BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The East Ohio Gas Company d/b/a/ Dominion East Ohio For Approval of Tariffs to Adjust its Automated Meter Reading Cost Recovery Charge and Related Matters.	)))))	Case No. 12-3116-GA-RDR

COMMENTS ON THE APPLICATION OF THE EAST OHIO GAS COMPANY
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL

I. INTRODUCTION

The Office of the Ohio Consumers' Counsel ("OCC"), an intervenor in the above-captioned proceeding, hereby files these Comments on the Application of The East Ohio Gas Company d/b/a Dominion East Ohio ("Dominion" or "the Utility"). This case involves the rider rate that Dominion charges its customers to recover the costs associated with the installation of Automated Meter Reading Devices ("AMRs"). Installation of AMRs permits the Utility to automatically read customers' meters rather than having to manually read their meters.

The Automated Meter Reading Cost Recovery Charge ("AMR Rider") was established pursuant to the Stipulation and Recommendation ("Stipulation") filed on August 22, 2008, in Case No. 07-829-GA-AIR et al., and the Opinion and Order of the Public Utilities Commission of Ohio ("PUCO" or "the Commission"). In this Application, filed on March 11, 2013, Dominion is seeking a reduction to the AMR Rider

charge that would be collected from customers from $0.42 per customer per month to $0.38 per customer per month.[1]

II. BURDEN OF PROOF

The Application has been filed pursuant to R.C. 4929.11. In such a case, the burden of proof regarding the Application rests upon Dominion. In a hearing regarding a proposal that involves an increase in rates, R.C. 4909.19 provides that, "[a]t any hearing involving rates or charges sought to be increased, the burden of proof to show that the increased rates or charges are just and reasonable shall be on the public utility."[2] Inasmuch as AMR is an outgrowth of Dominion's 2007 Rate Case, in this case Dominion bears the burden of proof. Therefore, neither OCC nor any other intervenor bears any burden of proof in this case.

III. COMMENTS

OCC has no issues with the Application as filed. Nevertheless, OCC reserves the right to supplement these Comments and/or file expert testimony, in accordance with the procedural schedule in this case. Pursuant to the procedural schedule included in the Attorney Examiner's March 13, 2013 Entry, the Parties have until April 3, 2013, to inform the Commission that issues raised in the Comments have been resolved.[3]

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[1] *In the Matter of Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of Tariffs to Adjust its Automated Meter Reading Costs Recovery Charge and Related Matters*, Application at 1 (March 11, 2013).

[2] R.C. 4909.19(C).

[3] *In the Matter of Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of Tariffs to Adjust its Automated Meter Reading Costs Recovery Charge to Recover Costs Incurred in 2012*, Entry, at 2 (March 13, 2013).

Otherwise, parties filing testimony must file by April 8, 2013, and prepare for the hearing scheduled for April 15, 2013.[4]

IV. CONCLUSION

OCC respectfully files these Comments on the Dominion AMR Rider Application in accordance with the procedural schedule included in the Attorney Examiner's March 13, 2013 Entry.[5]

Respectfully submitted,

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[4] Id. at 3.

[5] Id.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the *Comments* was served via electronic mail to the parties of record identified below, on this 29th day of March 2013.

/s/ Joseph P. Serio
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Summary: Comments Comments on the Application of the East Ohio Gas Company by the Office of the Ohio Consumers' Counsel electronically filed by Patti Mallarnee on behalf of Serio, Joseph P.