

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Joint Motion to Modify)	
the June 18, 2008 Opinion and Order in Case)	Case No. 12-1842-GA-EXM
No. 07-1224-GA-EXM.)	

**MOTION FOR A PROTECTIVE ORDER OF
THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO**

On April 1, 2015, the Commission issued an entry in this case stating that the Ohio Partners for Affordable Energy (OPAE) had asked the Staff to disclose “all of the data collected by Staff in its study of the consequences of DEO’s exit from the merchant function.” Entry at 3. The Entry provided DEO and competitive retail natural gas suppliers until April 8 to file motions for a protective order. *Id.* at 4. DEO then requested that the Commission provide for its review a copy of all information that DEO had provided that was subject to OPAE’s request. In response, DEO was provided 22 separate files, all of which were emails, many of which contained additional attachments.

DEO has reviewed these files and now seeks protective treatment of the following information:

- Attachment to email dated June 10, 2013, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO April 2013 Rate Period.xlsx”
- Attachment to email dated July 11, 2013, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO May 2013 Rate Period.xlsx”
- Attachment to email dated August 12, 2013, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO June 2013 Rate Period.xlsx”
- Attachment to email dated September 10, 2013, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO July 2013 Rate Period.xlsx”

- Attachment to email dated October 10, 2013, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO August 2013 Rate Period.xlsx”
- Attachment to email dated November 12, 2013, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO September 2013 Rate Period.xlsx”
- Attachments to email dated February 10, 2014, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO October 2013 Rate Period.xlsx”; “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO November 2013 Rate Period.xlsx”; and “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO December 2013 Rate Period.xlsx”
- Attachment to email dated April 9, 2014, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO January 2014 Rate Period.xlsx”
- Attachment to email dated April 15, 2014, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO February 2014 Rate Period.xlsx”
- Attachment to email dated June 6, 2014, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO March 2014 Rate Period.xlsx”
- Attachment to email dated June 30, 2014, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO April 2014 Rate Period.xlsx”
- Attachment to email dated July 3, 2014, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO May 2014 Rate Period.xlsx”
- Attachment to email dated September 24, 2014, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO June 2014 Rate Period.xlsx”
- Attachments to email dated December 1, 2014, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO July 2014 Rate Period.xlsx” and “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO August 2014 Rate Period.xlsx”
- Attachments to email dated December 4, 2014, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO September 2014 Rate

Period.xlsx” and “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO October 2014 Rate Period.xlsx”

- Attachment to email dated January 21, 2015, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO November 2014 Rate Period.xlsx”
- Attachment to email dated February 17, 2015, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO December 2014 Rate Period.xlsx”
- Attachment to email dated March 10, 2015, entitled “CONFIDENTIAL INFORMATION – Case No 12-1842-GA-EXM DEO January 2015 Rate Period.xlsx”

Given that all of the files identified above are identical in format, DEO is attaching to this motion a single sample file that discloses what information is proprietary and should be redacted, with such redactions applicable to all of the foregoing files. *See Exhibit A.*

Good cause exists to grant this motion for the reasons set forth in the attached Memorandum in Support.

Dated: April 8, 2015

Respectfully submitted,

/s/ Andrew J. Campbell
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ATTORNEYS FOR THE EAST OHIO GAS
COMPANY D/B/A DOMINION EAST OHIO

MEMORANDUM IN SUPPORT

I. INTRODUCTION

The files identified in DEO's motion contain extremely sensitive information regarding the pricing, volumes, and customer counts associated with all competitive retail natural gas (CRNG) supplier rate offers on DEO's system in conjunction with the Energy Choice program. DEO seeks protective treatment of the foregoing information for two reasons. First, contrary to state law and energy policy, disclosure of this sensitive information could severely distort the competitive market underpinning DEO's Energy Choice program and thus threaten the integrity of the program. Second, for reasons also explained today in filings by various CRNG suppliers and marketers, the files contain trade secrets.

II. ARGUMENT

The Commission has recognized that any requirement it may have to disclose information in its possession "excludes information which, under state or federal law, may not be released." *State ex rel. Besser v. Ohio State*, 89 Ohio St.3d 396, 399 (2000). As explained in detail below, two bodies of law prohibit the release of the information identified in DEO's motion: first, Ohio's energy policy; and second, the law protecting trade secrets.

A. Release of the information could distort competitive markets and threaten the integrity of DEO's Energy Choice program.

Disclosure of the information identified above could very well undermine the operation of the competitive market that undergirds DEO's Energy Choice program, in violation of state energy policy.

1. State policy requires the Commission to support and protect the development of competitive retail markets for natural gas.

The Commission must consider the state's energy policy in ruling on OP&E's request. As the Commission knows well, DEO has been fostering the emergence of competitive markets for

all 1.2 million customers on its system since 2000. That October, DEO implemented its Energy Choice program on a system-wide basis and since has introduced changes intended to gradually and methodically make its commodity marketplace more competitive, such as introducing the SSO and then the SCO default service options for eligible customers. The competition resulting from these efforts, recently among over thirty different suppliers, has provided numerous benefits to customers, through a wide array of fixed and variable rate offers.

The Energy Choice program is a direct result of Ohio's natural gas policies enshrined in R.C. Chapter 4929. That policy, in a nutshell, favors the promotion and protection of competitive commodity markets. Ohio's energy policy requires the Commission to support "the continuing emergence of competitive natural gas markets" and to "promote . . . effective competition." R.C. 4929.02(A)(6)–(8). These policies are mandatory; the Commission "shall follow" them. R.C. 4929.02(B). Consistent with these policies, an exemption from regulation (such as the exemption necessary to continue conducting the SCO commodity auctions) may be granted only if "effective competition" exists in DEO's service area. R.C. 4929.04(A)(1). Thus, in ruling on this motion, the Commission must consider the effect disclosure would have on the competitive markets behind DEO's system.

2. There is a serious risk that disclosure of the information identified above will undermine and distort DEO's competitive markets.

DEO has grave concerns that disclosing this information could severely distort the competitive market that underpins its Choice program. In a typical market, competitors are not forced to negotiate or compete with their cards facing up. Nor is DEO aware of any competitive marketplace in which each competitor is granted governmental access to comprehensive data regarding every other competitors' pricing, customer counts, and volumes. But this is precisely what would happen if DEO's motion were denied.

Dissemination of supplier-specific pricing, customer counts, and volumes will likely result in severe market distortions. Ohio's energy policy teaches, and DEO agrees, that markets should be driven by the forces of supply and demand, without government intervention unduly influencing market outcomes. While DEO cannot predict the precise outcomes, the disclosure of this information could have any number of detrimental effects: an increase or reduction in particular kinds of rate offers; freeloading by less diligent competitors at the expense of those who earned market share through research and marketing; and escalations in pricing, as the "unknowns" that tend to drive competitive offers and efficiencies become known. Further, if the disclosed information becomes known in the marketplace, it may influence customer perceptions of suppliers, such as which suppliers are the largest or most popular and so forth. DEO understands that customers may be able to determine such information through their own research. But while DEO can only speculate as to specifics, it is hard to imagine how the disclosure of accurate, comprehensive, market-wide, supplier-specific, and *heretofore unknown* information could *not* disrupt a well-functioning market.

If the market underlying the Choice program becomes distorted, the program itself (including not only bilateral offers, but auction-based offers as well) could also be undermined. Many years and a great deal of resources have gone into the development of DEO's Choice programs. The Commission should protect this investment and not disclose information that could distort the competitive market, in contravention of Ohio's mandatory energy policy.

B. The files identified above contain trade secrets.

This is not the only reason to protect this information. Ohio law also prohibits the release of trade secrets. *State ex rel. Besser v. Ohio State*, 89 Ohio St.3d 396, 399 (2000). "Trade secret," among other things, means "any business information or plans, financial information, or listing of names, addresses, or telephone numbers" that meets two conditions:

(1) “[i]t derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use” and

(2) “is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.”

R.C. 1333.61(D)(1)–(2). The information that DEO identified above satisfies these conditions and should be kept confidential.

1. The information has independent economic value, pertaining to pricing, customer counts, and volumes for all rate offers on DEO’s system.

First, the information has independent economic value. The spreadsheets identified above provide highly detailed information regarding the pricing and rate information of all CRNGS rate offers on DEO’s system, with various pricing options broken out by customer count, volumes billed, and other information.

a. The Commission has repeatedly recognized the need to protect pricing data, including the data at issue here.

For the reasons explained in motions filed today by the suppliers and marketers, detailed pricing data of this kind is extremely sensitive. The Commission has repeatedly recognized that pricing information, even in limited circumstances, is worthy of protection. *See, e.g., In re Appl. of Ohio Power Company*, Case No. 15-279-EL-RDR, 2015 Ohio PUC LEXIS 233, Finding & Order at *7 (Mar. 18, 2015) (granting protective treatment for “customer usage and pricing information”); *In re Appl. of N. Coast Gas Transmission LLC*, Case No. 14-158-PL-AEC, 2014 Ohio PUC LEXIS 59, Finding & Order at (Mar. 19, 2014) (granting protective treatment for “pricing, volumes, and shrinkage factors”); *In re Review of the Alt. Energy Rider of Ohio Edison Co. et al.*, Case No. 11-5201-EL-RDR, 2013 Ohio PUC LEXIS 159, Opin. & Order at *29 (Aug. 7, 2013) (granting protective treatment for “supplier-identifying and pricing information”).

More specific to this situation, DEO's Commission-approved tariffs specifically speak to the confidentiality of rate information submitted by marketers: "All rate information received by East Ohio [from CRNG suppliers] *shall be confidential*." Energy Choice Pooling Service Tariffs, 3d Rev. Sheet No. ECPS 61, ¶ 3.1(1) (emphasis added). And in this very case, the Commission recognized that "some of the information provided [to Staff] may be confidential and proprietary and would be given appropriate treatment." Entry on Reh'g. at 12–13 (Mar. 6, 2013); *see also* Opin. & Order at 17 (Jan. 9, 2013) ("Staff shall take appropriate actions to protect information that is marked as confidential"). This information is now being requested, and must be protected.

b. The comprehensiveness of DEO's data only increases the need for protection.

If pricing data for a few customers or suppliers is sensitive, how much more is this true for the entire market? Again, the information at issue here does not pertain merely to pricing in an individual contract or group of contracts. Much more is at stake: the files identified above contain pricing that covers every Energy Choice customer, including those on SCO and MVR rates, in the entire Choice market.

Notably, R.C. 1333.61(D) recognizes that "listings" of otherwise innocuous information (names, addresses, and phone numbers) can create value worthy of protection. An individual name, address, and phone number may be worth very little, while a compilation of such information may be worth very much. Likewise, it might not be difficult to obtain pricing and volume data for any given customer, and any individual piece of the information in DEO's spreadsheets (such as a rate or a customer count by itself) may have little value. But obtaining all of these items of information *together* (rates, volumes, customer counts, etc.), and for *the entire Choice market*, would not only be of immense value, but literally priceless. Other than DEO, whose business it is to maintain and protect such information, no one could provide it.

c. The identification of suppliers by number rather than by name in the spreadsheet does not change the need for protection.

Finally, although supplier names are not specifically identified in the spreadsheet, this does not negate its highly sensitive nature. To begin with, the use of supplier-identification numbers was never intended as a substitute for confidential treatment, but as a second line of defense if the confidential data were inadvertently disclosed. DEO believes that even without the names being given, an informed observer—particularly another competitor—would be able to determine identity, through a process of elimination and by correlating publicly available information with the rates, customer counts, and volumes associated with various offers.

Moreover, even if the use of identification numbers were sufficient to protect the identity of individual suppliers, the information would remain highly sensitive. It would provide any interested person with a detailed, market-wide view into which offers have been most successful, which have not, and how high or how low competitors have priced their various offerings. Such information could influence pricing practices going forward, regardless of whether the supplier were identified. In short, that suppliers have not been identified by name does not change the fact that this information is highly confidential.

In sum, the first factor is satisfied. This information has immense value.

2. DEO has taken reasonable steps to maintain the secrecy of this information.

DEO also satisfies the second factor: it has taken reasonable efforts to protect the information.

As noted above, DEO's Commission-approved tariffs provide that "[a]ll rate information received by East Ohio [from CRNG suppliers] *shall be confidential*." Energy Choice Pooling Service Tariffs, 3d Rev. Sheet No. ECPS 61, ¶ 3.1(1) (emphasis added). DEO has accordingly structured its policies and practices to prevent the disclosure of this information. DEO also made

clear in prior pleadings in this case that “that Staff and other parties should take appropriate steps to protect information marked as confidential.” (DEO Appl. for Rehg. at 3 (Feb. 5, 2013).)

Before it ever released any rate information to Staff, DEO stressed in various meetings that the information was sensitive, and DEO disclosed it with the understanding that it would be kept confidential. To that end, DEO took care to highlight the information’s confidentiality in multiple ways—noting confidential status in the cover emails, in the file names of the spreadsheets, and in the spreadsheets themselves. And DEO now files this motion for protective treatment.

The foregoing shows that DEO has taken reasonable steps to protect this information. The only other step DEO could have taken to protect this information would have been *not* to release it to Staff.

3. Other factors support the protection of this information.

Finally, DEO would also observe that the following factors, identified by the Supreme Court of Ohio in addition to the statutory factors, support protecting this information. *See State ex rel. Plain Dealer v. Ohio Dep’t of Ins.*, 80 Ohio St. 3d 513, 524–25 (1997).

First, comprehensive pricing of the entire Choice market by customer count and gas volume is *not* “known outside” of DEO. *Id.* No other entity has access to this information. Second, the information is not widely “known to those inside” of DEO. *Id.* This information is specially compiled for Staff’s review by a single individual and is not generally circulated within DEO. Under Dominion’s Access Control policy, only persons with a “need to know” have access to the information. Third, as explained above, DEO has taken reasonable “precautions to guard the secrecy of the information,” *id.*, including by identifying the need for secrecy in its Energy Choice tariffs, by carefully marking all emails and files containing the information, and by not disclosing the information except to Staff in this case. Fourth, as explained, the information

would be extremely “valu[able]” to competitors in the marketplace were it to be published. *Id.* Finally, regarding the “time and expense it would take for others to acquire and duplicate the information,” *id.*, DEO believes that it would be impossible, regardless of expense, for any other person to acquire comprehensive pricing, customer counts, and volumes for all of the rate offers in DEO’s Choice market.

In short, the information identified above is not generally known, is extremely valuable, and has been kept confidential. It should remain that way.

C. Parties who have provided protected information should be permitted an additional opportunity to review any redacted materials before they are released.

Finally, DEO would request that parties providing protected information be granted an opportunity to review any redacted files before they are released. In addition to the protected materials themselves, DEO recognizes that Staff or the Commission may have prepared documents or files that contain or describe protected information, in which case DEO believes that the protected information should be redacted. To ensure that no sensitive information is inadvertently disclosed, DEO recommends that it and the marketers be permitted to review any redacted files before they are released.

III. CONCLUSION

For the foregoing reasons, the Commission should grant protective treatment to all of the files identified in this motion, redacting them according to the sample file attached as Exhibit A, and provide any other necessary and proper relief.

Dated: April 8, 2015

Respectfully submitted,

/s/ Andrew J. Campbell

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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 Motion for Protective Treatment was served by electronic mail this 8th day of April, 2015, to the following:

tonetta.scott@puc.state.oh.us
kim.keeton@puc.state.oh.us
serio@occ.state.oh.us
sauer@occ.state.oh.us
BarthRoyer@aol.com
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/s/ Andrew J. Campbell

One of the Attorneys for The East Ohio Gas
Company d/b/a Dominion East Ohio

EXHIBIT A

CONFIDENTIAL DATA

Billing Period: _____

Revenue Month Billing Information for January Cycle 6 through February Cycle 5

CRNGS Reference Code	Total	Energy Choice	Aggregation	SCO	MVR	Supplier Billed	Free Gas
DEOM00001	REDACTED						
DEOM00002							
DEOM00003							
DEOM00004	REDACTED						
DEOM00005							
DEOM00006							
DEOM00007	REDACTED						
DEOM00008							
DEOM00009							
DEOM00010	REDACTED						
DEOM00011							
DEOM00012							
DEOM00013	REDACTED						
DEOM00014							
DEOM00015							
DEOM00016	REDACTED						
DEOM00017							
DEOM00018							
DEOM00019	REDACTED						
DEOM00020							
DEOM00021							
DEOM00022	REDACTED						
DEOM00023							
DEOM00024							
DEOM00025	REDACTED						
DEOM00026							
DEOM00027							
DEOM00028	REDACTED						
DEOM00029							
DEOM00030							
DEOM00031	REDACTED						
DEOM00032							
DEOM00033							
DEOM00034	REDACTED						
DEOM00035							
DEOM00036							
DEOM00037	REDACTED						
DEOM00038							
DEOM00040							
DEOM00041	REDACTED						
DEOM00042							
DEOM00043							
DEOM00044	REDACTED						
DEOM00078							
DEOM00045							
DEOM00046	REDACTED						
DEOM00047							
DEOM00048							
DEOM00049	REDACTED						
DEOM00050							
DEOM00051							
DEOM00052	REDACTED						
DEOM00053							
DEOM00054							

CONFIDENTIAL DATA

Billing Period: Revenue Month Billing Information for January Cycle 6 through February Cycle 5

CRNGS Reference Code	Total	Energy Choice	Aggregation	SCO	MVR	Supplier Billed	Free Gas
DEOM00055	REDACTED						
DEOM00056							
DEOM00057							
DEOM00058							
DEOM00059							
DEOM00060	REDACTED						
DEOM00061							
DEOM00062							
DEOM00063							
DEOM00064							
DEOM00065	REDACTED						
DEOM00066							
DEOM00067							
DEOM00068							
DEOM00069							
DEOM00070	REDACTED						
DEOM00071							
DEOM00072							
DEOM00073							
DEOM00074							
DEOM00075	REDACTED						
DEOM00077							
DEOM00079							
DEOM00080							
DEOM00081							
DEOM00082	REDACTED						
DEOM00083							
DEOM00084							
DEOM00085							
DEOM00086							
DEOM00087	REDACTED						
DEOM00088							
DEOM00089							
DEOM00090							
DEOM00091							
DEOM00092	REDACTED						
DEOM00093							
DEOM00094							
DEOM00095							
DEOM00096							
DEOM00097	REDACTED						
DEOM00098							
DEOM00099							
DEOM00100							
DEOM00101							
DEOM00102							
DEOM00103							
	27,626,733.1	14,819,728.2	7,352,394.1	3,257,230.2	1,260,922.2	922,355.5	14,102.9

CONFIDENTIAL DATA

Billing Period:

Revenue Month Billing Information for January Cycle 6 through February Cycle 5

[illegible]

CONFIDENTIAL DATA

Billing Period:		Revenue Month Billing Information for January Cycle 6 through February Cycle 5		Residential			Non-Residential			Total				
CRNGS Reference Code	Rate Type	Rate Reference Code	Count	Mcf	Commodity Amount	Count	Mcf	Commodity Amount	Average Rate Billed	Submitted Rate	Count	Mcf	Commodity Amount	
DEOM00058	Gov Agg	REDACTED												
DEOM00059	Gov Agg													
DEOM00060	Gov Agg													
DEOM00061	SCO													
DEOM00064	EC	REDACTED												
DEOM00066	Gov Agg													
DEOM00067	EC													
DEOM00067	MVR													
DEOM00074	EC	REDACTED												
DEOM00077	Gov Agg													
DEOM00078	Gov Agg													
DEOM00079	Gov Agg													
DEOM00080	Gov Agg	REDACTED												
DEOM00081	EC													
DEOM00082	Gov Agg													
DEOM00083	EC													
DEOM00084	Gov Agg	REDACTED												
DEOM00085	Gov Agg													
DEOM00086	Gov Agg													
DEOM00087	Gov Agg													
DEOM00088	Gov Agg	REDACTED												
DEOM00089	Gov Agg													
DEOM00090	Gov Agg													
DEOM00091	Gov Agg													
DEOM00092	EC	REDACTED												
DEOM00093	Gov Agg													
DEOM00094	Gov Agg													
DEOM00095	Gov Agg													
DEOM00096	Gov Agg	REDACTED												
DEOM00097	Gov Agg													
DEOM00098	Gov Agg													
DEOM00099	Gov Agg													
DEOM00100	Gov Agg	REDACTED												
DEOM00101	Gov Agg													
DEOM00102	Gov Agg													
DEOM00103	Gov Agg													
REDACTED														
REDACTED														
Summary:														
EC			473,308	9,701,428.5	55,882,280.05	44,807	5,118,299.7	24,555,777.36	5.4278		518,115	14,819,728.2	80,438,057.41	
Gov Agg			323,079	6,333,053.8	26,513,653.87	19,088	1,019,340.3	4,246,839.86	4.1837		342,167	7,352,394.1	30,760,493.73	
SCO			178,408	3,257,230.2	11,785,734.20	0	0.0	0.00	3.6183		178,408	3,257,230.2	11,785,734.20	
MVR			2,164	46,841.8	236,963.88	13,752	1,214,080.4	6,187,752.57	5.0953		15,916	1,260,922.2	6,424,716.45	

CONFIDENTIAL DATA

[illegible]

CONFIDENTIAL DATA

Billing Period:		Residential		Non-Residential		Total	
Revenue Month Billing Information for January Cycle 6 through February Cycle 5							
CRNGS Reference							
Code	Rate Type	Customers	Mcf	Customers	Mcf	Customers	Mcf
REDACTED							
REDACTED							
REDACTED							
REDACTED							
Totals		734	86,376.5	5,477	17,165,705.4	6,211	17,252,081.9

FG = Free Gas
CTO = Choice Transport Only
TT = Traditional Transport

CONFIDENTIAL DATA

Total Distribution Sales

Revenue Month Billing Information for January Cycle 6 through February Cycle 5

Volume Type	Res (mcf)	Res (Billed Count)	Non-Res (mcf)	Non-Res (Billed Count)	Total (mcf)	Billed Count
SSO	3,144,504.4	141,480	168,195.8	2,979	3,312,700.2	144,459
Choice - Commodity Billed	16,034,482.3	796,387	6,137,640.0	63,895	22,172,122.3	860,282
Choice - SCO	3,257,230.2	178,408	0.0	0	3,257,230.2	178,408
Choice - MVR	46,841.8	2,164	1,214,080.4	13,752	1,260,922.2	15,916
Choice - Transport Only	61,492.3	412	860,863.2	2,756	922,355.5	3,168
Choice - Free Gas	11,275.9	305	2,827.0	26	14,102.9	331
Traditional Transportation	13,608.3	17	16,302,015.2	2,695	16,315,623.5	2,712
Total	22,569,435.2	1,119,173	24,685,621.6	86,103	47,255,056.8	1,205,276

This summary data is provided each month as shown above.

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 12-1842-GA-EXM

Summary: Motion for Protective Order and Memorandum in Support electronically filed by Mr. Andrew J Campbell on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio