## BEFORE <br> THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East

Case No. 09-38-GA-UNC
 Ohio to Adjust its Automated Meter Reading Cost Recovery Charge and Related Matters

DIRECT TESTIMONY OF
VICKI H. FRISCIC
ON BEHALF OF
DOMINION EAST OHIO

This is to certify that the images appearing are an accurate and conrliten robtuction of a case file document desivprea in the wosiber con we of business: rechnicienty Date Frocersea $4 / 15 / 109$

## TABLE OF CONTENTS

Page
I. INTRODUCTION ..... 1
II. BACKGROUND ..... 3
III. DEO'S OBJECTION TO STAFF RECOMMENDATION NO. 1 ..... 5
IV. DEO'S OBJECTION TO OCC'S PROPOSAL ..... 12

Direct Testimony of
Vicki H. Friscic

## I. INTRODUCTION

Q1. Please state your name, occupation and business address.
A1. My name is Vicki H. Friscic. I am employed by The East Ohio Gas Company, d/b/a Dominion East Ohio ("DEO"), as Director Regulatory \& Pricing. My business address is 1201 East 55th Street, Cleveland, Ohio 44103-1028.

Q2. Please describe your educational background and work experience.
A2. I graduated from Ohio University in 1980 with a Bachelor of Business Administration degree. In 1980, I joined the accounting firm Price Waterhouse as an auditor, became a licensed CPA in 1982, and was promoted to Audit Manager in 1986. From 1987 to 1989, I worked for Progressive Insurance and held managerial accounting positions with responsibility for accounts payable, billing, cash processing, and internal reporting for Progressive's Financial Services Group. In 1989, I was employed by Pepsi-Cola as Manager, Financial Services for its Northeast Ohio franchise with responsibility for accounts receivable and credit, route sales auditing, and computer operations. From 1993 to 1997, I worked as a CPA for a local firm providing accounting, business consulting, and tax services to small businesses. I was hired by The East Ohio Gas Company (now DEO) in December 1997 as Manager, Tax and Accounting Services. In 2001, I joined DEO's Pricing and Regulatory Affairs department. I am currently a member of the Ohio Society of CPAs.

Q3. What are your job responsibilities as Director Regulatory \& Pricing?
A3. My present duties include oversight of DEO's regulatory affairs. In overseeing DEO's regulatory affairs, I am responsible for all of its regulatory filings before the Public Utilities Commission of Ohio ("Commission"). I also act as DEO's principle liaison with the Commission and with other regulatory process stakeholders. In order to represent DEO effectively in that role, I interact with all levels of management across a variety of functional areas to understand the commercial, operational and administrative issues facing the Company.

## Q4. Have you previously testified before the Commission?

A4. Yes. I testified on behalf of DEO in Case No. 07-829-GA-AIR, et al., regarding various schedules supporting the Company's application, including those related to working capital calculation, unaccounted-for gas, test year operating income, tax expense, and test year depreciation and amortization expense. I also testified on behalf of the Company in Case No. 05-474-GA-ATA regarding cost recovery through the Transportation Migration Rider - Part B and Energy Choice program costs under DEO's Phase 1 transition plan.

Q5. In your capacity as Director Regulatory \& Pricing, are you generally familiar with the Company's books and records?

A5. Yes. I am responsible to prepare and make a variety of financial filings with the regulatory agencies with which I interact. Those filings include financial information derived from DEO's financial records, including the general ledger, annual reports, income statements and balance sheets.

Q6. Are you familiar with DEO's Application to adjust its Automated Meter Reading Cost Recovery Charge ("AMR Charge")?

A6. Yes. I supervised and coordinated the collection of the data and assembly of the schedules supporting the AMR Charge, which were filed as part of DEO's pre-filing notice and Application.

## Q7. What is the purpose of your testimony in this proceeding?

A7. The purpose of my testimony is to explain why DEO disagrees with Staff Recommendation No. 1 set forth on page 9 of Staff's comments. This recommendation eliminates the regulatory asset agreed to by the parties and necessary for DEO to recover costs associated with the implementation of AMR equipment. It also is in conflict with the Stipulation and Recommendation ("Stipulation") signed by Staff and approved by the Commission.

I also explain why DEO disagrees with the proposal by the Ohio Consumers' Counsel ("OCC") to exclude adjustments made by DEO to meter reading costs in determination of the baseline level of expense from which meter reading operations and maintenance expense savings were measured.

## Q8. Does DEO disagree with any other comments made by Staff or OCC?

A8. No. DEO agrees with Staff's remaining proposals. OCC makes no other proposals in its comments.

## II. BACKGROUND

## Q9. What is AMR?

A9. AMR refers to equipment associated with a gas meter that allows the meter to be read remotely through electronic means. DEO is currently installing encoder-receivetransmitter ("ERT") devices, a type of AMR device, on all its customers' meters. These
devices are read by DEO employees using specialized receivers, while on a meter reading route, or simply while driving past the customer's premises.

## Q10. Does AMR benefit customers?

A10. Yes. DEO's customers will realize several benefits from AMR technology, including: (i) cost-effective meter reading as required under the minimum gas service standards; (ii) fewer estimated bills, which in turn will provide a better match between the amount billed and actual gas consumption; (iii) more frequent actual meter reads, which improves accuracy in transferring service and eliminates call volume associated with estimated meter reads; and (iv) less need for DEO to schedule appointments to read meters inside customers' premises, further enhancing convenience for customers. Commission Staff recognized many of these benefits in its report in Case No. 07-829-GA-AIR, et al., which was subsequently signed by the parties and approved by the Commission. In re DEO Rate Case, Case No. 07-829-GA-AIR et al., (Staff Report at 42) (May 23, 2008).

## Q11. Why did DEO propose an AMR Charge?

A11. DEO proposed an AMR Charge to secure the capital funds necessary to complete AMR installation on a five-year timetable. Absent this charge, DEO would have to fund the program through its normal capital budgeting process, which, in turn, would have meant that a system wide deployment would take fifteen to twenty years. With the AMR Charge, and the ability to deploy AMR technology throughout the Company's system in five years, DEO will achieve the "critical mass" of AMR installations that will yield AMR-related benefits and savings more quickly.

Q12. What Commission approvals are necessary for DEO to implement an AMR Charge.
A12. The process envisioned two steps. First, DEO applied for Commission approval of an automatic adjustment mechanism to recover AMR-related costs, in part through deferral
of costs to a regulatory asset comprised of depreciation expense, incremental property tax expense, and post-in-service carrying charges ("PISCC") associated with the AMR assets. The Commission approved this mechanism in its Opinion and Order, dated October 15,2008 . Second, all parties, including DEO, were to negotiate a baseline from which call center and meter reading savings could be calculated to offset the regulatory asset to determine the AMR Charge in Case No. 09-38-GA-UNC. Having been unsuccessful in negotiating a baseline, DEO has applied for approval of a $\$ 0.46$ AMR Charge under the approved automatic adjustment mechanism. DEO calculated the $\$ 0.46$ AMR Charge in accordance with the Stipulation, and with appropriate adjustments to meter-reading expenses. There were no call center savings during the applicable time period.

Q13. Is there a dispute regarding the arithmetic accuracy of DEO's calculation of the \$0.46 AMR Charge?

A13. No. Both Staff and OCC recommended adjustments from DEO's calculation of a $\$ 0.46$ AMR Charge but did not dispute $\$ 0.46$ as a starting point for their amendments.

## III. DEO'S OBJECTION TO STAFF RECOMMENDATION NO. 1

Q14. Please describe Staff's Recommendation No. 1.
A14. Staff allowed DEO's deferral of depreciation and property tax expense through December 31, 2008, but proposes eliminating any further deferrals of depreciation expense and property tax expense. Staff suggests that the deferred expenses be amortized over the useful life of the AMR equipment. Staff also recommends that the unamortized balances of deferred depreciation expense and property taxes be included in rate base.

## Q15. Why does DEO object to Staff's proposal?

A15. DEO objects to Staff's proposal because it is contrary to DEO's application in Case No. 06-1453-GA-UNC ultimately consolidated with Case No. 07-829-GA-AIR et al., contrary to the Staff Report issued in Case No. 07-829-GA-AIR et al., and contrary to the Stipulation signed by Staff and approved by the Commission in Case No. 07-829-GAAIR et al. It seeks to revisit issues that have been agreed to by the parties, and have been resolved and approved by the Commission. Further, it violates key regulatory principles and will ultimately adversely affect not only the Company, but also its customers.

Q16. Why is the Staff's recommendation contrary to the Staff Report, the Stipulation and the Commission order relating to the AMR Charge?

A16. The application, Staff Report, Stipulation signed by Staff, and Commission order approving the Stipulation resolved all issues regarding the method to be used to calculate the AMR Charge. Given that the automatic adjustment mechanism and use of deferrals to accumulate costs to be recovered through the AMR Charge have already been agreed to and approved, the only issues properly for consideration in this proceeding are: (1) the accuracy of calculations included in DEO's application in this case based on the cost recovery mechanism agreed to as part of the Stipulation; and (2) the development of "an appropriate baseline from which meter reading and call center savings will be determined...." In re DEO Rate Case, Case No. 07-829-GA-AIR et al., (Stipulation at 10) (August 22, 2008). Staff's proposal is improper because it has nothing to do with either of the issues remaining for consideration in this proceeding. Staff incorrectly seeks to relitigate the agreed to and approved calculation methodology. For this reason alone, Staff's recommendation should be rejected.

Q17. What was the AMR Charge calculation methodology that DEO set forth in its application in Case No. 06-1453-GA-UNC?

A17. DEO's application sought to establish an automatic adjustment mechanism that included: (1) a regulatory asset including depreciation expense, incremental property tax expense, and PISCC earned on AMR capital expenditures; (2) a comparison of the annual meter reading operating and maintenance ("O\&M") expense to a 2006 baseline (to determine any savings achieved through the AMR deployment that would be used to reduce the regulatory asset for the benefit of customers); and (3) recovery of the regulatory asset net of the O\&M savings through the AMR Charge. In re DEO AMR, Case No. 006-1453-GA-UNC, (Application at 6-7) (December 13, 2006). To provide appropriate due process, in February of each year, DEO proposed to file an application to establish the new AMR Charge based upon the costs accumulated through December 31 of the prior year, adjusted for the associated excise tax obligation, and bills rendered over the prior year.

Q18. What recommendations to DEO's application did Staff make in the Staff Report in Case No. 07-829-GA-AIR et al?

A18. The Staff Report made four recommendations regarding the AMR Charge calculation methodology. Staff recommended that DEO should: (1) exclude from the AMR Charge the cost of replacing 82,000 obsolete tin case meters; (2) exclude from the AMR Charge the cost of routine maintenance and replacement activities that occur concurrently with AMR replacement; (3) eliminate a charge for non-access to a customer's premises (that would reduce the regulatory asset as proposed in DEO's application); and (4) change the baseline year to measure O\&M expense savings from 2006 to 2007. In re DEO Rate Case, Case No. 07-829-GA-AIR et al., (Staff Report at 43) (May 23, 2008).

Q19. Did Staff make any proposals to modify DEO's proposed automatic adjustment mechanism, regulatory asset, or determination of the AMR Charge?

A19. No. In fact, the Staff Report unequivocally recognizes that DEO would record the regulatory asset in the manner that Staff now opposes. On page 41 of the Staff Report, it states:

According to the AMR Application, DEO would install AMR devices on all of its customer meters over a 5 -year period, and would record as a regulatory asset the depreciation, incremental property taxes, and post in-service carrying charges associated with AMR program costs. DEO would accumulate these costs during each year of the deployment period and file an application in February the following year with schedules supporting a fixed AMR Cost Recovery Charge. In each succeeding year, this charge would increase by the accumulated AMR costs until DEO files another rate case and new base rates are approved and go into effect. [Emphasis added.]

Q20. Did the Stipulation amend the AMR Charge calculation methodology proposed by DEO, as amended by the Staff Report?

A20. No. DEO agreed to all four of the Staff Report recommendations. As to all issues resolved by the Stipulation, it expressly adopted all rates, terms, and conditions set forth in the Staff Report and, if the Staff report did not address any such item, it expressly adopted the application. In re DEO Rate Case, Case No. 07-829-GA-AIR et al., (Stipulation at 3-4) (August 22, 2008). Regarding the AMR Charge, the Stipulation expressly adopted the recommendations set forth in the Staff Report and agreed that "DEO shall work with Staff and OCC to develop an appropriate baseline from which meter reading and call center savings will be determined and such quantifiable savings shall be credited to amounts that would otherwise be recovered through the AMR Cost Recovery Charge." In re DEO Rate Case, Case No. 07-829-GA-AIR et al., (Opinion and Order at 13) (October 15, 2008). Staff did not recommend elimination of DEO's proposed regulatory asset or suggest a change in the amortization period. Staff signed the

Stipulation and thus, agreed to DEO's AMR Charge calculation methodology. The Commission approved the Stipulation.

## Q21. How does the approval of the Stipulation affect this proceeding?

A21. It means that all parties - including Staff - have agreed upon DEO's AMR Charge calculation methodology set forth in DEO's application, as amended by the Staff Report. Therefore, as previously stated, the remaining issues for consideration in this proceeding are: (1) the accuracy of DEO's mechanical application of the calculation methodology agreed to as part of the Stipulation; and (2) the development of "an appropriate baseline from which meter reading and call center savings will be determined...." In re DEO Rate Case, Case No. 07-829-GA-AIR et al., (Stipulation at 10) (August 22, 2008). The Staff's proposal does not suggest that DEO deviated from the Stipulated calculation methodology for the AMR Charge. It also does not address the establishment of a baseline. Instead, Staff improperly attempts to reshape the calculation methodology already agreed upon and approved by the Commission. DEO believes the Commission should affirm its order approving the AMR cost recovery mechanism and reject Staff's proposal.

## Q22. Does DEO have any other objection to Staff's proposal?

A22. Yes. Staff's proposal results in an annual rate case with additional risk to customers and DEO by effectively eliminating the automatic adjustment mechanism and making it possible that DEO could over or under collect the costs associated with AMR.

Q23. Why do you say that?
A23. Staff's proposal requires DEO to establish annually a new AMR rate base at a date certain and AMR expenses over a test year, much like a traditional rate case. This eliminates several of the prime advantages of an automatic adjustment mechanism. It
also creates a more complex process that is likely to result in additional time for all parties, and additional costs for DEO to prosecute the case, to the detriment of all customers.

Q24. Is the AMR Charge calculated in a manner consistent with other DEO cost recovery mechanisms?

A24. Yes. DEO's deferral of AMR costs and calculation of the AMR Charge are consistent with how DEO handles other cost recovery deferrals and rider calculations. The following cost recovery mechanisms are designed to provide a full recovery of all costs incurred in connection with the affiliated programs in the same manner that DEO anticipates fully recovering all costs associated with the AMR program:

- The calculation of the Uncollectible Expense Rider is an example of another automatic adjustment mechanism, which for any given year includes deferred costs that have not yet been recovered from the preceding period(s) plus an estimate of net bad debt expense for the prospective 12 months.
- The calculation of DEO's Transportation Migration Rider - Part B includes previously deferred but unrecovered operational balancing gas costs plus an estimate of contract storage capacity costs for the prospective 12 months.
- The PIPP Rider calculation also includes previously deferred but unrecovered PIPP program costs plus an estimate of PIPP program deferrals for the prospective period during which the new rider will be in effect.


## Q25. Does Staff's proposal violate any important regulatory principle?

A25. Yes. Regulatory and accounting principles require that DEO incur expenses and collect revenues during the same time period to the extent possible. Staff's proposal violates the matching principle by causing a time lag between DEO's incurrence of an expense and its
receipt of revenues. Further, Staff's proposal applies the matching principle in an inconsistent manner. Specifically, Staff's proposal retains DEO's methodology of crediting operating and maintenance savings to customers over a single year while requiring DEO to amortize deferred depreciation and property tax expense over the life of the AMR assets. Simply put, Staff wants customers to realize within a year any savings achieved but doesn't want customers to pay in the same timeframe for the expenses incurred to achieve those savings. Staff's proposal results in a lopsided mechanism in which all of the savings go to the benefit of the customer but only a portion of the cost is recognized.

Q26. Does the AMR Charge calculation methodology agreed to by the parties to the Stipulation and approved by the Commission resolve the issues raised by Staff's proposal?

A26. Yes. The automatic adjustment mechanism permits DEO to recover actual costs associated with AMR implementation so that there is no over or under collection associated with the AMR Charge. Avoiding over or under collections is a benefit to customers and DEO. The annual deferrals will be offset by O\&M savings, including any reductions in call-center and or meter-reading expenses. The deferral of costs associated with AMR capital investments permits DEO to properly match expenses and revenues during the life of the AMR Charge.

## Q27. Does the Staff's proposal raise concerns apart from this case?

A27. Yes. Staff agreed to the automatic adjustment mechanism and deferral process. Staff did not propose any alternative in its Staff Report. Staff signed the Stipulation and did not propose any alternative to be included in the Stipulation. At no time did Staff suggest elimination of the regulatory asset set forth in DEO's application. At the same time, DEO accepted every adjustment proposed by Staff and ultimately, came to an agreement
on an AMR Charge calculation methodology with all parties. It is important to the regulatory process that Staff remain consistent in its position so that DEO and customers may depend upon agreements with the Staff.

## Q28. What effect does rejection of Staff's proposal have on the AMR Charge?

A28. Rejection of Staff's proposal and acceptance of Staff's remaining three recommendations changes DEO's proposed AMR Charge from $\$ 0.46$ to $\$ 0.39$ as shown on Attachment VHF 1.

## Q29. What effect would Commission acceptance of Staff's proposal have on AMR implementation?

A29. Staff has calculated the AMR Charge at $\$ 0.34$ if its proposals are adopted. At that rate it is doubtful that DEO can fully recover the actual costs associated with the AMR implementation.

## IV. DEO'S OBJECTION TO OCC'S PROPOSAL

Q30. Please describe OCC's proposal.
A30. OCC proposes to exclude adjustments made by DEO to meter reading costs in determination of the baseline level of expense from which meter reading $\mathrm{O} \& \mathrm{M}$ expense savings were measured.

Q31. What are DEO's obligations to the Department of Transportation ("DOT") to conduct inspections of inside meters?

A31. The DOT requires a safety inspection to perform leak detection for all inside meters every three years. This requirement does not change based upon installation of an ERT device. DEO incurs expense to conduct the inspection and uses a third party contractor and its employees to conduct the inspections. OCC proposes to include the Department of Transportation inspection costs as an offset to the AMR Charge.

Q32. Why does DEO object to OCC's proposal?
A32. DEO has four objections to OCC's proposal. First, OCC's proposal seeks to assign expenses to the AMR Charge that have nothing to do with AMR implementation. The costs associated with the required DOT inspections of inside meters do not vary with or have any relation to the AMR implementation.

Second, OCC, and all other parties, agreed in the Stipulation to include savings associated with DOT inspections of inside meters that may no longer be necessary if meters are relocated outside as part of the determination of the Pipeline Infrastructure Rider ("PIR") Cost Recovery Charge. In re DEO Rate Case, Case No. 07-829-GA-AIR et al., (Stipulation at 10) (August 22, 2008). It is inappropriate to try to amend the Stipulation subsequent to agreement by the parties and after Commission approval by including the DOT cost savings in the AMR Charge. Any such savings will be appropriately considered in connection with the PIR Cost Recovery Charge. Third, OCC seeks to eliminate adjustments made by DEO to meter reading O\&M expenses for 2007 and 2008 related to labor costs for six meter reading clerks. Effective November 2007, an organizational change was made to move six meter reading clerks into a pool of Operations clerical workers. That change had the effect of moving the labor costs associated with the six meter reading clerks out of meter reading cost centers into a cost center where the costs of the other Operations clerical workers are recorded. Accordingly, 2007 meter reading expense, which included 10 months of the meter reading clerks' labor costs, was not comparable to 2008 meter reading expense. The labor cost adjustments made by DEO put a full year of labor costs for these clerks in both 2007 and 2008 to make them comparable. DEO has implemented a change to ensure that
the labor costs associated with the meter reading clerks are properly classified as meter reading expense for 2009 and going forward.

Fourth, the OCC claims that the adjustments made by DEO "unjustifiably inflated the year-end regulatory asset and the resulting AMR Cost Recovery Charge," that 2007 is the proper base for calculating meter reading savings, and that "no adjustments were allowed or contemplated." DEO disagrees. The Stipulation directs the parties to determine "an appropriate baseline." It does not specify a year that should be used, nor does it state that adjustments to a given year being considered cannot be made. It also does not state that meter reading and call center expense savings should be determined separately rather than in the aggregate. In the spirit of compromise, DEO considers 2007 meter reading O\&M expenses, as adjusted, to be an appropriate baseline for meter reading expense savings and believes the meter reading savings included in its application were properly determined by comparing the 2007 baseline with 2008 meter reading expenses similarly adjusted.

Q33. Does this conclude your testimony?
A33. Yes.

## THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO <br> AUTOMATED METER READING ESTIMATED COST RECOVERY CHARGE - FILNG SCHEDULES REVENUE REQUIREMENT CASE NO. 09-38-GA-UNC


AUTOMATED METER READING ESTIMATED COST RECOVERY CHARGE
Schedule 2




| ferc | 01/31/08 | $29 / 18$ | 03/3108 | 0430008 | 05/31/08 | 06/30,08 | 07/3108 | 8831/08 | 09730/08 | 131208 | 11/30,08 | 31/2008 | $\begin{gathered} 2008 \\ \text { Total Year } \\ \hline \end{gathered}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 3820 | 2,850,196.00 | 3.624,591.97 | 4.676.879.87 | 5.562,167.96 | 6,212,493.88 | 7,160,490.82 | 7,831,598.89 | 8,685,890.15 | 9,341,23,30 | 10,134,562.46 | 10,633, 351.97 |  |  |
| 3810 | 4,441,299.60 | 9,126,312.24 | 10.521.850.24 | 12.0499425.28 | 13,611.675.49 | 15.112.200.10 | 16,727,186.88 | 19,845.983.10 | 19,443,794.33 | 19,421,460.23 | 19,405.561.13 | 19,294,622.51 |  |
| 3912 <br> 3900 <br> 900 | (15.959.17 | ${ }_{\text {cke }}^{11595959.17}$ | (120.828.23 |  | 473.399 .18 <br> 293 <br> 2949 <br> 18 | \% 888.3390 |  |  |  | ${ }_{7}^{4775,0888.212}$ | \$866.546.86 |  |  |
| 3030 | 34,39.38 | 30,956.12 | ${ }^{136.155 .10}$ | ${ }^{208,431.57}$ | - 3338.294 .3040 | ${ }_{4040.122 .73}$ | ${ }_{408,313.60}$ | ${ }_{4} 510.541 .63$ | 419,899, 22 | 421,929.43 | 423,969,46 | 423,969.46 |  |
|  |  | 312,039.75 |  | 2885.900.56 <br> 896.364 .92 | (280,97.62 | 28,5930.02 | 29,20,10.43 | 2994378.29 | 205,994.61 |  | $\underline{2958535}$ |  |  |
|  |  |  |  | 281930 |  |  |  |  |  |  |  |  |  |
|  | (81,748.28) | 4,685,081.64 | 1,995,469.00 | 1,527,575.04 | 1,562,251.21 | 1,500,533.61 | 1,614,96, 78 | 3,118,796.22 |  | (22,334,10) |  |  | 14,771,574.63 |
|  |  |  | 4,869.06 | 352.570.95 |  |  | 3,502.05 |  | 136.97 |  | 14,310.14 | 16,966.30 | 392,355.47 |
|  |  |  | 52,958.98 | 12,276.47 |  |  | 125,72 |  | 5,384, | 8,895.82 |  |  | 966,20.44 |
|  | 40,695.09 | 40,646. 24.4 | 12,421.15 | 17,990.93 |  | 55,350.26 |  |  |  | 2,030.21 | 2,0430.03 |  | (10, |
|  | - 118.9898 .02 | 5,560, 00.1.48 | 2, 29.9424 .652 | ${ }^{2,857,527.86}$ | 2,310,201.02 | 2,522.507.19 | ${ }^{2.422,099.16}$ | 4,093,339.04 | ${ }^{360,641.63}$ | ${ }^{843,350.18}$ | 579, 138.32 | 74,957.05 | 24,991, 177.47 |




| Balance at <br> 3/31/07 (1) | 04/30/07 | 05/31/07 | 06/30097 | 07/31/07 | 08/31/07 | 09/30/07 | 10/31/07 | 11/30/107 | 1233107 | Schedule 3 <br> Balance at 122/31/2007 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | 98.35 | 1,196.74 | 1,773.31 | 2,148.12 | 2,712.41 | 3,013.69 | 4,176.76 | 4,541.40 | 5,466.59 | 25,127.37 |
|  | 356.14 | 3,574.19 | 6,133.08 |  | 6,042.59 1.920 .96 | 8,008.28 1.920 .95 | 8.,698.43 1.920 .95 | 8,634,37 $1,921.49$ | 8,556.10 $1,932.65$ | 56,056.99 112537.96 |
|  | - | . |  | 1,920.96 | 1,920.96 |  |  |  |  |  |
|  | - | : |  |  | 1,992.43 | $\begin{aligned} & 2,045.26 \\ & 1,514.79 \end{aligned}$ | $\begin{aligned} & 2,054.78 \\ & 1 \end{aligned}$ | $2,880.87$ 1.528 .93 | $\begin{aligned} & 3,769.92 \\ & 4,649.09 \end{aligned}$ |  |
|  | 454.49 | 4,770.93 | 2,906.39 | 10,123.89 | 12.667 .39 | 16,502.97 | 18,372.76 | 19,507.06 | 24,374.35 | 114,680.23 |
| - | 454.49 | 5,225.42 | 13,131.81 | 23,255.70 | 35,923.09 | 52,426.06 | 70,798.82 | 90,305.88 | 114,688.23 |  |


| Depr Rate |
| :---: |
| $\begin{array}{c}233 \% \\ 2.77 \% \\ 20.0 \% \% \\ 20.0 \% \\ 20.0 \% \\ 20.0 \% \\ 6.67 \%\end{array}$ |

 (i) Inciuced in Rate Case No. 07-0829-GA-AlR
玉2 Computer Soffware Project - CCS
THE EAST OHIO GAS COMPANY d/W/Z DOMINIQN EAST OHIO
AUTOMATED METER REAOING ESTIMAED COST RECOVERY CHARGE
ProvisiK FO Depreciation

| 12/31/07 | 01/31/08 | 02/29/08 | 03/31/08 | 04/30/08 | 05/31/08 | 06/30/08 | 07/31/08 | 08/31/08 | 09/30/03 | 10/31/08 | 11/30/08 | 12/31/2008 | Schedule 3A <br> Balance at 12/31/2008 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | 5,652.89 | 7.188 .77 | 9,275.81 | 11,031.63 | 12,321.45 | 14,201.64 | 15,532.67 | 17.227.02 | 18,526.78 | 20.100 .22 | 19.566.15 | 20.994.60 | 172.719 .63 |
|  | 8,401.46 | 17,264.07 | 19,903.83 | 22,793.50 | 25.748.75 | 29,587.25 | 31.642 .26 | 37.541.98 | 35,781.18 | 36,738.93 | 43,662.51 | 43,412.90 | 352,478.62 |
|  | 1,932.65 | 1,932.65 | 2,013.80 | 7,889.99 | 7,889.99 | 7,889.99 | 7,948.35 | 7,948.35 | 7,950.64 | 7,950.64 | 8,189.14 | 8.471 .91 | 78,008 10 |
|  | 191.19 | 462.43 | 756.80 | 1,156.53 | 1,629.98 | 2,114.00 | 2,812.83 | 3.445.09 | 3,980.83 | 4,363.78 | 4,816.56 | 5,370.74 | 31.102.76 |
|  | 4,448.19 | 5,125.64 | 5.332.66 | 5.632.39 | 5,912.87 | 6,735.38 | 6.805 .23 | 6,842.36 | 6,999.32 | 7.032 .16 | 7.066 .16 | 7.056 .16 | 74,897.47 |
|  | 5,176.09 | 5,200.73 | 4,724.40 | 4,750.01 | 4,782.91 | 4,808.83 | 4,835.07 | 4,906.30 | 4,933.08 | 4,956,93. | 4,980.90 | 5,833.34 | 59,888. 97 |
|  | 25,802.47 | 37,174,29 | 42,007.30 | 53,256.00 | 58,185.95 | 64,337.09 | 69,576.41 | 77.911 .10 | 79,170.83 | 81,142,66 | 88,381.42 | 21,149.65 | 768,095.17 |
| 114,680.23 | 140,482.70 | 177,656.99 | 219,664.29 | 272.920.29 | 331,106.24 | 395,443.33 | 465,019.74 | 542,930.84 | 622,101.67 | 703,244.33 | 791,625.75 | 882,775.40 |  |



$\stackrel{8}{5} \underset{2}{2}$

THE EAST OHIO GAS COMPANY d／b／a DOMINION EAST OHIO
AUTOMATED MEIER READING ESTIMATED COST RECOVERY CHARGE
$\begin{array}{rrrrrrrrrr} & & & & & & & & & \\ 04 / 30 / 07 & 05 / 31 / 07 & 06 / 30 / 07 & 07 / 31 / 07 & 08 / 31 / 07 & 09 / 30 / 07 & 10 / 31 / 07 & 11 / 30 / 07 & 12 / 31 / 07 & \text { Balance at } \\ \text { 12／31／2007 }\end{array}$

|  |  |
| ---: | ---: |
| .99 | $53,695.39$ |
| $136,015.76$ |  |
| .97 | $3,121.72$ |
| .00 | 0.00 |
| .28 | $2,916.34$ |
| .90 | $1,483.81$ |
|  | $197,233.02$ |



$\begin{array}{ll}000 \\ 000 & 000\end{array}$
$\begin{array}{lll}00^{\circ} 0 & 00^{\circ} 0 & 00^{\circ} \\ 00^{\circ} 0 & 00^{\circ} 0 & 000^{\circ} \\ & & 00^{\circ} 0\end{array}$
88
08
88
08
0
88
8
$\begin{array}{lll}000 & 000 & 000 \\ 00^{\circ} 0 & 000 & 000\end{array}$

$$
\begin{array}{r}
8,230.66 \\
22,931.19
\end{array}
$$

1，407．12
24，907．40

$$
\begin{array}{r}
8,230.66 \\
\hline 021.60
\end{array}
$$



8

ong
in
min
min


$-197,233.02$

119，947．14 158，048．38 Net Regulatory Asset－Post In－Service Carrying Cost net Re





$$
\begin{array}{r}
7,407.84 \\
17,299.69 \\
624.31 \\
0.00 \\
647.54 \\
0.00 \\
\hline 25,979.39
\end{array}
$$


0.0 .00
$23,828.58$析
 os
$\qquad$



$24,723.97$
624.48
0.00

$\stackrel{8}{9} \mid$

87，003．97
$85^{\prime}+20^{\prime} 19$

14，791．26 37，196．00

$$
\begin{array}{r}
22,931.19 \\
624.31 \\
0.00 \\
664.71
\end{array}
$$ โカ＇89ス＇





## 888888880808080

8
8
0
0
念荷苟
624.31
0.00
667.81
$\stackrel{8}{8}$

$8,931.19$
624.31
0.00


$\qquad$ $\begin{array}{lllll}61,024.58 & 87,003.97 & 119,947.14 & 158,048.38 & 197,233.02\end{array}$

${ }^{-}$


| 888 |
| :--- |
| 80 |


Regulatory Asset - Deferrals

ERT Installation
Regulatory Asset－Net
ERT Installation
Computer Hardware
In House Labor－CCS IT
In House Labor－IT

Cumulative
THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO
AUTOMATED METER READING ESTIMATED COST RECOVERY CHARGE
Net Regulatory Asset - Post In-Service Carrying Cost

| 12/31/2007 | 01/31/08 | 02/29908 | 03/31/08 | 04/30,08 | 05/31/08 | 06,30/08 | 07/31/08 | 08/31/08 | 09,/30/08 | 10/31/08 | 11/30,08 | 12/31/2008 | Balance at 12/31/2000 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 2,756,263.11 | 2,850,196.00 | 3,624,591.97 | 4,676,879,87 | 5.562.167.96 | 6,212,493.88 | 7,160,490.82 | 7,831,598.89 | 8,685,890.15 | 9,341,235.30 | 10,134,552.46 | 10,630,351.97 | 11,348,431.25 |  |
| 4,523,047.88 | 4.441,299.60 | 9,126,381.24 | 10,521,850.24 | 12,049,425.28 | 13,611,676.49 | 15,112,200,10 | 16,727,186.88 | 19,845,983.10 | 19,443,794,33 | 19,421,460.23 | 19,405,561.13 | 19,294,622.51 |  |
| 115,959.17 | 115,599.17 | 115,959.17 | 120,8228.23 | 473.399.18 | 473,399.18 | 473,399.18 | 476.901.23 | 476.901.23 | 477.038.20 | 477.038 .20 | 491.398.34 | 508.314.64 |  |
| 0.00 | 34,397.38 | 83,196.12 | 136,155.10 | 208,331.57 | 293,249.30 | 380,330.28 | 506,057.26 | 619,806.93 | 716,191.30 | 785,087.12 | 866,546.86 | 966,250.44 |  |
| 226,195,37 | 266,991.45 | 307,538.29 | 319,959,44 | 337,940,37 | 348,772.47 | 409,122.73 | 488,313.60 | $410,541.63$ | 419,899.22 | 421,929.43 | 423,969.46 | 423,969.46 |  |
| 278,945.51. | 310,555.46 | 312,043.75 | 283,464.18 | 285,000.56 | 286,974.62 | 288,530.02 | 290,104,43 | 294,378.29 | 295,984,61 | 297,415.70 | 2988,853.70 | 350,000.21 |  |
| 7,900,411.04 | 8,019,309.06 | 13,569.710.54 | 16,059,137.06 | 18,916,364.92 | ,226.565.99 | ,819,073.13 | 6.240,162.29 | ,333,501.33 | ,694,142.96 | .537.493.14 | ,116,031.46 | 289,588.5 |  |









THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO
AUTOMATED METER READING ESTIMATED COST RECOVERY CHARGE
Net Deferred Tax Balance - PISCC

| 04/30/07 | 05/31/07 | 06/30/07 | 07/31/07 | 08/31/07 | 09/30/07 | 10/31/07 | 11/30/07 | Schedule 5 <br> Balance at <br> 12/31/07 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| - | - | 450.94 | 5,176.94 | 13,018.60 | 21,358.60 | 30,451.39 | 41,981.50 | 55,316.93 |
| - | 450.94 | 4,726.00 | 7,841.66 | 8,340.00 | 9,092.79 | 11,530.11 | 13,335.43 | 13,714.62 |
| . | 450.94 | 5,176.94 | 13,018.60 | 21,358.60 | 30,451.39 | 41,981.50 | 55,316.93 | 69,031.56 |
| 35.00\% | 35.00\% | 35.00\% | 35.00\% | 35.00\% | 35.00\% | 35.00\% | 35.00\% | 35.00\% |

Net Deferred Tax Balance - PISCC Beginning Balance Ending Balance
Tax Rate
$\stackrel{\text { E. }}{5}$
i) i -Nm +
THE EAST OHIO GAS COMPANY d/G/a DOMINION EAST OHIO
AUTOMATED METER READING ESTIMATED COST RECOVERY CHARGE
Net Deferred Tax Balance - PISCC

| $\begin{gathered} \text { Line } \\ \text { No. } \end{gathered}$ |  | 12/31/2007 | 01/31/08 | 02/2908 | 03/31/08 | 04/30/08 | 05/31/08 | 06/30/08 | 07/31/08 | 08/31/08 | 09/30/08 | 10/31/08 | 11/30.08 | Schedule 5A <br> Balance at 12/31/08 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\begin{aligned} & 2 \\ & 3 \end{aligned}$ | Net Deferred Tax Balance - PISCC Beginning Balarke Monthly Activity |  | $\begin{aligned} & 69,0,031.56 \\ & 1,977.86 \end{aligned}$ | $\begin{aligned} & 84,009.41 \\ & 15,20.27 \\ & \hline 10 \end{aligned}$ | $\begin{aligned} & 95,2125299 \\ & \hline 9 . \end{aligned}$ | $\begin{array}{r} 124,938.60 \\ 30,445.45 \end{array}$ | $155,384.05$ $35,862.27$ | 191,246.32 40,242.03 | 231,488.35 45,156.99 | $276,645.35$ 49,746.97 | $\begin{gathered} 326,392.32 \\ 57,507.26 \end{gathered}$ | 383,899.58 58,190.98 | 442,090.56 59,789.84 | $\begin{gathered} 501,880.40 \\ 60,887.78 \end{gathered}$ |
| 4 | Ending Balance | 699,031.56 | 84,009.41 | 99,212.59 | 124,938,60 | $1555,384.05$ | 191,246,32 | 231,488.35 | 2776.645 .35 | 326,392.32 | 383,899.58 | $442,090.56$ | 5028880.40 | 566,768.18 |
|  | Tax Rate | 35.00\% | 35.00\% | 35.00\% | 35.00\% | 35.00\% | 35.00\% | 35.00\% | 35.00\% | 35.00\% | 35.00\% | 35.00\% | 35.00 | 35.000 |

THE EAST OHIO GAS COMPANY d/b'a DOMINION EAST OHIO
AUTOMAIED METER READING ESTIMATED COST RECOVERY CHARGE
Deferred Taxes on Liberalized Depreciation


Schedule 7
THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO
AUTOMATED METER READING ESTIMATED COST RECOVERY CHARGE
Annualized Depreciation Associated With Additions

Line

No

Schedule 8

THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO
AUTOMATED METER READING ESTIMATED COST RECOVERY CHARGE
Annualized Amortization of PISCC

Schedule 9
THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO AUTOMATED METER READING ESTIMATED COST RECOVERY CHARGE

|  | 86'zZ9'ゅIE | 20't<c's | 000 |
| :---: | :---: | :---: | :---: |
|  | $\%<260$ |  |  |
|  |  | \% $296{ }^{\circ} 0$ |  |
|  | Ts ${ }^{\prime} 88 s^{\prime}$ ' $68^{\prime}$ ' $2 \varepsilon$ |  | $00 \%$ |
|  |  | to ${ }^{\prime}$ IT ${ }^{\prime} 006^{\prime} \mathrm{L}$ | $00 \%$ |
|  | $00^{\circ} 0$ | $00^{\circ} 0$ | 000 |
|  | $00^{\circ}$ | 000 | 000 |
| $\forall Z \varphi S$ | 15 ${ }^{\prime} 885^{\prime}$ I68'ze | +0'ttto $006^{\prime} \mathrm{C}$ | 00.0 |
|  | 80/TE/ZT กมч | 20/IE/ZI пчை \|епй | (T) $\angle 0 / \tau \varepsilon / \varepsilon$ ח. |

$\frac{\text { No. }}{1}$ Property Tax Expense (Arnounts Exclude Post In-Service Carrying Costs)

Line

THE EAST OHIO GAS COMPANY d/bla DOMINION EAST OHIO AUTOMATED METER READING ESTIMATED COST RECOVERY CHARGE
Appproved Rate of Return on Rate Base



Schedule 11

Schedule 12
THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO
AUTOMATED METER READING ESTIMATED COST RECOVERY CHARGE
CALL CENTER AND METER READING EXPENSES

Call Center
Meter Reading with Adjustments
Total
THE EAST OHIO GAS COMPANY d/b/a.DOMINION EAST OHIO
AUTOMATED METER READING ESTIMATED COST RECOVERY CHARGE
METER READING EXPENSES
Schedule 12A


## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Direct Testimony of Vicki H. Friscic on Behalf of Dominion East Ohio was sent to the following via regular U.S. Mail and electronic mail this 15th day of April, 2009:

Office of the Ohio Consumers' Counsel Joseph Serio, Esq. 10 West Broad Street, Suite 1800
Columbus, OH 43215-3485
serio@occ.state.oh.us

Stephen Reilly<br>Anne Hammerstein<br>Office of the Ohio Attorney General Public Utilities Section 180 East Broad Street, 9th Floor Columbus, Ohio 43215 stephen.reilly@puc.state.oh.us anne.hammerstein@puc.state.oh.us



Paul A. Colbert

