

FILE

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Adoption of Rules
for Alternative and Renewable Energy
Technologies and Resources, and
Emission Control Reporting
Requirements, and Amendment of
Chapters 4901:5-1, 4901:5-3, 4901:5-5,
and 4901:5-7 of the Ohio Administrative
Code, Pursuant to Chapter 4928,
Revised Code, to Implement Senate Bill
No. 221**

Case No. 08-888-EL-ORD

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**REPLY COMMENTS OF THE EAST OHIO GAS COMPANY
D/B/A DOMINION EAST OHIO**

The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO") hereby files its response to the comments filed in this case by The Ohio Consumer and Environmental Advocates ("OCEA") on September 9, 2008.

Because DEO is not an electric utility and this is an "EL" case, DEO did not file initial comments in the docket. It has since observed, however, that Staff has proposed revisions to the definitions section of Chapter 4901:5-7, Ohio Administrative Code, which pertains to "Gas and Natural Gas Forecast Reports." OCEA commented on Rule 4901:5-7-02(B) and proposed adding a new provision "requir[ing] the utility to show how energy efficiency resources are being optimized in the utility's resource procurement plan." (OCEA Comments, p. 82.)

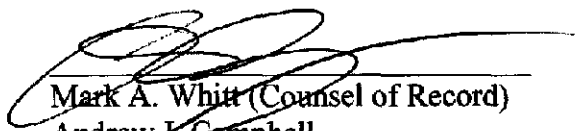
The addition proposed by OCEA should be rejected. OCEA's proposal is substantively ambiguous. It identifies no analytical framework from which to "describ[e] how the procurement of energy efficiency resources . . . are economically optimized relative to supply side options," and many of the terms of its proposed new section would be subject to multiple interpretations. (OCC Comments, p. 82.) Nor has OCEA justified imposing such a requirement

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on gas companies. No explanation is offered to justify any expansion of the current forecasting requirements. And some explanation is order, given that the industry has long recognized that integrated resource planning ("IRP") is more applicable to electric companies than natural gas companies due to the potential for IRP to eliminate electric generating capacity additions. Such concerns and benefits have no counterpart in the natural gas industry, making OCEA's proposal all the more unnecessary and unduly burdensome.

For the foregoing reasons, DEO respectfully requests the Commission reject the revision proposed by OCEA.

Respectfully submitted,



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CERTIFICATE OF SERVICE

A copy of the foregoing Reply Comments of The East Ohio Gas Company d/b/a

Dominion East Ohio was served upon the following parties this 26th day of September, 2008:¹

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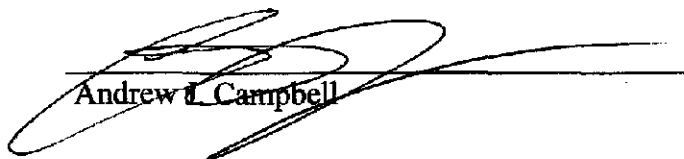
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