

FILE

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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO 2009 FEB 13 PM 5:21

PUCO

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Authority to Increase Rates for its Gas Distribution Service.

Case No. 07-829-GA-AIR

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of an Alternative Rate Plan for its Gas Distribution Service

Case No. 07-830-GA-ALT

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval to Change Accounting Methods

Case No. 07-831-GA-AAM

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of Tariffs to Recover Certain Costs Associated with a Pipeline Infrastructure Replacement Program Through an Automatic Adjustment Clause, And for Certain Accounting Treatment

Case No. 08-169-GA-ALT

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of Tariffs to Recover Certain Costs Associated with Automated Meter Reading Deployment Through an Automatic Adjustment Clause, and for Certain Accounting Treatment

Case No. 06-1453-GA-UNC

**MEMORANDUM CONTRA THE JOINT ADVOCATES'
JOINT MOTION TO REOPEN THE RECORD,
FOR WAIVER OF CERTAIN REQUIREMENTS OF OHIO ADM. CODE 4901-1-34(B),
AND FOR A PROCEDURAL SCHEDULE
OF THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO**

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I. INTRODUCTION

In their Motion, the Joint Advocates ask the Commission to reopen the proceedings in this case “for the purpose of admitting the Company’s updated COSS study into the record” (Mot., p. 12) and to establish a procedural schedule to enable “an appropriate review of the applicable year two rates (to be effective October 16, 2009)” (*id.*, p. 11). On both procedural and substantive grounds, the Motion must be denied.

Procedurally, this pleading, although captioned as a motion to reopen, actually seeks rehearing of matters determined in the December 19, 2008 Entry on Rehearing in this case. The time for rehearing has expired. *See* R.C. 4903.10. The Commission therefore is without jurisdiction to consider the pleading on the merits. *See Greer v. Pub. Util. Comm.* (1961), 172 Ohio St. 361, 362.

Substantively, even if the Motion was appropriately considered under Rule 4901-1-34, the Motion does not meet that rule’s standards for at least two reasons. First, the Joint Advocates cannot show good cause under Rule 4901-1-34(A). There is no reason the issues raised in the Motion cannot be taken up in a different proceeding. Further, the Joint Advocates’ Motion presents an incomplete picture of alleged intra-class subsidization. When PIPP program expense incurrence and rider payments are properly considered, it becomes clear that non-residential customers subsidize residential customers under the Year 2 rates currently planned for DEO’s GSS customers. Second, the Joint Advocates cannot show, as they must under Rule 4901-1-34(B), that the evidence to be presented “could not, with reasonable diligence, have been presented earlier in the proceeding.” All data necessary to prepare a class cost-of-service study reaching substantially similar conclusions as those reached in the study filed by DEO on January 13, 2009, was in the possession of the Joint Advocates well before the original hearing in this case.

II. ARGUMENT

A. **Because the Motion Is an Application for Rehearing, It Is Untimely and Should Be Denied.**

Although the Joint Advocates captioned their request as a motion to reopen under Rule 4901-1-34, it seeks rehearing of matters determined in the December 19, 2008 Entry on Rehearing. The deadline to seek rehearing, however, has expired. For this reason, the Commission is without jurisdiction to consider the Motion on the merits.

1. **The rehearing statute governs requests to introduce additional evidence regarding matters previously determined in the proceeding.**

After an order has been entered, R.C. 4903.10 provides that a party may “apply for rehearing in respect to any matters determined in the proceeding.” R.C. 4903.10 specifically provides that one purpose to seek rehearing is to consider “additional evidence.” Thus, “*after* the entry of [a final] order,” a party seeking to introduce additional evidence regarding matters previously determined must do so in compliance with R.C. 4903.10. *Cf.* Rule 4901-1-34(A) (authorizing reopening to take additional evidence “at any time *prior* to the issuance of a final order”) (emphasis added).

R.C. 4903.10 requires that rehearing requests must be filed within 30 days of the entry of the challenged order. This deadline is jurisdictional. “The commission . . . has no power to entertain an application for rehearing filed after the expiration of such 30-day period.” *Greer v. Pub. Util. Comm.* (1961), 172 Ohio St. 361, 362; *In re Thomas Mustric v. Columbia Gas of Ohio*, Case No. 01-2472-GA-CSS, Second Entry on Reh’g, ¶ 5 (Mar. 25, 2003) (“The 30-day time period established [for rehearing] by the Ohio General Assembly is jurisdictional and cannot be waived by the Commission.”). Notably, this deadline cannot be evaded by calling a request for rehearing something else. *E.g.*, *In re the Authorization of Norfolk S. Ry.*, Case No. 05-297-RR-FED, Entry on Reh’g, ¶ 5 (Jan. 18, 2006) (denying motions to stay and to dismiss

upon “find[ing] that these should be considered applications for rehearing . . . that were not filed within the 30-day time requirement”); *In re the Commission’s Investigation Into the Modification of Intrastate Access Charges*, Case No. 00-127-TP-COI, Entry, ¶ 7 (Jan. 23, 2003) (denying motion to alter access charge recovery upon finding “that it is in actuality an untimely and improper request . . . for the Commission to [grant] rehear[ing]”).

2. **Because the Motion seeks rehearing and was filed more than 30 days after the last entry in this case, the Commission is without jurisdiction to consider the Motion on the merits.**

The Commission is without jurisdiction to consider the Motion on the merits. The Joint Advocates expressly ask the Commission to consider additional evidence in connection with matters determined in the December 19, 2008 Entry on Rehearing. Thus, the Joint Advocates’ request is governed by R.C. 4903.10. Because the Joint Advocates make their request more than 30 days after the entry determining these matters, their Motion is untimely and must be denied.

- (a) **The Motion seeks to introduce additional evidence pertaining to matters determined in the December 19, 2008 Entry on Rehearing.**

On its face, the Motion pertains to matters that were specifically addressed in the December 19 Entry on Rehearing. In that entry, the Commission upheld its decision to adopt a modified SFV rate design, rejecting the Joint Advocates’ arguments that the evidence “did not support charging GSS class customers (residential and non-residential) uniform rates.” (Mot., p. 5; *see* Entry on Reh’g, pp. 6–7 (rejecting arguments regarding sufficiency of the evidence).) In fact, in response to the Joint Advocates’ arguments, the Commission specifically addressed the role of the to-be-filed Report and Recommendation that forms the basis of the present Motion:

[T]he additional information we will obtain through [the updated cost-of-service] study is not intended to address any issues relevant to the determination in these proceedings to move to a modified SFV rate design. Rather, the additional cost allocation information will provide us the opportunity to reassess whether it is appropriate

to separate the residential and nonresidential consumers in these classes, for future consideration.

Id., p. 6. Thus, both the decision to adopt uniform SFV for the GSS class and the issue whether the updated cost-of-service study was necessary to support that decision were determined in this proceeding on December 19, 2008.

The Motion seeks to revisit these very matters. On page 5 of the Motion, the Joint Advocates recount their arguments against the adoption of SFV that were made and rejected “[d]uring the proceedings.” They request reopening this case because “the updated COSS study” provides “evidence . . . that supports Joint Advocates’ [previously raised] arguments.” (Mot., p. 5.) Thus, the Joint Advocates are expressly asking the Commission to reconsider matters determined in the December 19, 2008 Entry on Rehearing.

Moreover, in asking the Commission to revisit these previously determined matters, the Joint Advocates seek a form of relief specifically provided by the rehearing statute. They ask the Commission to “reopen the record and admit the updated COSS into evidence” (Mot., p. 10), a basis for rehearing specifically contemplated by statute, *see* R.C. 4903.10 (authorizing the Commission, under certain conditions, to “specify the scope of the additional evidence, if any, that will be taken” on rehearing).¹

Thus, the Motion—asking the Commission to revisit matters determined in the December 19, 2008 Entry on Rehearing and seeking to reopen the hearing to take additional evidence—falls directly within the scope of R.C. 4903.10. Thus, the Motion must be considered an application for rehearing.

¹ For the reasons set forth in Section II.B.2, even if the Joint Advocates’ application for rehearing was timely, the Commission would nevertheless lack authority to allow the study in evidence because the Joint Advocates could have, “with reasonable diligence, . . . offered [the evidence] upon the original hearing.” *See* R.C. 4903.10.

(b) The Motion is untimely, and the Commission is without jurisdiction to grant it.

Because the Motion must be considered an application for rehearing, it is untimely and the Commission is without jurisdiction to consider it on the merits. The last “order” in the case was entered on December 19, 2008, and the Motion was filed on January 29, 2009, more than “thirty days after the entry of the order.” R.C. 4903.10. This deadline, as noted, is jurisdictional. Thus, the Commission may not entertain the Motion and must deny it. *See Greer*, 172 Ohio St., at 362.

3. There is no reason the Joint Advocates could not have filed their Motion before the expiration of the rehearing deadline.

The Joint Advocates’ Motion could have been filed before the expiration of the rehearing deadline. DEO filed and served the updated study on January 13, 2009, almost one week before the deadline for rehearing elapsed. The Report and Recommendation itself was only four pages. It highlighted the relevant issue, straightforwardly explaining, “it appears residential customers will generate an increasingly higher return on rate base, while it appears non-residential customers will generate an increasingly lower return on rate base.” (Rep., pp. 3–4.) In addition to the narrative report and the study itself, DEO provided a number of spreadsheets that digested and summarized the pertinent information. (*E.g., id.*, Att. 1 (summarizing rate of return provided by various classes, including residential and non-residential GSS customers, during Years 1 through 3).) In short, DEO’s filing was quickly digestible. If the Joint Advocates wanted to reopen the hearing, doing so in timely fashion could have followed shortly after the publication of DEO’s materials. With reasonable diligence, the Motion could have been filed before the deadline, not ten days after it expired.

B. Even if Considered as a Motion to Reopen the Proceedings, the Motion Should Still Be Denied.

R.C. 4903.10 regarding applications for rehearing—not Rule 4901-1-34 regarding motions to reopen proceedings—applies. Under R.C. 4903.10, the Joint Advocates’ request is time barred. But even if Rule 4901-1-34 did apply, the Motion should still be denied because it fails to show either: (1) that good cause exists; or (2) that the evidence could not, with reasonable diligence, have been presented earlier in the proceeding.

1. The Joint Advocates have not shown good cause for reopening the proceedings.

Rule 4901-1-34(A) provides that a motion to reopen must show “good cause” to reopen the proceedings. Fundamentally, the Joint Advocates have failed to explain why the issues raised in the Motion could not just as effectively be addressed in a separate proceeding. They seek review only of “the applicable year two rates (to be effective October 16, 2009).” (Mot., p. 11.) While this conceivably could call for a modestly accelerated procedural schedule, it provides no basis for reopening this proceeding. The fact that Year 2 rates were *established* in this proceeding does not mean that Year 2 rates must be *reviewed* in this proceeding as well. Indeed, there is no reason why they must be addressed in this case. The Commission possesses continuing authority to review the reasonableness of the rates charged by utilities. There would be no substantive difference between a review of year-two rates in this proceeding and a review of year-two rates in any other proceeding. In light of the Commission’s continuing powers of rate review, the Joint Advocates have shown *no* cause to reopen these proceedings, much less good cause.

Further, as their sole argument on this point, the Joint Advocates assert that “[t]he significant and verifiable harm to residential customers under the existing SFV rate design which is demonstrated by the updated COSS study . . . provides good cause” for reopening the

proceeding. (Mot., p. 6.) This harm, according to the Joint Advocates, arises from the purported “subsidiz[ation]” of “high-volume Commercial and Industrial customers and high-use residential customers” by “low-volume residential users.” (*Id.*, p. 10.)

Like the updated study, the Joint Advocates tell only part of the story. For example, the study and the Joint Advocates fail to reflect any intra-class subsidy arising from the Percentage of Income Payment Program (“PIPP”). Not a single non-residential customer participates in PIPP; the program is available only to residential customers. Nevertheless, although non-residential customers receive no direct benefit from the program, they bear a considerable portion of its costs through payment of the PIPP rider. In short, residential customers benefit from a subsidy from non-residential customers. This subsidy is substantial.

If PIPP expenses are allocated solely to residential customers and PIPP Rider revenues are allocated to each class based on PIPP Rider amounts billed, the relative rates of return generated by certain customer classes² change dramatically:

Customer Class	Rate of Return Per 1/13/09 Study	Rate of Return Considering PIPP Expense Shift
Overall DEO	8.48%	8.48%
GSS/ECTS Res	8.74%	6.59%
GSS/ECTS Non-Res	3.23%	9.38%
GSS Overall	7.79%	7.07%
LVGSS/LVECTS	8.89%	16.28%
GTS/TSS	13.25%	15.99%
DTS	5.15%	5.15%
Storage	21.15%	21.15%

Thus, the sole harm alleged by the Joint Advocates to justify reopening—a subsidy from residential to non-residential customers—is non-existent. In fact, the subsidy flows in the opposite direction. Addressing one alleged cross-subsidy while ignoring an offsetting one

² Using Year 2 rates.

flowing in the opposite direction would only serve to make rates less cost-based. The Joint Advocates' failure to show good cause presents another, independent reason to deny the Motion.

2. The evidence necessary to present an updated cost-of-service study similar to that filed by DEO has long been available to the Joint Advocates.

To reopen a proceeding for the purpose of presenting "additional evidence," Rule 4901-1-34(B) requires the movant to "set forth facts showing why such evidence could not, with reasonable diligence, have been presented earlier in the proceeding." The Joint Advocates fail to make this showing.

The Joint Advocates argue that "[a]t the time the Commission issued its Opinion and Order approving the SFV rate design," "the data and information necessary to confirm Joint Advocates' position was in the sole possession of the Company." (Mot., p. 9.) This is demonstrably false. The Office of the Ohio Consumers Counsel ("OCC") was in possession of all data necessary to perform a residential/non-residential cost-of-service study, had employed a specialist in cost-of-service studies, and had identified the precise issue at stake in the present motion. All these things occurred at least weeks (and likely months) before the hearing.

(a) OCC was in possession of all data necessary to update DEO's cost-of-service study on February 20, 2008.

On February 20, 2008, months before the August hearing, the Joint Advocates were in possession of all data necessary to perform a cost-of-service study similar to that filed by DEO on January 13, 2009. The specific data necessary to perform a study and the manner that this data was received by the Joint Advocates were as follows:³

³ See DEO Exhibit 1, attached to this Memorandum Contra, which is an affidavit from Cliff Andrews, who performed both the original and updated cost-of-service studies in these cases.

NECESSARY INFORMATION	HOW PROVIDED	WHEN PROVIDED
Number of customer bills for each rate schedule broken down by residential and non-residential customers	E-4 & E-4.1 schedules	Publicly filed on August 30, 2007
Amount of natural gas consumption for each rate schedule broken down by residential and non-residential customers	E-4 & E-4.1 schedules	Publicly filed on August 30, 2007
Revenue by category: customer charge, delivery charge, gas cost, riders, and taxes for each rate schedule broken down by residential and non-residential customers	E-4 & E-4.1 schedules	Publicly filed on August 30, 2007
Peak-day consumption for each rate schedule broken down by residential and non-residential customers	Test Year Forecast.xls spreadsheet submitted by DEO pursuant to PUCO Staff data request #10.2	Submitted to OCC via electronic mail on February 20, 2008 ⁴
Monthly natural gas consumption for each rate schedule broken down by residential and non-residential customers	Test Year Forecast.xls spreadsheet submitted by DEO pursuant to PUCO Staff data request #10.2	Submitted to OCC via electronic mail on February 20, 2008
Number of customer bills by month for each rate schedule broken down by residential and non-residential customers	Test Year Forecast.xls spreadsheet submitted by DEO pursuant to PUCO Staff data request #10.2	Submitted to OCC via electronic mail on February 20, 2008

Thus, by the end of February 2008, the Joint Advocates could have prepared a cost-of-service study similar to the one filed by DEO on January 13, 2009.

⁴ See DEO Exhibit 2, attached to this Memorandum Contra, which is an affidavit from Vicki Friscic, who coordinated discovery in this case and at whose direction this information was submitted to OCC. The e-mail, data request response, and spreadsheet are attached to Ms. Friscic's affidavit.

(b) OCC presented testimony from a cost-of-service specialist on June 23, 2008.

Not only did OCC have the data necessary to perform an updated cost-of-service study, it had the requisite personnel. As part of this case, OCC retained an individual with claimed expertise in cost of service studies. OCC witness Frank Radigan testified regarding cost of service; he listed “cost of service studies” as one of his “fields of specialization.” (See OCC Ex. 21.0 (Radigan Dir.), Att. FWR-1, p. 1 (filed June 23, 2008).) Thus, no later than June 23, 2008 (and surely earlier), OCC possessed all data necessary to perform a residential/non-residential cost-of-service study *and* had in its hire a person specializing in such studies.

(c) OCC had identified the purported flaw in the cost-of-service study on June 23, 2008.

What is more, on June 23, 2008, OCC’s cost-of-service expert identified the precise issue raised by the Joint Advocates’ Motion in his direct testimony. He testified that the cost-of-service study filed by DEO was “problematic because the GSS class includes both residential and nonresidential customers.” (*Id.*, p. 21.) He opined that Staff should have “require[d] DEO to segregate the current GSS class into residential and non-residential.” (*Id.*) For reasons unexplained, however, neither OCC nor Mr. Radigan ever undertook such a study.

In short, the record in this case shows that OCC had everything it needed—data, personnel, and an understanding of the issue—to perform a residential/non-residential cost-of-service study *no later than* five weeks before the beginning of the hearing in this proceeding. The Joint Advocates never explain why, given their ability to have performed a study like DEO’s, they failed to do one. With reasonable diligence, OCC could have presented such a study at the original hearing in this case. The failure to do so mandates that the Joint Advocates’ request to reopen be denied.

III. CONCLUSION

For the foregoing reasons, the Commission should deny the Joint Advocates' Motion.

Respectfully submitted,



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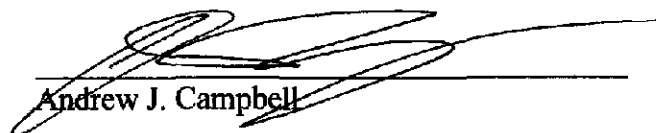
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Memorandum Contra of The East Ohio Gas Company d/b/a Dominion East Ohio was delivered to the following persons by electronic mail this 13th day of February, 2009.


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AFFIDAVIT OF CLIFFORD E. ANDREWS

CLIFFORD E. ANDREWS, being first duly sworn, states:

1. I am employed by The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO") as Financial Consultant. My business address is 1201 East 55th Street, Cleveland, Ohio 44103. I am currently responsible for analyzing and modeling various regulatory and rate

design concepts. Additionally, I am responsible for developing annual and long-term throughput and revenue forecasts for the industrial customer segment. I also have responsibilities in the area of strategic planning for the company. Through my experience in the industry and with the Company, I have developed an understanding of the usage patterns of the various customer classes served by DEO and the nature of the costs incurred to serve them. I prepared the cost-of-service study and testimony regarding my preparation of that study that were filed in this case on August 30, 2007. I also prepared the updated cost-of-service study that was filed in this case on January 13, 2009.

2. I have reviewed the Motion to Reopen the Record that was filed in this case on January 29, 2009, by the Office of the Ohio Consumers' Counsel ("OCC").

3. In my August 30, 2007 direct testimony, I explained the method by which I prepared the cost-of-service study filed in this case on August 30, 2007. As explained in greater detail in my direct testimony, I used a three-step process generally referred to as functionalization, classification and allocation, which is in my experience a recognized and accepted methodology for performing a cost of service study in the natural gas industry.

4. The cost-of-service study filed on January 13, 2009, was an update of the August, 30, 2007 study. To update the original study, it was only necessary to reallocate costs within the GSS/ECTS class to capture residential and non-residential customer segments.

5. To reallocate costs among residential and non-residential customers within the GSS/ECTS class, the following data was necessary:

- Number of customer bills for each rate schedule broken down by residential and non-residential customers
- Amount of natural gas consumption for each rate schedule broken down by residential and non-residential customers

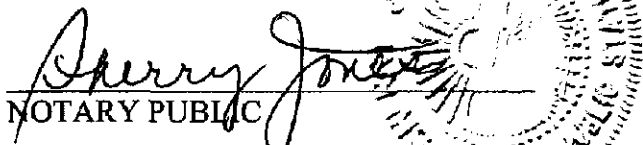
- Revenue by category: customer charge, delivery charge, gas cost, riders, and taxes for each rate schedule broken down by residential and non-residential customers
- Peak-day consumption for each rate schedule broken down by residential and non-residential customers
- Monthly natural gas consumption for each rate schedule broken down by residential and non-residential customers
- Number of customer bills by month for each rate schedule broken down by residential and non-residential customers


6. With the foregoing data, a person would have been able to prepare a cost-of-service study reaching substantially the same conclusions regarding intra-class subsidization within the GSS/ECTS class as were reached in the cost-of-service study filed in this case by DEO on January 13, 2009. While it is conceivable that a person preparing a cost-of-service study could desire to incorporate additional data based on the exercise of his or her professional judgment, the foregoing data by itself would have been sufficient to develop a study substantially similar to that filed on January 13, 2009.


CLIFFORD E. ANDREWS

Sworn to and subscribed in my presence by CLIFFORD E. ANDREWS on this 12TH
day of February, 2009

SHERRY JONES
NOTARY PUBLIC • STATE OF OHIO
Recorded in Cuyahoga County
My commission expires Jan. 22, 2013


NOTARY PUBLIC



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AFFIDAVIT OF VICKI H. FRISCIC

VICKI H. FRISCIC, being first duly sworn, states:

1. I am employed by The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO") as Director, Regulatory and Pricing. My business address is 1201 East 55th Street,

Cleveland, Ohio 44103. Among other responsibilities, I coordinated DEO's responses to data requests and discovery requests in the above-captioned cases.

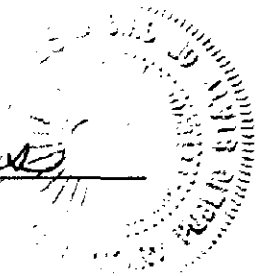
2. At my direction and with my knowledge, DEO transmitted a spreadsheet entitled "Test Year Forecast.xls" to the Office of the Ohio Consumers' Counsel ("OCC") via electronic mail on February 20, 2008. This spreadsheet had been submitted in response to PUCO Staff Data Request No. 10.2. A true and correct copy of the electronic mail, data request response, and spreadsheet are attached to this Affidavit.


VICKI H. FRISCIC

Sworn to and subscribed in my presence by VICKI H. FRISCIC on this 11TH day of February, 2009.

SHERRY JONES
NOTARY PUBLIC • STATE OF OHIO
Recorded in Cuyahoga County
My commission expires Jan. 22, 2013


NOTARY PUBLIC



Attachment to DEO Exhibit 2
(V. Friscic Affidavit)



Melanie.M.MoneyPenny@dom.com

02/20/2008 02:51 PM

To serio@occ.state.oh.us, poulos@occ.state.oh.us,
sauer@occ.state.oh.us
cc Jeff.Murphy@dom.com, Vicki.H.Friscic@dom.com,
mawhitt@jonesday.com, ajcampbell@JonasDay.com,
anne.hammerstein@puc.state.oh.us,
bcc

Subject PUCO Responses

History: This message has been forwarded.

CONFIDENTIALITY NOTICE: This electronic message contains information which may be legally confidential and/or privileged and does not in any case represent a firm ENERGY COMMODITY bid or offer relating thereto which binds the sender without an additional express written confirmation to that effect. The information is intended solely for the individual or entity named above and access by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution, or use of the contents of this information is prohibited and may be unlawful. If you have received this electronic transmission in error, please reply immediately to the sender that you have received the

- message in error, and delete it. Thank you.** [10][1].pdf [10][2].pdf [14][].pdf [15][].pdf [19][1 a-b].pdf
[19][2 a-b].pdf [19][3 a].pdf [19][4 a-b].pdf [10.2][].pdf DTS Usage by Day 151 Days.xls TEST_YEAR_FORECAST.XLS
Example.xls

The East Ohio Gas Company d/b/a Dominion East Ohio
Case No. 07-0829-GA-AIR
Response to Data Requests

Requesting Party:

PUCO

Data Request Set:

Marchia Rutherford

Question Number:

10

Subpart:

2

Request Date:

12/18/2007

Due Date:

12/31/2007

Topic:

Peak Day (Average/Excess Peak Day) Calculation

Question:

Show how the above information ties back to calculations as provided in work paper WPE-3.2g.

Answer:

The peak day provided in response to data request 10 part 1a for February 2007 is 2,154,474. The HDD for that date was 63. WPE-3.2q shows a peak day of 2,407,024 at 78 HDD.

Preparer Of Response:

Larry Rice

Date Prepared:

12/20/2007 04:05:15 PM EST

Attachments:

No

Domestic East Ohio
Test Year
Customer Counts

Residential

	Jan 2007	Feb 2007	Mar 2007	Apr 2007	May 2007	Jun 2007	Jul 2007	Aug 2007	Sep 2007	Oct 2007	Nov 2007	Dec 2007
East Side CCS - GSS SSO	345,610	350,458	357,878	354,926	353,536	351,673	350,299	349,251	349,246	351,565	354,015	355,354
East Side CCS - GSS Choice	733,234	727,895	718,948	719,065	715,018	711,252	706,473	706,351	706,343	711,083	715,968	718,695
East Side CCS - LVGSS SSO	30	30	30	30	30	30	30	30	30	30	30	30
East Side CCS - LVGSS Choice	262	262	262	262	262	262	262	262	262	262	262	262
East Side CCS - GTS	1	1	1	1	1	1	1	1	1	1	1	1
East Side SRS - GSS SSO	57	57	57	57	57	57	57	57	57	57	57	57
East Side SRS - GSS Choice	63	63	63	63	63	63	63	63	63	63	63	63
East Side SRS - LVGSS SSO	14	14	14	14	14	14	14	14	14	14	14	14
East Side SRS - LVGSS Choice	38,291	38,291	38,291	38,296	38,098	37,898	37,730	37,637	37,636	37,846	38,130	38,294
West Side CCS - GSS SSO	21,857	21,802	21,536	21,321	21,393	21,280	21,197	21,134	21,133	21,274	21,422	21,503
West Side CCS - GSS Choice	345,611	350,459	357,879	354,927	353,537	351,674	350,300	349,252	349,247	351,567	354,016	355,355
SSO LVGSS	30	30	30	30	30	30	30	30	30	30	30	30
CMAS GSS	727,892	727,892	718,903	719,122	715,075	711,209	706,430	706,408	706,400	711,092	715,043	718,752
CMAS LVGSS	66	66	66	66	66	66	66	66	66	66	66	66
W GSR SSO	38,291	38,291	38,292	38,296	38,098	37,898	37,730	37,637	37,636	37,846	38,130	38,294
W GSR Choice	21,857	21,802	21,536	21,321	21,393	21,280	21,197	21,134	21,133	21,274	21,422	21,503
Total East Side - Residential	1,072,323	1,078,742	1,072,285	1,074,470	1,069,083	1,063,404	1,059,234	1,056,081	1,056,068	1,063,080	1,070,482	1,074,528
Total West Side - Residential	59,898	60,063	59,918	59,617	59,491	59,178	58,947	58,771	58,769	59,160	59,572	59,797
Total Residential	1,132,221	1,138,805	1,132,203	1,134,087	1,128,574	1,122,582	1,118,181	1,114,852	1,114,837	1,122,240	1,130,054	1,134,325

Commercial

	Jan 2007	Feb 2007	Mar 2007	Apr 2007	May 2007	Jun 2007	Jul 2007	Aug 2007	Sep 2007	Oct 2007	Nov 2007	Dec 2007
East Side CCS - GSS SSO	22,728	22,003	22,753	22,555	22,295	22,149	22,071	22,041	22,060	22,305	22,527	22,729
East Side CCS - GSS Choice	31,422	31,592	31,479	31,602	31,445	31,114	30,937	30,868	30,911	30,468	30,969	31,426
East Side CCS - LVGSS SSO	1,082	1,083	1,083	1,073	1,064	1,054	1,049	1,049	1,050	1,052	1,052	1,052
East Side CCS - GTS-E	820	823	821	814	805	800	797	796	796	805	813	820
East Side SRS - GSS SSO	314	315	314	312	308	305	305	305	305	308	311	314
East Side SRS - GSS Choice	299	299	299	299	299	299	299	299	299	299	299	299
East Side SRS - LVGSS SSO	54	54	54	54	54	54	54	54	54	54	54	54
East Side SRS - LVGSS Choice	207	207	207	207	207	207	207	207	207	207	207	207
East Side SRS - GTS	732	732	732	732	732	732	732	732	732	732	732	732
West Side SRS - GTS	112	112	112	112	112	112	112	112	112	112	112	112
West Side CCS - GSS SSO	3	3	3	3	3	3	3	3	3	3	3	3
West Side CCS - GSS Choice	3,313	3,312	3,295	3,248	3,248	3,248	3,248	3,248	3,248	3,248	3,248	3,248
West Side CCS - GSS SSO	2,809	2,796	2,785	2,785	2,745	2,728	2,718	2,714	2,716	2,746	2,778	2,798
West Side CCS - LVGSS SSO	21	21	21	21	21	21	21	21	21	21	21	21
West Side CCS - LVGSS Choice	56	56	56	56	56	56	56	56	56	56	56	56
West Side SRS - GSS SSO	91	91	91	90	89	88	88	88	88	88	88	88
West Side SRS - GSS Choice	4	4	4	4	4	4	4	4	4	4	4	4
West Side SRS - LVGSS SSO	1	1	1	1	1	1	1	1	1	1	1	1
West Side SRS - LVGSS Choice	4	4	4	4	4	4	4	4	4	4	4	4
West Side SRS - GTS	31	31	31	31	31	31	31	31	31	31	31	31
West Side SRS - GTS Daily Balance	3	3	3	3	3	3	3	3	3	3	3	3
Total East Side - Commercial	78,486	78,739	77,903	77,027	76,534	76,270	76,168	76,232	77,061	77,809	78,491	78,491
Total West Side - Commercial	6,374	6,343	6,289	6,200	6,162	6,140	6,131	6,136	6,202	6,203	6,203	6,318
Total Commercial	84,860	85,082	84,192	83,227	82,696	82,410	82,399	82,368	83,263	84,012	84,694	84,809

Dominion East Ohio
Test Year
Customer Counts

	Jan 2007	Feb 2007	Mar 2007	Apr 2007	May 2007	Jun 2007	Jul 2007	Aug 2007	Sep 2007	Oct 2007	Nov 2007	Dec 2007
Industrial												
East Side CCS - GSS SSO	122	122	122	122	122	122	122	117	117	117	117	117
East Side CCS - GSS Choice	183	183	183	183	183	183	183	178	178	178	178	178
East Side CCS - LVGSS SSO	15	15	15	15	15	15	15	15	15	15	15	15
East Side CCS - LVGSS Choice	43	43	43	43	43	43	43	43	43	43	43	43
East Side CCS - GTS-F	49	49	49	49	49	49	49	49	49	49	49	49
East Side SRS - GSS SSO	208	205	203	203	193	182	184	184	184	193	198	211
East Side SRS - GSS Choice	105	105	105	105	105	105	105	105	105	105	105	105
East Side SRS - LVGSS SSO	20	20	20	20	20	20	20	20	20	20	20	20
East Side SRS - LVGSS Choice	62	62	62	62	62	62	62	62	62	62	62	62
East Side SRS - GTS Choice	641	641	641	641	641	641	641	641	641	641	641	641
East Side SRS - GTS	65	65	65	65	65	65	65	65	65	65	65	65
East Side SRS - DTFS	12	12	12	12	12	12	12	12	12	12	12	12
West Side CCS - GSS SSO	7	7	7	7	7	7	7	7	7	7	7	7
West Side CCS - GSS Choice	2	2	2	2	2	2	2	2	2	2	2	2
West Side CCS - LVGSS SSO	4	4	4	4	4	4	4	4	4	4	4	4
West Side CCS - LVGSS Choice	1	1	1	1	1	1	1	1	1	1	1	1
West Side CCS - GTS-W	10	10	10	10	10	10	10	10	10	10	10	10
West Side SRS - GSS SSO	2	2	2	2	2	2	2	2	2	2	2	2
West Side SRS - GSS Choice	2	2	2	2	2	2	2	2	2	2	2	2
West Side SRS - LVGSS Choice	48	48	48	48	48	48	48	48	48	48	48	48
West Side SRS - GTS	18	18	18	18	18	18	18	18	18	18	18	18
West Side SRS - GTS Daily Balance	1,513	1,510	1,508	1,508	1,498	1,487	1,489	1,479	1,479	1,488	1,493	1,506
Total East Side - Industrial	1,04	1,06	1,06	1,06	1,06	1,06	1,06	1,06	1,06	1,06	1,06	1,06
Total West Side - Industrial	1,619	1,616	1,614	1,614	1,604	1,593	1,595	1,583	1,583	1,594	1,599	1,612
Total Industrial												

Non-Residential

SSO GSS	23,429	23,501	23,449	23,251	22,981	22,824	22,748	22,713	22,732	22,986	23,213	23,428
SSO LVGSS	431	432	431	428	424	422	421	420	421	424	428	431
CMAS GSS	52,009	52,179	52,066	51,619	51,032	50,791	50,524	50,490	50,493	51,050	51,551	52,008
CMAS LVGSS	1,394	1,397	1,394	1,385	1,373	1,366	1,362	1,361	1,362	1,374	1,384	1,394
GTS	2,342	2,245	2,241	2,236	2,227	2,222	2,219	2,218	2,218	2,227	2,235	2,242
TSS	426	427	426	424	420	418	417	417	417	420	420	426
DTFS	68	68	68	68	68	68	68	68	68	68	68	68
W GSR SSO	3,339	3,349	3,338	3,321	3,274	3,253	3,242	3,237	3,240	3,275	3,307	3,336
W GSR Choice	2,810	2,819	2,809	2,795	2,785	2,778	2,778	2,724	2,726	2,756	2,783	2,808
W LVGSS SSO	23	23	23	23	23	23	23	23	23	23	23	23
W LVGSS Choice	66	66	66	65	64	64	64	64	64	64	65	65
W GSR GTS	171	171	171	170	169	169	168	168	168	169	170	171
W GSR GTS Daily Balance	21	21	21	21	21	21	21	21	21	21	21	21

Dominion East Ohio
BaseLoad - Daily per customer

	Jan 2007	Feb 2007	Mar 2007	Apr 2007	May 2007	Jun 2007	Jul 2007	Aug 2007	Sep 2007	Oct 2007	Nov 2007	Dec 2007
Residential												
East Side CCS - GSS SSO	0.0664	0.0655	0.0629	0.0699	0.0682	0.0593	0.0734	0.0661	0.0746	0.0683	0.0677	0.0664
East Side CCS - GSS Choice	0.0664	0.0655	0.0629	0.0699	0.0682	0.0593	0.0734	0.0661	0.0746	0.0683	0.0677	0.0664
East Side CCS - LVGSS SSO	2.9248	2.8219	2.7489	2.9235	2.9040	2.7211	3.1640	2.8342	3.0182	2.9302	2.7270	2.9187
East Side CCS - LVGSS Choice	2.9248	2.8219	2.7489	2.9235	2.9040	2.7211	3.1640	2.8342	3.0182	2.9302	2.7270	2.9187
East Side CCS - GTS	1.5644	1.5888	1.3752	1.6043	1.5997	1.2907	1.9154	1.3012	1.8155	1.6323	1.5456	1.5823
East Side SBS - GSS SSO	6.4979	6.4979	6.4979	6.4979	6.4979	6.4979	6.4979	6.4979	6.4979	6.4979	6.4979	6.4979
East Side SBS - GSS Choice	6.4979	6.4979	6.4979	6.4979	6.4979	6.4979	6.4979	6.4979	6.4979	6.4979	6.4979	6.4979
East Side SBS - LVGSS Choice	6.2735	6.2735	6.2735	6.2735	6.2735	6.2735	6.2735	6.2735	6.2735	6.2735	6.2735	6.2735
East Side SBS - GTS	14.8698	14.8698	14.8698	14.8698	14.8698	14.8698	14.8698	14.8698	14.8698	14.8698	14.8698	14.8698
West Side CCS - GSR SSO	0.0454	0.0451	0.0427	0.0483	0.0475	0.0346	0.0508	0.0441	0.0518	0.0486	0.0472	0.0460
West Side CCS - GSR Choice	0.0454	0.0451	0.0427	0.0483	0.0475	0.0346	0.0508	0.0441	0.0518	0.0486	0.0472	0.0460
Commercial												
East Side CCS - GSS SSO	0.2558	0.2493	0.2350	0.2804	0.2804	0.2679	0.2679	0.2679	0.2816	0.2701	0.2653	0.2532
East Side CCS - GSS Choice	0.2558	0.2493	0.2350	0.2804	0.2804	0.2679	0.2679	0.2679	0.2816	0.2701	0.2653	0.2532
East Side CCS - LVGSS SSO	2.2946	2.2691	2.2104	2.3776	2.4429	2.1173	2.4476	2.4476	2.7372	2.3973	2.3408	2.1543
East Side CCS - LVGSS Choice	2.2946	2.2691	2.2104	2.3776	2.4429	2.1173	2.4476	2.4476	2.7372	2.3973	2.3408	2.1543
East Side CCS - GTS-E	4.7016	4.6958	4.6164	4.8627	4.8094	4.9366	4.9366	4.9366	5.2733	4.9691	4.8945	2.6968
East Side CCS - TSS	0.6684	0.6856	0.6770	0.6716	0.6685	0.5880	0.5880	0.5880	0.8275	0.7160	0.6693	0.6882
East Side SBS - GSS SSO	1.8022	1.8022	1.8022	1.8022	1.8022	1.8022	1.8022	1.8022	1.8022	1.8022	1.8022	1.8022
East Side SBS - GSS Choice	1.8022	1.8022	1.8022	1.8022	1.8022	1.8022	1.8022	1.8022	1.8022	1.8022	1.8022	1.8022
East Side SBS - LVGSS SSO	4.7080	4.7080	4.7080	4.7080	4.7080	4.7080	4.7080	4.7080	4.7080	4.7080	4.7080	4.7080
East Side SBS - LVGSS Choice	4.7080	4.7080	4.7080	4.7080	4.7080	4.7080	4.7080	4.7080	4.7080	4.7080	4.7080	4.7080
East Side SBS - GTS	13.4906	13.4906	13.4906	13.4906	13.4906	13.4906	13.4906	13.4906	13.4906	13.4906	13.4906	13.4906
East Side SBS - TSS	0.7592	0.7592	0.7592	0.7592	0.7592	0.7592	0.7592	0.7592	0.7592	0.7592	0.7592	0.7592
East Side SBS - DTS												
West Side CCS - GSR SSO	0.2311	0.2305	0.2127	0.2459	0.2553	0.2239	0.2239	0.2239	0.2500	0.2483	0.2380	0.2309
West Side CCS - GSR Choice	0.2311	0.2305	0.2127	0.2459	0.2553	0.2239	0.2239	0.2239	0.2500	0.2483	0.2380	0.2309
West Side CCS - LVGSR SSO	1.5011	1.5763	3.2036	3.4038	3.7657	2.9519	3.2428	3.2428	3.3636	3.2285	3.3048	1.4372
West Side CCS - LVGSR Choice	1.5011	1.5763	3.2036	3.4038	3.7657	2.9519	3.2428	3.2428	3.3636	3.2285	3.3048	1.4372
West Side CCS - GTS-W	5.9477	6.5109	6.0148	6.2479	6.3080	7.3670	7.3670	7.3670	8.2116	7.7282	6.8241	6.6241
West Side SBS - GSR SSO	2.9152	2.9152	2.9152	2.9152	2.9152	2.9152	2.9152	2.9152	2.9152	2.9152	2.9152	2.9152
West Side SBS - GSR Choice	2.9152	2.9152	2.9152	2.9152	2.9152	2.9152	2.9152	2.9152	2.9152	2.9152	2.9152	2.9152
West Side SBS - LVGSR Choice	5.7708	5.7708	5.7708	5.7708	5.7708	5.7708	5.7708	5.7708	5.7708	5.7708	5.7708	5.7708
West Side SBS - GTS	15.0398	15.0398	15.0398	15.0398	15.0398	15.0398	15.0398	15.0398	15.0398	15.0398	15.0398	15.0398
West Side SBS - GTS Daily Balance												
Industrial												

Dominion East Ohio
Baseload - Daily per customer

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
	2007	2007	2007	2007	2007	2007	2007	2007	2007	2007	2007	2007
East Side CCS - GSS SSO	0.5847	0.5775	0.5016	0.6704	0.6923	0.5433	0.8230	0.5966	0.7918	0.7475	0.6187	0.6209
East Side CCS - GSS Choice	0.5847	0.5775	0.5016	0.6704	0.6923	0.5433	0.8230	0.5966	0.7918	0.7475	0.6187	0.6209
East Side CCS - LVGSS SSO	5.2901	5.3171	4.6653	5.0623	4.4330	4.4925	5.3935	5.1141	6.0084	5.6476	5.8539	5.3075
East Side CCS - LVGSS Choice	5.2901	5.3171	4.6653	5.0623	4.4330	4.4925	5.3935	5.1141	6.0084	5.6476	5.8539	5.3075
East Side CCS - GTS-E	11.7940	11.4476	11.9701	13.3614	13.0131	11.8332	13.1890	13.3669	13.2095	12.6714	12.3824	11.8500
East Side SBS - GSS SSO	3.8993	3.8993	3.8993	3.8993	3.8993	3.8993	3.8993	3.8993	3.8993	3.8993	3.8993	3.8993
East Side SBS - GSS Choice	3.8993	3.8993	3.8993	3.8993	3.8993	3.8993	3.8993	3.8993	3.8993	3.8993	3.8993	3.8993
East Side SBS - LVGSS SSO	10.9656	10.9656	10.9656	10.9656	10.9656	10.9656	10.9656	10.9656	10.9656	10.9656	10.9656	10.9656
East Side SBS - LVGSS Choice	10.9656	10.9656	10.9656	10.9656	10.9656	10.9656	10.9656	10.9656	10.9656	10.9656	10.9656	10.9656
East Side SBS - GTS	93.4710	93.4710	93.4710	93.4710	93.4710	93.4710	93.4710	93.4710	93.4710	93.4710	93.4710	93.4710
East Side SBS - DTS												
West Side CCS - GSR SSO	2.0020	1.9489	2.2686	1.5138	1.5244	0.9062	3.9505	1.5066	5.0570	1.1816	3.2720	2.6454
West Side CCS - GSR Choice	2.0020	1.9489	2.2686	1.5138	1.5244	0.9062	3.9505	1.5066	5.0570	1.1816	3.2720	2.6454
West Side CCS - LVGSR SSO	3.2306	1.7536	2.9456	2.4454	1.5216	2.1031	2.6964	3.4323	3.7439	2.0728	1.4933	1.5052
West Side CCS - LVGSR Choice	3.2306	1.7536	2.9456	2.4454	1.5216	2.1031	2.6964	3.4323	3.7439	2.0728	1.4933	1.5052
West Side CCS - GTS-W	30.5415	30.5415	30.5415	30.5415	30.5415	31.7612	32.8638	29.4414	27.0471	30.5415	30.5415	30.5415
West Side SBS - GSR SSO	0.0660	0.0660	0.0660	0.0660	0.0660	0.0660	0.0660	0.0660	0.0660	0.0660	0.0660	0.0660
West Side SBS - GSR Choice	0.0660	0.0660	0.0660	0.0660	0.0660	0.0660	0.0660	0.0660	0.0660	0.0660	0.0660	0.0660
West Side SBS - LVGSR Choice	3.1097	3.1097	3.1097	3.1097	3.1097	3.1097	3.1097	3.1097	3.1097	3.1097	3.1097	3.1097
West Side SBS - GTS	75.1417	75.1417	75.1417	75.1417	75.1417	75.1417	75.1417	75.1417	75.1417	75.1417	75.1417	75.1417
West Side SBS - GTS Daily Balance												

Dominion East Ohio
Heating Degree Day Factors per customer per HDD

	Jan 2007	Feb 2007	Mar 2007	Apr 2007	May 2007	Jun 2007	Jul 2007	Aug 2007	Sep 2007	Oct 2007	Nov 2007	Dec 2007	Year Total
Residential													
East Side CCS - GSS SSO	0.0144	0.0143	0.0146	0.0115	0.0084	0.0086	0.0000	0.0000	0.0000	0.0092	0.0120	0.0134	0.0134
East Side CCS - GSS Choice	0.0144	0.0143	0.0146	0.0115	0.0084	0.0086	0.0000	0.0000	0.0000	0.0092	0.0120	0.0134	0.0134
East Side CCS - LVGSS SSO	0.4956	0.4362	0.4841	0.4455	0.3428	0.2834	0.0000	0.0000	0.0000	0.3285	0.4311	0.4703	0.4703
East Side CCS - LVGSS Choice	0.4956	0.4362	0.4841	0.4455	0.3428	0.2834	0.0000	0.0000	0.0000	0.3285	0.4311	0.4703	0.4703
East Side CCS - GTS	0.2671	0.2445	0.2685	0.2539	0.2026	0.1144	0.0000	0.0000	0.0000	0.1932	0.2375	0.2592	0.2592
East Side SBS - GSS SSO	0.9579	0.6970	1.0719	0.8224	0.7612	0.6671	0.0000	0.0000	0.1573	0.6711	0.7847	0.8023	0.8023
East Side SBS - GSS Choice	0.9579	0.6970	1.0719	0.8224	0.7612	0.6671	0.0000	0.0000	0.1573	0.6711	0.7847	0.8023	0.8023
East Side SBS - LVGSS Choice	1.2181	1.1966	1.3727	1.1781	1.1240	1.0024	0.0000	0.0000	0.5445	1.1423	1.1691	1.2546	1.2546
East Side SBS - GTS	2.1269	2.2429	2.3823	2.6084	1.8992	1.4275	0.0000	0.0000	0.2989	1.6841	2.2584	2.2343	2.2343
West Side CCS - GSR SSO	0.0127	0.0122	0.0132	0.0098	0.0074	0.0099	0.0000	0.0000	0.0000	0.0080	0.0106	0.0119	0.0119
West Side CCS - GSR Choice	0.0127	0.0122	0.0132	0.0098	0.0074	0.0099	0.0000	0.0000	0.0000	0.0080	0.0106	0.0119	0.0119
Commercial													
East Side CCS - GSS SSO	0.0507	0.0511	0.0537	0.0383	0.0250	0.0238	0.0000	0.0000	0.0000	0.0266	0.0372	0.0460	0.0460
East Side CCS - GSS Choice	0.0507	0.0511	0.0537	0.0383	0.0250	0.0238	0.0000	0.0000	0.0000	0.0266	0.0372	0.0460	0.0460
East Side CCS - LVGSS SSO	0.4258	0.3996	0.4448	0.3402	0.2639	0.2055	0.0000	0.0000	0.0000	0.2617	0.3632	0.4049	0.4049
East Side CCS - LVGSS Choice	0.4258	0.3996	0.4448	0.3402	0.2639	0.2055	0.0000	0.0000	0.0000	0.2617	0.3632	0.4049	0.4049
East Side CCS - GTS-E	0.4129	0.4233	0.4222	0.3601	0.2731	0.2366	0.0000	0.0000	0.0000	0.2642	0.3639	0.3814	0.3814
East Side CCS - TSS	0.4059	0.4114	0.4057	0.3364	0.2169	0.1385	0.0000	0.0000	0.0000	0.2514	0.3477	0.3975	0.3975
East Side SBS - GSS SSO	0.4333	0.4857	0.5102	0.3547	0.2359	0.2023	0.0000	0.0000	0.1660	0.2547	0.3600	0.4191	0.4191
East Side SBS - GSS Choice	0.4333	0.4857	0.5102	0.3547	0.2359	0.2023	0.0000	0.0000	0.1660	0.2547	0.3600	0.4191	0.4191
East Side SBS - LVGSS SSO	0.8831	1.0242	1.1475	0.9922	0.7024	0.5613	0.0000	0.0000	0.4240	0.5677	0.8549	0.9365	0.9365
East Side SBS - LVGSS Choice	0.8831	1.0242	1.1475	0.9922	0.7024	0.5613	0.0000	0.0000	0.4240	0.5677	0.8549	0.9365	0.9365
East Side SBS - GTS	1.2360	1.3412	1.3826	1.2329	1.0360	0.8457	0.0000	0.0000	0.7725	1.1592	1.1786	1.2403	1.2403
East Side SBS - TSS	0.5677	0.6204	0.6119	0.4568	0.3216	0.1699	0.0000	0.0000	0.3308	0.4177	0.5164	0.5534	0.5534
East Side SBS - DTS													
West Side CCS - GSR SSO	0.0473	0.0511	0.0525	0.0369	0.0224	0.0404	0.0000	0.0000	0.0000	0.0252	0.0378	0.0483	0.0483
West Side CCS - GSR Choice	0.0473	0.0511	0.0525	0.0369	0.0224	0.0404	0.0000	0.0000	0.0000	0.0252	0.0378	0.0483	0.0483
West Side CCS - LVGSR SSO	0.3814	0.3947	0.4277	0.3417	0.2441	0.2928	0.0000	0.0000	0.0000	0.2610	0.3335	0.5216	0.5216
West Side CCS - LVGSR Choice	0.3814	0.3947	0.4277	0.3417	0.2441	0.2928	0.0000	0.0000	0.0000	0.2610	0.3335	0.5216	0.5216
West Side CCS - GTS-W	0.6694	0.9965	0.6706	0.6151	0.3379	0.7572	0.0000	0.0000	0.0000	0.5105	0.5473	0.6419	0.6419
West Side SBS - GSR SSO	0.6223	0.5465	1.0106	0.5761	0.0504	0.0147	0.0000	0.0000	0.0000	1.3562	1.3198	0.8107	0.8107
West Side SBS - GSR Choice	0.6223	0.5465	1.0106	0.5761	0.0504	0.0147	0.0000	0.0000	0.0000	1.3562	1.3198	0.8107	0.8107
West Side SBS - LVGSR Choice	0.4894	0.6265	0.3487	0.3019	0.3886	0.0147	0.0000	0.0000	1.0852	0.8402	0.4079	0.5586	0.5586
West Side SBS - GTS	1.7019	1.5856	1.4487	1.0886	0.9884	0.7162	0.0000	0.0000	1.1286	2.0194	1.5426	1.6774	1.6774
West Side SBS - GTS Daily Balance													

Dominion East Ohio
Heating Degree Day Factors per customer per HDD

	Jan 2007	Feb 2007	Mar 2007	Apr 2007	May 2007	Jun 2007	Jul 2007	Aug 2007	Sep 2007	Oct 2007	Nov 2007	Dec 2007	Year Total
Industrial													
East Side CCS - GSS SSO	0.1142	0.1108	0.1227	0.0890	0.0495	0.0407	0.0000	0.0000	0.0000	0.0586	0.0842	0.1048	0.1048
East Side CCS - GSS Choice	0.1142	0.1108	0.1227	0.0890	0.0495	0.0407	0.0000	0.0000	0.0000	0.0586	0.0842	0.1048	0.1048
East Side CCS - LVGSS SSO	0.3218	0.3469	0.3565	0.2307	0.1967	0.1297	0.0000	0.0000	0.0000	0.2189	0.2602	0.3208	0.3208
East Side CCS - LVGSS Choice	0.3218	0.3469	0.3565	0.2307	0.1967	0.1297	0.0000	0.0000	0.0000	0.2189	0.2602	0.3208	0.3208
East Side CCS - GTS-E	0.4522	0.4626	0.5167	0.4420	0.3145	0.2757	0.0000	0.0000	0.0000	0.3169	0.4139	0.3916	0.3916
East Side SBS - GSS SSO	0.3597	0.4763	0.4794	0.3339	0.2020	0.2240	0.0000	0.0000	0.1493	0.2086	0.2778	0.3506	0.3506
East Side SBS - GSS Choice	0.3597	0.4763	0.4794	0.3339	0.2020	0.2240	0.0000	0.0000	0.1493	0.2086	0.2778	0.3506	0.3506
East Side SBS - LVGSS SSO	0.7079	0.8817	1.0777	0.6885	0.3625	0.3077	0.0000	0.0000	0.4956	0.5785	0.5720	0.6728	0.6728
East Side SBS - LVGSS Choice	0.7079	0.8817	1.0777	0.6885	0.3625	0.3077	0.0000	0.0000	0.4956	0.5785	0.5720	0.6728	0.6728
East Side SBS - GTS	1.7410	1.9195	2.0148	1.6085	1.8212	2.4833	0.0000	0.0000	3.9200	2.3983	1.7770	1.6345	1.6345
East Side SBS - DTS													
West Side CCS - GSR SSO	0.1568	0.2607	0.3063	0.0574	0.0694	0.0311	0.0000	0.0000	0.0000	0.0162	0.0799	0.2931	0.2931
West Side CCS - GSR Choice	0.1568	0.2607	0.3063	0.0574	0.0694	0.0311	0.0000	0.0000	0.0000	0.0162	0.0799	0.2931	0.2931
West Side CCS - LVGSR SSO	0.1272	0.1752	0.1776	0.1028	0.0620	0.1733	0.0000	0.0000	0.0000	0.0895	0.0453	0.1139	0.1139
West Side CCS - LVGSR Choice	0.1272	0.1752	0.1776	0.1028	0.0620	0.1733	0.0000	0.0000	0.0000	0.0895	0.0453	0.1139	0.1139
West Side CCS - GTS-W	1.8664	1.6434	1.0430	0.8630	0.4470	0.4648	0.0000	0.0000	0.0000	1.8526	2.0799	2.2055	2.2055
West Side SBS - GSR SSO	0.5017	0.4470	0.3809	0.1631	0.0312	0.5284	0.0000	0.0000	0.2572	0.3857	0.4769	0.4381	0.4381
West Side SBS - GSR Choice	0.5017	0.4470	0.3809	0.1631	0.0312	0.5284	0.0000	0.0000	0.2572	0.3857	0.4769	0.4381	0.4381
West Side SBS - LVGSR Choice	0.3432	0.3503	0.2279	0.0378	0.0280	0.1227	0.0000	0.0000	1.7136	3.2839	3.1401	2.1405	2.1405
West Side SBS - GTS	2.3340	2.2458	1.2175	1.0389	2.2825	2.3109	0.0000	0.0000	10.5746	5.6269	2.5246	1.8479	1.8479
West Side SBS - GTS Daily Balance													

THE EAST OHIO GAS COM

Case No.

OCC Data Req

	Jan	Feb	Mar	Apr	May
Residential					
East Ohio	20,579,687	17,810,786	15,541,169	9,406,495	4,895,108
West Ohio	961,528	812,397	737,651	415,233	209,171
Sub-Total Residential	21,541,215	18,623,183	16,278,820	9,821,728	5,104,279
Non-Residential					
East Ohio	16,375,889	15,438,521	14,130,971	10,210,931	8,093,062
West Ohio	1,528,545	1,456,228	1,235,251	919,135	789,461
Sub-Total Non-Residential	17,904,434	16,894,749	15,366,222	11,130,066	8,882,523
Total					
East Ohio	36,955,576	33,249,307	29,672,140	19,617,426	12,988,170
West Ohio	2,490,073	2,268,625	1,972,902	1,334,368	998,632
Total On System	39,445,649	35,517,932	31,645,042	20,951,794	13,986,802

PANY d/b/a DOMINION EAST OHIO

07-0829-GA-AIR

quest - Set 4 Question 187

Jun	Jul	Aug	Sep	Oct	Nov	Dec
2,837,802	2,469,765	2,221,068	2,424,183	5,046,907	9,607,984	15,973,500
117,054	92,783	80,340	91,327	217,945	440,058	747,403
2,954,856	2,562,548	2,301,408	2,515,510	5,264,852	10,048,042	16,720,903
6,906,764	6,423,204	6,685,718	6,636,894	8,255,176	10,134,327	13,426,721
693,717	675,026	680,865	719,925	873,519	994,298	1,261,870
7,600,481	7,098,230	7,366,583	7,356,819	9,128,695	11,128,625	14,688,591
9,744,566	8,892,969	8,906,786	9,061,077	13,302,083	19,742,311	29,400,221
810,771	767,809	761,205	811,252	1,091,464	1,434,356	2,009,273
10,555,337	9,660,778	9,667,991	9,872,329	14,393,547	21,176,667	31,409,494

Total

108,814,454
4,922,890
113,737,344

122,718,178
11,827,840
134,546,018

231,532,632
16,750,730
248,283,362

**Dominion East Ohio
Test Year
Forecast in MMcfs**

Month	Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
Residential	East Side CCS - GSS SSO	6,428,630	5,677,720	5,053,337	3,083,153	1,536,771	914,988	796,980	715,015	781,013	1,626,454	3,106,482	5,170,901	34,864,114
	East Side CCS - GSS SSO	13,720,225	11,791,169	10,120,154	6,145,849	3,148,980	1,844,547	1,611,008	1,447,313	1,802,796	3,293,514	6,282,795	10,557,012	71,517,449
	East Side CCS - L VGS SSO	19,894	15,524	14,625	10,142	5,519	3,257	2,943	2,636	2,716	5,465	9,748	15,863	108,322
	East Side CCS - L VGS SSO	171,738	126,666	128,721	171,738	48,533	28,442	23,698	23,019	23,723	47,206	81,133	138,540	946,014
	East Side CCS - GTS - E	18,562	15,102	13,819	9,923	5,507	3,188	2,979	2,677	2,832	5,364	9,378	15,111	103,862
	East Side SSS - GSS SSO	1,306	1,002	1,002	665	443	254	208	201	205	404	637	7,188	40,951
	East Side SSS - GSS SSO	74,547	50,340	62,255	37,457	23,544	14,724	11,482	11,482	11,684	21,887	36,337	54,102	409,811
	East Side SSS - L VGS SSO	100,888	86,904	84,116	55,568	31,938	17,856	12,532	12,532	14,087	31,826	53,396	84,988	584,988
	East Side SSS - GTS - E	40,845	37,418	34,170	26,769	13,845	8,144	6,453	6,453	12,867	24,078	35,607	53,166	331,066
	West Side CCS - GSS SSO	611,248	517,656	472,321	333,053	193,553	74,947	59,419	51,650	48,486	139,572	281,814	478,637	3,116,430
	West Side CCS - GSS SSO	350,280	294,741	265,120	148,201	75,218	42,092	33,364	28,690	28,890	78,373	158,244	268,766	1,778,490
	SSO GSS	6,430,938	5,678,653	5,054,129	3,084,210	1,537,184	914,256	796,781	715,816	781,818	1,628,838	3,107,119	5,171,350	34,891,332
	SSO L VGS	19,894	15,524	14,625	10,142	5,519	3,257	2,943	2,636	2,716	5,465	9,748	15,863	108,322
	CMAS GSS	13,796,822	11,841,500	10,121,489	6,183,386	3,148,980	1,844,547	1,611,008	1,447,313	1,458,751	3,215,401	6,119,132	10,557,012	71,927,900
	CMAS L VGS	274,626	222,370	211,837	142,145	80,489	46,298	37,950	35,271	35,271	79,032	138,529	224,435	1,531,012
	GTS	59,407	52,320	47,899	36,692	19,352	9,941	8,500	8,500	9,718	18,231	31,456	50,718	356,528
	W GSS SSO	611,248	517,656	472,321	333,053	193,553	74,947	59,419	51,650	48,486	139,572	281,814	478,637	3,116,430
	W GSS SSO	350,280	294,741	265,120	148,201	75,218	42,092	33,364	28,690	28,890	78,373	158,244	268,766	1,778,490
	Total East Side - Residential	30,379,687	17,410,766	15,541,169	9,406,493	4,895,108	2,857,902	2,468,765	2,121,866	2,121,866	5,045,077	9,607,984	15,873,600	108,814,459
	Total West Side - Residential	961,528	812,397	737,851	415,213	209,171	92,783	67,403	60,408	60,408	171,943	340,038	567,403	440,038
	Total Residential	18,662,189	16,278,820	16,279,020	9,821,706	5,104,279	2,950,684	2,536,168	2,182,274	2,182,274	5,217,020	10,008,042	16,441,003	113,257,344
	Average per Customer (Mcf)	18.94	16.35	14.32	8.66	4.52	2.63	2.29	2.06	2.06	4.69	8.89	14.74	100.36
Commercial	East Side CCS - GSS SSO	1,512,389	1,320,148	1,180,676	675,815	348,261	232,254	183,922	183,073	186,363	348,136	652,337	1,133,019	7,987,329
	East Side CCS - GSS SSO	3,421,774	3,011,735	2,671,807	1,579,815	789,111	414,777	314,648	314,648	314,648	608,705	1,133,019	2,008,708	18,071,588
	East Side CCS - L VGS SSO	191,528	159,684	149,951	103,997	49,951	27,654	25,191	25,191	27,654	48,741	93,244	151,893	1,050,127
	East Side CCS - L VGS SSO	629,110	424,339	405,417	283,477	136,200	79,670	79,670	79,670	79,670	154,517	294,861	480,566	3,291,645
	East Side CCS - GTS - E	380,548	315,707	283,477	191,736	103,951	58,426	52,560	52,560	58,426	103,951	181,850	286,237	3,173,603
	East Side SSS - GSS SSO	191,707	136,004	112,447	65,244	34,651	19,426	14,560	14,560	16,012	31,426	52,560	87,240	739,839
	East Side SSS - GSS SSO	208,418	145,024	124,024	84,011	44,000	23,888	13,888	13,888	15,340	30,727	46,431	78,888	1,123,676
	East Side SSS - L VGS SSO	166,359	161,188	143,475	75,767	36,315	16,705	16,705	16,705	16,705	33,410	60,115	103,457	905,805
	East Side SSS - GTS - E	62,962	62,962	59,375	37,738	17,881	7,881	7,881	7,881	9,115	16,230	33,663	55,012	381,539
	East Side SSS - L VGS SSO	241,354	240,377	227,605	144,664	70,631	40,276	30,211	30,211	34,941	62,176	129,040	210,879	1,462,264
	East Side SSS - GTS - E	1,351,145	1,064,149	947,123	535,363	269,544	145,944	103,000	103,000	117,912	228,812	388,812	635,212	4,455,209
	East Side SSS - GSS SSO	78,077	72,387	65,590	31,362	16,650	8,326	4,959	4,959	5,559	11,118	18,168	30,403	257,426
	East Side SSS - DTIS	192,358	217,221	176,255	117,897	62,650	33,333	18,750	18,750	21,111	42,222	73,333	125,000	1,118,112
	West Side CCS - GSS SSO	204,890	192,126	166,332	92,639	45,914	24,312	18,866	18,866	21,111	42,222	73,333	125,000	1,118,112
	West Side CCS - GSS SSO	173,172	163,408	140,560	78,317	38,803	20,794	15,449	15,449	17,778	35,556	60,667	104,444	866,667
	West Side CCS - L VGS SSO	162,220	127,277	127,277	93,877	48,969	26,072	13,536	13,536	15,449	30,898	51,778	86,667	733,333
	West Side CCS - GTS - E	87,131	107,815	67,677	47,983	25,765	13,536	7,292	7,292	8,333	16,667	28,000	46,667	400,000
	West Side SSS - GSS SSO	3,336	2,336	2,336	1,336	668	336	180	180	200	400	668	1,111	9,336
	West Side SSS - GSS SSO	2,977	3,167	3,167	1,716	858	429	215	215	244	488	811	1,333	11,111
	West Side SSS - L VGS SSO	7,590	6,002	5,173	3,512	1,806	903	452	452	511	1,022	1,778	3,000	25,556
	West Side SSS - GTS - E	16,184	17,168	13,174	7,292	3,646	1,823	912	912	1,022	2,044	4,088	8,176	66,667
	Total East Side - Commercial	8,677,729	7,820,666	6,985,764	4,232,028	2,141,909	1,124,024	714,909	714,909	714,909	1,429,818	2,859,636	4,764,472	33,111,111
Total West Side - Commercial	601,244	562,315	481,677	264,781	132,391	66,196	40,118	40,118	45,667	91,333	152,333	254,000	2,111,111	
Total Commercial	9,278,973	8,383,081	7,467,441	4,496,809	2,274,300	1,200,220	756,027	756,027	760,576	1,521,151	2,981,969	4,988,472	35,222,222	
Average per Customer (Mcf)	169.66	98.77	87.96	53.77	39.29	20.72	17.21	17.40	18.16	31.05	53.11	86.51	624.48	

**Dominion East Ohio
Test Year
Forecast in MMcf's**

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
Industrial													
East Side CCS - GNS SSO	18,307	15,575	14,340	8,555	4,295	2,460	3,111	2,164	2,779	4,577	7,231	13,676	97,574
East Side CCS - GNS Choice	27,460	23,363	21,311	12,832	6,443	3,690	4,669	3,592	4,228	6,964	11,762	20,889	147,033
East Side CCS - LVGSS SSO	8,034	7,468	6,613	4,233	2,882	2,206	2,508	2,378	2,704	4,519	7,855	14,323	54,323
East Side CCS - LVGSS Choice	21,932	21,408	18,956	12,103	8,261	6,325	7,190	6,817	7,751	10,893	19,532	35,885	155,728
East Side CCS - GTR-E	49,507	38,511	39,225	31,814	24,051	18,679	20,004	20,904	19,418	27,911	54,379	98,483	344,336
East Side SRS - GNS SSO	111,967	120,606	105,012	61,844	34,167	23,164	22,982	22,884	25,310	34,320	54,179	96,483	709,457
East Side SRS - GNS Choice	56,320	61,774	54,323	31,980	18,388	14,518	12,662	12,662	13,284	18,630	30,776	46,988	370,776
East Side SRS - LVGSS SSO	23,190	21,841	24,709	14,318	8,414	6,164	6,799	6,799	7,254	10,254	18,341	28,936	165,176
East Side SRS - LVGSS Choice	71,786	74,030	61,774	34,518	21,323	15,208	12,978	12,978	14,069	20,813	34,379	59,936	512,904
East Side SRS - GTR	3,146,369	2,874,042	2,629,839	1,948,206	1,148,888	782,839	1,197,926	1,852,735	1,940,273	2,275,507	3,439,867	6,451,668	28,724,492
West Side SRS - DTG	4,110,408	4,311,512	3,852,738	3,059,894	3,411,406	3,253,786	3,139,031	3,197,851	3,179,534	3,479,909	3,323,309	3,451,668	42,276,548
West Side CCS - GNS SSO	1,402	1,402	1,402	1,402	1,402	1,402	1,402	1,402	1,402	1,402	1,402	1,402	23,036
West Side CCS - GNS Choice	1,700	1,718	1,718	1,718	1,718	1,718	1,718	1,718	1,718	1,718	1,718	1,718	13,437
West Side CCS - LVGSS SSO	1,094	1,094	1,094	1,094	1,094	1,094	1,094	1,094	1,094	1,094	1,094	1,094	3,302
West Side CCS - LVGSS Choice	9,982	9,982	9,982	9,982	9,982	9,982	9,982	9,982	9,982	9,982	9,982	9,982	6,401
West Side CCS - GTR-W	3,183	2,988	3,183	1,401	1,071	1,071	1,071	1,071	1,071	1,071	1,071	1,071	20,179
West Side SRS - GNS SSO	5,815	4,515	3,186	1,814	1,071	936	1,071	936	1,071	1,071	1,071	1,071	23,192
West Side SRS - GNS Choice	1,163	9,903	8,037	4,515	3,077	2,523	2,523	2,523	2,523	2,523	2,523	2,523	4,637
West Side SRS - LVGSS SSO	9,986	8,879	8,037	4,515	3,077	2,523	2,523	2,523	2,523	2,523	2,523	2,523	13,770
West Side SRS - LVGSS Choice	241,208	209,437	180,275	136,229	82,268	58,742	58,742	58,742	65,279	95,279	176,550	284,241	1,929,382
West Side SRS - GTR (Balanced Daily)	668,924	648,299	579,453	493,109	488,151	450,697	468,683	476,576	476,002	504,677	508,190	534,241	8,189,889
Total East Side - Industrial	7,678,160	7,617,555	7,143,207	5,985,843	5,228,118	3,114,865	5,095,716	5,332,887	5,238,316	6,847,743	12,967,367	24,608,704	133,071,681
Total West Side - Industrial	937,301	873,913	753,544	564,334	633,578	373,322	594,358	622,230	622,230	695,906	696,954	748,499	8,333,306
Total Industrial	8,615,461	8,491,468	7,896,751	6,550,177	5,861,696	3,488,187	5,690,074	5,955,117	5,860,546	7,543,649	13,664,321	25,357,203	141,404,987
Average per Customer (MMcf)	5,315.29	5,234.62	4,851.56	4,091.20	3,966.11	3,695.66	3,561.30	3,748.48	3,697.61	4,105.18	4,167.18	4,369.32	51,054.51
Non-Residential													
SSO GSS	1,848,681	1,667,331	1,478,462	840,225	432,285	287,066	229,494	223,206	236,314	433,425	809,140	1,426,771	9,917,998
SSO LVGSS	286,674	253,802	240,548	145,276	80,073	47,531	42,379	41,173	46,900	78,425	144,774	213,204	1,444,373
CMAS GNS	3,671,913	3,258,060	2,890,806	1,649,639	850,437	565,614	448,843	446,893	458,371	650,739	1,393,333	2,410,084	15,434,371
CMAS LVGSS	843,262	841,730	797,689	482,846	284,416	156,937	138,147	137,688	151,308	217,613	478,162	838,384	5,451,943
GTR	5,951,909	4,676,730	4,322,446	2,495,648	2,984,019	2,458,868	2,301,492	2,303,609	3,017,150	3,238,839	4,828,315	4,382,327	41,007,483
TSS	229,784	206,691	172,077	96,566	37,601	8,196	8,196	8,196	12,311	16,949	30,903	48,315	111,646
DTG	4,341,036	4,558,757	4,028,955	3,300,711	3,324,213	3,373,564	3,294,743	3,316,743	3,292,740	3,571,669	3,601,303	3,614,841	44,027,153
W GNS SSO	210,868	208,169	177,138	96,172	47,238	33,300	24,173	23,229	26,469	40,912	101,163	180,482	1,185,941
W GNS Choice	175,866	168,160	146,410	79,459	39,394	29,198	19,817	19,259	2,653	4,912	8,322	13,017	96,847
LVGSS SSO	9,746	10,048	10,048	5,439	2,878	1,680	1,680	1,680	2,344	3,276	6,174	11,450	71,555
LVGSS Choice	25,618	25,618	25,618	11,853	7,496	4,284	4,284	4,284	5,822	8,120	15,424	26,778	220,304
W GNS GTR	406,432	382,360	341,539	218,525	141,225	161,901	143,286	143,286	178,948	211,286	265,086	333,532	2,969,276
West Side SRS - GTR (Balanced Daily)	685,048	665,467	591,167	500,198	495,165	471,161	474,786	482,015	482,338	513,081	518,330	545,471	6,412,947

Dominion East Ohio
 Test Year - Peak Day
 Forecast in MMcf's

Design

	Res.	Non-Res	Total
General	1,350.279	385.911	1,736.191
Large Volume	18.175	83.583	101.758
GTS/TSS	3.799	333.508	337.307
DTS/Off	0.000	231.768	231.768
Total	<u>1,372.254</u>	<u>1,034.770</u>	<u>2,407.024</u>

		Avg. Daily	Load Factor
General	143,308.810	392.627	0.2261
Large Volume	8,994.640	24.643	0.2422
GTS/TSS	51,952.159	142.335	0.4220
DTS/OFF	50,368.814	137.997	0.5954
Total	254,624.423	697.601	0.2898

Off System 12 Months 6,341,061

