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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO** 2010 NOV 16 AM 9:07

In the Matter of The East Ohio Gas Company)
d/b/a Dominion East Ohio Percentage of)
Income Payment Plan Rider Audit.)

Case No. 10-604-GE-PIP **PLUGO**

**COMMENTS OF
OHIO PARTNERS FOR AFFORDABLE ENERGY**

By Entry filed on May 5, 2010, the Commission initiated an audit of the East Ohio Gas Company d/b/a Dominion East Ohio ("Dominion") Percentage Income Payment Plan ("PIPP") Rider. An Entry filed on September 17, 2010 solicited comments from interested parties regarding the audit report, which was filed on October 15, 2010. Ohio Partners for Affordable Energy (OPAE) hereby submits its comments to the audit report.

A review of the report prepared by Deloitte & Touche LLP indicates Dominion has complied with the requirements established by the Commission in Case Nos. 88-1115-GE-PIP, 90-705-GE-PIP, and 90-879-GE-ORD. OPAE agrees with the conclusion of the report.

OPAE also observes that the report shows that customers have been charged \$12,215,953 in carrying charges during the years 2006-2009. These charges resulted from the failure of Dominion to update its PIPP Rider in a timely manner. Fortunately, the Company will now update its Rider annually, saving customers millions in carrying charges.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David C. Rinebolt", with a long horizontal stroke extending to the right.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Comments* were served by regular U.S. Mail upon the parties of record identified below in this case on this 15th day of November 2010.



David C. Rinebolt

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