

GREGORY L. WILLIAMS

The KeyBank Building
88 East Broad Street, Suite 1590
Columbus, Ohio 43215

Direct: 614.224.3946
williams@whitt-sturtevant.com

August 29, 2014

Ms. Barcy F. McNeal
Director, Office of Administration
Public Utilities Commission of Ohio
180 East Broad Street, 11th Floor
Columbus, Ohio 43215

Re: The East Ohio Gas Company d/b/a Dominion East Ohio Curtailment Plan
Case No. 89-8006-GA-TRF

Dear Ms. McNeal:

In accordance with Ohio Adm. Code 4901:5-25-02(D), enclosed is a revised Emergency Curtailment Plan for The East Ohio Gas Company d/b/a Dominion East Ohio. If you have any questions, please do not hesitate to contact me.

/s/ Gregory L. Williams
One of the Attorneys for The East Ohio Gas
Company d/b/a Dominion East Ohio

Enclosures

**THE EAST OHIO GAS COMPANY
d/b/a Dominion East Ohio**

EMERGENCY CURTAILMENT PLAN

Pursuant to the provisions of Ohio Administrative Code (“OAC”) Chapter 4901:5-25, “Gas Emergency,” The East Ohio Gas Company d/b/a Dominion East Ohio (“DEO” or “Company”) shall implement the following curtailment plan (“Plan”) in response to a gas emergency that has been declared by the governor, at the directive of the Commission, or in response to a natural gas supply disruption that may affect service to a substantial number of customers. As used herein, the word “curtail” means to cut-off or reduce the delivery of gas to certain customers in order to maintain service to priority use and/or a majority of customers.

Attachment A identifies the applicable provisions of the Company’s General Terms and Conditions of Transportation Service, which may apply to customers receiving service under the Daily Transportation Service, General Transportation Service, or Transportation Service for Schools rate schedules during curtailment situations. Similar provisions may also apply to customers that are not priority or human needs customers receiving service under the Large Volume Energy Choice Transportation Service rate schedule. Those provisions are incorporated into this Plan by reference and shall be implemented accordingly. Consistent with those provisions, curtailments of customers receiving service under those rate schedules will be based on the size and location of facilities to minimize the absolute number of disruptions required. To the extent that operating conditions permit, DEO shall curtail customers in the manner set forth in Attachment B. In addition, DEO may disconnect service to non-priority use customers who fail immediately to disconnect or curtail consumption after notification by the Company. (Priority use customers are defined in OAC 4901:5-25-01.) However, implementation of the curtailment plan will depend on the specific circumstances surrounding the event and may vary accordingly.

There is no difference in Plan implementation associated with supply-related and capacity-related scenarios because both have a similar impact with regard to potential disruptions of service. There is no difference in Plan implementation within a customer class based upon the supplier of the commodity apart from the supplier performance issues that may affect service to customers receiving service under the aforementioned rate schedules.

Notwithstanding its best efforts to mitigate the impact of a natural gas supply disruption, the Company may be required to curtail priority use customers. Such curtailments shall be implemented only after all reasonable efforts have been made to curtail sufficient non-priority usage to restore operating pressures in the affected areas of the system. In addition, DEO shall utilize appropriate media and governmental resources to request voluntary reductions in usage and/or curtailments by all customers, with particular emphasis on non-priority use customers. The notices shall also reference the energy conservation measures identified in OAC 4901:5-25-04(A) and be in accordance with the requirements as set forth in OAC 4901:5-25-05(B).

The Company shall attempt to curtail usage so as to minimize the number of priority use customers, particularly human needs customers, whose service will be disrupted. (Included in that consideration will be priority use and human needs customers of other gas companies receiving transportation service

from DEO to the extent requested by those companies and to the extent that DEO can provide such service without jeopardizing its own system reliability.) To accomplish that objective, the Company will deploy a system-wide effort to reduce usage and divert available supplies to affected areas of its system where maintaining operating pressures will maximize the number of priority and human needs customers that will continue to receive service.

For the duration of the gas emergency and subsequent restoration efforts, non-essential services may be suspended in order to increase the resources available to respond to the situation. DEO may also suspend those activities identified in OAC 4901:5-25-06(A) relative to promotional activities to acquire new customers, new service tie-ins, or other actions that may worsen or prolong the emergency. DEO shall submit periodic reports to the Commission regarding the status of pipeline, storage and Ohio-produced supplies relative to estimated sendout and shall keep the Commission, media, governmental and emergency personnel informed of the areas and estimated numbers of customers that have been or may be affected by the curtailment as well as the potential timing of such curtailments and subsequent restoration efforts. To the extent operationally practical, DEO shall restore service as soon as practicable to the customer classes in the reverse order of their curtailment. If appropriate under the circumstances, service to residential and small commercial customers shall be restored in accordance with OAC 4901:5-25-06(B).

DEO cooperates with other gas utilities within the state of Ohio in managing available gas supplies during emergencies other than those declared by the Governor of the State of Ohio. In the event an Ohio gas utility contacts DEO with a critical supply request due to a force majeure event, DEO will use all reasonable efforts to provide supplies to the requesting gas utility; provided, however, that there is no legal obligation on the part of DEO to deliver gas to the requesting gas utility.

In accordance with OAC 4901:5-25-02(D), the Company shall file on or before September 1st any revisions it is proposing to make to its curtailment plan. If no revisions are to be made, a statement to that effect shall be filed.

ATTACHMENT A

APPLICABLE PROVISIONS OF GENERAL TERMS AND CONDITIONS OF TRANSPORTATION SERVICE

The following provisions apply to customers served under the Company's Daily Transportation Service, General Transportation Service, and Transportation Service for Schools rate schedules.

Section 2 – Authorized Daily Volume

Describes the Company's obligations to make daily volumes available to customers and imposes limitations on deliveries to, and consumption at, the customer's facility.

Section 13 – Operational Flow Orders

Details provisions under which the Company may issue operational flow orders in order to support system operations and maintain system integrity.

Section 15 – Provision for Human Needs Customers

Requires human needs customers to have adequate alternate fuel capability or firm commodity service or purchase Standby Service from the Company.

Section 16 – Force Majeure

Identifies Force Majeure events and obligations, references the Company's Emergency Curtailment Plan and specifies default compensation covering the sale of a customer's gas to the Company.

The Company's General Terms and Conditions of Transportation Service also include definitions for Core Demand, Daily Available Volume, and Human Needs Customers that are referenced in the above sections.

Similar provisions may apply to customers served by retail suppliers under the Company's General Terms and Conditions of Energy Choice Pooling Service. In addition, the Company's sales service tariffs include a provision that enables DEO to curtail service under this plan if necessary.

ATTACHMENT B CURTAILMENT PROCESS

CURTAILMENT PLAN DEFINITIONS

Alternative Fuel Capability – The ability of a customer to use an alternate fuel to fulfill energy requirements normally met by natural gas delivered by DEO. Such fuel includes, but is not limited to, fuel oil, propane, waste products, coal, wood, steam, other gas utilities, landfill gas, and private wells. Alternate fuel capability exists as long as facilities and equipment that use such fuel are installed.

Human Needs – As defined in DEO's tariff, a subset of Priority Use comprised of any customer who uses natural gas for heating a residence or a governmental agency or other entity that provides emergency or life support services. Such customers include houses, apartment buildings, hospitals, nursing homes, and residential correctional institutions, and exclude hotels, motels, and non-residential educational facilities.

Minimal Plant Protection Level (MPPL) – The minimum volume required to prevent physical harm to facilities or danger to personnel when such protection cannot be afforded through the use of alternative fuel. This includes the protection of materials in process that would otherwise be destroyed, but does not include volumes required to maintain plant production.

Priority Use – As defined in OAC 4901:5-25-01.

RATE SCHEDULE ABBREVIATIONS

Sales Rate Schedules

GSS-R	General Sales Service – Residential
GSS-NR	General Sales Service – Non-Residential
LVGSS	Large Volume General Sales Service

Energy Choice Rate Schedules

ECTS-R	Energy Choice Transportation Service – Residential
ECTS-NR	Energy Choice Transportation Service – Non-Residential
LVECTS	Large Volume Energy Choice Transportation Service

Commodity Rate Schedules

SSO	Standard Service Offer
SCO	Standard Choice Offer

Non-Energy Choice Transportation Rate Schedules

DTS	Daily Transportation Service
GTS	General Transportation Service
TSS	Transportation Service for Schools

ATTACHMENT B CURTAILMENT PROCESS

CURTAILMENT PROCESS

General Approach

DEO shall use its best efforts to minimize the number of priority use customers, particularly human needs customers, curtailed as a result of a natural gas supply disruption. In the event of a supply disruption, DEO's initial efforts may focus on a system-wide reduction in natural gas usage, beginning with non-priority use DTS customers, as it may allow non-disrupted supply sources to be diverted to the impacted areas and customers. Because supply disruptions may be localized, lower priority customer classes (i.e., those that would ordinarily be curtailed earlier in a gas supply emergency) in an unaffected area may continue to receive service even when higher priority customer classes in the affected area are curtailed. However, these lower priority customers will be requested to voluntarily reduce gas usage in an effort to divert supplies to affected areas. DEO shall curtail customers in lower priority usage classes based on the size and location of facilities so as to minimize the absolute number of disruptions required. Once the Company has determined that it has curtailed as much lower priority usage in the affected area(s) as operationally feasible, it shall proceed to curtail the next higher priority usage class. Because it may not be operationally feasible to curtail 100% of one class before curtailing usage of the next higher priority class, some lower priority customers in the affected area may continue to receive service even when higher priority customers in the same area are curtailed.

Curtailment Process

The curtailment process below refers only to those customers whose curtailments and voluntary usage reduction will enable the Company to maintain operating pressures in areas that have been or may be affected by a supply disruption. To the extent practicable, DEO shall communicate with customers and suppliers directly via its electronic bulletin board, e-mail and telephone. Where such communication is not practicable, DEO shall utilize media, governmental, internet website, and other outlets as appropriate under the circumstances.

Stage 1 – DEO Operational Advisory:

In the event of a potential curtailment situation, DEO will issue an Operational Advisory via its Electronic Bulletin Board (EBB) to inform customers and suppliers of the potential curtailment situation and instruct them to monitor the EBB for further information.

Stage 2 – Operational Flow Order, Voluntary Usage Reduction, and Curtailment for Insufficient Supplies:

If circumstances warrant, DEO shall issue an Operational Flow Order (OFO) in Stage 2 or Stage 3 for the affected areas, pursuant to section 13 of its General Terms and Conditions of Transportation Service.

If DEO determines that the supply situation warrants Curtailment Plan implementation, DEO shall contact all non-priority use DTS customers via telephone and/or e-mail to request

ATTACHMENT B CURTAILMENT PROCESS

voluntary volume reduction to MPPL or to use alternate fuels where able. DEO will also initiate hourly usage monitoring of DTS customers as required.

If any DTS customers have nominated insufficient supply volumes relative to their consumption, DEO will notify these customers to match their nominated supply volume or to request consumption reduction to the MPPL as required.

DEO will contact Gas Marketers, LDC Gas Supply, and other suppliers to request additional deliveries if available to appropriate receipt points to support operating pressures in the affected areas.

DEO shall inform the PUCO and local municipal and government contacts that a potential emergency situation exists. DEO will continually provide updates throughout the process.

Stage 3 – DTS Customer Follow-Up, Remote Shut-Offs and Remaining Customer Notification:

If Stage 2 does not restore operating pressures to acceptable levels in the affected areas, DEO will provide a second notification by telephone and e-mail to DTS customers that are failing or have failed to reduce gas usage to the MPPL. Customers will be informed that failure to comply may result in curtailment or termination of gas service.

Customers who utilize DEO as a secondary delivery source and have meters equipped with automated remote shut-off valves will be notified that DEO will be unable to provide alternate supply and their meters will be turned off.

DEO will initiate an automated telephone message to all remaining large volume customers (≥ 3000 Mcf annual consumption) requesting voluntary usage reduction.

DEO will notify all media outlets of the emergency situation to request that all customers voluntarily reduce their gas consumption where possible by turning down thermostats and reducing and/or postponing the use of non-essential gas appliances and equipment.

Stage 4 – Curtailment of Non-Human Needs DTS, GTS, TSS, and LVECTS Customers:

If Stage 3 does not restore operating pressures to acceptable levels in the affected areas, meter turn-off orders will be issued for DTS customers that have not complied with the previous volume reduction request.

DEO will identify the service area(s) for curtailment that will minimize the number of customers impacted, but provide maximum potential to divert supplies to maintain service to priority use and human needs customers. Customers will be notified of a pending loss of gas service via automated phone calls, media outlets, and internet website. As required under its tariff, to the extent possible and as appropriate in the circumstances, curtailment of the customers identified in this stage will be based on the size and location of the facilities involved.

**ATTACHMENT B
CURTAILMENT PROCESS**

DEO shall use its best efforts to mitigate the impact to priority use and human needs customers. DEO may be unable to follow the above curtailment sequence under certain circumstances in order to divert available supplies to affected areas of its system where maintaining operating pressures will maximize the number of priority use and human needs customers that will continue to receive service.

Stage 5 - Curtailment of Non-Human Needs Priority Use Customers and Remaining LVECTS Customers:

If Stage 4 does not restore operating pressures to acceptable levels in the affected areas, no distinction will be made among rate schedules in this stage. DEO shall curtail customers in this class based on the size and location of facilities so as to minimize the total number of customers affected.

Stage 6 - Curtailment of Human Needs Customers:

If Stage 5 does not restore operating pressures to acceptable levels in the affected areas, no distinction will be made among rate schedules in this stage. DEO shall curtail customers in this class based on the size and location of facilities so as to minimize the total number of customers affected.

In the event of a short-term situation requiring immediate deliveries of additional gas to prevent irreparable injury to life or property, the Company may deliver additional volumes of gas to a lower priority customer or class to meet such needs instead of those volumes that otherwise would be delivered under the curtailment process specified above.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/29/2014 10:20:07 AM

in

Case No(s). 89-8006-GA-TRF

Summary: Correspondence regarding revisions to Emergency Curtailment Plan electronically filed by Mr. Gregory L. Williams on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio