## 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 to Implement a Capital Expenditure Program.	) ) )	Case No. 12-3279-GA-UNC
In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Authority to Change Accounting Methods.	) ) )	Case No. 12-3280-GA-AAM

## **REPLY COMMENTS**

In accordance with the procedural entry of June 12, 2013, The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO") hereby files its reply comments to the comments and recommendations filed by the Commission's Staff.

The Staff recommended approving DEO's application subject to two recommendations. Its first recommendation is that the Commission should "acknowledge DEO's commitments [set forth in its Application] and indicate its approval of DEO's Application in this case is conditioned on those commitments." (Staff Comments at 10.) Staff also states that the Commission should "indicate that . . . recovery of the deferrals is not guaranteed and will be considered in a future proceeding." (*Id.*) DEO does not oppose the recommendation that it should be held to the commitments made in its Application, and it does not disagree with Staff's statement that recovery of the deferrals is not guaranteed.

Staff's other recommendation is that "the Commission direct that DEO's April 30, 2014 and future annual informational filings should include revenue data from all potential sources of revenue delineated in the incremental revenue formula adopted in Case No. 11-6024-GA-UNC." (*Id.* at 12–13.) DEO does not oppose including in its annual informational filings a more detailed calculation of incremental revenue in accordance with the adopted formula, and it will

work with Staff to ensure that the appropriate data is included in the April 30, 2014 informational filing.

Given that there is no disagreement between DEO and Staff, and given that both parties recommend approval, DEO would respectfully request that the Commission approve DEO's Application.

Dated: August 26, 2013 Respectfully submitted,

/s/ Andrew J. Campbell

Mark A. Whitt (Counsel of Record)
Andrew J. Campbell
Gregory L. Williams
WHITT STURTEVANT LLP
The KeyBank Building, Suite 1590
88 East Broad Street
Columbus, Ohio 43215
Telephone: (614) 224-3911
Facsimile: (614) 224-3960

whitt@whitt-sturtevant.com campbell@whitt-sturtevant.com williams@whitt-sturtevant.com

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

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of DEO's Reply Comments was served by electronic mail

this 26th day of August, 2013 to the following:

William L. Wright, Section Chief Stephen A. Reilly, Assistant Attorney General Public Utilities Section 180 East Broad Street Columbus, OH 43215 william.wright@puc.state.oh.us stephen.reilly@puc.state.oh.us

/s/ Andrew J. Campbell

One of the Attorneys for The East Ohio Gas Company d/b/a Dominion East Ohio This foregoing document was electronically filed with the Public Utilities

**Commission of Ohio Docketing Information System on** 

8/26/2013 1:07:05 PM

in

Case No(s). 12-3279-GA-UNC, 12-3280-GA-AAM

Summary: Reply Comments electronically filed by Mr. Andrew J Campbell on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio