an excellent opportunity to study the consequences of the
17 exit.” *Id.*

18
19 The Supreme Court highlighted this commitment to continued oversight when it
20 affirmed the Commission’s 2013 Order. *In Re Application to Modify, in*
21 *Accordance with R.C. 4929.08, the Exemption Granted to E. Ohio Gas Co.*, 144
22 Ohio St.3d 265, 2015-Ohio-3627. The Court noted that:

23 ...we rely on the commission’s stated willingness to reestablish the
24 standard choice offer if it later determines that Dominion’s exit from

1 the merchant function is unjust or unreasonable for any customer
2 class. We also rely on the commission's rational that
3 discontinuation of the standard choice offer for this small subset of
4 customers will allow the commission to study the effects of the
5 company's exit from the merchant function...We expect the
6 commission to continue to monitor the effects of Dominion's exit
7 from the merchant function for nonresidential customers and
8 carefully analyze the data. Our decision today approves only the
9 limited proposal here, based on the record before us.
10

11 Q. IS OPAE'S MOTION PROPERLY BEFORE THE COMMISSION?

12 A. Yes. OPAE is seeking to modify the 2013 Order, which was affirmed by the
13 Supreme Court in 2015. As such, OPAE's motion is timely. This applies equally
14 to the nonresidential exit of the merchant function approved in 2013, and the
15 residential MVR, which was dealt with specifically in the 2013 Order.
16

17 Q. ARE THE FINDINGS UPON WHICH THE ORDER WAS BASED NO LONGER
18 VALID?

19 A. Yes. In the ensuing five years it has become clear that an exit from the merchant
20 function fails to comply with State policy as articulated by the General Assembly.
21 In the 2013 Order, the Commission determined that the 2008 Order no longer
22 was a reasonable structure to further the potential benefits of market-based
23 commodity pricing, and that the existence of the SCO option for nonresidential
24 customers was hindering the continued development of the market, thus
25 justifying a temporary exit of the merchant function. It cited the potential for
26 increased innovation in providing services and types of available products. The
27 Commission also indicated a belief "that customers will be protected by a market
28 during this transition." None of these findings remain valid.

1
2 At the time of the 2013 motion, twenty percent (20%) of nonresidential customers
3 were receiving service under the SCO. Data provided by DEO indicates that the
4 number of nonresidential customers that have remained on MVR service for over
5 five years is 2,664, or 3.08 percent, and for 2 through 5 years it is 3,962, or 4.58
6 percent. (Exhibit C and Exhibit D). The MVR process has forced most customers
7 to shop, but a stubborn percentage of customers remain uninterested in actively
8 participating in the market. Moreover, the number of customers on the MVR has
9 remained constant for the past several years, again indicating that whatever
10 stimulation of the competitive market occurred as a result of the 2013 Order it
11 has run its course and is no longer encouraging additional shopping.

12
13 I analyzed the bills of six OPAE-member agencies. Only one of the agencies
14 was on the MVR, and the MVR provider continues to charge sales tax
15 unnecessarily. The loss of the SCO has not encouraged the nonprofit company
16 to shop.

17
18 Residential customers have steered away from MVR pricing. DEO data indicates
19 that only a small number of customers are on the MVR on a monthly basis, and a
20 much larger group of residential customers, averaging 13,905, jump through the
21 hoops to contact Dominion and return to the SCO. (Exhibit B.) With an average
22 of only 2,911 or around 0.26 percent of residential customers on the MVR per
23 month on average for the year ending August 2019, whatever impact the MVR

1 might have had on shopping is no longer necessary. Based on the data it is
2 reasonable to conclude that the MVR has encouraged shopping because people
3 have regularly made the conscious effort to return to SCO service.
4

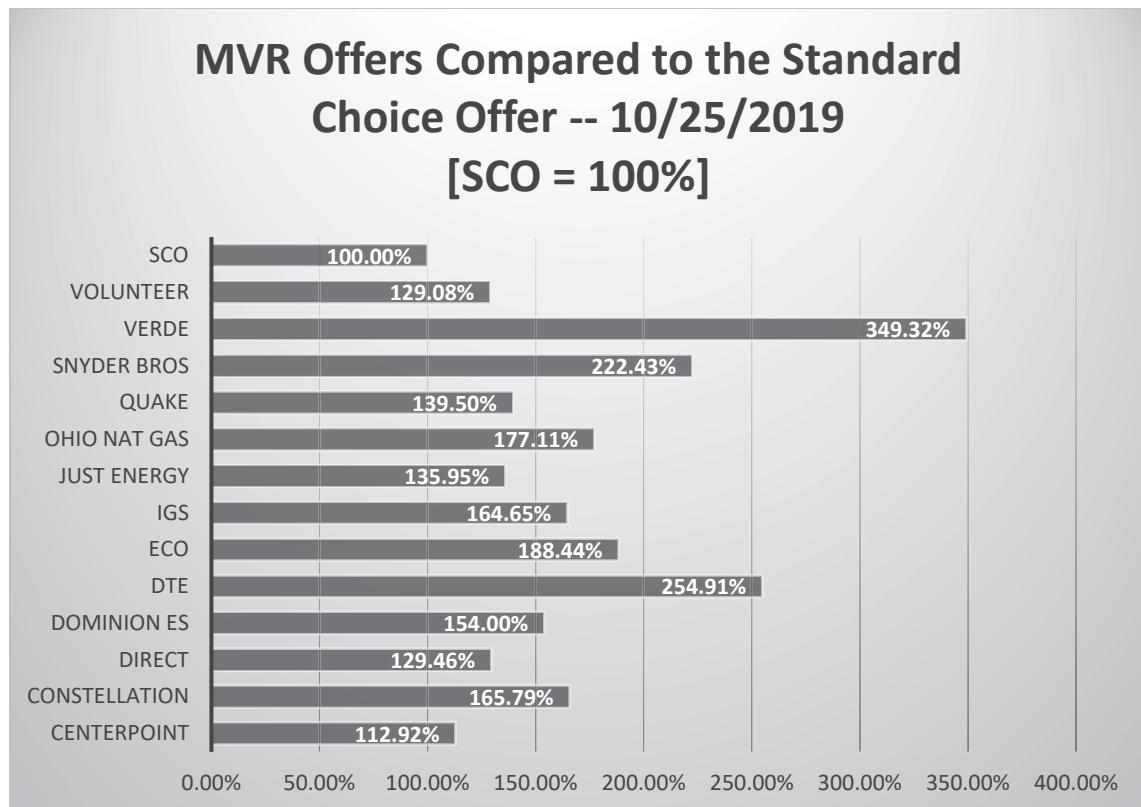
5 Q. HAS THE EXIT OF THE MERCHANT FUNCTION PILOT RESULTED IN
6 INNOVATIVE SERVICES AND VARIETY OF AVAILABLE PRODUCTS?

7 A. I reviewed a large selection of archived Apples to Apples charts for residential
8 and nonresidential customers. Beyond the fixed and variable rates, several
9 companies offer introductory rates that are quite low, but unless they ultimately
10 become a fixed rate there is no way of knowing or evaluating the post-
11 introductory rates. Several CRNGS offer rebates, gift cards, or rewards, and one
12 company has offered an enrollment bonus. One CRNGS has offered a price
13 match, and another offered a savings 'guarantee' though it was not clear what
14 savings were guaranteed. On the positive side, carbon offsets have been offered
15 regularly since 2009.
16

17 Direct Energy and IGS have both bundled smart thermostats or other energy
18 efficient products with their supply contracts. That is about as innovative as the
19 offerings get. No CRNGS offers weatherization services, high efficiency heating
20 or cooling units, or other major efficiency items.
21

22 Q. HAS THE MARKET PROTECTED MVR CUSTOMERS AS ANTICIPATED BY
23 THE COMMISSION IN THE 2013 ORDER?

A. It has not. MVR rates are determined by the marketers that make the offer. Ohio does not require CRNGS offering variable rates, the requirement for MVRs, to define the factors considered when establishing the monthly rate, so customers cannot compare pricing regimes. In addition, several marketers are gaming the MVR system. These marketers post high prices, often offer nothing other than an MVR. (See Apples to Apples Archive.) Customers are assigned to these marketers through Dominion's MVR process in which all CRNGS offering MVR service receive essentially the same number of customers who receive no notice of the rate. The following chart illustrates the wide variation in MVR prices, making clear that the market is not disciplining prices.



1 Q. COULD THE MVR BE MODIFIED TO PREVENT GAMING THE SYSTEM TO
2 CHARGE UNCONSCIONABLE PRICES?

3 A. The Commission could order the MVR price to be regulated in a manner to
4 prevent a CRNGS from providing natural gas service to customers at a price that
5 is not competitive, but this runs counter to Ohio's policy. If the MVR only works if
6 the prices are regulated then it becomes antithetical to the purpose of
7 deregulation – substituting market forces for regulation. Putting 'guardrails'
8 around the MVR price would mark a return to regulation.

9
10 Q. IS IT IN THE PUBLIC INTEREST TO ABROGATE THE PRIOR ORDER WHICH
11 AUTHORIZED THE EXIT OF THE MERCHANT FUNCTION FOR
12 NONRESIDENTIAL CUSTOMERS?

13 A. Yes, there are several reasons why modifying the prior order is in the public
14 interest. As is obvious from the spread of MVR prices, customers are being
15 placed on rates far above market, on a random basis. It is a bad way to set
16 default prices and is decidedly not in the public interest. Customers do shop, and
17 can save money through government aggregations or bilateral contract when
18 compared to the SCO. Marketers can beat the SCO price, but will realize lower
19 profits. That is competition. Because of the essential nature of energy service, a
20 default option is necessary. It is in the public interest to have a transparent
21 default price established by a competitive auction that customers can use to
22 evaluate the market. Allowing default pricing that is not affected by market forces
23 is bad public policy.

The following chart provides an illustration of the results of the shopping behavior of six community action agencies that are OPAE members receiving distribution service from Dominion East Ohio. The chart represents the cost of natural gas during the year ending September 2019. The lack of a competitive SCO option caused all the agencies to pay more for natural gas service, though some proved to be fairly astute shoppers.

Agency Annual Cost of Gas for the Year Ending September 2019.



Source: Agency Utility Bills. See also Exhibit E.

All but one of the accounts, WMCA-3, would have paid a lower rate if they had been able to opt for the SCO. The single account with a retail contract that beat the SCO over a year's period was in the City of Marietta's government

1 aggregation on a fixed rate which protected the bill from a price hike in the
2 wholesale market mid-winter. Only CAWM, the first column, was on the MVR.
3 All the other agencies shopped their load in one way or another, but only one
4 agency found a product that beat the SCO and only one other came close.
5 These are not large customers generally, but whatever savings the agencies can
6 achieve pay for services in local communities. The less a business pays for
7 natural gas, the higher the profits. Assigning nonresidential customers to the
8 MVR does not support local communities in the same way a transparent price set
9 in an economically efficient manner can serve the public interest. Natural gas is
10 a fungible commodity; price and value are the ultimate considerations.

11
12 The point of Ohio law is to substitute market forces for regulation, but that does
13 not mandate bilateral contracts. The public interest is best served by the use of
14 market forces to provide just and reasonable prices. The SCO defines
15 reasonable.

16
17 Q. IS CONTINUING THE MVR IN THE PUBLIC INTEREST?

18 A. No. The MVR has had no discernable impact on shopping in the past three
19 years. It is subjecting some of the customers assigned through the MVR process
20 to unconscionably priced contracts. It is a complicated system that is difficult to
21 explain to customers. Only a very few residential customers are on the rate.
22 And, the indifference of a noticeable number of nonresidential customers tells us

1 that using the MVR as the default price is no longer promoting shopping in those
2 customer classes. Continuing the MVR is not in the public interest.

3
4 Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION?

5 A. I recommend that the Commission eliminate the MVR and reinstate the SCO as
6 the default rate for all customers. The experimentation by the Commission, and
7 the long evolution of competition in natural gas in Ohio, has resulted in a
8 regulatory scheme that uses market forces to establish commodity prices for all
9 natural gas customers. CRNGS serve all customers through a variety of
10 competitive options: bilateral contracts; government aggregations; and, the SCO
11 retail auction. Marketers do not face barriers to entry, and particularly in the
12 Dominion service territory have been successful in enticing virtually all residential
13 customers to shop, though families do not always choose the most profitable
14 option for the marketers. Ohio law does not include policy designed to maximize
15 marketer profits. It requires the Commission use market forces to price energy
16 rather than using regulation. Ohio has a vibrant, active market. We should
17 declare a victory for competition and move on.

18
19 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

20 A. Yes, but I reserve the right to supplement the testimony as new information
21 becomes available.

CERTIFICATE OF SERVICE

I hereby certify that the undersigned counsel served Ohio Partners for Affordable Energy's Responses to RESA's First Set of Interrogatories and Requests for Production of Documents on counsel for all parties of record in this case, by E-mail, on the 1st day of November 2019.

/s/ Colleen L. Mooney
Colleen L. Mooney

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Exemption Granted to The East Ohio Gas)	Case No. 18-1419-GA-EXM
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**THE RETAIL ENERGY SUPPLY ASSOCIATION'S
FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS PROPOUNDED UPON
THE EAST OHIO GAS COMPANY D/B/A DOMINION ENERGY OHIO**

September 24, 2019

Pursuant to Rules 4901-1-16, 4901-1-17, 4901-1-19, and 4901-1-20, Ohio Administrative Code, the Retail Energy Supply Association ("RESA") serves this First Set of Interrogatories and Requests for Production of Documents upon The East Ohio Gas Company d/b/a Dominion Energy Ohio ("Dominion Energy Ohio").

The Monthly Variable Rate ("MVR") program referenced in this first set of discovery refers to the MVR program that is the subject of this proceeding.

INTERROGATORIES

INT 1-1. Identify the number of residential customers that were assigned to a supplier in the Dominion Energy Ohio MVR program in each month of the following years: 2013; 2014; 2015; 2016; 2017; 2018 and January through August 2019.

RESPONSE:

INT 1-2. Identify the number of non-residential customers that were assigned to a supplier in the Dominion Energy Ohio MVR program in each month of the following years: 2013; 2014; 2015; 2016; 2017; 2018 and January through August 2019.

RESPONSE:

INT 1-3. Identify both the median and mean length of time residential customers participated in the Dominion Energy Ohio MVR program from January 2013 to present.

RESPONSE:

INT 1-4. Identify both the median and mean length of time non-residential customers participated in the Dominion Energy Ohio MVR program from January 2013 to present.

RESPONSE:

INT 1-5. Identify both the median and mean length of time residential customers participated in the Dominion Energy Ohio MVR program from January 2018 to present.

RESPONSE:

INT 1-6. Identify both the median and mean length of time non-residential customers participated in the Dominion Energy Ohio MVR program from January 2018 to present.

RESPONSE:

INT 1-7. Identify both the median and mean length of time residential customers participated in the Dominion Energy Ohio MVR program from January 2013 to December 2015.

RESPONSE:

INT 1-8. Identify both the median and mean length of time non-residential customers participated in the Dominion Energy Ohio MVR program from January 2013 to December 2015.

RESPONSE:

INT 1-9. Identify both the median and mean length of time residential customers participated in the Dominion Energy Ohio MVR program from January 2016 to December 2018.

RESPONSE:

INT 1-10. Identify both the median and mean length of time non-residential customers participated in the Dominion Energy Ohio MVR program from January 2016 to December 2018.

RESPONSE:

INT 1-11. Provide the supplier name and MVR rates charged by that supplier in each month of the following years: 2013; 2014; 2015; 2016; 2017; 2018 and January through August 2019.

RESPONSE:

INT 1-12. How many surveys did Dominion Energy Ohio or its agent conduct regarding the MVR program?

RESPONSE:

INT 1-13. How does Dominion Energy Ohio educate customers about the MVR program?

RESPONSE:

INT 1-14. Has Dominion Energy Ohio provided any data on the MVR program to the Staff of the Public Utilities Commission of Ohio?

RESPONSE:

INT 1-15. How many surveys did Dominion Energy Ohio or its agent conduct regarding the Choice program?

RESPONSE:

REQUESTS FOR PRODUCTION OF DOCUMENTS

RESA requests that Dominion Energy Ohio produce true and accurate copies of the following documents:

RPD 1-1. Provide any surveys and results of any surveys conducted by or for Dominion Energy Ohio regarding competitive retail natural gas service in Ohio.

RESPONSE:

RPD 1-2. Provide any surveys and results of any surveys conducted by or for Dominion Energy Ohio regarding the MVR program.

RESPONSE:

RPD 1-3. Provide any educational materials Dominion Energy Ohio or its agents provided since April 1, 2013, to MVR customers that relates to or refers to the MVR program.

RESPONSE:

RPD 1-4. Provide any educational materials Dominion Energy Ohio or its agents provided since January 1, 2017, to MVR customers that relates to or refers to the MVR program.

RESPONSE:

RPD 1-5. Provide any documents, including data, related to the MVR that Dominion Energy Ohio provided to the Staff of the Public Utilities Commission of Ohio.

RESPONSE:

RPD 1-6. Provide any documents, including data, related to the length of time that residential customers and non-residential customers remain on a monthly variable rate under the MVR program.

RESPONSE:

Respectfully Submitted,

/s/ Gretchen L. Petrucci

Michael J. Settineri (0073369), Counsel of Record

Gretchen L. Petrucci (0046608)

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Attorneys for the Retail Energy Supply Association

CERTIFICATE OF SERVICE

The undersigned certifies that a courtesy copy of the foregoing document is being served (via electronic mail) on this 24th day of September 2019 upon the following persons/entities listed below:

Ohio Partners for Affordable Energy	cmooney@ohiopartners.org cmooney@opae.org
Ohio Consumers' Counsel	terry.etter@occ.ohio.gov bojko@carpenterlipps.com
The East Ohio Gas Company d/b/a Dominion Energy Ohio	kennedy@whitt-sturtevant.com andrew.j.campbell@dominionenergy.com
Dominion Energy Solutions, Inc.	barthroyer@aol.com
Staff of the Public Utilities Commission of Ohio	werner.margard@ohioattorneygeneral.gov

/s/ Gretchen L. Petrucci

Gretchen L. Petrucci

Supplier	Jan 18	Feb 18	Mar 18	Apr 18	May 18	Jun 18	Jul 18	Aug 18	Sep 18	Oct 18	Nov 18	Dec 18
CenStar Energy Corporation	\$ 8,7900	\$ 8,7900	\$ 9,2500	\$ 9,2500	\$ 9,2500	\$ 9,2500	\$ 9,2500	---	---	---	---	---
Centerpoint Energy (Lakeshore Energy)	\$ 3,1500	\$ 3,1500	\$ 3,1500	\$ 3,1500	\$ 2,9900	\$ 2,9900	\$ 2,9900	\$ 2,9900	\$ 2,9900	\$ 2,9900	\$ 3,2500	\$ 3,7500
Constellation New Energy	\$ 5,9900	\$ 5,9900	\$ 6,0900	\$ 6,0900	\$ 5,7900	\$ 5,7900	\$ 6,4900	\$ 6,4900	\$ 6,4900	\$ 6,2900	\$ 6,0900	\$ 6,7900
Direct Energy LLC	\$ 3,3380	\$ 4,0310	\$ 3,2390	\$ 3,1910	\$ 3,3210	\$ 3,3750	\$ 3,4960	\$ 3,3220	\$ 3,3950	\$ 3,5210	\$ 3,6850	\$ 5,2150
Dominion Energy Solutions	\$ 4,3880	\$ 5,2810	\$ 4,2890	\$ 4,3410	\$ 4,4710	\$ 4,5250	\$ 4,6460	\$ 4,4720	\$ 4,5450	\$ 4,6710	\$ 4,8350	\$ 6,3650
DTE Energy Trading dba DTE Energy Supply	\$ 2,7380	\$ 3,6310	\$ 2,6390	\$ 2,6910	\$ 2,8210	\$ 2,8750	\$ 2,9660	\$ 2,8220	\$ 2,8950	\$ 3,0910	\$ 3,2550	\$ 4,7850
Energy Cooperative of Ohio	\$ 4,2900	\$ 4,2900	\$ 4,2900	\$ 4,2900	---	\$ 4,2900	\$ 4,2900	\$ 4,2900	\$ 4,2900	\$ 4,2900	\$ 4,1900	\$ 4,1900
Engie Resources	---	---	---	---	---	---	---	\$ 7,0000	\$ 4,5000	\$ 4,5000	\$ 4,5000	\$ 4,5000
Interstate Gas Supply Inc.	\$ 3,9900	\$ 4,7400	\$ 4,8100	\$ 4,6100	\$ 4,6100	\$ 4,8700	\$ 4,8100	\$ 4,8100	\$ 4,8100	\$ 4,8100	\$ 4,9900	\$ 5,7400
Just Energy (Commerce Energy)	\$ 4,0632	\$ 4,2303	\$ 4,1567	\$ 4,2351	\$ 4,1005	\$ 4,7173	\$ 5,1342	\$ 4,9862	\$ 4,6924	\$ 4,6924	\$ 4,1168	\$ 4,0598
North American Power and Gas LLC	\$ 4,5900	\$ 7,9900	\$ 6,9900	\$ 6,0900	\$ 6,0900	\$ 6,0900	\$ 6,0900	\$ 6,0900	\$ 6,0900	\$ 6,0900	\$ 6,5900	\$ 7,1900
Energy 95, LLC dba Quake Energy LLC	\$ 5,4500	\$ 5,9400	\$ 4,8990	\$ 4,4950	\$ 3,9550	\$ 3,1920	\$ 3,3150	\$ 3,6830	\$ 4,4730	\$ 4,9170	\$ 5,3900	\$ 6,9900
Shipley Energy	\$ 7,6800	\$ 7,6800	\$ 7,6800	\$ 5,2100	\$ 3,3000	\$ 3,3000	\$ 4,5000	\$ 4,0900	\$ 4,5300	\$ 4,4500	\$ 4,9900	\$ 4,9900
Snyder Brothers Energy Marketing, LLC	\$ 4,8900	\$ 4,9900	\$ 4,8900	\$ 4,9900	\$ 4,8900	\$ 4,9900	\$ 4,8900	\$ 4,9900	\$ 4,8900	\$ 4,9900	\$ 4,8900	\$ 5,8900
SouthStar Energy dba Ohio Natural Gas	\$ 5,4900	\$ 6,3900	\$ 5,9900	\$ 5,5900	\$ 5,5900	\$ 4,9900	\$ 4,6900	\$ 4,0900	\$ 4,8900	\$ 5,2900	\$ 5,2900	\$ 6,9900
Spark Energy Gas LP	\$ 8,7900	\$ 9,2500	\$ 9,2500	\$ 9,2500	\$ 9,2500	\$ 9,2500	\$ 9,2500	---	---	---	---	---
Titan Gas and Power	\$ 3,6000	\$ 3,6000	\$ 3,6000	\$ 3,6000	\$ 3,6000	\$ 3,6000	\$ 3,6000	\$ 3,6000	\$ 3,6000	\$ 3,6000	\$ 3,6000	\$ 3,6000
United Energy Trading dba Kratos	\$ 4,7200	\$ 5,5200	\$ 4,5300	\$ 3,9800	\$ 3,9800	\$ 4,5300	\$ 4,6300	\$ 4,5500	\$ 4,5300	\$ 5,0350	\$ 5,4700	\$ 7,2250
U.S. Gas & Electric dba Ohio Gas & Electric	\$ 6,5000	\$ 6,5000	\$ 6,5000	\$ 6,5000	\$ 6,5000	\$ 6,5000	\$ 6,5000	\$ 6,5000	\$ 6,5000	\$ 6,5000	\$ 6,5000	\$ 6,5000
Verde Energy	---	---	---	---	---	---	---	\$ 9,2500	\$ 9,2500	\$ 9,2500	\$ 9,2500	\$ 9,2500
Vista Energy	\$ 3,4900	\$ 3,4900	\$ 3,6310	\$ 3,6310	\$ 3,6310	\$ 3,6310	\$ 3,6310	\$ 3,6310	\$ 3,6310	\$ 3,6310	\$ 3,6310	\$ 3,6310
Volunteer Energy Service, Inc.	\$ 3,7280	\$ 4,6210	\$ 3,6290	\$ 3,6810	\$ 3,8110	\$ 3,8650	\$ 3,9860	\$ 3,8120	\$ 3,8850	\$ 3,8850	\$ 4,1750	\$ 6,7050

Supplier	Jan 17	Feb 17	Mar 17	Apr 17	May 17	Jun 17	Jul 17	Aug 17	Sep 17	Oct 17	Nov 17	Dec 17
CenStar Energy Corporation	\$ 5.9900	\$ 5.8900	\$ 5.2000	\$ 5.7000	\$ 5.8500	\$ 6.4900	\$ 7.4900	\$ 7.4900	\$ 8.4900	\$ 8.4900	\$ 8.4900	\$ 8.7900
Centerpoint Energy (Lakeshore Energy)	\$ 2.9900	\$ 2.9900	\$ 2.9900	\$ 2.9900	\$ 2.9900	\$ 2.9900	\$ 2.9900	\$ 3.1500	\$ 3.1500	\$ 3.1500	\$ 3.1500	\$ 3.1500
Commerce Energy, Inc. dba Just Energy	\$ 3.4888	\$ 3.5623	\$ 3.7760	\$ 4.2861	\$ 4.2405	\$ 4.9583	\$ 5.2951	\$ 5.3637	\$ 4.8026	\$ 3.8569	\$ 3.8569	\$ 4.1445
Constellation New Energy	-	-	-	\$ 5.7900	\$ 5.9900	\$ 6.3900	\$ 6.6900	\$ 6.6900	\$ 6.6900	\$ 5.9900	\$ 5.9900	\$ 5.9900
Constellation Energy Gas Choice, Inc	\$ 5.3900	\$ 5.7900	\$ 5.9900	\$ 5.7900	\$ 5.9900	\$ 6.3900	\$ 6.6900	\$ -	\$ -	\$ -	\$ -	\$ -
Direct Energy LLC	\$ 4.4300	\$ 3.8910	\$ 3.3270	\$ 3.6750	\$ 3.8420	\$ 3.9360	\$ 3.7670	\$ 4.3690	\$ 3.6610	\$ 3.5740	\$ 3.2520	\$ 3.5740
Dominion Energy Solutions	\$ 5.5800	\$ 5.0410	\$ 4.2770	\$ 4.8250	\$ 4.7920	\$ 4.8860	\$ 4.7170	\$ 4.6190	\$ 4.6110	\$ 4.6240	\$ 4.4020	\$ 4.7240
DTE Energy Trading dba DTE Energy Supply	\$ 3.8800	\$ 3.3410	\$ 2.5770	\$ 3.1750	\$ 3.1420	\$ 3.2360	\$ 3.0670	\$ 2.9690	\$ 2.9610	\$ 2.9740	\$ 2.7520	\$ 3.0740
Energy Cooperative of Ohio	\$ 4.6900	\$ 4.6900	\$ 4.6900	\$ 4.6900	\$ 4.5900	\$ 4.5900	\$ 4.5900	\$ 4.2900	\$ 4.2900	\$ 4.2900	\$ 4.2900	\$ 4.2900
Constellation Energy Services – Nat Gas, LLC	\$ 4.9900	\$ 5.7900	\$ 5.9900	\$ 5.7900	\$ 5.9900	\$ 6.3900	\$ 6.6900	\$ -	\$ -	\$ -	\$ -	\$ -
Interstate Gas Supply Inc.	\$ 3.9900	\$ 3.9900	\$ 3.9900	\$ 3.9900	\$ 3.9900	\$ 3.9900	\$ 3.9900	\$ 3.9900	\$ 3.9900	\$ 3.9900	\$ 3.9900	\$ 3.9900
North American Power and Gas LLC	\$ 6.6900	\$ 6.6900	\$ 6.6900	\$ 6.4900	\$ 6.4900	\$ 6.4900	\$ 5.6900	\$ 5.4900	\$ 5.2900	\$ 4.5900	\$ 4.5900	\$ 4.5900
Energy 95, LLC dba Quake Energy LLC	\$ 5.8900	\$ 5.6700	\$ 4.5550	\$ 4.9990	\$ 4.2400	\$ 3.4900	\$ 2.4900	\$ 2.9560	\$ 3.5990	\$ 3.3930	\$ 3.9990	\$ 5.0630
Shipley Energy	-	-	-	\$ 4.7700	\$ 4.6800	\$ 4.6800	\$ 4.6800	\$ 5.3700	\$ 5.3600	\$ 5.3600	\$ 5.3600	\$ 5.2000
Snyder Brothers Energy Marketing, LLC	\$ 4.8900	\$ 4.9900	\$ 4.8900	\$ 4.9900	\$ 4.8900	\$ 4.9900	\$ 4.8900	\$ 4.9900	\$ 4.8900	\$ 4.9900	\$ 4.8900	\$ 4.9900
SouthStar Energy dba Ohio Natural Gas	\$ 5.9900	\$ 5.9900	\$ 5.5900	\$ 5.7900	\$ 4.9900	\$ 4.9900	\$ 4.9900	\$ 5.4900	\$ 5.4900	\$ 5.5900	\$ 5.3900	\$ 5.7900
Spark Energy Gas LP	-	-	-	\$ 9.9900	\$ 9.9900	\$ 9.9900	\$ 7.4900	\$ 7.4900	\$ 8.4900	\$ 8.4900	\$ 8.4900	\$ 4.8820
Titan Gas and Power	\$ 3.6000	\$ 3.6000	\$ 3.6000	\$ 3.6000	\$ 3.6000	\$ 3.6000	\$ 3.6000	\$ 3.6000	\$ 3.6000	\$ 3.6000	\$ 3.6000	\$ 3.6000
United Energy Trading dba Kratos	\$ 5.1700	\$ 4.7300	\$ 3.9100	\$ 4.5900	\$ 4.5300	\$ 4.7500	\$ 4.5300	\$ 4.3400	\$ 4.3400	\$ 4.3400	\$ 4.5300	\$ 4.9800
U.S. Gas & Electric dba Ohio Gas & Electric	\$ 6.9900	\$ 6.9900	\$ 6.9900	\$ 6.9900	\$ 6.5000	\$ 6.5000	\$ 6.5000	\$ 6.5000	\$ 6.5000	\$ 6.5000	\$ 6.5000	\$ 6.5000
Vista Energy	-	-	-	\$ 3.4900	\$ 3.4900	\$ 3.4900	\$ 3.4900	\$ 3.4900	\$ 3.4900	\$ 3.4900	\$ 3.4900	\$ 3.4900
Volunteer Energy Service, Inc.	\$ 4.9200	\$ 4.3810	\$ 3.6170	\$ 4.1650	\$ 4.1320	\$ 4.2260	\$ 4.0570	\$ 3.6170	\$ 3.9510	\$ 3.9640	\$ 3.7420	\$ 3.7420

Supplier	Jan 16	Feb 16	Mar 16	Apr 16	May 16	Jun 16	Jul 16	Aug 16	Sep 16	Oct 16	Nov 16	Dec 16
CenStar Energy Corporation	\$ 4,4900	\$ 4,8900	\$ 4,6000	\$ 4,6000	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 5,3390	\$ 5,3390
Constellation Energy Gas Choice, Inc	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 5,2900	\$ 5,6900	\$ 5,6900	\$ 5,4900	\$ 4,9900	\$ 4,9900	\$ 4,9900
Direct Energy LLC	\$ 3,2720	\$ 2,9890	\$ 2,7110	\$ 2,8030	\$ 2,9450	\$ 3,1630	\$ 3,9170	\$ 3,3720	\$ 3,3530	\$ 4,1520	\$ 3,1640	\$ 3,7320
Dominion Energy Solutions	\$ 3,8620	\$ 3,6790	\$ 3,2010	\$ 3,5530	\$ 3,6450	\$ 3,6130	\$ 4,5670	\$ 4,3220	\$ 4,5030	\$ 4,6020	\$ 4,4140	\$ 4,8820
DTE Energy Trading dba DTE Energy Supply	\$ 2,3920	\$ 2,2090	\$ 1,7310	\$ 1,8530	\$ 1,9450	\$ 1,9130	\$ 2,8670	\$ 2,6220	\$ 2,8030	\$ 2,9020	\$ 2,7140	\$ 3,1820
Energy Cooperative of Ohio	\$ 3,7900	\$ 3,7900	\$ 2,9900	\$ 2,9900	\$ 2,9900	\$ 2,9900	\$ 4,2900	\$ 4,2900	\$ 4,2900	\$ 4,1900	\$ 4,1900	\$ 4,1900
Constellation Energy Services – Nat Gas, LLC	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 5,2900	\$ 5,6900	\$ 5,6900	\$ 5,4900	\$ 4,9900	\$ 4,9900	\$ 4,9900
Interstate Gas Supply Inc.	\$ 4,2400	\$ 4,2400	\$ 4,2400	\$ 3,9900	\$ 3,9900	\$ 3,9900	\$ 3,9900	\$ 3,9900	\$ 3,9900	\$ 3,9900	\$ 3,9900	\$ 3,9900
Commerce Energy, Inc. dba Just Energy	\$ 3,3796	\$ 3,3950	\$ 3,2252	\$ 2,8364	\$ 2,9195	\$ 3,6424	\$ 3,6437	\$ 3,7973	\$ 3,4366	\$ 2,6321	\$ 3,9931	\$ 3,3706
United Energy Trading dba Kratos	\$ 4,3500	\$ 3,7800	\$ 3,9500	\$ 3,4300	\$ 2,9900	\$ 2,9500	\$ 3,9900	\$ 3,6000	\$ 3,9900	\$ 3,9500	\$ 4,2400	\$ 4,7100
Lakeshore Energy dba Centerpoint Energy	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 2,9900	\$ 2,9900
North American Power and Gas LLC	--	--	--	\$ 5,7900	\$ 5,4900	\$ 5,4900	\$ 5,4900	\$ 4,7900	\$ 4,7900	\$ 4,4900	\$ 5,1900	\$ 5,7900
SouthStar Energy dba Ohio Natural Gas	\$ 4,9900	\$ 4,9900	\$ 4,5900	\$ 4,3900	\$ 4,3900	\$ 4,2900	\$ 4,9900	\$ 4,7900	\$ 4,7900	\$ 4,9900	\$ 4,9900	\$ 5,4900
Energy 95, LLC dba Quake Energy LLC	\$ 4,1300	\$ 4,0400	\$ 3,6900	\$ 3,4000	\$ 3,1900	\$ 3,1400	\$ 3,1300	\$ 2,4000	\$ 2,8900	\$ 3,1400	\$ 3,4100	\$ 4,9900
Snyder Brothers Energy Marketing, LLC	\$ 5,8900	\$ 5,8900	\$ 5,8900	\$ 4,9900	\$ 4,8900	\$ 4,9900	\$ 4,8900	\$ 4,9900	\$ 4,8900	\$ 4,9900	\$ 4,8900	\$ 4,9900
U.S. Gas & Electric dba Ohio Gas & Electric	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 3,9900	\$ 4,3999	\$ 6,9900
Volunteer Energy Service, Inc.	\$ 3,3620	\$ 3,1790	\$ 2,7010	\$ 2,8930	\$ 2,9850	\$ 2,9850	\$ 3,9070	\$ 3,6620	\$ 3,8430	\$ 3,9420	\$ 3,9420	\$ 3,1820

Supplier	Jan 15	Feb 15	Mar 15	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	Nov 15	Dec 15
CenStar Energy Corporation	\$ 4,9900	\$ 4,9900	\$ 5,5000	\$ 4,5000	\$ 3,9000	\$ 4,1000	\$ 4,1000	\$ 4,1000	\$ 2,9900	\$ 4,4900	\$ 4,4900	\$ 4,4900
Constellation Energy Gas Choice, Inc	\$ 6,9900	\$ 6,9900	\$ 6,9900	\$ 6,3900	\$ 4,5000	\$ 4,9900	\$ 5,9900	\$ 5,4900	\$ 5,4900	\$ 5,4900	\$ 5,4900	\$ 5,4900
Direct Energy LLC	\$ 4,3890	\$ 4,0660	\$ 4,0940	\$ 3,0000	\$ 3,1070	\$ 3,3050	\$ 3,2630	\$ 3,1860	\$ 3,1380	\$ 2,7630	\$ 2,4830	\$ 3,4060
Dominion Energy Solutions	\$ 4,6800	\$ 4,3600	\$ 4,3800	\$ 4,0800	\$ 4,0100	\$ 4,3100	\$ 4,2600	\$ 4,3760	\$ 4,1300	\$ 4,0500	\$ 3,5230	\$ 3,8560
DTE Energy Trading dba DTE Energy Supply	\$ 3,6190	\$ 3,2960	\$ 3,3240	\$ 2,6100	\$ 2,5370	\$ 2,8350	\$ 2,7930	\$ 2,9060	\$ 2,6580	\$ 2,5830	\$ 2,0530	\$ 2,2260
Energy Cooperative of Ohio	\$ 5,1900	\$ 4,2900	\$ 4,2900	\$ 4,0900	\$ 4,0900	\$ 3,9900	\$ 3,9900	\$ 3,9900	\$ 3,9900	\$ 3,7900	\$ 3,7900	\$ 3,7900
Constellation Energy Services – Nat Gas, LLC	\$ 4,1890	\$ 3,8660	\$ 3,8940	\$ 3,5900	\$ 4,5000	\$ 4,9900	\$ 5,8900	\$ 5,4900	\$ 5,4900	\$ 5,4900	\$ 5,4900	\$ 5,4900
Interstate Gas Supply Inc.	\$ 5,4900	\$ 5,4900	\$ 5,4900	\$ 4,9900	\$ 4,2400	\$ 4,2400	\$ 4,2400	\$ 4,2400	\$ 4,2400	\$ 4,2400	\$ 4,2400	\$ 4,2400
Commerce Energy, Inc. dba Just Energy	\$ 5,0431	\$ 5,0224	\$ 5,1214	\$ 3,0150	\$ 3,1140	\$ 2,9073	\$ 2,6815	\$ 3,5826	\$ 3,4608	\$ 3,5407	\$ 3,5151	\$ 3,4235
United Energy Trading dba Kratos	\$ 5,1700	\$ 4,8200	\$ 4,6700	\$ 3,9900	\$ 3,9000	\$ 3,8000	\$ 3,2700	\$ 3,3500	\$ 3,3100	\$ 3,2300	\$ 3,5400	\$ 3,7400
Lakeshore Energy	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 2,5000	\$ 2,5000	\$ 2,5000
SouthStar Energy dba Ohio Natural Gas	\$ 6,3900	\$ 5,9900	\$ 5,9900	\$ 4,9900	\$ 4,7900	\$ 4,9900	\$ 4,9900	\$ 5,0900	\$ 4,9900	\$ 4,9900	\$ 4,7900	\$ 4,7900
Energy 95, LLC dba Quake Energy LLC	\$ 4,9840	\$ 4,5940	\$ 4,6430	\$ 3,6500	\$ 2,4900	\$ 2,7100	\$ 2,0900	\$ 2,4400	\$ 3,0200	\$ 3,3900	\$ 3,4900	\$ 3,9400
Snyder Brothers Energy Marketing, LLC	\$ 5,8900	\$ 5,9900	\$ 5,8900	\$ 5,9900	\$ 5,8900	\$ 5,9900	\$ 5,8900	\$ 5,9990	\$ 5,8900	\$ 5,9900	\$ 5,8900	\$ 5,9900
U.S. Gas & Electric dba Ohio Gas & Electric	\$ 5,9900	\$ 5,9900	\$ 5,9900	\$ 3,9900	\$ 3,9900	\$ 2,9900	\$ 2,9900	\$ 2,9900	\$ 2,9900	\$ 2,9900	\$ 4,9900	\$ 4,9900
Volunteer Energy Service, Inc.	\$ 3,9200	\$ 3,6160	\$ 3,6440	\$ 3,3400	\$ 3,2670	\$ 3,5650	\$ 3,7630	\$ 3,8760	\$ 3,6280	\$ 3,5530	\$ 3,0230	\$ 3,1960

Supplier	Jan 14	Feb 14	Mar 14	Apr 14	May 14	Jun 14	Jul 14	Aug 14	Sep 14	Oct 14	Nov 14	Dec 14
CenStar Energy Corporation	\$ 5.1000	\$ 7.3000	\$ 8.4000	\$ 7.5000	\$ 6.4900	\$ 5.9900	\$ 5.9900	\$ 5.2700	\$ 4.9900	\$ 4.8900	\$ 4.1000	\$ 5.1000
Constellation Energy Gas Choice, Inc	\$ 6.2900	\$ 6.9900	\$ 7.5900	\$ 7.9900	\$ 7.4900	\$ 7.4900	\$ 6.9900	\$ 6.5900	\$ 5.9900	\$ 5.9900	\$ 7.2900	\$ 6.1900
Direct Energy LLC	\$ 5.6870	\$ 7.6570	\$ 6.7550	\$ 5.7840	\$ 6.0250	\$ 5.8190	\$ 5.6000	\$ 5.0080	\$ 5.0070	\$ 5.1840	\$ 4.7280	\$ 5.4820
Direct Energy Source	\$ 5.3520	\$ 5.3520	\$ 5.3520	\$ 5.3520	\$ 5.3520	\$ 5.3520	\$ 5.3520	\$ 5.3520	\$ 5.3520	\$ 5.3520		
Dominion Energy Solutions	\$ 5.9000	\$ 7.0500	\$ 6.3500	\$ 6.0700	\$ 6.2900	\$ 6.1100	\$ 5.6900	\$ 5.1000	\$ 5.4500	\$ 5.4700	\$ 5.2200	\$ 5.7700
DTE Energy Trading dba DTE Energy Supply	\$ 5.0070	\$ 6.1570	\$ 5.4550	\$ 5.0140	\$ 5.2250	\$ 5.0490	\$ 4.8300	\$ 4.2380	\$ 4.3870	\$ 4.4140	\$ 4.1580	\$ 4.7120
Energy Cooperative of Ohio	\$ 5.2900	\$ 6.9900	\$ 6.9900	\$ 5.9900	\$ 5.6900	\$ 5.6900	\$ 5.4900	\$ 4.9900	\$ 4.9900	\$ 4.9900	\$ 4.9900	\$ 5.1900
Hess Small Business Services, LLC	\$ 5.5070	\$ 6.6570	\$ 5.9550	\$ 5.9550								
Integritys Energy Services, Inc. - Natural Gas LLC	\$ 5.4070	\$ 6.5570	\$ 5.8550	\$ 5.5840	\$ 6.7950	\$ 6.6190	\$ 6.4000	\$ 5.8080	\$ 5.5100	\$ 4.9840	\$ 4.7280	\$ 5.2820
Interstate Gas Supply Inc.	\$ 5.4900	\$ 6.4900	\$ 6.4900	\$ 5.4900	\$ 5.4900	\$ 5.4900	\$ 5.4900	\$ 5.4900	\$ 5.4900	\$ 5.4900	\$ 5.4900	\$ 5.4900
Commerce Energy, Inc. dba Just Energy	\$ 6.0096	\$ 6.4293	\$ 7.6680	\$ 6.3483	\$ 5.9875	\$ 5.9875	\$ 5.3380	\$ 5.2245	\$ 5.1524	\$ 5.1317	\$ 5.0122	\$ 5.0245
United Energy Trading dba Kratos	\$ 5.9500	\$ 7.4800	\$ 6.4900	\$ 5.9800	\$ 5.9900	\$ 5.8200	\$ 5.4000	\$ 4.7900	\$ 4.9900	\$ 4.9700	\$ 4.6700	\$ 5.9700
Lakeshore Energy	\$ 5.5500	\$ 7.9900	\$ 6.9900	\$ 6.9900	\$ 6.9900	\$ 6.9900	\$ 5.9900	\$ 5.5500	\$ 5.5500	\$ 5.5500	\$ 5.5500	\$ 5.5500
SouthStar Energy dba Ohio Natural Gas	\$ 6.9900	\$ 7.9900	\$ 7.9900	\$ 7.7900	\$ 6.9900	\$ 6.9900	\$ 6.7900	\$ 5.9900	\$ 6.1900	\$ 6.4900	\$ 6.3900	\$ 6.9900
Energy 95, LLC dba Quake Energy LLC	\$ 5.8900	\$ 7.8900	\$ 6.4500	\$ 5.5490	\$ 4.9850	\$ 4.0420	\$ 4.1270		\$ 4.3400	\$ 4.5490	\$ 4.9790	\$ 5.4900
Snyder Brothers Energy Marketing, LLC	\$ 5.9900	\$ 6.9900	\$ 6.4900	\$ 5.9900	\$ 5.8900	\$ 5.9900	\$ 5.8900	\$ 5.9900	\$ 5.8900	\$ 5.9900	\$ 5.8900	\$ 5.9900
U.S. Gas & Electric dba Ohio Gas & Electric	\$ 4.9900	\$ 6.9900	\$ 8.9900	\$ 8.9900	\$ 5.2900	\$ 5.2900	\$ 5.2900	\$ 3.9900	\$ 5.2900	\$ 4.9900	\$ 4.9900	\$ 5.9900
Volunteer Energy Service, Inc.	\$ 5.1570	\$ 6.3070	\$ 5.6050	\$ 5.3340	\$ 5.5450	\$ 5.3690	\$ 5.1500	\$ 4.5580	\$ 4.7070	\$ 4.7340	\$ 4.7180	\$ 5.3020

Supplier	Jan 13	Feb 13	Mar 13	Apr 13	May 13	Jun 13	Jul 13	Aug 13	Sep 13	Oct 13	Nov 13	Dec 13
CenStar Energy Corporation				\$ 5,3000	\$ 5,5000	\$ 5,7000	\$ 5,6000	\$ 4,7500	\$ 4,9000	\$ 4,7000	\$ 4,7000	\$ 4,7000
Constellation Energy Gas Choice, Inc	\$ 5,9900	\$ 5,9900	\$ 5,9900	\$ 5,9900	\$ 6,4900	\$ 6,4900	\$ 6,1900	\$ 5,9900	\$ 5,9900	\$ 6,4900	\$ 6,4900	\$ 6,4900
Direct Energy LLC	\$ 4,8540	\$ 4,7260	\$ 4,9270	\$ 5,4760	\$ 5,3520	\$ 5,3520	\$ 4,8570	\$ 4,2090	\$ 5,0170	\$ 5,0980	\$ 5,1960	\$ 5,0980
Direct Energy Source	\$ 4,8540	\$ 4,7260	\$ 4,9270	\$ 5,7760	\$ 5,3520	\$ 5,3520	\$ 5,3520	\$ 5,3520	\$ 5,3520	\$ 5,3520	\$ 5,3520	\$ 5,3520
Dominion Energy Solutions	\$ 5,0000	\$ 4,8800	\$ 5,0800	\$ 5,6300	\$ 5,8020	\$ 5,8000	\$ 5,3600	\$ 4,9500	\$ 5,0600	\$ 4,9900	\$ 4,9900	\$ 5,3100
DTE Energy Trading dba DTE Energy Supply				\$ 4,5760	\$ 4,9520	\$ 4,7480	\$ 4,3070	\$ 4,0590	\$ 4,1670	\$ 4,0980	\$ 4,0960	\$ 4,4180
Energy Cooperative of Ohio	\$ 5,4900	\$ 5,4900	\$ 5,4900	\$ 5,4900	\$ 5,4900	\$ 5,6900	\$ 5,5900	\$ 5,3900	\$ 5,3900	\$ 5,3900	\$ 5,2900	\$ 5,2900
Hess Small Business Services, LLC	\$ 5,2040	\$ 5,0760	\$ 5,0760	\$ 5,0760	\$ 5,2520	\$ 5,2480	\$ 4,8070	\$ 4,5590	\$ 4,6670	\$ 4,5980	\$ 4,5960	\$ 4,5960
Integrity's Energy Services, Inc. - Natural Gas LLC	\$ 4,3540	\$ 4,2260	\$ 4,4270	\$ 4,9760	\$ 5,1520	\$ 5,1480	\$ 4,7070	\$ 4,4590	\$ 4,5670	\$ 4,4980	\$ 4,4960	\$ 4,8180
Interstate Gas Supply Inc.	\$ 4,6900	\$ 4,6900	\$ 4,6900	\$ 4,9900	\$ 5,2900	\$ 5,2900	\$ 5,2900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900	\$ 4,9900
Commerce Energy, Inc. dba Just Energy	\$ 4,1360	\$ 3,6350	\$ 3,8260	\$ 4,3470	\$ 4,5360	\$ 4,5110	\$ 4,0920	\$ 3,8560	\$ 4,1570	\$ 5,2055	\$ 5,4823	\$ 5,4420
United Energy Trading dba Kratos	\$ 5,5000	\$ 5,4000	\$ 5,4800	\$ 5,1700	\$ 5,3900	\$ 5,3900	\$ 5,2200	\$ 4,6500	\$ 5,1000	\$ 4,7500	\$ 5,2500	\$ 5,4900
Lakeshore Energy				\$ 5,2000	\$ 5,4000	\$ 5,5000	\$ 5,1000	\$ 4,8500	\$ 4,8500	\$ 4,8500	\$ 4,8500	\$ 5,5500
SouthStar Energy dba Ohio Natural Gas	\$ 5,7900	\$ 5,6900	\$ 5,9900	\$ 6,5900	\$ 6,9900	\$ 6,8900	\$ 6,4900	\$ 5,9900	\$ 5,9900	\$ 5,8900	\$ 5,8900	\$ 5,9900
Energy 95, LLC dba Quake Energy LLC	\$ 5,4900	\$ 5,3900	\$ 5,2500	\$ 5,4900	\$ 4,8900	\$ 4,7800	\$ 4,2900	\$ 4,1900	\$ 4,2900	\$ 4,7400	\$ 4,9940	\$ 5,3900
Snyder Brothers Energy Marketing, LLC				\$ 5,6900	\$ 5,6900	\$ 5,6900	\$ 5,4900	\$ 5,4500	\$ 5,4900	\$ 5,4500	\$ 5,4900	\$ 5,4500
Trademark Merchant Energy, LLC				\$ 4,9560	\$ 5,1520							
U.S. Gas & Electric dba Ohio Gas & Electric				\$ 4,9900	\$ 5,5900	\$ 5,5900	\$ 5,5900	\$ 4,7900	\$ 4,7900	\$ 4,7900	\$ 4,7900	\$ 4,9900
Volunteer Energy Service, Inc.	\$ 3,9660	\$ 3,8260	\$ 4,0270	\$ 4,7260	\$ 4,9020	\$ 4,8980	\$ 4,4570	\$ 4,2090	\$ 4,3170	\$ 4,2480	\$ 4,2460	\$ 4,2460

Tuesday, October 15, 2019 at 8:53:34 AM Eastern Daylight Time

Subject: CONFIDENTIAL: DEO MVR Questions
Date: Monday, October 14, 2019 at 3:34:44 PM Eastern Daylight Time
From: Jeff Murphy
To: Chris Kennedy
Attachments: DEO MVR Data - 12-01-2018.xlsx

From: Jeff Murphy (Services - 6)
Sent: Monday, December 03, 2018 7:52 AM
To: 'Howard.Petricoff@puco.ohio.gov'
Subject: CONFIDENTIAL: DEO MVR Questions

Good morning Howard,

Below are the answers to the questions you posed on Friday:

What portion of DEO's residential customers participate in opt-out governmental aggregation programs?

36.6% of DEO's residential Energy Choice customers participate in opt-out governmental aggregation programs.

How do prices for DEO customers who have been on the MVR for less than 60 months compare to those who have been on it for more than 60 months?

The average MVR prices for the 12-month period ending October 2018 are below:

Non-Residential

\$4.472/Mcf - 60 months or more

\$4.890/Mcf - Less than 60 months

Residential

\$4.456/Mcf - 60 months or more

\$4.671/Mcf - Less than 60 months

The attached spreadsheet contains the back-up detail used to answer the questions.

If you need anything else, please let me know.

Thanks,
Jeff

CONFIDENTIALITY NOTICE: This electronic message contains information which may be legally confidential and or privileged and does not in any case represent a firm ENERGY COMMODITY bid or offer relating thereto which binds the sender without an additional express written confirmation to that effect. The information is intended solely for the individual or entity named above and access by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution, or use of the contents of this information is prohibited and may be unlawful. If you have received this electronic transmission in error, please reply immediately to the sender that you have received the message in error, and delete it. Thank you.

Customer Composition

Run Date: 12/01/2018

	Non-Res	Res	Total	Notes:
SSO	3,591	109,448	113,039	
Choice	50,144	449,946	500,090	
DTS/GTS/TSS	1,924		1,924	1
Govt. Agg.	19,737	368,021	387,758	
SCO		186,113	186,113	
MVR	10,665	2,742	13,407	
Total	86,061	1,116,270	1,202,331	
Total Energy Choice	80,546	1,006,822	1,087,368	2
% Govt. Agg.	24.5%	36.6%	35.7%	3

Notes:

1. DTS - Daily Transportation Service
GTS - General Transportation Service
TSS - Transportation Service for Schools
2. Total Energy Choice include Choice, Govt. Agg., SCO and MVR.
3. % Govt. Agg. uses Total Energy Choice as the denominator.

MVR Customers Length of Stay

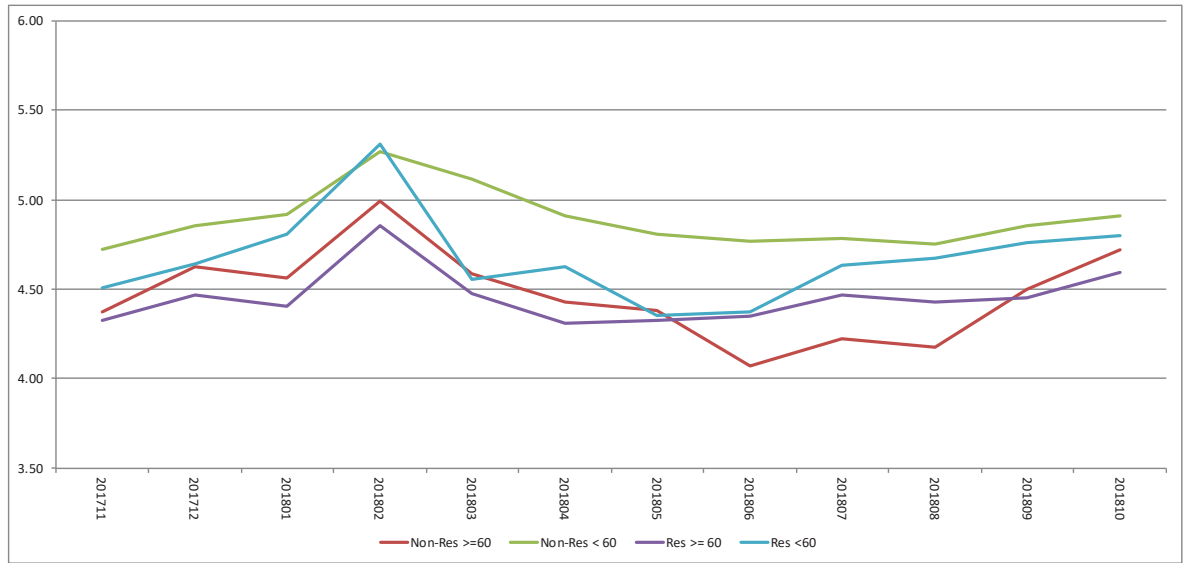
Run Date: 10/18/2018

	Residential		Non-Residential	
	#	%	#	%
0-12 Months	1,392	53%	5,184	44%
13-24 Months	397	15%	1,233	10%
25-36 Months	186	7%	1,358	11%
37-48 Months	129	5%	628	5%
49-60 Months	95	4%	743	6%
Over 60 Months	406	16%	2,664	23%
Total	2,605		11,810	

MVR Pricing - Nov-2017 to Oct-2018

Type	201711	201712	201801	201802	201803	201804	201805	201806	201807	201808	201809	201810	Average
Non-Res >=60	4.377	4.628	4.566	4.994	4.591	4.433	4.380	4.072	4.223	4.173	4.502	4.723	4.472
Non-Res <60	4.723	4.858	4.918	5.270	5.113	4.909	4.811	4.771	4.782	4.754	4.858	4.913	4.890
Res >=60	4.328	4.473	4.409	4.856	4.476	4.310	4.324	4.350	4.470	4.431	4.453	4.593	4.456
Res <60	4.510	4.642	4.808	5.312	4.554	4.627	4.354	4.373	4.636	4.675	4.759	4.797	4.671

MVR Pricing - Nov-2017 to Oct-2018



The East Ohio Gas Company d/b/a Dominion Energy Ohio
Case No. 18-1419-GA-EXM
PUCO Data Request No. 1
Date Received: September 16, 2019
Date Due: September 30, 2019

Staff requests the following information.

1. Are residential customers eligible for any of the following tariff rate schedules: Large Volume General Sales Service (LVGSS), Large Volume Energy Choice Transportation Service (LVECTS)?

If so, how many residential customers are enrolled in each tariff service?

Response: Yes. As of September 16, 2019, the following number of residential customers were on each of the above-mentioned rate schedules:

LVGSS	2
LVECTS	257

2. If residential customers are placed on one of the above tariff services, are those residential customers eligible to elect the Standard Choice Offer (SCO) tariff service?

Response: Yes.

3. Please provide the number of customers who are assigned to an MVR supplier per month for the last 12 months.

Response:

Month	MVR Posted Adds
2018 09	947
2018 10	1,005
2018 11	1,118
2018 12	2,121
2019 01	2,209
2019 02	1,390
2019 03	1,553
2019 04	1,505
2019 05	1,474
2019 06	1,352
2019 07	1,125
2019 08	1,006

The East Ohio Gas Company d/b/a Dominion Energy Ohio
Case No. 18-1419-GA-EXM
PUCO Data Request No. 1
Date Received: September 16, 2019
Date Due: September 30, 2019

4. Please provide the number of customers who leave the MVR per month for the last 12 months.

Response: The requested information is not maintained in the ordinary course of business and is not readily reportable. DEO manually determined the number of customers who left the MVR in favor of another commodity service by reviewing accounts that billed in a specific revenue month under the MVR and identifying whether that account billed under the MVR in the following month. DEO did not include accounts that became inactive (i.e., were not billed) in the following month.

	Leaving MVR
2018 09	414
2018 10	1,042
2018 11	1,198
2018 12	2,183
2019 01	647
2019 02	1,495
2019 03	1,578
2019 04	2,471
2019 05	770
2019 06	1,374
2019 07	689
2019 08	981

5. Please provide the number of customers who leave the MVR per month and are placed on the SCO tariff service at their request. If you do not have such data, can you provide the number of customers placed on the SCO tariff service each month?

Response: The requested information is not maintained in the ordinary course of business, is not readily reportable, and cannot be determined without reviewing accounts on an individual basis. SCO additions by month are set forth below, excluding SCO additions that took place during the annual reallocation of customers following the auction.

The East Ohio Gas Company d/b/a Dominion Energy Ohio
Case No. 18-1419-GA-EXM
PUCO Data Request No. 1
Date Received: September 16, 2019
Date Due: September 30, 2019

	SCO
Month	Adds
2018 09	14,465
2018 10	17,883
2018 11	15,891
2018 12	20,096
2019 01	22,942
2019 02	16,475
2019 03	9,230
2019 04	2
2019 05	3,908
2019 06	12,890
2019 07	17,205
2019 08	15,875

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Motion to Modify the)
Exemption Granted to The East Ohio Gas) Case No. 18-1419-GA-EXM
Company d/b/a Dominion Energy Ohio.)

**RESPONSES AND OBJECTIONS TO THE RETAIL ENERGY SUPPLY
ASSOCIATION'S FIRST SET OF INTERROGATORIES AND
REQUESTS FOR THE PRODUCTION OF DOCUMENTS OF
THE EAST OHIO GAS COMPANY D/B/A DOMINION ENERGY OHIO**

In accordance with Ohio Adm. Code 4901-1-18, 4901-1-19(A), and 4901-1-20(C), The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO) hereby provides its responses and objections to the Retail Energy Supply Association's (RESA) First Set of Interrogatories and Requests for Production of Documents, served on September 24, 2019.

I. GENERAL OBJECTIONS

DEO's responses to the RESA's First Set of Interrogatories and Requests for Production of Documents are subject to the following general objections:

1. DEO objects to the Instructions for Answering to the extent such instructions purport to impose discovery obligations that are inconsistent with or go beyond the Commission's rules for discovery.
2. DEO objects to each request for production to the extent such discovery requests seek the disclosure of information subject to attorney-client privilege or that constitutes attorney work product.
3. DEO objects to each request for production that purports to require a detailed, narrative response. Under applicable Commission rules and the Ohio Rules of Civil Procedure, "[a]n interrogatory seeks an admission or seeks information of major significance in the trial or in the preparation for trial. It does not contemplate an array of details or outlines of evidence, a

function reserved by the rules for deposition.” Penn Central Transp. Co. v. Armco Steel Corp., 27 Ohio Misc. 76, 77 (Montgomery Cty. 1971).

II. INTERROGATORIES

The Monthly Variable Rate (“MVR”) program referenced in this first set of discovery refers to the MVR program that is the subject of this proceeding.

INT-1-1. Identify the number of residential customers that were assigned to a supplier in the Dominion Energy Ohio MVR program in each month of the following years: 2013; 2014; 2015; 2016; 2017; 2018 and January through August 2019.

RESPONSE: DEO objects that this request is overbroad and unduly burdensome to answer.

DEO further objects to the request to the extent that it calls for the creation of new analysis or the manual compilation of data that DEO does not maintain in the regular course of business in the form requested. Subject to and without waiving these objections, DEO answers as follows:

The data provided below represents the “gross” number of customers that were assigned to the MVR each month for the time period January 2013 through August 2019. This data does not identify the “net” number of customers that were assigned to the MVR each month, and does not take into account the number of customers who switched from the MVR to a different rate in that month or who were enrolled in MVR but terminated service or were disconnected in that month. Please see DEO’s Responses to INT 1-3 and 1-4 for an explanation of the data identified on DEO’s broker change orders, i.e., enrollment records.

Dominion Energy Ohio							
Residential MVR Adds by Month							
	2013	2014	2015	2016	2017	2018	2019
Jan	285	344	122	188	223	680	382
Feb	210	394	182	269	808	341	356
Mar	173	200	167	293	274	396	525
Apr	104	90	76	81	138	276	645
May	-	16	4	8	22	14	664
Jun	81	236	109	176	176	190	588
Jul	670	226	211	345	274	339	471
Aug	156	154	170	185	192	307	347
Sep	134	130	141	203	162	294	
Oct	159	161	134	233	171	339	
Nov	168	120	129	179	303	404	
Dec	199	187	198	273	490	363	

Answerer: Larry J. Rice, Manager, Commercial Operations Support Services, Dominion Energy Ohio

INT-1-2. Identify the number of non-residential customers that were assigned to a supplier in the Dominion Energy Ohio MVR program in each month of the following years: 2013; 2014; 2015; 2016; 2017; 2018 and January through August 2019.

RESPONSE: DEO objects that this request is overbroad and unduly burdensome to answer.

DEO further objects to the request to the extent that it calls for the creation of new analysis or the manual compilation of data that DEO does not maintain in the regular course of business in the form requested. Subject to and without waiving these objections, DEO answers as follows:

The data provided below represents the “gross” number of customers that were assigned to the MVR each month for the time period January 2013 through August 2019. This data does not identify the “net” number of customers that were assigned to the MVR each month, and does not take into account the number of

customers who switched from the MVR to a different rate in that month or who were enrolled in MVR but terminated service or were disconnected in that month. Please see DEO's Responses to INT 1-3 and 1-4 for an explanation of the data identified on DEO's broker change orders, i.e., the enrollment records.

Dominion Energy Ohio							
Non-Residential MVR Adds by Month							
	2013	2014	2015	2016	2017	2018	2019
Jan	25	1,859	1,708	1,569	1,560	2,034	1,827
Feb	30	1,233	1,187	1,420	1,431	1,458	1,034
Mar	6,945	733	1,022	1,157	857	1,111	1,028
Apr	10,389	1,161	832	811	697	973	860
May	9	806	655	1,109	828	1,574	810
Jun	400	1,770	633	1,303	649	1,383	764
Jul	591	875	490	1,272	548	611	654
Aug	549	549	527	532	554	574	659
Sep	457	514	509	471	520	653	
Oct	627	646	649	635	650	666	
Nov	753	779	664	759	687	714	
Dec	1,610	1,689	1,339	1,467	1,652	1,758	

Answerer: Larry J. Rice, Manager, Commercial Operations Support Services, Dominion Energy Ohio

INT-1-3. Identify both the median and mean length of time residential customers participated in the Dominion Energy Ohio MVR program from January 2013 to present.

RESPONSE: DEO objects that this request is overbroad and unduly burdensome to answer.

DEO does not maintain or track this information in the regular course of business, and it cannot be readily reported. This information cannot be determined without performing a manual review and compilation of information associated with individual customer account records each month and repeating such review over

multiple months for each account. Subject to and without waiving these objections, DEO answers as follows:

The snapshot of data provided below is based on customer accounts enrolled in MVR as of October 9, 2019. DEO's broker change orders, i.e., the enrollment records, identify the (1) new supplier; (2) the prior supplier; (3) the new rate; and (4) the date of enrollment. The broker change orders, however, do not identify the prior rate, whether that prior rate was fixed or variable, the duration that the customer was served under that prior rate, or otherwise indicate the type or terms of service for the prior rate. To provide the October 9, 2019 snapshot of data below, DEO performed the same analysis that it performed when it previously provided similar data to Staff on October 17, 2018. (Counsel for all parties received the October 2018 data on October 2, 2019.) Without information on prior service type and prior enrollment date on the broker change order records, DEO cannot easily run a query on its stored data to determine the prior service type and prior enrollment date for customers currently enrolled in MVR, and has not otherwise developed and tested a program to accurately and reliably extract that data from its systems. For the customer accounts enrolled in MVR as of October 9, 2019, DEO identified and examined data for the broker change orders associated with those specific accounts to determine the approximate duration that the customer had been served under the MVR. The results of that manual review and analysis produced the data below. Since it takes a significant amount of time to review data for the broker change orders on an account by account basis, it would be unreasonable and unduly burdensome, and DEO does not intend, to

supplement this information or perform additional, new analysis to produce different snapshots of data based on different dates.

	R	
0-12 months	2,366	67.8%
13-24 months	377	10.8%
25-36 months	208	6.0%
37-48 months	102	2.9%
49-60 months	90	2.6%
60+ months	<u>345</u>	9.9%
	3,488	

Answerer: Larry J. Rice, Manager, Commercial Operations Support Services, Dominion Energy Ohio

INT-1-4. Identify both the median and mean length of time non-residential customers participated in the Dominion Energy Ohio MVR program from January 2013 to present.

RESPONSE: DEO objects that this request is overbroad and unduly burdensome to answer.

DEO does not maintain or track this information in the regular course of business, and it cannot be readily reported. This information cannot be determined without performing a manual review and compilation of information associated with individual customer account records each month and repeating such review over multiple months for each account. Subject to and without waiving these objections, DEO answers as follows:

The snapshot of data provided below is based on customer accounts enrolled in MVR as of October 9, 2019. DEO's broker change orders, i.e., the enrollment records, identify the (1) new supplier; (2) the prior supplier; (3) the new rate; and

(4) the date of enrollment. The broker change orders, however, do not identify the prior rate, whether that prior rate was fixed or variable, the duration that the customer was served under that prior rate, or otherwise indicate the type or terms of service for the prior rate. To provide the October 9, 2019 snapshot of data below, DEO performed the same analysis that it performed when it previously provided similar data to Staff on October 17, 2018. (Counsel for all parties received the October 2018 data on October 2, 2019.) Without information on prior service type and prior enrollment date on the broker change order records, DEO cannot easily run a query on its stored data to determine the prior service type and prior enrollment date for customers currently enrolled in MVR, and has not otherwise developed and tested a program to accurately and reliably extract that data from its systems. For the customer accounts enrolled in MVR as of October 9, 2019, DEO identified and examined data for the broker change orders associated with those specific accounts to determine the approximate duration that the customer had been served under the MVR. The results of that manual review and analysis produced the data below. Since it takes a significant amount of time to review data for the broker change orders on an account by account basis, it would be unreasonable and unduly burdensome, and DEO does not intend, to supplement this information or perform additional, new analysis to produce different snapshots of data based on different dates.

	C	
0-12 months	3,870	41.7%
13-24 months	1,548	16.7%
25-36 months	674	7.3%
37-48 months	613	6.6%
49-60 months	387	4.2%
60+ months	<u>2,195</u>	23.6%
	9,287	

Answerer: Larry J. Rice, Manager, Commercial Operations Support Services, Dominion Energy Ohio

INT-1-5. Identify both the median and mean length of time residential customers participated in the Dominion Energy Ohio MVR program from January 2018 to present.

RESPONSE: See the Objections and Response to INT-1-3.

INT-1-6. Identify both the median and mean length of time non-residential customers participated in the Dominion Energy Ohio MVR program from January 2018 to present.

RESPONSE: See the Objections and Response to INT-1-4.

INT-1-7. Identify both the median and mean length of time residential customers participated in the Dominion Energy Ohio MVR program from January 2013 to December 2015.

RESPONSE: See the Objections and Response to INT-1-3.

INT-1-8. Identify both the median and mean length of time non-residential customers participated in the Dominion Energy Ohio MVR program from January 2013 to December 2015.

RESPONSE: See the Objections and Response to INT-1-4.

INT-1-9. Identify both the median and mean length of time residential customers participated in the Dominion Energy Ohio MVR program from January 2016 to December 2018.

RESPONSE: See the Objections and Response to INT-1-3.

INT-1-10. Identify both the median and mean length of time non-residential customers participated in the Dominion Energy Ohio MVR program from January 2016 to December 2018.

RESPONSE: See the Objections and Response to INT-1-4.

INT-1-11. Provide the supplier name and MVR rates charged by that supplier in each month of the following years: 2013; 2014; 2015; 2016; 2017; 2018 and January through August 2019.

RESPONSE: DEO objects that this request is overbroad and unduly burdensome to answer.

DEO further objects to the request to the extent that it calls for the creation of new analysis or the manual compilation of data that DEO does not maintain in the regular course of business in the form requested. Subject to and without waiving these objections, DEO answers as follows:

See the accompanying document marked as “RESA INT 1-11 Attach” for the requested data. This data constitutes the previously publicly available rates that were published by the Commission in its Apples to Apples comparison charts.

Answerer: Larry J. Rice, Manager, Commercial Operations Support Services, Dominion Energy Ohio

INT-1-12. How many surveys did Dominion Energy Ohio or its agent conduct regarding the MVR program?

RESPONSE: DEO objects that this request is vague and undefined, and overbroad and unduly burdensome to answer. Subject to and without waiving these objections, DEO answers as follows:

The Commission’s March 3, 2009 Entry in Case No. 07-1224-GA-ATA approved the tariff covering Monthly Variable Rate (MVR) Commodity Service, Original Sheet B-MVR. Since that time, DEO has not conducted any surveys that exclusively addressed customers’ understanding and perceptions of the MVR. See the Objections and Responses to INT-1-15 and RPD 1-1 concerning surveys that have been conducted regarding the Energy Choice program in general.

Answerer: Vicki H. Friscic, Director Regulatory and Pricing, Dominion Energy Ohio

INT-1-13. How does Dominion Energy Ohio educate customers about the MVR program?

RESPONSE: DEO objects that this request is vague and undefined, and overbroad and unduly burdensome to answer. Subject to and without waiving these objections, DEO answers as follows:

DEO informs customers regarding its Energy Choice program, including the MVR, through a variety of means, including its tariffs, information provided by customer service agents, bill inserts and mailings, websites (including www.DominionGasChoice.com), and through other generally available information. In addition, DEO also educates customers on its Energy Choice program through advertisements and other public educational initiatives in its service territory. See the Objections and Response to RPD 1-3 for examples of the messaging that DEO has provided to customers on its Energy Choice program.

Answerer: Vicki H. Friscic, Director Regulatory and Pricing, Dominion Energy Ohio

INT-1-14. Has Dominion Energy Ohio provided any data on the MVR program to the Staff of the Public Utilities Commission of Ohio?

RESPONSE: DEO objects that this request is vague and undefined, and overbroad and unduly burdensome to answer. DEO further objects that this request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, DEO answers as follows:

See the October 17, 2018 email provided to counsel for all parties on October 2, 2019. In addition, see the accompanying document marked as “RESA INT-1-14

Attach,” which is a December 3, 2018 email from DEO to Staff. See also DEO’s responses to Staff DR 1 and DR 2 in this proceeding, which have been provided to counsel for all parties. See also DEO’s response to RPD 1-5.

Answerer: Counsel for DEO

INT-1-15. How many surveys did Dominion Energy Ohio or its agent conduct regarding the Choice program?

RESPONSE: DEO objects that this request is vague and undefined, and overbroad and unduly burdensome to answer. Subject to and without waiving these objections, DEO answers as follows:

The Commission’s March 3, 2009 Entry in Case No. 07-1224-GA-ATA approved the tariff covering Monthly Variable Rate (MVR) Commodity Service, Original Sheet B-MVR. Since that time, DEO has conducted three surveys of customers concerning its Energy Choice program. See the Objections and Response to RPD 1-1 for information concerning those surveys.

Answerer: Vicki H. Friscic, Director Regulatory and Pricing, Dominion Energy Ohio

III. REQUESTS FOR PRODUCTION OF DOCUMENTS

RPD-1-1. Provide any surveys and results of any surveys conducted by or for Dominion Energy Ohio regarding competitive retail natural gas service in Ohio.

RESPONSE: DEO objects that this request is vague and undefined, and overbroad and unduly burdensome to answer. DEO further objects that this request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, DEO responds as follows:

See the Objections and Response to INT-1-15. The Commission's March 3, 2009 Entry in Case No. 07-1224-GA-ATA approved the tariff covering Monthly Variable Rate (MVR) Commodity Service, Original Sheet B-MVR. Since that time, DEO has conducted three surveys of customers concerning its Energy Choice program. Documents concerning those surveys, which have been marked for identification as 18141900001-18141900211 RESA RPD 1-1 CONFIDENTIAL, will be provided to RESA. The documents are designated as Confidential (C) and are considered "Protected Materials," subject to the Protective Agreement between DEO and RESA, as they were prepared by outside vendors and are regarded as confidential work product of the vendor with respect to the manner and ways in which the vendor collects and presents the data.

RPD-1-2. Provide any surveys and results of any surveys conducted by or for Dominion Energy Ohio regarding the MVR program.

RESPONSE: DEO objects that this request is vague and undefined, and overbroad and unduly burdensome to answer. Subject to and without waiving these objections, DEO responds as follows:

See the Objections and Response to INT 1-12. No surveys exclusively addressing the MVR program were performed. Questions regarding MVR were incorporated into surveys regarding the Energy Choice program. See the Objections and Response to RPD-1-1.

RPD-1-3. Provide any educational materials Dominion Energy Ohio or its agents provided since April 1, 2013, to MVR customers that relates to or refers to the MVR program.

RESPONSE: DEO objects that this request is vague and undefined, and overbroad and unduly burdensome to answer. Subject to and without waiving these objections, DEO responds as follows:

See the Objections and Response to INT-1-13. Examples of customer messaging on DEO's Energy Choice program, which have been marked for identification as 18141900212-18141900460 RPD 1-3, will be provided to RESA. As the documents are still being compiled and labeled, a final bates number has not yet been identified.

RPD-1-4. Provide any educational materials Dominion Energy Ohio or its agents provided since January 1, 2017, to MVR customers that relates to or refers to the MVR program.

RESPONSE: See the Objections and Response to RPD-1-3.

RPD-1-5. Provide any documents, including data, related to the MVR that Dominion Energy Ohio provided to the Staff of the Public Utilities Commission of Ohio.

RESPONSE: DEO objects that this request is vague and undefined, and overbroad and unduly burdensome to answer. DEO further objects that this request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. The request does not limit the scope or the time frame of the “documents, including data” related to the MVR. See DEO’s response to INT 1-14 for the identification of data concerning the MVR provided to Staff in connection with this proceeding as of the date of this response. To the extent that DEO submits additional documents, including data, to Staff related to the MVR in response to Staff data requests in this proceeding, counsel for RESA will be provided with those responses. To the extent that DEO identifies other documents related to the MVR previously provided to Staff in response to more narrowly focused discovery requests subsequently submitted by other parties to this proceeding, counsel for RESA will be provided with those responses.

RPD-1-6. Provide any documents, including data, related to the length of time that residential customers and non-residential customers remain on a monthly variable rate under the MVR program.

RESPONSE: See the Objections and Responses to INT-1-3 and INT-1-4.

Dated: October 15, 2019

Respectfully submitted:

/s/ Christopher T. Kennedy

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ATTORNEYS FOR THE EAST OHIO
COMPANY D/B/A DOMINION ENERGY OHIO

CERTIFICATE OF SERVICE

I hereby certify that a courtesy copy of the foregoing Responses and Objections was served by electronic mail this 15th day of October, 2019, to the following:

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/s/ Christopher T. Kennedy
One of the Attorneys for The East Ohio Gas
Company d/b/a Dominion Energy Ohio

**RESPONSES AND OBJECTIONS TO THE OFFICE OF THE OHIO CONSUMERS'
COUNSEL'S FIRST SET OF INTERROGATORIES AND
REQUESTS FOR THE PRODUCTION OF DOCUMENTS OF
THE EAST OHIO GAS COMPANY D/B/A DOMINION ENERGY OHIO**

I. GENERAL OBJECTIONS

1. DEO objects to the Instructions for Answering to the extent such instructions purport to impose discovery obligations that are inconsistent with or go beyond the Commission's rules for discovery.

2. DEO objects to each request for production to the extent such discovery requests seek the disclosure of information subject to attorney-client privilege or that constitutes attorney work product.

3. DEO objects to each request for production that purports to require a detailed, narrative response. Under applicable Commission rules and the Ohio Rules of Civil Procedure, “[a]n interrogatory seeks an admission or seeks information of major significance in the trial or in the preparation for trial. It does not contemplate an array of details or outlines of evidence, a

function reserved by the rules for deposition.” Penn Central Transp. Co. v. Armco Steel Corp., 27 Ohio Misc. 76, 77 (Montgomery Cty. 1971).

II. INTERROGATORIES

INT-1-1. How many residential customers have been enrolled in Dominion’s Monthly Variable Rate program since the program started in 2013? Please provide your answer for each month of 2013, 2014, 2015, 2016, 2017, 2018, and year-to-date 2019.

RESPONSE: DEO objects to OCC’s characterization of when the Monthly Variable Rate (MVR) program began. The Commission’s March 3, 2009 Entry in Case No. 07-1224-GA-ATA approved the tariff covering MVR Commodity Service, Original Sheet B-MVR. Subject to and without waiving that objection, DEO answers as follows:

The data below constitutes the approximate number of residential customers in DEO’s service territory enrolled in the MVR each month for the time period from January 2013 through October 2019.

Residential Customer Count							
	2013	2014	2015	2016	2017	2018	2019
Jan	3,087	2,838	2,100	1,986	2,125	2,667	2,757
Feb	3,218	2,901	2,148	2,047	2,242	3,376	2,947
Mar	3,277	3,264	2,178	2,173	2,585	4,369	2,919
Apr	3,300	3,292	2,007	2,348	2,595	3,167	2,717
May	3,216	3,096	2,073	2,329	2,550	2,741	2,848
Jun	3,097	2,509	1,973	1,917	2,304	2,465	3,270
Jul	2,814	2,426	1,889	1,861	2,275	2,253	3,242
Aug	2,932	2,592	2,004	2,109	2,457	2,460	3,616
Sep	3,424	2,598	2,080	2,159	2,581	2,511	3,492
Oct	3,420	2,435	2,148	2,254	2,558	2,711	3,565
Nov	3,418	2,480	2,085	2,240	2,480	2,627	
Dec	2,998	2,175	2,007	2,125	2,392	2,772	

Answerer: Larry J. Rice, Manager, Commercial Operations Support Services, Dominion
Energy Ohio

INT-1-2. On average, how long do residential customers stay on Dominion's Monthly
Variable Rate program?

RESPONSE: See DEO's Objections and Response to RESA INT 1-3.

INT-1-3. How are customers assigned to the Monthly Variable Rate program?

RESPONSE: DEO objects that this request is vague and undefined, overbroad and unduly
burdensome to answer, and seeks information that is publicly available and/or in
OCC's possession. Subject to and without waiving these objections, DEO answers
as follows:

Procedures applicable to the MVR program are set forth in DEO's Fourth Revised
Sheet No. B-MVR 1 for MVR Commodity Service, and further described in
documents filed in Case Nos. 07-1224-GA-EXM and 12-1842-GA-EXM,
including the Stipulation and Recommendation, filed on April 10, 2008, in Case
No. 07-1224-GA-EXM. Both the MVR Tariff and the documents filed in Case
Nos. 07-1224-GA-EXM and 12-1842-GA-EXM are publicly available. It is not
clear to DEO what additional information that this request is seeking.

Answerer: Response prepared by counsel.

INT-1-4. How do marketers participate in the Monthly Variable Rate program?

RESPONSE: DEO objects that this request is vague and undefined, overbroad and unduly burdensome to answer, seeks information that is outside DEO's possession and knowledge, and seeks information that is publicly available and/or in OCC's possession. Subject to and without waiving these objections, DEO answers as follows:

See DEO's Objections and Response to INT 1-3.

INT-1-5. How do marketers withdraw from the Monthly Variable Rate program?

RESPONSE: DEO objects that this request is vague and undefined, overbroad and unduly burdensome to answer, seeks information that is outside DEO's possession and knowledge, and seeks information that is publicly available and/or in OCC's possession. Subject to and without waiving these objections, DEO answers as follows:

See DEO's Objections and Response to INT 1-3.

III. REQUESTS FOR PRODUCTION OF DOCUMENTS

RPD-1-1. Please provide copies of all formal and informal requests (e.g., interrogatories, data requests) made to the Company by the Commission, the PUCO Staff, and/or the PUCO's Attorneys General in this proceeding, and the Company's responses to those requests.

RESPONSE: DEO objects that this request is vague and undefined, overbroad and unduly burdensome to answer, and seeks information already in OCC's possession. Subject to and without waiving these objections, DEO responds as follows: Documents that DEO believes are responsive to this request will be made available to counsel for OCC in this proceeding, on an ongoing basis, to the extent not already in OCC's possession. To the extent that such documents are designated by DEO as Protected Materials, access to those documents will be provided only to authorized representatives who have agreed to the terms of a Protective Agreement between OCC and DEO. See also DEO's Objections and Response to RESA INT 1-14.

RPD-1-2. Please provide copies of all documents and workpapers provided to the Commission, the PUCO Staff, and/or the PUCO's Attorneys General in connection with this proceeding, including schedules in Excel format.

RESPONSE: DEO objects that this request is vague and undefined, overbroad and unduly burdensome to answer, and seeks information already in OCC's possession. Subject to and without waiving these objections, DEO responds as follows: See DEO's Objections and Response to RPD 1-1.

RPD-1-3. Please provide copies of all communications related to this proceeding between the Company and the Commission, the PUCO Staff, and/or the PUCO's Attorneys General.

RESPONSE: DEO objects that this request is vague and undefined, overbroad and unduly burdensome to answer, seeks information already in OCC's possession, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, DEO responds as follows:

See DEO's Objections and Response to RPD 1-1.

RPD-1-4. Please provide copies of all communications regarding Dominion's Monthly Variable Rate program between the Company and the Commission, the PUCO Staff, and/or the PUCO's Attorneys General since the program began in 2013.

RESPONSE: DEO objects that this request is vague and undefined, overbroad and unduly burdensome to answer, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. DEO also objects to OCC's characterization of when the MVR program began. The Commission's March 3, 2009 Entry in Case No. 07-1224-GA-ATA approved the tariff covering MVR Commodity Service, Original Sheet B-MVR. Subject to and without waiving these objections, DEO responds as follows:

See DEO's Objections and Response to RPD 1-1.

RPD-1-5. Please provide copies of all discovery received by the Company from other parties in this proceeding, and the Company's responses to that discovery.

RESPONSE: See DEO's Objections and Response to RPD 1-1.

RPD-1-6. Please provide copies of all complaints Dominion has received from residential customers regarding the Monthly Variable Rate program since the program started in 2013.

RESPONSE: DEO objects that this request is vague and undefined, overbroad and unduly burdensome to answer, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. DEO also objects to this request to the extent it seeks information that is publicly available or that DEO does not maintain, and is not required to maintain, in the regular course of business in the form requested. DEO also objects to OCC's characterization of when the MVR program began. The Commission's March 3, 2009 Entry in Case No. 07-1224-GA-ATA approved the tariff covering MVR Commodity Service, Original Sheet B-MVR. Subject to and without waiving these objections, DEO responds as follows:

The request does not make clear either what is meant by "complaint" nor what is meant by "regarding the MVR program." DEO does not track or otherwise segregate customer complaints based on relationship to the MVR. Formal complaints involving DEO are publicly available through the Commission's DIS website. See the accompanying file marked as "OCC RPD-1-6 Attach" for a list

of informal Commission complaints that DEO has logged as pertaining to the Energy Choice program for the past three years. The reference numbers for the informal complaints correspond to numbers assigned to the complaints by the Commission. Informal Commission complaints are publicly available to OCC via public records requests.

RPD-1-7. Please provide all documents Dominion used in responding to OCC INT-1-001.

RESPONSE: DEO objects that this request is vague and undefined, overbroad and unduly burdensome to answer, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, DEO responds as follows: See DEO's Response to OCC INT-1-1, and DEO's Response and Objections to RESA INT 1-1.

RPD-1-8. Please provide all documents Dominion used in responding to OCC INT-1-002.

RESPONSE: DEO objects that this request is vague and undefined, overbroad and unduly burdensome to answer, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, DEO responds as follows: See DEO's Response to OCC INT-1-2, and DEO's Response and Objections to RESA INT 1-3.

Dated: October 17, 2019

Respectfully submitted:

/s/ Christopher T. Kennedy

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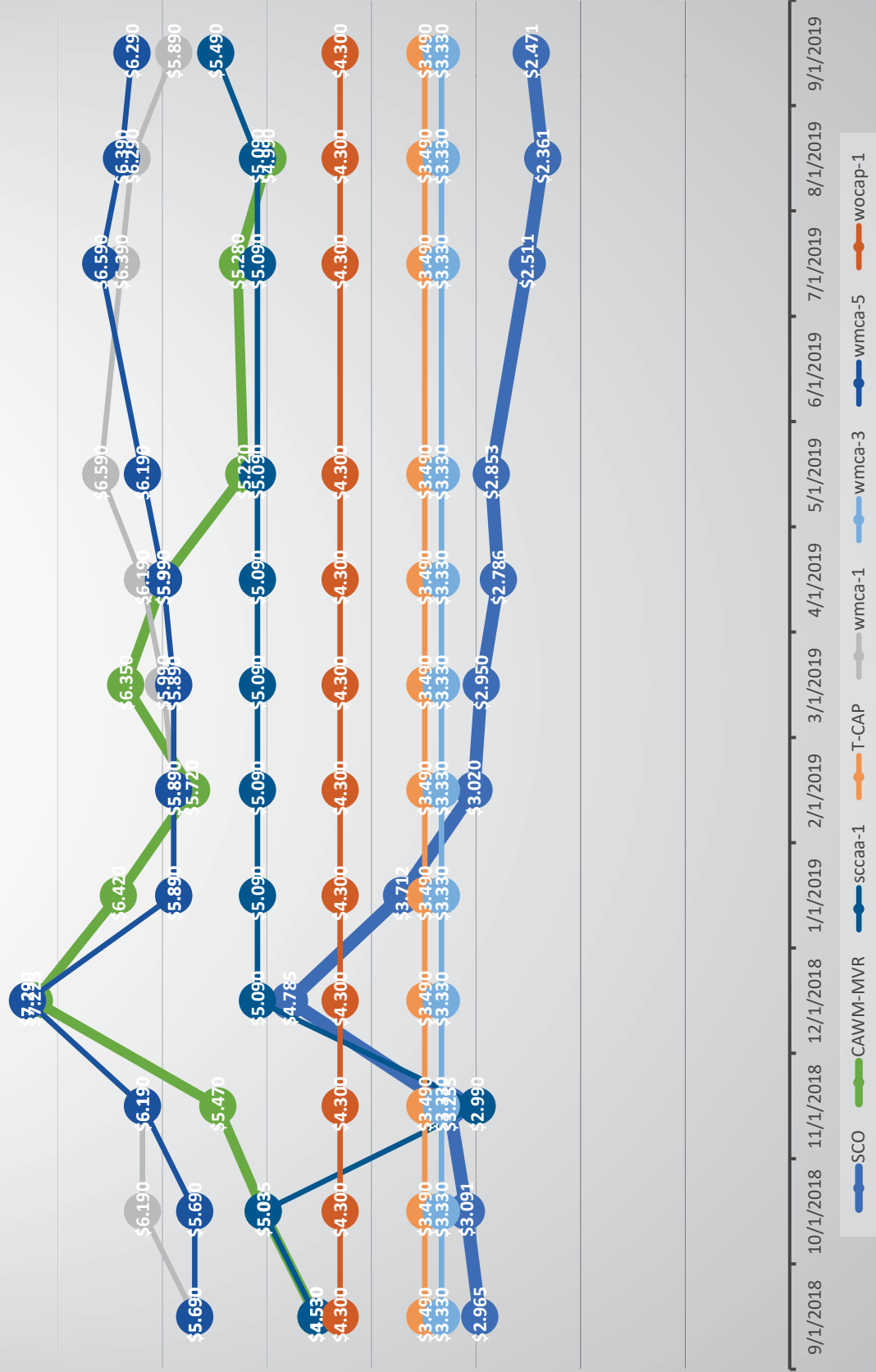
ATTORNEYS FOR THE EAST OHIO
COMPANY D/B/A DOMINION ENERGY OHIO

CERTIFICATE OF SERVICE

I hereby certify that a courtesy copy of the foregoing Responses and Objections was served by electronic mail this 17th day of October, 2019, to the following:

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/s/ Christopher T. Kennedy
One of the Attorneys for The East Ohio Gas
Company d/b/a Dominion Energy Ohio



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Case No(s). 18-1419-GA-EXM

Summary: Testimony of David C. Rinebolt electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy