

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Vectren	)	
Energy Delivery of Ohio, Inc., for Approval	)	18-0049-GA-ALT
of an Alternative Rate Plan	)	

In the Matter of the Application of Vectren	)	
Energy Delivery of Ohio, Inc. for Approval of	)	18-0298-GA-AIR
an Increase in Gas Rates	)	

In the Matter of the Application of Vectren	)	
Energy Delivery of Ohio, Inc., for Approval	)	18-0299-GA-ALT
of an Alternative Rate Plan	)	

**MOTION TO CONSOLIDATE  
OF VECTREN ENERGY DELIVERY OF OHIO, INC.**

In accordance with Ohio Adm. Code 4901-1-02(A)(6) and 4901-1-12, Vectren Energy Delivery of Ohio, Inc. (VEDO) files this motion to consolidate Case No. 18-0049-GA-ALT (the Capital Expenditure Program (CEP) Rider Proceeding) with Case Nos. 18-0298-GA-AIR and 18-0299-GA-ALT (collectively, the Rate Case Proceeding). Good cause to grant this request is set forth as follows.

On March 30, 2018, in the Rate Case Proceeding, VEDO filed applications to increase rates and for approval of an alternative rate plan. Today, VEDO is filing a separate application for approval of an alternative rate plan to establish a CEP Rider. Certain issues in the Rate Case Proceeding and the CEP Rider Proceeding are interrelated, and consolidation will both ease consideration of the issues and support administrative efficiency. For these reasons, VEDO requests that the Proceedings be consolidated.

In the Rate Case Proceeding, VEDO proposes (among other things) recovery in base rates of accrued CEP deferrals as of December 31, 2017. In the CEP Rider Proceeding, VEDO requests recovery going forward of annual CEP deferrals beginning with 2018 activity.

Determinations regarding the proper treatment or recovery of deferrals in one case could affect the treatment or recovery of deferrals in the other. Consolidation would ease the consideration and review of these issues, avoid the possibility of duplicative or conflicting efforts, and conserve the Commission's resources.

Additionally, information provided in the Rate Case Proceeding may also be relevant, by rule, to consideration of the CEP Rider Proceeding. Under Ohio Adm. Code 4901:1-19-06(C), if an alternative rate plan proposes "an increase in rates, applicants shall submit the exhibits described in divisions (A) to (D) of section 4909.18 of the Revised Code, and standard filing requirements pursuant to rule 4901-7-01 of the Administrative Code (SFRs) . . . unless otherwise waived." To the extent this applies to the CEP Rider Proceeding, the requisite information has been filed as part of the Rate Case Proceeding. Requiring VEDO to file this voluminous information in both dockets would be inefficient and wasteful of resources, and consolidation will ensure that the information is contained in the record of both cases. In addition, certain inputs into the proposed calculation of the CEP Rider reflect proposals made in the Rate Case Proceeding, and consolidation will help ensure that interrelated issues are considered together and in a timely fashion.

Finally, the Rate Case Proceeding is in the very early going. Direct testimony is being filed today, and no procedural schedule has been issued. Moreover, in the Rate Case Proceeding, VEDO explained its intention to file the CEP Alternative Rate Plan, how the latter case would intersect with the former, and the Company's plan to request consolidation. (*See, e.g.*, 18-0298 Application at 3 n.1.) Consolidating these Proceedings at this juncture will not delay the consideration of either application, nor prejudice any party's review.

For these reasons, good cause exists to grant the Company's motion to consolidate. VEDO respectfully requests that the Commission issue an entry consolidating Case Nos. 18-0049-GA-ALT, 18-0298-GA-AIR, and 18-0299-GA-ALT.

Dated: April 13, 2018

Respectfully submitted,

/s/ Andrew J. Campbell

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by electronic mail upon the following this 13th day of April, 2018:

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Summary: Motion to Consolidate electronically filed by Ms. Rebekah J. Glover on behalf of Vectren Energy Delivery of Ohio, Inc.