

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

**In the Matter of Protocols for the
Measurement and Verification of Energy
Efficiency and Peak Demand Reduction
Measures.**

Case No. 09-512-GE-UNC

**CURRENT AND PROPOSED MEASURES OF THE EAST OHIO GAS COMPANY
D/B/A DOMINION EAST OHIO, COLUMBIA GAS OF OHIO, INC., VECTREN
ENERGY DELIVERY OF OHIO, INC. AND DUKE ENERGY OHIO, INC.**

Pursuant to the Commission's Entries of June 24 and July 14, 2009, The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO"), Columbia Gas of Ohio, Inc. ("Columbia"), Vectren Energy Delivery of Ohio, Inc. ("VEDO"), and Duke Energy Ohio, Inc. ("DE-Ohio") (together, the "Gas Utilities") jointly file their list of current and proposed measures, attached as Exhibit A.

Despite some uncertainty regarding whether the Commission intended the Gas Utilities to file proposed measures in addition to current measures,¹ the Gas Utilities have worked diligently to file both current and proposed measures. To develop the list of proposed measures, the Gas Utilities solicited and received input from mercantile customers. Accordingly, Exhibit A to these comments is divided into two sections. The first section lists the current measures in place or in progress for each of the Gas Utilities. The Gas Utilities' current measures have been approved by the Commission or implemented through a collaborative process that included Staff participation. The second section consists of a list of proposed measures. The proposed

¹ See June 24, 2009 Entry, ¶ 11(b) (requiring the filing of "Measures that are intended by the *electric utilities* to be proposed within their initial submission of program portfolio plans.")(Emphasis added.)

measures reflect a consensus among the Gas Utilities and the input of mercantile customers. The Gas Utilities expect that the proposed measures may change as measures are added or removed during the course of this proceeding.

The Gas Utilities would also note that, although they have no current statutory obligation to invest in energy efficiency, such obligation may arise in the future if certain proposed federal legislation is enacted – specifically, H.R. 2454 § 784, passed by the United States House of Representatives on June 26, 2009. Because an obligation to invest in energy efficiency does not exist now, but may exist in the future, the Gas Utilities could have a disincentive to invest in energy efficiency prior to the effective date of the proposed federal legislation. Accordingly, the Commission should provide assurances that the Gas Utilities will be able to preserve the benefits associated with energy efficiency investments made prior to the effective date of any federal legislation, by counting these investments toward federal energy efficiency mandates. H.R. 2454 leaves the decision to determine which measures count toward compliance with federal mandates with state utility commissions. *Id.* The Gas Utilities will more thoroughly discuss this issue in their next round of comments, which are due October 15, 2009.

Respectfully submitted,

/s/ Paul A. Colbert/per email authority/MAW

David A. Kutik (Counsel of Record)

JONES DAY

North Point, 901 Lakeside Avenue

Cleveland, Ohio 44114

Telephone: (216) 586-3939

Facsimile: (216) 579-0212

dakutik@jonesday.com

Paul A. Colbert

Grant W. Garber

JONES DAY

325 John H. McConnell Blvd., Suite 600

P. O. Box 165017

Columbus, Ohio 43216-5017

Telephone: (614) 469-3939

Facsimile: (614) 461-4198

pacolbert@jonesday.com

gwggarber@jonesday.com

ATTORNEYS FOR THE EAST OHIO GAS
COMPANY D/B/A DOMINION EAST OHIO

/s /Eric Gallon per email authority/MAW

Eric Gallon

Porter Wright Morris & Arthur LLP

Huntington Center

41 South High Street

Columbus, Ohio 43215

Telephone: (614) 227-2190

Facsimile: (614) 227-2100

egallon@porterwright.com

Stephen Seiple

Columbia Gas of Ohio, Inc.

200 Civic Center Drive, PO Box 117

Columbus, Ohio 43215

Telephone: (614) 460-4648

Facsimile: (614) 460-6986

sseiple@nisource.com

ATTORNEYS FOR COLUMBIA GAS OF
OHIO, INC.

/s/ Mark A. Whitt

Mark A. Whitt
Carpenter Lipps & Leland LLP
280 Plaza, Suite 1300
280 North High Street
Columbus, Ohio 43215
Telephone: (614) 365-4100
Facsimile: (614) 365-9145
whitt@carpenterlipps.com

ATTORNEY FOR VECTREN ENERGY
DELIVERY OF OHIO, INC.

/s/ Elizabeth Watts per phone authority/MAW

Elizabeth H. Watts
Duke Energy Ohio, Inc.
155 East Broad Street, 21st Floor
Columbus, Ohio 43215
Telephone: (614) 222-1331
Facsimile: (614) 222-1337
Elizabeth.watts@duke-energy.com

ATTORNEY FOR DUKE ENERGY OHIO,
INC.

Exhibit A

Gas Utilities' Current and Proposed Measures

I. Current Measures

A. Columbia Gas of Ohio

Residential, Low-Income Weatherization Retrofit

Attic insulation
Sidewall insulation
Floor insulation
Duct insulation
Water heater insulation
Water heater temperature setback
Water pipe insulation
Blower-door-guided air sealing
Blower-door-guided duct sealing
High-efficiency gas furnaces
High-efficiency gas boilers
Standard gas water heater
Power vented water heater
Gas heating system repairs
Gas water heater repairs
Gas space heaters, vented
Energy-efficient showerhead
Programmable thermostat
Other measures necessary to ensure customer health and safety

Residential Weatherization Retrofit

Attic insulation
Wall insulation
Blower-door-guided air sealing
High-efficiency gas furnaces/boilers (CEE Tier 2 or above)
Programmable thermostat
High-performance, energy-efficient showerheads, ≤ 1.8 gpm

Residential New Construction

Any high-efficiency gas space and water heating, building shell insulation, and air sealing energy conservation measures necessary for house to perform 50% better than 2004 IECC and or qualify for federal energy efficiency tax credits, as determined by a home energy rating.

Small Commercial Retrofit

Ceiling/attic insulation
Wall insulation
Floor insulation

- Perimeter insulation
- Air leakage sealing
- Duct sealing
- Water heater insulation
- Water pipe insulation
- Low-flow water fixtures and devices
- High-efficiency gas water heater
- Tankless water heater
- Replacement gas furnaces and boilers, AFUE>90%
- Programmable thermostat
- Infrared fryer

B. Dominion East Ohio

DEO is currently discussing the implementation of an energy efficiency program with its collaborative that involves home energy audits and subsequently, the implementation of energy efficiency measures.

C. Vectren Energy Delivery of Ohio

Residential Programs

- Furnace AFUE 92% or more
- Boiler AFUE 90% or more
- Storage tank water heater - .62 EF or more
- Tankless water heater - .82 EF or more
- Online Audit and water heating savings kit
- Energy Star certification of 85 points or less, new construction
- Energy Star certification of 70 points or less, new construction
- Audit and installed savings, including insulation and air sealing

Commercial Programs

- Furnace AFUE 92% or more
- Boiler AFUE 90% or more (300,000 btu/hr or less input), 90% combustion efficiency (300,000 btu/hr or greater input)
- Storage tank water heater - .62 EF or more
- Tankless water heater - .88 thermal efficiency (TE) or more
- Audit and Technical assistance

D. Duke Energy-Ohio

- Low income weatherization

II. Proposed Measures

A. Residential

Basement Wall Insulation
Ceiling Insulation (R11-R38)
Ceiling Insulation (R19-R38)
Ceiling Insulation (R30-R38)
Clothes Dryers
Clothes Washer CEE Tier2, Electric Water heater, Gas Dryer
Clothes Washer CEE Tier2, Gas water heater, Electric dryer
Clothes Washer CEE Tier2, Gas water heater, Gas dryer
Clothes Washer CEE Tier3, Electric Water heater, Gas Dryer
Clothes Washer CEE Tier3, Gas water heater, Electric dryer
Clothes Washer CEE Tier3, Gas water heater, Gas dryer
CO Remediation
Crawlspace Wall Insulation
Draught Insulation
Dual Fuel Heat Pumps
Duct Insulation
Duct sealing
EE Furnace–AFUE of 65 to 90 Required; 5 Yrs on Old Furnace and 25 yrs on 90+
EE Windows
Energy Efficient Clothes Dryer
Energy Efficient Clothes Washer
Energy Efficient Gas Water Heater
Energy Star Construction
Energy Star Homes
ES Dishwasher Tier 1 - gas water heater
ES Dishwasher Tier 2 - gas water heater
Floor/Basement Insulation
Gas Stove/Oven
Gravity Film Heat Exchanger GFX
High Efficiency Boilers
High efficiency furnace
House Sealing Using Blower Door
HVAC Sizing
HVAC Tune-Ups
Infiltration reduction
Install cover for pools/spas
Instant Gas Water Heater
Insulate uninsulated basement walls to R-10
Insulate uninsulated basement/crawl space ceiling to R-19
Insulate uninsulated wall to R-15
Insulate uninsulated wall to R-19
Insulate uninsulated wall to R-21

Insulate, seal and balance ducts in unconditioned space
Low Flow Faucet Aerators
Low Flow Showerheads
Pipe/Tank Wrap
Place ducts within thermal envelope (RNC only)
Point of Use Water Heater
Programmable Thermostats
Retiring refrigerators and freezers
Roof Insulation
Seal, balance ducts in conditioned space
Setback thermostat - full setback
Setback thermostat - moderate setback
Smart air sealing
Solar Domestic Hot Water
Solar Water Heater
Solar water heating for pools/hot tubs
Super Efficiency Gas Water Heater
Tank-less Water Heater
Turn down water heater temperature setting
Upgrade atmospheric fireplace to direct vent model
Upgrade attic insulation from R-11 to R-49
Upgrade attic insulation from R-19 to R-49
Upgrade attic insulation from R-27 to R-49
Upgrade form efficient (0.63 EF) stand-alone water heater to indirectly-fired storage tank
Upgrade from efficient (0.63 EF) stand-alone water heater to tankless water heater
Upgrade from standard (0.59 EF 50 gallon tank) to efficient (0.63 EF) stand-alone water heater
Upgrade from standard to super-efficient (MEF 1.80) clothes washer
Upgrade from tankless coil to indirectly-fired storage tank water heating
Upgrade gas dryer to model with humidity sensor control
Upgrade manual thermostat to programmable model
Upgrade to insulated attic hatch
Upgrade to insulated exterior door
Wall Insulation
Weatherization
Window Replacement

B. Commercial/Industrial

Air Sealing
Boiler Modulating Burner Control 5to1 turn-down - retrofit
Boiler Replacement
Boiler Reset Control

Boiler tune-up
Builder tune-up
Building automation system
Central hot oil system heater tune up
Chilled Water reset 5 deg
Clothes Washer CEE Tier2, Electric Water heater, Gas Dryer
Clothes Washer CEE Tier2, Gas water heater, Electric dryer
Clothes Washer CEE Tier2, Gas water heater, Gas dryer
Clothes Washer CEE Tier3, Electric Water heater, Gas Dryer
Clothes Washer CEE Tier3, Gas water heater, Electric dryer
Clothes Washer CEE Tier3, Gas water heater, Gas dryer
Combination Ovens
Commissioning Audit
Commissioning–New
Condensing DHW stand-alone tank
Condensing hot water heaters
Controls
Convection Ovens
Cooling system chilled water reset
Cooling system oversized cooling tower
Cooling system water side economizer
Demand-Controlled Ventilation (controller, sensor)
Direct fired convection range/oven
Economizers and feedwater preheaters
EE Water Heater EF >0.6
Energy Management Systems
ENERGY STAR Fryers
Energy Star Gas Clothes Dryer
Energy Star Gas Oven
Energy Star Gas Stove
ENERGY STAR Steam Cookers 5 Pan
ENERGY STAR Steam Cookers 6 Pan
Energy Star washer
Engineered CKV Hood
Exhaust Hood Makeup Air
Faucet aerator
Furnace Tube Inserts
Gas Engine Chiller
Gas tankless water heater 80plus EF
Gas water Heater 62plus EF less than 75000 btu hr less than 75 gal
Graywater heat exchanger/GFX
Griddles
Guestroom Energy Management Control
Heat recovery from dryer and furnace exhausts and thermal oxidizers
High Efficiency Boilers
High efficiency ENERGY STAR fryer

High efficiency ENERGY STAR steam cooker
High efficiency Furnace
High efficiency griddle
High Efficiency Pool Heater & Cover
High Performance Glazing double pane, low-E, low conductivity frame-T1
High Performance Glazing triple pane, low-E, low conductivity frame - T2
Hot water conservation
Improved below-grade insulation
Improved dryer and furnace designs
Improved heat exchanger maintenance
Improved heating system condensing unit - Tier 2
Improved heating system high efficiency unit - Tier 1
Improved roof insulation
Improved sensors and process controls
Improved unit space heaters
Improved wall insulation
Indirect-fired DHW off space heating boiler
Infrared Heater
Instantaneous High-Modulating Water Heater
Integrated Design - High Performance (30% > codes) - Tier 1
Integrated Design - High Performance (50% > codes) Tier 2
Large Vat Fryers
Low Flow Fixtures
Low-E Windows 1500 Ft²
Low-E Windows 1500 Ft² Replace
Low-flow shower heads
Lowering hot water operating temperatures
Method or procedure changes
Outdoor Air Reset
Oxygen Trim
Pipe insulation
Pipe Wrap - Hot Water Boiler
Pipe Wrap - Steam Boiler
Pool Covers
Pre-Rinse Spray Valve
Programmable Thermostat
Rack Oven Double
Rack Oven Single
Refrigeration heat recovery
Replacement of general exhaust with specific exhaust
Retrocommissioning
Roof Insulation
Seals around shipping dock doors
Sensible Heat Recovery
Solar Water Heater
Steam trap maintenance/ management

Steam trap repair or replacement
Swimming pool/spa covers
Tank insulation
Upgraded heat exchangers
Upgrade/replace direct fired heaters with 100% outside air to 80/20
inside/outside air

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Current and Proposed Measures of The East Ohio Gas D/B/A Dominion East Ohio, Columbia Gas of Ohio, Inc., Vectren Energy Delivery of Ohio, Inc. and Duke Energy Ohio Inc. was e-filed on the Commission's Docketing Information System (DIS) on this 8th day of September, 2009. Parties of Record and other interested parties may access this filing through DIS. Courtesy copies were also sent by e-mail or regular U.S. mail to the following:

/s/ Mark A. Whitt

Mark A. Whitt

*Kenneth D. Schisler
Enernoc, Inc.
75 Federal St., Suite 300
Boston, MA 02110
kschisler@enernoc.com

Randall V. Griffin
Dayton Power and Light Company
1065 Woodman Drive
P O Box 8825
Dayton, OH 45401

*Kathy J. Kolich, Esq.
FirstEnergy Corp
76 South Main Street
Akron, OH 44308
kjkolich@firstenergycorp.com

*Carolyn S. Flahive
Thompson Hine LLP
41 South High Street Suite 1700
Columbus, OH 43215-6101
carolyn.flahive@thompsonhine.com

Candace Jones
Ohio Department of Development
77 S. High Street
P.O. Box 1001
Columbus, OH 43216-1001

*Nolan M. Moser
The Ohio Environmental Council
1207 Grandview Ave.
Columbus, OH 43212-3449
nolan@theoec.org

*David C. Rinebolt
Ohio Partners For Affordable Energy
231 West Lima St
P O Box 1793
Findlay, OH 45839-1793

Teresa Orahood
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43216-4291

Amy B. Spiller
139 Fourth Street 25 Atrium II
Cincinnati, OH 45202

Marvin Resnik
American Electric Power Service
Corporation
1 Riberside Plaza, 29th Floor
Columbus, OH 43215

Richard M. Bulgrin
Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, OH 43215

*Steven T. Nourse
American Electric Power Service
Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
stnourse@aep.com

Office of the Ohio Consumers' Counsel
Jeffery Small
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485
small@occ.state.oh.us

Harvey Wagner
Cleveland Electric Illuminating Co.
Ohio Edison Company
Toledo Edison Company
76 S. Main Street
Akron, OH 44308

Columbia Gas of Ohio, Inc
Robert G. Kriner
200 Civic Center Drive
Columbus, OH 43215

Selwyn J. Dias
Columbus Southern Power
Ohio Power Company
88 East Broad Street, Suite 800
Columbus, OH 43215

Dayton Power & Light Company
Dona Seger-Lawson
1065 Woodman Drive
Dayton, OH 45432

*Industrial Energy Users of Ohio
Samuel C. Randazzo, General Counsel
21 E. State Street, 17th Floor
Columbus, OH 43215
sam@mwncmh.com

*Lisa G. McAlister
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus, OH 43215
lmcalister@mwncmh.com

Ohio Department of Development
Bruce Johnson
77 South High Street
PO Box 1001
Columbus, OH 43216-1001

*Janet K. Stoneking
Ohio Department of Development
77 S. High Street
P.O. Box 1001
Columbus, OH 43216-1001

Ohio Hospital Association
Richard L. Sites
155 E. Broad Street, 15th Floor
Columbus, OH 43215-3620

Thomas O'Brien
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215

Ohio Manufacturers Association
Eric L. Burkland, President
33 North High Street
Columbus, OH 43215-3005

Toledo Edison Company
76 S. Main Street
Akron, Ohio 44308

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Summary: Comments of The East Ohio Gas Company d/b/a Dominion East Ohio, Columbia Gas of Ohio, Inc., Vectren Energy Delivery of Ohio, Inc., and Duke Energy Ohio, Inc. electronically filed by Mr. Mark A Whitt on behalf of Vectren Energy Delivery of Ohio, Inc. and The East Ohio Gas Company d/b/a Dominion East Ohio and Duke Energy Ohio and Columbia Gas of Ohio, Inc.