

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Vectren Energy Delivery of Ohio, Inc.)	
for Approval of a Revision to its)	Case No. 14-242-GA-ATA
Unaccounted For Gas Percentage in)	
Tariff Sheet No. 54)	

**MOTION TO AMEND APPLICATION
OF VECTREN ENERGY DELIVERY OF OHIO, INC.,
MEMORANDUM IN SUPPORT, AND
AMENDED APPLICATION**

Samuel C. Randazzo
Frank P. Darr (Counsel of Record)
Matthew R. Pritchard
MCNEES WALLACE & NURICK LLC
21 East State Street, 17th Floor
Columbus, OH 43215-4228
Telephone: (614) 469-8000
Telecopier: (614) 469-4653
sam@mwncmh.com
fdarr@mwncmh.com
mpritchard@mwncmh.com

February 25, 2014

**ATTORNEYS FOR VECTREN ENERGY DELIVERY OF
OHIO, INC.**

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Vectren Energy Delivery of Ohio, Inc.)	
for Approval of a Revision to its)	Case No. 14-242-GA-ATA
Unaccounted For Gas Percentage in)	
Tariff Sheet No. 54)	

MOTION TO AMEND APPLICATION

Pursuant to Rule 4901-1-6, Ohio Administrative Code ("O.A.C."), Vectren Energy Delivery of Ohio, Inc. ("VEDO") hereby files this Motion requesting that the Public Utilities Commission of Ohio ("Commission") authorize VEDO to amend its application filed in the above-captioned proceeding on February 10, 2014. Good cause exists to grant VEDO's amendment because an error exists in VEDO's February 10, 2014 application. VEDO's revised application is attached hereto. Approval of the application as amended would result in a decrease from its current Unaccounted For Gas Percentage. The grounds for this Motion are set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Matthew R. Pritchard

Samuel C. Randazzo
Frank P. Darr (Counsel of Record)
Matthew R. Pritchard
MCNEES WALLACE & NURICK LLC
21 East State Street, 17th Floor
Columbus, OH 43215-4228
sam@mwncmh.com
fdarr@mwncmh.com
mpritchard@mwncmh.com

**ATTORNEYS FOR VECTREN ENERGY DELIVERY OF
OHIO, INC.**

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Vectren Energy Delivery of Ohio, Inc.)	
for Approval of a Revision to its)	Case No. 14-242-GA-ATA
Unaccounted For Gas Percentage in)	
Tariff Sheet No. 54)	

MEMORANDUM IN SUPPORT

On February 10, 2014, VEDO filed an application in the above-captioned proceeding to revise its Unaccounted For Gas Percentage shown on P.U.C.O. No. 3, Sheet 54, to be effective on April 1, 2014 to coincide with VEDO's Standard Choice Offer ("SCO") period. VEDO's application was filed pursuant to the requirement in Sheet No. 54, which states "[t]he Unaccounted For Gas Percentage . . . shall be adjusted periodically by Company, through updating of this Sheet No. 54 after approval by the Commission, to reflect any changes in the system unaccounted for percentage." Calculations supporting VEDO's initial proposal to reduce its Unaccounted for Gas Percentage from 1.1% to 0.9% were contained in VEDO's February 10, 2014 application.

No party has sought intervention since VEDO filed its application.

Subsequently, VEDO discovered an error in its calculations. As supported in VEDO's Amended Application attached hereto, VEDO's Unaccounted For Gas Percentage should be 1.0%. As noted in VEDO's Amended Application, the Amended Application does not involve an increase in rates.

The Amended Application is necessary to correct an error and will not adversely affect any other party inasmuch as no party has sought intervention in this proceeding. Accordingly, the Commission should grant this Motion and accept VEDO's Amended Application.

Respectfully submitted,

/s/ Matthew R. Pritchard

Samuel C. Randazzo

Frank P. Darr (Counsel of Record)

Matthew R. Pritchard

MCNEES WALLACE & NURICK LLC

21 East State Street, 17th Floor

Columbus, OH 43215-4228

sam@mwncmh.com

fdarr@mwncmh.com

mpritchard@mwncmh.com

**ATTORNEYS FOR VECTREN ENERGY DELIVERY OF
OHIO, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Amend Application of Vectren Energy Delivery of Ohio, Inc. and Memorandum in Support and Amended Application* was served upon the following parties of record this 25th day of February 2014, *via* electronic transmission or first class mail, U.S. postage prepaid.

/s/ Matthew R. Pritchard

MATTHEW R. PRITCHARD

William L. Wright
Assistant Attorney General
Chief, Public Utilities Section
180 E. Broad Street, 6th Floor
Columbus, Ohio 43215-3793
William.wright@puc.state.oh.us

**ON BEHALF OF THE STAFF OF THE PUBLIC
UTILITIES COMMISSION OF OHIO**

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**APPLICATION NOT FOR AN INCREASE IN RATES,
PURSUANT TO SECTION 4909.18, REVISED CODE**

IN THE MATTER OF THE APPLICATION OF)	
VECTREN ENERGY DELIVERY OF OHIO, INC.)	
FOR APPROVAL OF A REVISION TO ITS)	CASE NO. 14-0242-GA- ATA
UNACCOUNTED FOR GAS PERCENTAGE)	
IN TARIFF SHEET NO. 54.)	

AMENDED APPLICATION

1. APPLICANT RESPECTFULLY PROPOSES: (Check applicable proposals)

<input type="checkbox"/> New Service	<input type="checkbox"/> Change in Rule/Regulation
<input type="checkbox"/> New Classification	<input type="checkbox"/> Reduction in Rates
<input type="checkbox"/> Change in Classification	<input type="checkbox"/> Correction of Error
<input checked="" type="checkbox"/> Other, not involving increase in rates:	

2. DESCRIPTION OF PROPOSAL

Vectren Energy Delivery of Ohio, Inc. ("VEDO") seeks approval to revise its Unaccounted For Gas Percentage shown on P.U.C.O. No. 3, Sheet No. 54, to be effective on April 1, 2014 to coincide with VEDO's Standard Choice Offer ("SCO") period, based on the calculation of system unaccounted for percentage shown on Exhibit C-3, attached hereto. This proposal is made pursuant to the requirement of Sheet No. 54 which states that "[t]he Unaccounted For Gas Percentage . . . shall be adjusted periodically by Company, through updating of this Sheet No. 54 after approval by the Commission, to reflect any changes in the system unaccounted for percentage." On February 10, 2014, VEDO filed its application to revise Sheet No. 54. This amended application corrects an error identified in the application.

3. TARIFFS AFFECTED:

P.U.C.O. No. 3, Sheet No. 54, Fourth Revised Page 1 of 1.

4. Attached hereto and made a part hereof are: (check applicable Exhibits)

☒ Exhibit A - existing schedule sheets (to be superseded) if applicable

- X Exhibit B - proposed schedule sheets
- X Exhibit B-1 – Red-lined tariff sheets showing changes made to existing tariffs
- ____ Exhibit C-1
- (a) if new service is proposed, describe;
- (b) if new equipment is involved, describe (preferably with a picture, brochure, etc.) and where appropriate, a statement distinguishing proposed service from existing services;
- (c) if proposed service results from customer requests, so state giving if available, the number and type of customers requesting proposed service.
- ____ Exhibit C-2-if a change of classification, rule or regulation is proposed, a statement explaining reason for change.
- X Exhibit C-3 statement explaining reason for any proposal not covered in Exhibits C-1 or C-2.

5. This amended application will not result in an increase in any rate, joint rate, toll, classification, charge or rental.
6. VEDO respectfully requests the Commission to permit the filing of the proposed schedule sheets, to become effective on the date, subsequent to filing, to be shown on the proposed schedule sheets which will be filed with the Commission; and to be in the form of the schedule sheets in Exhibit B modified by any further revisions that have become effective prior to the effective date of the proposed schedule sheets.

____/s/ Frank P. Darr
Frank P. Darr
McNees Wallace & Nurick LLC
Fifth Third Center
21 East State Street, 17th Floor
Columbus, OH 43215
Telephone: 614-469-8000
Telecopier: 614-469-4653
fdarr@mwncmh.com

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

VECTREN ENERGY DELIVERY OF OHIO, INC.
Tariff for Gas Service
P.U.C.O. No. 3

Sheet No. 54
Fourth Revised Page 1 of 1
Cancels Third Revised Page 1 of 1

UNACCOUNTED FOR GAS PERCENTAGE

APPLICABILITY

The Unaccounted for Gas Percentage shall be applicable to Choice Suppliers, Pool Operators, SCO Suppliers, and to non-Pooling Transportation Customers served under Rate 345 and Rate 360.

DESCRIPTION

A percentage of the quantities delivered by applicable parties at a point of receipt on Company's distribution system shall be designated to compensate for gas lost, used, and unaccounted for in system operations.

The Unaccounted for Gas Percentage stated below shall be adjusted periodically by Company, through updating of this Sheet No. 54 after approval by the Commission, to reflect any changes in the system unaccounted for percentage.

UNACCOUNTED FOR GAS PERCENTAGE

The Unaccounted for Gas Percentage is 1.1%.

VECTREN ENERGY DELIVERY OF OHIO, INC.
Tariff for Gas Service
P.U.C.O. No. 3

Sheet No. 54
Fifth Revised Page 1 of 1
Cancels Fourth Revised Page 1 of 1

UNACCOUNTED FOR GAS PERCENTAGE

APPLICABILITY

The Unaccounted for Gas Percentage shall be applicable to Choice Suppliers, Pool Operators, SCO Suppliers, and to non-Pooling Transportation Customers served under Rate 345 and Rate 360.

DESCRIPTION

A percentage of the quantities delivered by applicable parties at a point of receipt on Company's distribution system shall be designated to compensate for gas lost, used, and unaccounted for in system operations.

The Unaccounted for Gas Percentage stated below shall be adjusted periodically by Company, through updating of this Sheet No. 54 after approval by the Commission, to reflect any changes in the system unaccounted for percentage.

UNACCOUNTED FOR GAS PERCENTAGE

The Unaccounted for Gas Percentage is 1.0%.

Filed pursuant to the Finding and Order dated _____ in Case No. 14-0242-GA-ATA of The
Public Utilities Commission of Ohio.

Issued _____ Issued by Scott E. Albertson, Vice-President Effective April 1, 2014

EXHIBIT B-1

VECTREN ENERGY DELIVERY OF OHIO, INC.
Tariff for Gas Service
P.U.C.O. No. 3

Sheet No. 54
~~Fifth~~ Revised Page 1 of 1
Cancels ~~Fourth~~ Revised Page 1 of 1

Deleted: Fourth

Deleted: Third

UNACCOUNTED FOR GAS PERCENTAGE

APPLICABILITY

The Unaccounted for Gas Percentage shall be applicable to Choice Suppliers, Pool Operators, SCO Suppliers, and to non-Pooling Transportation Customers served under Rate 345 and Rate 360.

DESCRIPTION

A percentage of the quantities delivered by applicable parties at a point of receipt on Company's distribution system shall be designated to compensate for gas lost, used, and unaccounted for in system operations.

The Unaccounted for Gas Percentage stated below shall be adjusted periodically by Company, through updating of this Sheet No. 54 after approval by the Commission, to reflect any changes in the system unaccounted for percentage.

UNACCOUNTED FOR GAS PERCENTAGE

The Unaccounted for Gas Percentage is ~~1.0~~%.

Deleted: 1.1

Deleted: March 20, 2013

Deleted: 13-370

Deleted: March 20, 2013

Deleted: 2013

Filed pursuant to the Finding and Order dated _____ in Case No. 14-~~0242~~-GA-ATA of The Public Utilities Commission of Ohio.

Issued _____ Issued by Scott E. Albertson, Vice-President Effective April 1, 2014

EXHIBIT C-3

VEDO's Tariff of Natural Gas Service, P.U.C.O. No. 3, Sheet No. 54 provides that "[t]he Unaccounted For Gas Percentage . . . shall be adjusted periodically by Company, through updating of this Sheet No. 54 after approval by the Commission, to reflect any changes in the system unaccounted for percentage." On February 10, 2014, VEDO filed an application seeking to adjust its Unaccounted For Gas Percentage. After the application was filed, VEDO determined that the percentage was incorrect. With this amended application, VEDO is providing a new calculation of the Unaccounted For Gas Percentage. The calculation on the attached document demonstrates that the system unaccounted for percentage is now 1.0%. Consistent with the requirement in Sheet No. 54, VEDO, therefore requests approval to adjust its Unaccounted For Gas Percentage to 1.0%.

VECTREN ENERGY DELIVERY OF OHIO

Unaccounted For Gas Percentage Annual Review

Period	Volumes (Dth)		Unaccounted For	Unaccounted For %
	Deliveries	Billed Sales		
Sept 09 - Aug 10	53,208,157	52,767,442	440,715	0.83%
Sept 10 - Aug 11	56,538,559	55,921,967	616,592	1.09%
Sept 11 - Aug 12	49,806,802	49,294,048	512,754	1.03%
Sept 12 - Aug 13	55,446,657	54,905,940	540,717	0.98%
4 Year (2010-2013)	215,000,175	212,889,397	2,110,778	0.98%

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

2/25/2014 2:02:05 PM

in

Case No(s). 14-0242-GA-ATA

Summary: Amended Application Vectren Energy Delivery of Ohio, Inc's Motion to Amend Application, Memorandum in Support and Amended Application electronically filed by Ms. Vicki L. Leach-Payne on behalf of Darr, Frank P. Mr.