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# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

2017 FEB 28 PH 3: 18

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In the Matter of the Application of The East	)	The state of the s
Ohio Gas Company d/b/a Dominion East	)	
Ohio for Approval of Tariffs to Adjust its	)	Case No. 16-2206-GA-RDR
Automated Meter Reading Cost Recovery	)	
Charge and Related Matters.	)	

### APPLICATION

In accordance with R.C. 4929.11 and the Commission's October 15, 2008 Opinion and Order in Case No. 07-829-GA-AIR (Distribution Rate Case), The East Ohio Gas Company d/b/a Dominion East Ohio (DEO) respectfully requests that the Commission approve an adjustment to DEO's Automated Meter Reading (AMR) Cost Recovery Charge from \$0.46 per customer per month to \$0.44 per customer per month to reflect costs during the 2016 calendar year associated with cumulative capital investments through June 30, 2012. In support of its Application, DEO states as follows:

- 1. DEO is an Ohio corporation engaged in the business of providing natural gas service to approximately 1.2 million customers in northeastern, western, and southeastern Ohio. As such, DEO is a "natural gas company" and "public utility" as defined by R.C. 4905.03(E) and R.C. 4905.02.
- 2. On December 13, 2006, in Case No. 06-1453-GA-UNC, DEO filed an application to establish an AMR Cost Recovery Charge, via an automatic adjustment mechanism. The application was later consolidated with DEO's application in the Distribution Rate Case. As described in DEO's application, AMR technology: (i) provides a cost-effective way for DEO to read customers' meters as required under the minimum gas service standards; (ii) lessens the need for estimated bills, which in turn results in a better match between the amount billed and

actual gas consumed; (iii) facilitates more frequent actual meter reads, which improves accuracy in transferring service; and (iv) eliminates the need for DEO to schedule appointments to read meters inside customers' premises, further enhancing convenience for customers.

- 3. To enable timely implementation of AMR technology, DEO proposed the use of an AMR Cost Recovery Charge applicable to all customer classes receiving AMR equipment. By recovering its incremental program costs through a separate charge, DEO was able to secure the capital funds needed to complete AMR installation on a five-year timetable. Absent this charge, DEO would have been required to fund the program through its normal capital budgeting process, which would have accommodated a 15- to 20-year systemwide deployment.
- 4. On May 23, 2008, Staff filed its report in the Distribution Rate Case. The Staff Report concluded that "AMR technology is a cost effective way to achieve more frequent actual meter readings and avoid inconveniencing these customers." (06-1453 Staff Report at 42.) Staff also agreed that a five-year AMR deployment period "is preferable to spreading deployment over a 15 to 20 year time span." (*Id.* at 42–43.) Staff recommended approval of the AMR Cost Recovery Charge, subject to certain modifications.
- 5. On August 22, 2008, the parties in the Distribution Rate Case stipulated to adopting Staff's recommendations with respect to AMR. On October 15, 2008, the Commission approved the Stipulation. The Stipulation and Opinion and Order in the Distribution Rate Case contemplated an annual adjustment of the AMR Cost Recovery Charge.
- 6. The current AMR Cost Recovery Charge was approved in the April 20, 2016 Opinion and Order in Case No. 15-1986-GA-RDR.
- 7. On November 29, 2016, DEO filed a pre-filing notice, including schedules reflecting estimated figures supporting the requested adjustment to the AMR Cost Recovery

Charge. Additionally, on November 30, 2016, pursuant to R.C. 4909.18 and 4909.43, DEO provided written notice to the mayor and legislative authority of each municipality within its service territory of DEO's intent to file this Application.

- 8. In accordance with the Stipulation and Opinion and Order in the Distribution Rate Case, DEO hereby submits the following schedules supporting its revised AMR Cost Recovery Charge, which are attached collectively as Attachment A:
  - a. Schedule 1, which summarizes the annualized revenue requirement and the proposed AMR Cost Recovery Charge;
  - b. Schedule 2, which reflects the incremental monthly plant additions for the cost of AMR devices and installation and the cumulative plant additions resulting from installations, system integration, and purchases of AMR devices and related computer hardware and software;
  - c. Schedule 2A, which reflects cumulative and incremental monthly retirements of AMR assets;
  - d. Schedule 3, which reflects cumulative and incremental monthly depreciation of the plant additions;
  - e. Schedule 4, which reflects monthly amortization of post-in-service carrying costs and the remaining cumulative net regulatory asset;
  - f. Schedule 5, which reflects the cumulative and incremental net deferred tax balance related to post-in-service carrying costs;
  - g. Schedule 6, which reflects cumulative and incremental deferred tax on liberalized depreciation;
  - h. Schedule 7, which reflects annualized amortization of post-in-service carrying costs for 2016;
  - i. Schedule 8, which reflects incremental annual property tax expense for 2016 associated with cumulative plant additions through December 31, 2015;
  - j. Schedule 9, which reflects the approved rate of return on rate base on a pretax basis;
  - k. Schedule 10, which reflects the number of bills issued to customers on applicable rate schedules from January 1, 2016, through December 31, 2016; and

1. Schedule 11, which reflects the change in meter-reading and call-center expense from the 2007 approved baseline to the 2016 actual expense, in compliance with the Commission's supplemental directives contained in the May 5, 2012 Opinion and Order in Case No. 09-1875-GA-RDR.

### 9. As reflected in Schedule 1:

- a. The total net rate base through December 31, 2016, is \$45,014,726.27;
- b. The annualized pre-tax return on rate base is \$5,113,672.90;
- c. Meter-reading savings are \$6,104,509.27;
- d. Call-center savings are \$82,712.84;
- e. The annualized AMR-related revenue requirement is \$6,414,707.01;
- f. The number of bills issued to customers on applicable rate schedules from January 1, 2016, through December 31, 2016, is 14,453,236; and
- g. The resulting AMR Cost Recovery Charge is \$0.44 per customer per month.
- 10. Clean and scored versions of the tariff sheet reflecting the adjusted AMR Cost Recovery Charge are attached as Attachment B.
- 11. In its Opinion and Order in Case No. 11-5843-GA-RDR, the Commission stated that DEO "should prefile its supporting testimony at the same time it files its application." Opin. at 20 (Oct. 3, 2012). Accordingly, Attachment C to this Application contains the Direct Testimony of Vicki H. Friscic.
- 12. DEO expects that it shall have the right to file rebuttal testimony in response to any recommendations made by witnesses for the Commission's Staff or any other intervenors. By filing the Direct Testimony contained in Attachment C, DEO does not waive or forfeit any right to file additional testimony to the extent any such recommendations are made.

WHEREFORE, DEO respectfully requests that the Commission approve DEO's Application to adjust its AMR Cost Recovery Charge to \$0.44 per customer per month, as

reflected in the revised AMR Cost Recovery Charge tariff attached as Attachment B, and grant DEO all other necessary and proper relief.

Dated: February 28, 2017

Respectfully submitted,

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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 the foregoing Application was served by electronic mail on the 28th day of February, 2017, to the following:

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/s/ Rebekah J. Glover\_

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

# ATTACHMENT A

# THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO AUTOMATED METER READING COST RECOVERY CHARGE CASE NO. 16-2206-GA-RDR REVENUE REQUIREMENT

ment A	hedule 1
Attac	Sch

schedule 1	Reference				Schedule 2A, Line 7			Schedule 3, Lines 26	Line 4			Schedule 4, Lines 33 & 41	Schedule 5, Lines 4 & 5	Schedule 6, Line 31		5 Schedule 9, Line 8	Line 14 x Line 15		-			_	Schedule 11, Line 2	II	Schedule 10, Line 4	Per Customer Per Month
Cumulative	Through 12/31/16			90,630,951.01	(1,358,891,32)	89,272,059.69		33,999,118.83	(1,358,891.32)	32,640,227.51	56,631,832.18	4,502,330.96	(1,575,815.83)	(14,543,621.04)	45,014,726.27	11.36%	5,113,672.90		5,855,628.84	500,657.66	1,131,969.72	(6,104,509.27)	(82,712.84)	6,414,707.01	14,453,236	0.44
	2016 Activity			\$	•	r		5,855,628.84	'	5,855,628.84	(5,855,628.84)	(507,418.04)	177,596.32	1,298,068.71	(4,887,381.85) \$		\$							<b>∿</b> ∥		<b>∽</b> ∥
	Approved 12/31/15			90,630,951.01 \$	(1,358,891.32)	89,272,059.69		28,143,489.99	(1,358,891.32)	26,784,598.67	62,487,461.02	5,009,749.00	(1,753,412.15)	(15,841,689.75)	49,902,108.12 \$											
		l		Φ.	i							VA.			<b>∽</b> ∥											
		- Return on investment	Plant in Service	Additions	Retirements	Total Plant in Service	Less: Accumulated Provision for Depreciation	Depreciation Expense	Retirements	Total Accumulated Provision for Depreciation	Subtotal: Net Plant Additions	Net Regulatory Asset - Post-In-Service Carrying Costs	Net Deferred Tax Balance - PISCC	Deferred Taxes on Liberalized Depreciation	Net Rate Base	Approved Pre-Tax Rate of Return (ROR)	Annualized Return on Rate Base	Operating Expense	Incremental Annual Depreciation Expense	Annualized Amortization of PISCC	Adjusted Incremental Annual Property Tax Expense	Reduction in Meter Reading Expense	Reduction in Call Center Expense	Annualized Revenue Requirement	Number of Bills	AMR Cost Recovery Charge
	Line	-	7	ო	4	2	9	7	8	თ	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25

THE EAST CHIO GAS COMPANY d/b/a DOMINION EAST OHIO AUTOMATED METER READING COST RECOVERY CHARGE CASE NO. 16-2206-GA-RDR Plant Additions by Month

Cumulative	FERC	12/31/15	01/31/16	02/28/15	03/31/16	04/30/16	05/31/16	06/30/16	07/31/16	08/31/16	03/30/16	10/31/16	21/30/10	12/31/16
1 ERT installation	3820	\$ 36,901,116.14 \$	\$ 35,901,116.14	36,901,116.14 \$ 36,901,116.14 \$ 36,901,116.14 \$	\$ 36,901,116.14 \$	36,901,116.14 \$	36,901,116.14 \$	36,901,116.14 \$	36,901,116.14 \$	36,901,116.14 \$ 36,901,116.14 \$	\$ 36,901,116.14 \$	\$ 36,901,116.14 \$	\$ 36,901,116.14 \$	36,901,116.14
2 ERT Purchases	3810	48,944,461.71	48,944,461.71	48,944,461.71	48,944,461.71	48,944,461.71	48,944,461.71	48,944,461.71	48,944,461.71	48,944,461.71	48,944,461.71	48,944,461.71	48,944,461.71	48,944,451.71
3 Computer Hardware	3912	2,079,836.69	2,079,836.69	2,079,836.69	2,079,836.69	2,079,836.69	2,079,836.69	2,079,836.69	2,079,836.69	2,079,836.69	2,079,836.69	2,079,836.69	2,079,836.69	2,079,836.69
4 In House Labor - CCS IT	3930	1,944,960.80	1,944,960.80	1,944,960.80	1,944,950.80	1,944,950,80	1,944,950.80	1,944,960.80	1,944,960.80	1,944,960.80	1,944,960.80	1,944,960.80	1,944,950.80	1,944,960.80
5 In House Labor - IT	3030	410,575.46	410,575.46	410,575.46	410,575.46	410,575.46	410,575.46	410,575.46	410,575.46	410,575.46	410,575.46	410,575.46	410,575.46	410,575.46
6 Computer Software - Purchased	3030	350,000.21	350,000.21	350,000.21	350,000.21	350,000.21	350,000.21	350,000.21	350,000.21	350,000.21	350,000.21	.350,000.21	350,000.21	350,000.21
7 Total		\$ 90,630,951.01	90,630,951.01 \$ 90,630,951.01 \$	\$ 90,630,951.01 \$ 90	\$ 90,630,951.01 \$	ι л	\$ 10,156,053,01 \$ 10,156,053,053	90,630,951.01 \$	90,630,951.01 \$		90,630,951.01 \$ 90,630,951.01 \$	\$ 90,630,951.01 \$	\$ 90,630,951.01 \$ 90,630,951.01	90,630,951.0
Incremental														
8 ERT Installation			•									,	•	•
9 ERT Purchases			•	•							•	•		•
10 Computer Hardware			•	•	•	•	•	•	•	,	1	1	•	,
11 In House Labor - CCS IT			٠	•	•	•				•	٠	•	•	1
12 In House Labor - IT				,								,	,	•
13 Computer Software - Purchased									•			•		
14 Total		: "'	,	\$	\$ ,	\$	**  	\$ -	\$	,	×**		,	
		•		,	•	•			,		•	•		
15 Completive Correct Year Additions		,		,		•	•	•	•	•				

Attachment A Schedule 2A

THE EAST OHIO GAS COMPANY d'Ib/a DOMINION EAST OHIO AUTOMATED METER READING COST RECOVERY CHARGE CASE NO. 16-2206-GA-RDR

Total (1,358,891.32) (1,358,891.32) (1,358,891.32) \$ (1,358,891.32) 12/31/16 11/30/16 (1,358,891.32) \$ (1,358,891.32) 10/31/16 (1,358,891,32) \$ (1,358,891.32) (1,358,891.32) (1,358,891.32) (1,358,891.32) (1,358,891.32) (1,358,891.32) (1,358,891.32) (1,358,891.32) 09/30/16 08/31/16 07/31/16 91/05/90 05/31/16 04/30/16 03/31/16 02/28/16 01/31/16 (1,358,891.32) Approved 12/31/15 3820 3810 3912 3990 3030 3820 3810 3912 3990 3030 15 Cumulative Current Year Retirements 1 ERT installation
2 ERT burchases
3 Computer Hardware
4 In House Labor - CCS IT
5 In House Labor - IT
6 Computer Software - Purchased
7 Total Refrictableion

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11 In House Labor - CCS IT

12 In House Labor - IT

13 Computer Software - Purchased

14 Total Line No. Cumulative

# THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO AUTOMATER NEMPORE READING COST RECOVERY CHARGE CASE NO. 16-2056-6A-BDR Provision for Depredation

THE EAST OHID GAS COMPANY d/b/a DOMINION EAST OHIO AUTOMATED METER READING COST RECOVERY CHARGE CASE NO. 16-2206-GA-ROR Net Regulatory Asset - Post-In-Service Carrying Costs (PISCC)

ERT Installation ERT Installation ERT Provishes ERT Provishes Computer Handwate in House Labor - CR IT Computer Schware - Purchased Accumulated Capital Additions ERT Purchases ERT Purchases ERT Purchases Computer Schware - Purchased in House Labor - CR IT Computer Schware - Purchased		01/31/16	02/28/16	03/31/16	04/30/16	Rate Change 05/31/16	06/30/16	07/31/16	98/31/16	09/30/16	10/31/16	11/30/16	12/31/16	Balance at 12/31/16
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egulatory Asser - Deferration Eff Installation Eff Thristillation Eff Thristillation Eff Thristillation Eff Thristillation Eff Thribase In House Labor - CCS IT Computer Thribased Computer Saftware - Purchased		ς, ,		<b>v</b> >	•		,	vs	<b>,</b>	ν <b>,</b>	vs ,	·		
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In House Labor - If Computer Software - Purchased	1	٠				•	•		•		•			•
Computer Software - Purchased									,					•
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Regulatory Asset - Amortization		,												200
EKT Installation		5 16,594.61 5		16,594,61 5	16,594.51 5	16,594.61 \$	16,594.61 5	16,594,61	16,594.61 \$	16,594,61	10,594.61	10,594,51	10,394.51	207 700 CO
EKI Purchases		24,565.80	24,565.80	24,565.80	24,565.60	24,565.80	74,565.80	24,565.80	24,565.80	09'595'57	74,365.80	06.coc,25	29.202.64	0.00.00 0.00.00
Computer Hardware		70.689	989.07	989.07	70.686	638.65	638.65	538.65	638.65	038.05	638.65	63.050	038.60	9777 6
II COA - CCA II		311./4	311.74	317.74	511.74	911./4	311.74	311.74	311./4	P/T/C	511.74	30.00	30.00	370.69
In House Labor - IT		30.89	30.89	30.89	30.89	30.89	30.89	30.89	30.89	30.83	30.08	30.69	30.89	216.0
Computer Software - Purchased	, ·	PE 47		20.34	20.34	DE 97	45.02	20.34	PC-07	20.05 CA	47 450 63 6	\$ 5000	40.00	C07 418 04
Total Amortization		\$ 42,518.45 \$	42,518.45 \$	42,518,45 \$	42,518.45 \$	42,168.03 \$	42,168.03 \$	42,168.03 \$	42,168.03 \$	47,158.03 \$	47,158.03 >	42,168.03 5	47,168,03 \$	30v,410
Regulatory Asset - Net Change														
ERT Installation		\$ (16,594.61) \$		(16,594.61) \$	(16,594.61) \$	(16,594.61) \$	(16,594.61) \$	(16,594.61) \$	(16,594.61) \$	(16,594.61) \$	(16,594.61) \$	(16,594.61) \$	(16,594.61) \$	(199,135.32)
ERT Purchases	-	(24,565.80)	(24,565.80)	(24,565.80)	(24,565.80)	(24,565.80)	(24,565.80)	(24,565.80)	(24,565.80)	(24,565.80)	(24,565.80)	(24,565.80)	(24,565.80)	(294,789.60)
Computer Hardware		(288)	(289.07)	(289.07)	(286)	(638.65)	(538.65)	(638.65)	(638.65)	(638.65)	(638.65)	(638.65)	(638.65)	(9,065.48)
in House Labor - CCS IT		(311.74)	(311.74)	(311.74)	(311.74)	(311.74)	(311.74)	(311.74)	(311.74)	(311.74)	(311.74)	(311.74)	(311.74)	(3,740.88)
In House Labor - IT		(30.89)	(30.89)	(30.89)	(30.89)	(30.89)	(30.89)	(30.89)	(30.89)	(30.89)	(30.89)	(30.89)	(30.89)	(370.68)
Computer Software - Purchased		(26.34)	(26.34)	(26.34)	(26.34)	(26.34)	(26.34)	(26.34)	(26.34)	(26.34)	(26.34)	(26.34)	(26.34)	(316 08)
Net		\$ (42,518,45) \$	(42,518.45) \$	(42,518,45) \$	(42,518.45) \$	(42,168.03) \$	(42,168.03) \$	(42,168.03) \$	(42,168.03) \$	(42,168.03) \$	(42,168.03) S	(42,168,03) \$	(42,168.03) \$	(507,418.04)
Cumulative Current Year Activity		\$ (42,518.45) \$	(85,036.90) \$	(127,555.35) \$	\$ (08.620,071)	(212,241.83) \$	(254,409.86) \$	(296,577.89) \$	(338,745.92) \$	(380,913.95) 5	(423,081.98) \$	(465,250.01) \$	(507,418.04)	
Jatory Asset		16.016.000.6	4 00 100 100 1	2 00 101 130 1	0.0000000000000000000000000000000000000	0 000 000	2 2000 6100	1 000 340 40 6	3 70 731 700 1	3 27 633 630 1	2 CR F30 V28 1	> 100000001	2 03 257 710 1	181777560
^_		\$ 2,000,316.51 \$		1,967,127,08	1,990,552.40	1,933,937.07	1,917,343.20 \$	1,300,146,03	L,884,124.04		1,024,704,04	* **********	C 00:01/1897	500000000000000000000000000000000000000
2,9	-	2,908,524,82	2,883,959.02	2,859,393.22	2,834,827.42	2,810,251.62	2,785,695.82	2,761,130.02	2,736,564.22	2,711,998.42	7,587,432,62	7,562,856.82	2,638,301.02	2,638,301.0
		15,169.83	14,180.76	13,191.69	12,202.62	11,563.97	10,925.32	10,286.67	9,648.02	9,009.37	8,370.72	(1,132.0)	7,085.42	7,035.42
, n	<b>90</b>	40,302,04	39,990.30	39,678.56	39,366.82	39,055.08	38,743.34	38,431.60	38,119.86	37,808.12	37,496.38	37,184.64	36,872.90	36,872.90
_	ξ p	1,574,94	1,544.05	1,513.16	1,482.27	1,451.38	1,420.49	1,389.60	1,358.71	1,327.82	1,296.93	1,265.04	1,235.15	1,235.15
Computer Software - Purchased 1,368.95	امِ	1,342.61	1,316.27	1,289.93	1,263.59	1,237.25	1,210.91	1,184.57	1,158.23	1,131.89	1,105.55	1,079.21	1,052.87	1,052.87

[a] Prior year cumulative assets are included in the calculation of PISCC up to the month in which the associated AMR Cost Recovery charge was put into effect.

THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO AUTOMATED METER READING COST RECOVERY CHARGE CASE NO. 16-2206-GA-RDR Net Deferred Tax Balance - PISCC

													Attachment A Schedule 5
	12/31/15	01/31/16	02/28/16	03/31/16	04/30/16	05/31/16	06/30/16	07/31/16	08/31/16	09/30/16	10/31/16	11/30/16	Balance at 12/31/16
Net Deferred Tax Balance - PISCC Beginning Balance Monthly Activity		\$ 1,753,412.15 \$ (14,881.46)	\$ 1,753,412.15 \$ 1,738,530.69 \$ 1,723,649.23 \$ 1,708,767.77 \$ 1,693,886.31 \$ 1,679,127.50 \$ 1,664,368.69 \$ 1,649,609.88 \$ 1,634,851.07 \$ 1,620,092.26 \$ 1,605,333.45 \$ (14,881.46) (14,881.46) (14,881.46) (14,788.81) (14,758.81) (14,758.81) (14,758.81) (14,758.81) (14,758.81) (14,758.81)	1,723,649.23 \$ (14,881.46)	1,708,767.77 \$ (14,881.46)	1,693,886.31 \$ (14,758.81)	1,679,127.50 \$ (14,758.81)	1,664,368.69 \$ (14,758.81)	1,649,609.88 \$ (14,758.81)	1,634,851.07 \$ (14,758.81)	1,620,092.26 \$ (14,758.81)		1,590,574.64 (14,758.81)
Ending Balance	\$ 1,753,412.15	\$ 1,738,530.69 \$	1,753,412.15 \$ 1,738,530.69 \$ 1,703,649.23 \$ 1,708,767.77 \$ 1,693,886.31 \$ 1,679,127.50 \$ 1,664,368.69 \$ 1,649,609.88 \$ 1,634,851.67 \$ 1,620,092.26 \$ 1,605,333,45 \$ 1,590,574,64 \$ 1,575,815.83	1,708,767.77 \$	1,593,886.31 \$	1,679,127.50 \$	1,664,368.69 \$	1,649,609.88 \$	1,634,851.07 \$	1,620,092.26 \$	1,605,333,45 \$	1,590,574.64 \$	1,575,815.83
5 Cumulative Current Year Activity	11	\$ (14,881.46) \$	(14.881.46) \$ (29,762.92) \$ (44,644.38) \$ (59,525.84) \$ (74,284.65) \$ (89,043.46) \$ (103,802.27) \$ (118,561.08) \$ (133,319.89) \$ (148,078.70) \$ (162,837.51) \$ (177,596.32)	(44,644.38) \$	(59,525.84) \$	(74,284.65) \$	(89,043.46) \$	(103,802.27) \$	(118,561.08) \$	(133,319.89) \$	(148,078,70) \$	(162,837.51) \$	(177,596.32)
6 Tax Rate		35.00%	35.00%	35.00%	35.00%	35.00%	35.00%	35.00%	35.00%	35.00%	35.00%	35.00%	35.00%

THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO AUTOMATED METER READING COST RECOVERY CHARGE CASE NO. 16-2205-GA-ROR Deferred Taxes on Liberalized Depreciation

										Tax Year 2016						ה ו	Schedule 6
ë		EFRC	Ž	Tan October 4	1000	Total	Total	400	100	Total	Ford	Total	Total	Total	Total		
Ň		Account	ě	12/31/15	Vintage 2007	Vintage 2008	Vintage 2009	Vintage 2010	Vintage 2010	110	212	Vintage 2013	Vintage 2014	Vintage 2015	Vintage 2016	Cumu	Cumulative
	Plant In-Service		ı			Ì	į.										
r	ERT Installation	3820		\$ 36,901,115.14	\$ 2,756,263.11	s	\$ 9,492,002.23 \$		2,116,251.53 \$	7,279,949.83 \$	378,973.68 \$		٠,	, s		\$ 36,90	36,901,116.14
7	ERT Purchases	3810	15/20	48,944,461.71	4,523,047.88	7	10,204,104.37	8,178,417.04	2,438,292.24	8,533,669.04	295,356.51	•	,	•	•	48,9	48,944,461.71
m	Computer Hardware	3912	S	2,079,836.69	115,959.17	392,355.47	580,969.48	95,005.49	682,916.35	212,630.73	•	•	•	•	•	2,0	2,079,836.69
4	Computer Software - CCS II	3990	1	1,944,960.80	•		1,419,779.86	,	397,230.83	127,950.11	•			•	•	4.9	1,944,960.80
v	Computer Software - IT	3030	-	410,575.46	226,195.37	184,380.09	,						,	•	•	₹	410,575.46
9	Computer Software - Purchased	3030	m		278,945.51							,				3	350,000.21
^	Total Plant In-Service			\$ 90,630,951.01	\$ 7,900,411.04 \$	2,0		21,696,855.94 \$ 14,558,930.15 \$	5,634,690.95 \$	5,634,690.95 \$ 16,154,199.71 \$	674,330.19 \$	-			•	\$ 90.6	10.126,055,09
	Tax Base In-Service:																
80	MACRS - 5 Year Property		.,	\$ 2,079,835.69	\$ 115,959.17	\$ 392,355.47	\$ 580,969.48 \$	95,005.49 \$	\$ 582,916.35 \$	212,630.73 \$	٠,	•		·		\$ 2,0	2,079,836.69
¢n	MACRS - 15 Year Property			69,357,528.79	7,279,310.99	23,363,742.77	19,696,106.60	14,463,924.66	4,554,543.77				٠		•	69,38	69,357,628.79
22	MACRS - 20 Year Property			16,487,949.06	•					15,813,618.87	674,330.19	•		•	•	16,41	15,487,949.06
Ħ	MACRS - 3 Year Property			350,000.21	278,945.51			it.			ţ	•	٠	•	•	æ.	350,000.21
12	MACRS - 1 Year Property		ı	2,355,536.26	226,195.37	184,380.09	1,419,779.86	.)	397,230.83	127,950.11				•		2,3	2,355,536.26
1	Total Tax Depreciation Base			\$ 90,630,951.01	\$ 7,900,411.04	\$ 24,011,533.03	\$ 21,696,855.94 \$	14,558,930.15 \$	5,634,690.95 \$	16,154,199.71 \$	674,330.19 \$			, s	•	39'06 \$	90,630,951.01
	Tax Rates				10th year	9th year*	8th year*	7th year*	7th year**	6th year**	5th year*	4th year	3rd year	2nd year	1st year		
7	MACRS - 5 Year Property				0.000%	0.000%	0.000%	0,000%	%0000	%0000	11.520%	11.520%	19.200%	32.000%	20.000%	ı	
15	MACRS - 15 Year Property				\$300%	5.910%	5.900%	2:900%	0.000%	0.000%	6.930%	7.700%	8.550%	9.200%	2.000%		
91	MACRS - 20 Year Property				4.461%	4.462%	4.522%	4.888%	90000	0.000%	5.713%	6.177%	6.677%	7.219%	3.750%		
17	MACRS - 3 Year Property				9,000,0	360000	6.000%	0.000%	0.000%	0.000%	0.000%	16.667%	33.333%	33.333%	16.667%		
18	MACR5 - 1 Year Property				9,000,0	0.000%	0.000%	900000	0.000%	0.000%	90000	0.000%	0.000%	0.000%	0.000%		
	Tax Depreciation																
13	MACRS - 5 Year Property			\$ 2,079,836.70	· .	, ,	\$		S			•		•	•	\$ 2,07	2,079,835,70
2	MACRS - 15 Year Property			52,388,980.70	429,479.35	690,398.50	581,035.14	426,685.78	*		. :	•	•	•	•	25	54,516,579.57
1	MACRS - 20 Year Property			15,231,106.81					•		19,262,24					16,2	16,250,369.05
3 8	MACRS - 3 Year Property			350,000.21			•		•		٠		•		•	9 5	350,000.21
7	MACKS - L Year Property		1	2,355,536.25							,	•		,		3	53,336.26
z	Total Tax Depreciation		-1	\$ 73,405,460.69	\$ 429,479.35 \$	\$ 690,398.60 \$	5 581,035.14 \$	426,685.78 \$	*	,	19,262.24 \$					\$ 75,55	75,552,321.80
×	Current Year Sub-total														\$ 2,146,861,11		
	Book Depreciation																
% F	ERT - Installations		-	\$ 10,088,839.91											3 2461,304.40	s,	12,550,144.31
3 8	ENI PRINCIPAS			14,400,017.34											100 000 000		0.0222000
8 6	Utner Total Book Depreciation		(-,	\$ 28,143,489.99											\$ 5,855,528.84	5	33,999,118.83
93	Tax Depreciation In Excess of Book Depreciation	, poi	*1	\$ 45,261,970.70											\$ (3,708,767.73) \$		41,553,202,97
5	Coderal Deferred Tours © 35 000		, `	ı											\$ (17.890.68.71) \$		14 543 621 04
			u	12,044,052,13											* 1.000(100=14)	,	
32	Accumulated Deferred Income Tax (ADIT)														\$ 14,543,621.04	a	
33	Federal Tax Rate			35,00%											35.00%	35.0	35.00%

 <sup>50%</sup> bonus tax depreciation applies. Tax depreciation is calculated on the remaining 50% of plant value at the stated tax depreciation rates.
 100% bonus tax depreciation applies to October 2010 through Detember 2011 plant additions.

THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO AUTOMATED METER READING COST RECOVERY CHARGE CASE NO. 16-2206-GA-RDR Annuelized Amortization of PISCC

											To let to	
	Description	,	2008		2009	2010	2011	2012	2013	2014-2016	12/31/16	
Reg	Regulatory AssetDeferrals											
	ERT installation		\$ 484,140.14	2.14 \$	637,446.79 \$	517,451.28 \$		413,510.10 \$			\$ 2,518,819.07	
	ERT Purchases		1,025,594.22	1.22	845,624.48	629,317.60	765,792.14	476,810.50	7,999.25		3,751,138.19	
	Computer Hardware		26,349.10	110	33,973.79	21,024.97	26,804.32	11,517.50	•	•	119,669.68	
	In House Labor - CCS IT		,		•	38,452.35	10,758.35	6,930.60		•	56,141.30	
	In House Labor - IT		26,186.72	:72	11,119.75	٠	1		•	1	37,306.47	
	Computer Software - Purchased		20,562,72	.72	9,479.15	•	•		,		30,041.87	
	Cumulative TotalDeferred PISCC		\$ 1,582,832.90	\$ 06.3	1,537,643.96 \$	1,206,246.20 \$	1,259,361.72 \$	908,768.70 \$	18,263.10	. \$	5 6,513,116.58	
		3				Š	Activities Assessed Participation				Total Annual	Moothly
		<b>(E)</b>					indal Atriol Uzanori OI:			2000	to the contract	
¥	Amortization Approved in Case #14-2125-GA-RDR	Amortization %	2008 PISCC		2009 PISCC	2010 PISCC	2011 PISCC	2012 PISCC	2013 PISCC	2014-2016 PISCL	Amortization	Amortization
₹	Annualized Amortization of PISCC	VBL. / J	200000	,	400 40	2 00 151 06	\$ 50,000	> 66017	03 783		\$ 75 751 \$	15 594 61
	EDI Buochage	0.07%	50.0P0,C# 52 698 57				55 705 85				99.582.59	
	Control of the design	20000			-	4 205 00	5 360 33	2 303 50			11.868.83	70.686
	In Danies Labor. O'S IT	76297				2 562 14	716 95	461.84	•		3,740.93	311.74
	In House Labor of	30000			27072			•	•		370.73	30.89
	Committee Cofficients - Durchared	30.01			316.03		٠	•	•	,	316,03	26.34
	Total Annualized PISCC Amortization		\$ 131,738.58	358 \$	122.041.63 \$	95,171.37 \$	95,293,09 \$	64,758.56 \$	1,218.15		\$ 510,221.38	42,518.45
												Schedule 4
		(g)				An	Annual Amortization of:	į			Total Annual	Monthly
Ą	Amortization Approved in Case #15-1986-GA-RDR	Amortization %	2008 PISCC		2009 PISCC	2010 PISCC	2011 PISCC	2012 PISCC	2013 PISCC	2014-2016 PISCC	Amortization	Amortization
Ą	Annualized Amortization of PISCC	700.00	20 040 05	30.5	2 208 40	40.323.00 €	33 208 35	28 850 17 \$	584 FO		\$ 199.135.77 \$	16 594.51
	CAT INSCALLED IN	9,00	C 003 00				26 202 23			•	294 789 59	
	ERI Purchases	8,700 %	oen'99	ζ,	05,055,00	47.1./L/OH	5 360 33	2,303.50	treer.	•	7.663.83	638.65
	In Boxes (abov. CC)	%L 5 5				2 562 14	716 95	461.84			3,740.93	311.74
	In House Cabot - Cabit	10.00%			FLOTE			•			370.73	30.89
	Committee Cofficients - Dissipated	10.00%			376.03				•		316.03	26.34
	Total Appualized PISCC Amortization	W. C.	\$ 131,738.58	58 5	122,041.63 \$	90,966,37 \$	95,293.09 \$	64,758.56 \$	1,218.15	\$	\$ 506,016.38 \$	42,168.03
												Schedule 4
		(e)				An	Annual Amortization of:				Total Annual	
₫.	Current Year Calculation	Amortization %	2008 PISCC		2009 PISCC	2010 PISCC	2011 PISCC	2012 PISCC	2013 PISCC	2014-2016 PISCC	Amortization	
Ä	Annualized Amortization of PISCC FOT Installation	8,67%	S 43.040.06	v 90	52.798.49	40.232.99 \$	33.509.96	28.869.17 \$	684.60		\$ 199,135.27	
	EBT Purchases	6.67%		257				33,124,05		•		
	Computer Hardware	20.00%			•	•	1.61	2,303.50	•	•	2,305.11	
	In House Labor - CCS IT	6.67%	•		•	2,562.14	716.95	461.84	•		3,740.93	
	In House Labor - IT	10.00%	•		370.73	•	•	•	•	•	370.73	
	Computer Software - Purchased	10,00%			316.03		•	•			316.03	
	Total Annualized DISCC Amortization		131 738 58	000	122 047 53 5	2 66 555 37 6	A CC 650 00	27 250 55 5	121010		500 657 66 School la 1	T almost

<sup>(</sup>a) Based on asset lives approved in Case # 13-1988-GA-AAM (b) Due to completion of program, no PISCC recorded for calandar years 2014-2016

# THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO AUTOMATED METER READING COST RECOVERY CHARGE CASE NO. 16-2206-GA-RDR Property Tax Expense Calculation

			Approved	Actual		Cumulative
Line			Through	Through		Through
No.			12/31/15	12/31/16	Ì	12/31/16
•		•	\$ 100 OE 1 O1 \$		٠,	2 0 000 000 000 000 000 000 000 000 000
-	lotal Plant In Service	Դ	\$ 10.155,050,08	•	<u>ጉ</u>	SO,000,301.U1 Schedule 2
2	Retirements	I	(1,358,891.32)			(1,358,891.32) Schedule 2A
က	Total Plant in Service Less Retirements	❖	\$ 99,272,059.69 \$	•	\$	89,272,059.69
4	2015 Effective Rate		1.268%			
52	5 Tax on Property Through 12/31/2015 - Expensed in 2016	Υ	1,131,969.72			

# THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO AUTOMATED METER READING COST RECOVERY CHARGE CASE NO. 16-2206-GA-RDR

Approved Rate of Return on Rate Base

Capital Structure Debt Cost of Capital Cost of Capital Equity Return on Rate Base		48.66%	51.34%		6.50%	10.38%	8.49%	11.36%
7 65 4 3 2 7	Capital Structure	Debt	Equity	Cost of Capital	Debt	Equity	Return on Rate Base	Return on Rate Base using Pre-Tax Equity
	Н	7	m	4	5	9	7	∞

# THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO AUTOMATED METER READING COST RECOVERY CHARGE

CASE NO. 16-2206-GA-RDR Actual Bills Issued

Twelve Months Ended December 31, 2016

<u> </u> <u> </u> <u> </u> <u> </u>	Customer Class	CCS	SBS	Total Bills
	GSS / ECTS	14,381,551	1,444	14,382,995
<b>~</b> 1	LVGSS / LVECTS	41,635	1,363	42,998
~	GTS / TSS	18,594	8,649	27,243
_	Total	14,441,780	11,456	14,453,236

# THE EAST OHIO GAS COMPANY d/b/a DOMINION EAST OHIO AUTOMATED METER READING COST RECOVERY CHARGE

CASE NO. 16-2206-GA-RDR Meter Reading and Call Center O&M Expense

Line No.	I		2007 Baseline	2016 Activity	Variance 2016 Projected vs. 2007 Baseline	- 4 -	Reduction of AMR Revenue Requirement
47	Meter Reading Call Center - Restated	φ.	8,684,136.64 \$ 19,031,482.22	2,579,627.37 \$ 18,948,769.38 \$	(6,104,509.27) (82,712.84)	φ.	(6,104,509.27) (82,712.84)
m	Total	<b>-</b>	27.715.618.86 \$	21.528.396.75 \$	(6.187.222.11)	401	(6.187.222.11)

# ATTACHMENT B

## **AMR Cost Recovery Charge**

A monthly charge of \$0.44 shall be added to the otherwise applicable monthly service charge for all customers receiving service under the following rate schedules to recover the depreciation, incremental property taxes and post in-service carrying charges associated with the installation of automated meter reading (AMR) equipment throughout East Ohio's system:

- a) General Sales Service Residential
- b) General Sales Service Nonresidential
- c) Large Volume General Sales Service
- d) Energy Choice Transportation Service Residential
- e) Energy Choice Transportation Service Nonresidential
- f) Large Volume Energy Choice Transportation Service
- g) General Transportation Service
- h) Transportation Service for Schools

Issued: Effective: With bills rendered on or after

Eleventh Revised Sheet No. AMR 1
Superseding Tenth Revised Sheet No. AMR 1

Deleted: Tonth	 	 	 _
Deleted: Ninth	 	 	 _

### **AMR Cost Recovery Charge**

A monthly charge of \$0.44 shall be added to the otherwise applicable monthly service charge for all customers receiving service under the following rate schedules to recover the depreciation, incremental property taxes and post in-service carrying charges associated with the installation of automated meter reading (AMR) equipment throughout East Ohio's system:

Deleted: 46			

Deleted: April 25, 2016

Deleted: May 6, 2016

- a) General Sales Service Residential
- b) General Sales Service Nonresidential
- c) Large Volume General Sales Service
- d) Energy Choice Transportation Service Residential
- e) Energy Choice Transportation Service Nonresidential
- f) Large Volume Energy Choice Transportation Service
- g) General Transportation Service

Issued: ,

h) Transportation Service for Schools

			. / /
			// <b>∫ Deleted:</b> 15-1986
			/ Deleter: 13-1900
T 04 1	 	•	// /

Effective: With bills rendered on or after

# ATTACHMENT C

# 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 for Approval of Tariffs to Adjust its	Ś	Case No. 16-2206-GA-RDR
Automated Meter Reading Cost Recovery	)	
Charge and Related Matters.	)	

DIRECT TESTIMONY OF VICKI H. FRISCIC
ON BEHALF OF
THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO

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m.	PROGRAM STATUS	7
IV.	NOTICE TO MUNICIPALITIES	8
V.	CONCLUSION	8

## Direct Testimony of Vicki H. Friscic

### I. INTRODUCTION

- Q1. Please introduce yourself.
- A. My name is Vicki H. Friscic. I am employed by The East Ohio Gas Company d/b/a

  Dominion East Ohio (DEO or Company) as Director Regulatory & Pricing. My business
  address is 1201 East 55th Street, Cleveland, Ohio 44103.
- Q2. In your capacity as Director Regulatory & Pricing, are you generally familiar with DEO's books and records?
- A. Yes. I am responsible for preparing and making a variety of regulatory filings that include financial information derived from DEO's financial records, including the general ledger, annual reports, income statements, and balance sheets.
- Q3. Are you familiar with DEO's Application to adjust its Automated Meter Reading (AMR) Cost Recovery Charge?
- A. Yes. I supervised and coordinated the preparation of DEO's Pre-Filing Notice and Application, including the collection of the data and assembly of the schedules supporting the AMR Cost Recovery Charge (AMR Charge), which were submitted as part of DEO's AMR filings.
- Q4. What is the purpose of your testimony in this proceeding?
- A. The purpose of my testimony is to explain the adjustment to the AMR Charge set forth in DEO's Application in this case.

### II. DESCRIPTION OF APPLICATION

- Q5. What change is DEO requesting to the AMR Charge?
- A. DEO is requesting a change from the current charge of \$0.46 per applicable customer, per month, to \$0.44 per applicable customer, per month.

- Q6. Please describe the components used to calculate the Annualized Revenue Requirement for the AMR Program.
- A. DEO has calculated the AMR Program revenue requirement in a manner consistent with the revenue requirement calculation in the last rate case and in prior annual AMR Charge proceedings. The formula, shown on Application Attachment A at Schedule 1, is rate base times rate of return plus operating expenses. Each component of the formula is supported by a schedule or schedules.
- Q7. Please identify the rate components and schedules that support the calculation of rate base shown on Application Attachment A at Schedule 1.
- A. Rate base consists of the following components: Total Plant In Service shown on Schedule 2; Retirements shown on Schedule 2A; Accumulated Provision for Depreciation shown on Schedule 3; Net Regulatory Asset Post-in-Service Carrying Costs (PISCC) shown on Schedule 4; Net Deferred Taxes on PISCC shown on Schedule 5; and Deferred Taxes on Liberalized Depreciation shown on Schedule 6.
- Q8. Please explain the information set forth on Schedule 2 and how that information is shown on Schedule 1.
- A. Schedule 2 shows the Plant Additions by Month associated with the AMR Program cumulatively and for the year ended December 31, 2016. These Plant Additions represent capital investments by DEO for the purchase and installation of AMR devices on customer meters, associated remote reading devices and equipment and computer software. Because the AMR program was completed in 2012, there are no additional plant investments in 2016. Plant Additions from Schedule 2 appear on Schedule 1 at line 3.

- Q9. Please explain the information set forth on Schedule 2A and how that information is shown on Schedule 1.
- A. Schedule 2A shows retirements of AMR Program assets, which reduce Plant in Service and Accumulated Depreciation in the rate base. Total retirements from Schedule 2A appear on Schedule 1 at lines 4 and 8.
- Q10. Please explain the information set forth on Schedule 3 and how that information is shown on Schedule 1.
- A. Schedule 3 shows the Provision for Depreciation associated with the AMR Program cumulatively and for the year ended December 31, 2016. The accumulated Provision for Depreciation, sometimes known as "Accumulated Depreciation," represents the depreciation expense accumulated since inception of the AMR Program and during the year ended December 31, 2016, on the cumulative AMR Program Plant Additions shown on Schedule 2. The accumulated Provision for Depreciation from Schedule 3 appears on Schedule 1 at line 7 and the incremental depreciation expense for the year ended December 31, 2016, from Schedule 3 appears on Schedule 1 at line 18.
- Q11. Please explain the information set forth on Schedules 4, 5, and 6 and how that information is shown on Schedule 1.
- A. Schedule 4 shows the Net Regulatory Asset Post-in-Service Carrying Costs associated with the AMR Program for the year ended December 31, 2016, and cumulatively. PISCC represents carrying charges calculated at 6.5 percent on cumulative AMR Plant Additions, for which the Commission has authorized cost recovery through the AMR Charge, but for which cost recovery has not yet begun. The 6.5 percent rate is DEO's cost of long-term debt from the last rate case. The Net Regulatory Asset PISCC represents accumulated PISCC net of the amortization of PISCC amounts deferred in prior years.

  The Net Regulatory Asset PISCC from Schedule 4 appears on Schedule 1 at line 11.

Schedule 5 shows the Net Deferred Tax Balance - PISCC associated with the AMR Program for the year ended December 31, 2016, and cumulatively. The Net Deferred Tax Balance - PISCC represents a tax liability resulting from a book versus tax timing difference associated with the recognition of PISCC on AMR Plant Additions.

The Net Deferred Tax Balance - PISCC from Schedule 5 appears on Schedule 1 at line 12.

Schedule 6 shows Deferred Taxes on Liberalized Depreciation associated with the AMR Program for the year ended December 31, 2016, and cumulatively. The Deferred Taxes on Liberalized Depreciation represent the federal income tax liability associated with the difference between depreciation allowed for income tax purposes, which is determined in accordance with tax rules, compared with depreciation calculated for book purposes, which is determined in accordance with accounting rules. Such taxes are calculated based on AMR Plant Additions. The calculation of Deferred Taxes on Liberalized Depreciation on Schedule 6 of this filing includes bonus tax depreciation allowed by law for capital additions in 2008 through 2012. There have been no capital additions since 2012. Deferred Taxes on Liberalized Depreciation from Schedule 6 appears on Schedule 1 at line 13.

- Q12. Please identify the schedule that supports the Approved Pre-Tax Rate of Return that DEO applies to the AMR Program rate base shown on Application Attachment A at Schedule 1.
- A. Schedule 9 shows the Approved Rate of Return on Rate Base as determined by the Commission in its December 19, 2008 Entry on Rehearing in Case No. 07-829-GA-AIR and the associated pre-tax rate. The Return on Rate Base using Pre-Tax Equity is shown as the Approved Pre-Tax Rate of Return on Schedule 1 at line 15. The Approved Pre-Tax

Rate of Return multiplied by the AMR Program rate base on Schedule 1 at line 14 provides the amount of the Annualized Return on Rate Base on Schedule 1 at line 16.

# Q13. Please identify the rate components and schedules that support the calculation of Operating Expense shown on Application Attachment A at Schedule 1.

A. Operating Expense consists of five rate components: Incremental Annual Depreciation
 Expense shown on Schedule 3; Annualized Amortization of PISCC shown on Schedule

 7; Incremental Annual Property Tax Expense shown on Schedule 8; Reduction in Meter
 Reading Expense shown on Schedule 11; and Reduction in Call Center Expense shown
 on Schedule 11.

# Q14. Please explain the information set forth on Schedule 7 and how that information is shown on Schedule 1.

A. Schedule 7 sets forth the Annualized Amortization of PISCC deferred for recovery in prior years and during the year ended December 31, 2016. The Annualized Amortization of PISCC represents the amortization during the twelve-month period the adjusted AMR Charge will be in effect of PISCC accumulated during each year of the AMR Program through December 31, 2016. This amortization spreads each year's accumulated PISCC to expense over the lives of the related assets. The Annualized Amortization of PISCC is shown on Schedule 1 at line 19.

# Q15. Please explain the information set forth on Schedule 8 and how that information is shown on Schedule 1.

A. Schedule 8 sets forth the Incremental Annual Property Tax Expense, which is property tax expense for AMR-related assets net of retirements recognized on DEO's books during the year ended December 31, 2016 and deferred for recovery through the AMR Charge.

Property tax expense recognized in any calendar year is based on plant assets as of the preceding year end. As a result, property tax expense incurred in 2016 reflects one year's

tax on cumulative AMR Plant Additions as of December 31, 2015. Incremental Annual Property Tax Expense is shown on Schedule 1 at line 20.

# Q16. Please explain the information set forth on Schedule 11 and how that information is shown on Schedule 1.

A. Schedule 11 sets forth the operations-and-maintenance (O&M) expense savings attributable to the AMR program for the year ended December 31, 2016. The Reduction in Meter Reading Expense is determined by measuring the decrease in meter reading expenses incurred during the 2016 program year as compared with the same expenses in the baseline year, which is the calendar year ended December 31, 2007. The Reduction in Meter Reading Expense amount for 2016 is shown on Schedule 1 at line 21.

The Reduction in Call Center Expense is determined by comparing call center expenses during the 2016 program year, after the adjustments ordered by the Commission in Case No. 09-1875-GA-UNC to restate call center expenses for non-AMR-related activities since the 2007 baseline year, with call center expenses in the baseline year. The Reduction in Call Center Expense amount for 2016 is shown on Schedule 1 at line 22.

# Q17. Please explain the information set forth on Schedule 10 and how that information is shown on Schedule 1.

A. Schedule 10 sets forth the number of Actual Bills Issued through DEO's CCS (low-pressure) and SBS (high-pressure) billing systems during the twelve months ended December 31, 2016, for each of the rate classes to which the AMR Charge is applicable.

The total number of bills issued for 2016 is reflected on Schedule 1 at line 24.

### Q18. How is the AMR Charge shown on Schedule 1 at line 25 calculated?

A. The AMR Program Annualized Revenue Requirement on Schedule 1 at line 23 is divided by the total Number of Bills at line 24 to arrive at the AMR Charge shown at line 25.

### Q19. Does the proposed AMR Charge include any credit for expense reductions?

A. Yes. As shown on Schedule 1 at line 21 and line 22, the AMR Charge includes credits to the Annualized Revenue Requirement of \$6,104,509.27 related to meter-reading and \$82,712.84 related to call-center O&M expense savings.

### III. PROGRAM STATUS

### Q20. What is the status of the AMR program as of December 31, 2016?

A. DEO considered the program to be complete as of the end of June 2012. Since that time, DEO has continued and will continue to install AMR devices as needed, but is not seeking recovery of those costs through the AMR Charge. Although there is no further capital investment in the AMR program, DEO will continue to request approval for recovery of PISCC, depreciation, property taxes, and a return on AMR investments until such time as the AMR investments are included in rate base.

# Q21. What was the total cost of AMR deployment, and how did that compare to DEO's pre-acceleration estimates?

A. The total capital investment in the AMR program was \$90,630,951.01. This is approximately \$10 million less than the lowest estimate of the total program cost given when DEO filed its original AMR application.

### O22. Has DEO reduced meter-reading O&M expense?

A. Yes. In 2016, DEO achieved \$6,104,509.27 in meter-reading O&M expense savings compared to that expense for the 2007 baseline year and despite increases in labor rates and benefit costs that have occurred since 2007.

### Q23. Has DEO restated its call-center expense in accordance with the 09-1875 Order?

A. Yes. DEO has restated call-center expense using the same methodology in every case since Case No. 09-1875, including this one. This methodology was reviewed in detail

with Staff in March 2011 for the filing based on 2010 AMR costs (Case No. 10-2853-GA-RDR).

# Q24. Did this methodology result in the recognition of any call-center O&M expense savings this year?

A. Yes. The restatement of call-center O&M expenses in 2016 resulted in savings of \$82,712.84 compared to that expense for the 2007 baseline year.

### IV. NOTICE TO MUNICIPALITIES

## Q25. Did DEO file a Notice of Intent to File an Application to Adjust its AMR Charge?

A. Yes, DEO filed its Notice of Intent on November 29, 2016, and served it on every party to its original distribution rate case in Case No. 07-829-GA-AIR.

# Q26. Did DEO provide municipalities a notice of its intent to file an Application to Adjust its AMR Charge?

A. Yes, it did. DEO mailed the notice to mayors and legislative authorities within its service territories on November 30, 2016, which was more than 30 days prior to the end of February.

### V. CONCLUSION

- Q27. Does this conclude your direct testimony?
- A. Yes.