Frank P. Darr
(614) 719-2855—Direct Dial
fdarr@mwncmh.com

October 5, 2018

Barcy McNeal

Secretary, Docketing Division

Public Utilities Commission of Ohio

180 East Broad Street

Columbus, Ohio 43215

**Re: Case No. 18-0420-GA-PIP**

Dear Secretary McNeal:

On September 21, 2018, Deloitte & Touche LLP (“D&T”) filed its Audit Report regarding Vectren Energy Delivery of Ohio, Inc.’s (“VEDO”) percentage of income payment plan (“PIPP”) rider. In section 3b of the report, D&T reported the following exception regarding the audit of the program credits applied by VEDO during the period May 1, 2017 to April 30, 2018:

1. D&T noted that one of the credit selections, in the amount of $395.09, was not recorded in accordance with the Energy Assistance Resource Guide, published by the Public Utilities Commission of Ohio (“PUCO”). This resulted in an over applied Delta credit of $378.42.

Response: VEDO concurs with D&T’s findings and will adjust accordingly in the next PIPP filing. As a result of this exception, a customer billing system defect has been identified that results in credits being incorrectly applied. The defect is the result of a combination of rarely occurring factors including: (1) a customer dropping off the PIPP program per their request; (2) this same customer signing up for the PIPP program at a later date, and (3) this same customer paying their required PIPP payment on time. This issue has been communicated with VEDO’s technical team to investigate the system defect, isolate the cause, and resolve the problem. Due to competing resources and scheduled system processes, the technical team will not be able to begin the investigation process earlier than the first quarter of 2019. Until the billing system “fix” is in place, VEDO will be reviewing accounts that fall within the defect criteria and will manually adjust any reviewed account that is not in accordance with the PIPP rules.

 Thank you for your kind attention to this matter.

Very truly yours,

*/s/ Frank P. Darr*

Frank P. Darr

**Attorney for Vectren Energy Delivery**

**of Ohio, Inc.**

FPD:pm