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September 27, 2011

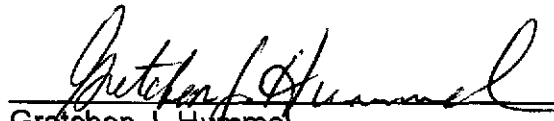
Betty McCauley  
Secretary  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215

**RE: Case No. 11-320-GA-UEx**

Dear Secretary McCauley:

Enclosed please find the Audit Report of Deloitte & Touche LLP of Vectren Energy Delivery of Ohio, Inc.'s Uncollectible Expense Rider to be filed in the approved referenced case.

Very truly yours,

  
Gretchen J. Hummel

**Attorney for Vectren Energy Delivery of  
Ohio, Inc.**

Enclosure  
GJH:vlp

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## **INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES**

The Board of Directors of  
Vectren Energy Delivery of Ohio:

We have performed the procedures enumerated below, which were agreed to by Vectren Energy Delivery of Ohio (the "Company") and provided to the Public Utility Commission of Ohio (PUCO), solely to assist the specified parties in the evaluation of the recovery of uncollectible expense through an uncollectible expense recovery mechanism for the period April 1, 2010 to March 31, 2011, in conjunction with the PUCO Case No. 11-320-GA-UEx. The Company's management is responsible for the uncollectible expense recovery mechanism. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures that we performed and our findings are as follows:

### **Uncollectible Expense Recovery Mechanism**

1. We obtained from Company management, and proved the arithmetic accuracy of the accounting schedules summarizing the following items included as a component of the uncollectible expense rider (the "Filing" or UEX) for the year ended December 31, 2010 and the three-month period ended March 31, 2011 (we previously performed procedures on the uncollectible expense recovery rider for the period January 1, 2009 to March 31, 2010 as described in our report dated September 24, 2010).
  - a. Uncollectible charge off activity for the year ended December 31, 2010 of \$10,230,861 and for the three-month period ended March 31, 2011 of (\$175,692)
  - b. Billed and unbilled recovery of uncollectible expense for the year ended December 31, 2010 of \$6,245,298 and for the three-month period ended March 31, 2011 of \$2,306,952
  - c. Other recoveries for the year ended December 31, 2010 of \$560,199 and for the three-month period ended March 31, 2011 of (\$60,647)
  - d. Carrying charges for the year ended December 31, 2010 of \$999 and for the three-month period ended March 31, 2011 of \$1,810
2. We compared uncollectible charge off activity from the schedule obtained in step 1a above to the Company's *Write-Off and Collection Summary* report and found such amounts to be in agreement.

3. Company management has informed us that the uncollectible charge-off activity included in the *Write-Off and Collection Summary* report provided for step 2 above and that the uncollectible charge-off activity included in the Filing do not include Percentage of Income Payment Plan (PIPP) accounts.
4. We compared uncollectible expense recoveries from the Filing obtained in step 1 above to the schedules prepared by Company management and found such amounts to be in agreement.
5. We randomly selected ten customers from the UEX recovery supporting documentation across the months of June, October, and December 2010, and February 2011, totaling monthly customer recoveries by customer and premise for the period April 1, 2010 to March 31, 2011 and recalculated the UEX portion of their bills in the randomly selected month, agreeing the rate to the corresponding UEX rates found on the PUCO website. We noted no exceptions in performing the following:
  - a. We obtained each customer's bill detail from the customer billing system from the *Customer History Card* in Banner (the Company's customer billing system) for the selected month
  - b. We agreed customer and premise number from the selection to the customer bill
  - c. We agreed the selected customer's UEX Rider eligibility based on the customer's rate class
  - d. We recalculated the UEX rider revenue portion of the customer invoice
  - e. We agreed UEX rider revenue to the *Customer History Card* in Banner (the Company's billing system) and agreed total charges per screenshot to the customer invoice
6. We randomly selected the months of June, October, and December 2010, and February 2011 included in the schedules obtained in step 1 above and performed the following procedures:
  - a. For the selected months, we compared volumes and related sales in the Filing (*Bad Debt Analytical Analysis* report) to Banner (the Company's customer billing system) *Total Cons from Revenue Ledger* and *Total Bad Debt Charges from Revenue Ledger* system reports respectively, and found such amounts to be in agreement. We noted that eligible volumes relate only to accounts that are responsible for the payment the PIPP rider.
  - b. We compared the uncollectible expense rider rates for the Company with those permitted by the PUCO, as outlined in Case Nos. 09-456-GA-UEx and 10-320-GA-UEx, and found the uncollectible expense rider rates to be in agreement. We noted that the respective uncollectible expense rider rates have been applied to the eligible volumes that pay the PIPP rider.
  - c. We compared the summary schedule in the Filing obtained in step 1 above to the supporting schedules for uncollectible charge-off activity, uncollectible expense recoveries, and other recoveries and found such amounts to be in agreement.
  - d. We compared the internal interest rates utilized by the Company to calculate the carrying charges included in the schedule obtained in step 1d above to interest rates included in a supporting schedule we obtained from Company management and found the interest rates to be in agreement.

7. From the bad debts written off during the period April 1, 2010 to March 31, 2011, we randomly selected 25 charge-offs and obtained the related customer billing history from Banner. We documented the dates and transactions prior to the charge off of the customer's outstanding balance, including any subsequent recovery of any portion of the balance written off. We agreed the selected charge offs and recoveries on the *Customer History Card* in Banner to the Filing's supporting documents. We noted no exceptions.

#### **Uncollectible Expense Rider Regulatory Asset Balance**

8. We obtained the Accounts Receivable Regulatory Asset balance at December 31, 2010 and March 31, 2011 from the Company's general ledger account number 1905922 and compared the balances to the Filings and found differences of \$13 and \$16, respectively. We obtained the journal entry subsequently correcting the differences through April 30, 2011. Management informed us that the difference related to carrying charges.
9. We obtained from Company management the rollforward of general ledger account numbers 1905922 and 1231000 and compared uncollectible charge-off activity, uncollectible recoveries, and other recoveries to the supporting schedules obtained in step 1 above and found such amounts to be in agreement for the months selected in step 5 above.
10. We obtained from Company management the rollforward of general ledger account number 1905922 and noted that the uncollectible charge-off activity included therein did not include *PIPP* accounts.
11. We inquired of management regarding the uncollectible expense rider mechanism, noting no amortization of the regulatory asset is required for the period April 1, 2010 to March 31, 2011.

We were not engaged to, and did not, conduct an audit, the objective of which would be the expression of an opinion on the Company's compliance with the uncollectible expense recovery mechanism in accordance with the PUCO Case No. 11-320-GA-UEX. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the Company and, the PUCO and is not intended to be and should not be used by anyone other than these specified parties.

*Deloitte + Touche LLP*

September 22, 2011