

**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 : Case No. 20-1624-GA-RDR
of Tariffs to Adjust its Automated :
Meter Reading Cost Recovery Charge :
and Related Matters :

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

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On behalf of the Staff of
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March 23, 2021

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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 (AMR Rider).

Pursuant to the Attorney Examiner's Entry dated March 2, 2021, 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 the Staff's representations 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 Rider. 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. The filing shall also 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, the 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 30, 2020, DEO issued a PFN in this case that included preliminary schedules containing projected data related to AMR costs incurred in 2020. On February 26, 2021, DEO filed its Application and supporting schedules with actual data for AMR device costs incurred in calendar year 2020. 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 Rider 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 2, 2021, the Attorney Examiner issued an Entry establishing the following procedural schedule:

- (a) March 23, 2021 – Deadline for filing of motions to intervene.
- (b) March 23, 2021 – Deadline for the Staff and intervenors to file comments on the Application.
- (c) March 29, 2021 – Deadline for DEO to file a statement, informing the Commission whether the issues raised in the comments have been resolved.
- (d) March 31, 2021 – Deadline for the parties and the 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, 2021.
- (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 5, 2021, at 10:00am. Given the continuing COVID-19 health emergency, the hearing will be held using remote access technology that facilitates participation by telephone and/or live video on the internet. Additional details and instructions regarding remote access to the hearing will be provided by future entry. Any party requesting a continuance of the hearing must file a motion to continue the hearing with the Commission by 10:00 a.m. on April 2, 2021.

DEO'S APPLICATION

For recovery of 2020 AMR costs, DEO's Application and supporting schedules propose an annualized revenue requirement of \$(58,259.16) that, when allocated to customers, results in a proposed AMR Rider of \$0.00 per customer per month. The current rate that is being paid monthly by customers (as set last year in Case No. 19-1945-GA-RDR) is \$0.02 per customer.

STAFF'S REVIEW, COMMENTS, AND RECOMMENDATIONS

The Staff reviewed the Company's Application, schedules, testimony, and related documentation and confirmed that the Company properly calculated the annualized revenue requirement proposed in this case. The Staff acknowledges a reconciliation component is not currently incorporated in the computation of the revenue requirement of AMR Rider; however, given that the revenue requirement of \$(58,259.16) results in a rider rate of \$0.00, the Staff recommends that the Company track and reconcile this component as part of the revenue requirement in next year's AMR Application. The Staff notes that without this reconciliation, customers will not receive the amounts owed to them. The Staff has no additional objections to DEO's Application and supporting documentation, and recommends the Commission approve DEO's Application, subject to the Staff's proposed modification.

Respectfully Submitted,

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

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, 2021.

/s/ Chelsea R. Fletcher

Chelsea R. Fletcher

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Summary: Comments electronically filed by Mrs. Tonnetta Y Scott on behalf of PUCO