

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Operations of The East)	
Ohio Gas Company d/b/a Dominion Energy)	Case No. 20-0600-GA-UNC
Ohio During the Declared State of Emergency)	
and Related Matters.)	

**NOTICE REGARDING IMPLEMENTATION OF COVID-19 TRANSITION PLAN
OF THE EAST OHIO GAS COMPANY D/B/A DOMINION ENERGY OHIO**

The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO or the Company) hereby files the following notice regarding its implementation of its transition plan, in follow up to the Commission's July 15, 2020 Supplemental Finding & Order (the Order).

The Order directed DEO to file a plan for the safe resumption of activities that DEO had temporarily suspended in response to the 2019 novel coronavirus (COVID-19). Among other things, the Order provided as follows:

The Commission directs that PIPP income-based payments due or billed to the PIPP participant as of March 12, 2020, through August 2, 2020, which have not been paid by August 3, 2020, shall be added to the PIPP or Graduate PIPP participant's arrearage.

Id. ¶ 31. This provision of the Order included requirements that were not part of DEO's original plan to begin resuming normal operations, and soon after the Order, DEO began evaluating feasibility of implementation. The Company determined that significant programming difficulties and delays would be associated with carving out and individually transferring unpaid installments that had been due or billed within a defined date range. Such difficulties, however, were not presented if a customer's entire outstanding balance were transferred into arrearages.

DEO raised the issue with the Commission's Staff and discussed the possibility of adopting this latter approach. In DEO's view, this approach supported the same goals generally supported by the Commission, by further reducing the arrearages that might be owed by a PIPP customer at this time. DEO also believed that this approach was consistent with the

Commission's encouragement "to recognize the former PIPP participant's financial circumstances and to be flexible" in the offering of payment plans. *Id.* Moreover, DEO would note that of the total PIPP amount currently due, approximately 80 percent was incurred after March 12 – meaning that DEO's approach would only expand the amount transferring to arrearages by the incremental 20 percent. On the other hand, pursuing the course set forth in the Order would require significant programming, increased costs, and delayed implementation. DEO discussed the situation with Staff, who agreed that DEO's proposed approach was reasonable, but recommended an appropriate filing with the Commission.

For these reasons, DEO files this implementation notice to advise the Commission that the Company is proceeding to transfer *all* outstanding due or billed PIPP amounts as of August 2, 2020, into arrearages. DEO believes that this approach is consistent with the Order as stated above, and in view of both the time sensitivity and Staff's support, DEO intends to proceed accordingly. If and to the extent additional authority from the Commission is needed, DEO respectfully requests such authorization along with any other necessary or proper relief.

Dated: August 4, 2020

Respectfully submitted,

/s/ Andrew J. Campbell

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CERTIFICATE OF SERVICE

I hereby certify that a courtesy copy of the foregoing pleading was served by electronic mail on this 4th day of August, 2020, to the following:

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Summary: Notice Notice Regarding Implementation of COVID-19 Transition Plan
electronically filed by Christopher T Kennedy on behalf of The East Ohio Gas Company d/b/a
Dominion Energy Ohio