

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The East :
Ohio Gas Company D/B/A Dominion :
Energy Ohio for Approval of Tariffs to : Case No. 19-1945-GA-RDR
Adjust its Automated Meter Reading Cost :
Recovery Charge to Recover Costs :
Incurred in 2019. :

COMMENTS
SUBMITTED ON BEHALF OF THE STAFF OF THE
PUBLIC UTILITIES COMMISSION OF OHIO

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**On behalf of the Staff of
The Public Utilities Commission of Ohio**

March 23, 2020

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INTRODUCTION

In accordance with the Public Utilities Commission of Ohio's (Commission) Opinion and Order adopting the Stipulation and Recommendation filed in Case No. 07-829-GA-AIR et al., the Staff of the Public Utilities Commission of Ohio (Staff) conducted its investigation in the above-referenced matter and submits its findings and recommendations to the Commission in these Comments.

The Commission's Rates and Analysis Department Staff prepared these Comments. Included are findings and recommendations resulting from financial reviews of The East Ohio Gas Company d/b/a Dominion Energy Ohio's (DEO or Company): proposed revenue requirement, matters related to its program to install automated meter reading (AMR) equipment on customer meters throughout its service area, and the associated AMR Cost Recovery Charge.

Pursuant to the Attorney Examiner's Entry dated March 6, 2020, these Comments are being filed with the Commission's Docketing Division. These Comments contain the

results of the Staff's investigation. These Comments do not reflect the views of the Commission and the Commission is not bound by Staff's representations and/or recommendations.

BACKGROUND

DEO is an Ohio corporation engaged in the business of providing natural gas service to approximately 1.2 million customers in northeastern, western, and southeastern Ohio communities.

In its October 15, 2008 Opinion and Order in Case No. 07-829-GA-RDR adopting the Stipulation and Recommendation (2007 Stipulation) filed by the parties, the Commission authorized DEO to establish an automated adjustment mechanism to recover the costs associated with an AMR program. The recovery mechanism, in the form of an annual rider, is designed to permit the Company to recover its annual costs to install AMR equipment on each of the nearly 1.3 million meters in its system over a five-year period. AMR equipment enables DEO to remotely read customers' meters, which promotes billing accuracy and customer convenience. The AMR program also lessens the need for estimated meter reads and for scheduling appointments to read inside meters.

The 2007 Stipulation established a process that called for annual filings to support proposed increases to the AMR Cost Recovery Charge. The process involves a pre-filing notice (PFN) being filed in November of each year. The filing must contain schedules with nine months of actual and three months of projected costs and related data in support of the rider increase. Also, the filing shall include a date certain of December 31st of the applicable year for property valuation. By February 28th of the following year, the

Company must then file an application updating the data provided to include a full year of actual data. The process then provides that, unless the Staff finds DEO's filing to be unjust or unreasonable or another party files an objection that is not resolved by DEO, Staff will recommend the Commission approve the Company's application. If approved by the Commission, the resulting increase to the AMR rider will take effect with the first billing cycle following the Commission order.

In accordance with the application process, on November 26, 2019, DEO issued a PFN in this case that included preliminary schedules containing projected data related to AMR costs incurred in 2019. On February 26, 2020, DEO filed its Application and supporting schedules with actual data for AMR device costs incurred in calendar year 2019. Although DEO completed installation of AMR devices throughout its system in 2012, it will continue to incur recoverable AMR-related costs such as depreciation and property tax expenses and continue to reduce the AMR Cost Recovery Charge by the annual operation and maintenance savings resulting from the AMR deployment. As a result, the Company will continue to file annual applications until the AMR costs are included in its base rates in its next base rate case. On March 6, 2020, the Attorney Examiner issued an Entry establishing the following procedural schedule:

- (a) March 23, 2020 – Deadline for filing of motions to intervene.
- (b) March 23, 2020 – Deadline for Staff and intervenors to file comments on the Application.
- (c) March 27, 2020 – Deadline for DEO to file a statement, informing the Commission whether the issues raised in the comments have been resolved.
- (d) March 31, 2020 – Deadline for the parties and Staff to file expert testimony.
- (e) In the event that some or all of the parties enter into a stipulation resolving some or all of the issues in this case, the parties must file such stipulation with the Commission by 9:00 a.m. on April 2, 2020.
- (f) In the event that all of the issues are not resolved or the parties enter into a stipulation, a hearing shall commence on April 3, 2020, at 10:00 a.m. at the offices of the Commission, 180 East Broad Street, 11th Floor, Hearing Room 11-D, Columbus, Ohio 43215. Any party requesting a continuance of the hearing must file a motion to continue the hearing with the Commission by 9:00 a.m. on April 2, 2020.

DEO’S APPLICATION

For recovery of 2019 AMR costs, DEO’s Application and supporting schedules propose an annualized revenue requirement of \$349,570.45, which when allocated to customers, results in a proposed AMR Cost Recovery Charge of \$0.02 per customer per month. The current rate that is being paid monthly by customers (as set last year in Case No. 18-1588-GA-RDR) is \$0.25 per customer.

STAFF’S REVIEW, COMMENTS, AND RECOMMENDATIONS

Staff reviewed the Company’s Application, schedules, testimony, and related documentation and confirmed that the Company properly applied the depreciation rates adopted in Case No. 19-1639-GA-AAM. Staff reviewed the Company’s schedules to

confirm that Normalized and Non-Normalized excess deferred income taxes (EDIT), including EDIT associated with post-in-service carrying costs (PISCC), is being refunded to customers in accordance with the Commission's Finding and Order in the previous year's Rider AMR filing.¹

Staff has no objections to DEO's Application and supporting documentation and recommends that the Commission approve DEO's Application.

Respectfully Submitted,

Dave Yost
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/s/ Robert Eubanks

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**On behalf of the Staff of
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¹ See *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion Energy Ohio for Approval of Tariffs to Adjust Its Automated Meter Reading Cost Recovery Charge to Recover Costs Incurred in 2018*, Case No. 18-1588-GA-RDR, Finding and Order (April 4, 2019).

PROOF OF SERVICE

I certify that a copy of the foregoing **Comments** was served via electronic mail and/or regular U.S. mail, postage prepaid upon the following parties of record this 23rd day of March, 2020.

/s/ Robert Eubanks

Robert Eubanks
Assistant Attorney General

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/23/2020 12:01:39 PM

in

Case No(s). 19-1945-GA-RDR

Summary: Comments Submitted on Behalf Of the Staff Of The Public Utilities Commission of Ohio electronically filed by Mrs. Kimberly M Naeder on behalf of PUCO