

December 20, 2019

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

Re: *In re The East Ohio Gas Company d/b/a Dominion Energy Ohio*, Case No. 19-468-GA-ALT

Dear Ms. McNeal:

With respect to the Commission's September 11, 2019 Entry and its August 14, 2019 Entry issued in this proceeding, The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO) files the following request for extension, as described below.

By way of background, the August 14, 2019 Entry directed Staff to issue a request for proposal (RFP) for audit services to assist the Commission with an audit of DEO's Capital Expenditure Program (CEP) and associated CEP costs and deferrals. Among other things, the RFP identified the timeline for the audit, with a final audit report due to be filed with the Commission by February 26, 2020. (RFP at 6.) The September 11, 2019 Entry directed DEO to enter into a contract with Blue Ridge Consulting Services, Inc. (Blue Ridge) for these auditing services.

The RFP also advised that DEO's "legacy fixed-asset reporting system may not permit reporting of CEP versus non-CEP expenditures and assets," and that "a separate data repository is used to provide such reporting." (RFP at 4.) The RFP went on to note that "[f]or this reason, the required emphasis on CEP expenditures and assets may require additional time and/or selections (a) to identify and exclude non-CEP items from fixed-asset-system selections and/or (b) to trace selections from the data repository to the fixed asset system." (*Id.*) Although the RFP stated that the timeline reflected this issue, the RFP contemplated that the timeline "may be revisited and extended," if after conferring the parties determined that "any difficulties or delays are greater than assumed." (*Id.* at 4-5.)

As the RFP contemplated, DEO has despite its best efforts encountered difficulties in dealing with legacy reporting issues, and this has caused delays in producing certain data in response to Blue Ridge data requests. For this reason, DEO is requesting that the Commission approve a 60-day extension of all deadlines reflected in the RFP timeline, with the final audit report to be filed with the Commission by April 27, 2020. Granting this request will permit DEO additional time to fully respond to Blue Ridge's data requests and, in turn, will ensure that Blue Ridge has sufficient time to complete its auditing services. The August 14, 2019 Entry (Paragraph 16) also found that DEO would bear the costs of the audit services solicited in the

RFP; DEO acknowledges that it will bear any costs associated with this extension. DEO does not seek to modify any other terms of the RFP.

DEO discussed its intention to file this request with Staff and Blue Ridge, and neither indicated an objection to DEO's intention to file. DEO expects that Staff will file a recommendation in response.

Please note that a copy of this correspondence will be filed electronically in the above-captioned docket. Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Christopher T. Kennedy

*Counsel for The East Ohio Gas Company d/b/a
Dominion Energy Ohio*

CERTIFICATE OF SERVICE

I hereby certify that a courtesy copy of the foregoing document was served by electronic mail upon the following individuals on December 20, 2019:

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In addition, the PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

Office of the Ohio Consumers' Counsel
Northeast Ohio Public Energy Council

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

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12/20/2019 4:12:12 PM

in

Case No(s). 19-0468-GA-ALT

Summary: Correspondence Correspondence requesting extension of Blue Ridge audit electronically filed by Mr. Christopher T Kennedy on behalf of The East Ohio Gas Company d/ b/a Dominion Energy Ohio