

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
The East Ohio Gas Company d/b/a)	Case No. 15-0362-GA-ALT
Dominion East Ohio for Approval of an)	
Alternative Form of Regulation)	

**OBJECTIONS TO THE STAFF REPORT BY
THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO**

In accordance with the Commission’s June 23, 2015 Entry, The East Ohio Gas Company d/b/a Dominion East Ohio (DEO or the Company) respectfully submits the following objections to the Staff Report filed on August 26, 2015.

Objection No. 1: DEO objects to Staff’s recommendation “that the O&M savings sharing mechanism included in the approved stipulation in the 11-2401 case should be eliminated.” (Staff Report at 6.) Staff’s recommendation fails to accord proper significance to the fact that the current O&M savings mechanism was approved by the Commission; properly establishes reasonable savings incentives for the Company and guaranteed minimum savings for customers; and has resulted in an absolute increase in realized O&M savings.

Objection No. 2: DEO objects to the Staff Report’s failure to recommend necessary, corresponding adjustments to the calculation of O&M savings that should follow if the shared-savings mechanism is eliminated. In particular, the Staff Report fails to recommend adjusting the O&M savings calculation to include both cost categories that experience savings and cost categories that experience increases. While the current method of determining O&M savings may have been appropriate under a shared-savings mechanism, it is unreasonable if savings will not be shared.

Objection No. 3: DEO objects to Staff’s recommendation that “the Commission keep the 25-year time period it originally adopted for completing” the PIR Program (*id.* at 7) only to

the extent that this recommendation (a) were understood to establish an inflexible 25-year limit within which the PIR Program must be completed or (b) assumes that no further adjustments to or increases in investment in the PIR program will be necessary. DEO is otherwise supportive of maintaining the 25-year time frame as a target for the PIR program.

Objection No. 4: DEO objects to Staff's recommendation that "DEO and Staff agree that the Company should stay on track to complete the PIR Program within the 25-year period originally approved in the 2007 Rate Case" (*id.* at 8) only to the extent that this recommendation (a) were understood to establish an inflexible 25-year limit within which the PIR Program must be completed or (b) assumes that no further adjustments to or increases in investment in the PIR program will be necessary. DEO is otherwise supportive of maintaining the 25-year time frame as a target for the PIR program.

Dated: September 25, 2015

Respectfully submitted,

/s/ Andrew J. Campbell

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CERTIFICATE OF SERVICE

I hereby certify that a copy of these Objections was served by electronic mail to the following persons on this 25th day of September, 2015:

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/s/ Rebekah J. Glover
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Summary: Text Objections to the Staff Report electronically filed by Ms. Rebekah J. Glover on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio