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Docketing Division Public Utilities Commission of Ohio 180 East Broad Street Columbus, Ohio 43215

In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval of RE: an Adjustment to its Energy Efficiency Funding Rider Rate, Case No. 18-444-GA-RDR.

Enclosed please find the Staff's Comments regarding Vectren Energy Delivery of Ohio's Energy Efficiency Rider balance reconciliation statement and rate proposal in Case No. 18-444-GA-RDR.

Respectfully submitted,

Tarhara S. Turkenton

Director, Rates and Analysis

Public Utilities Commission of Ohio

David Lipthratt

Chief, Research and Policy Division Public Utilities Commission of Ohio

Enclosure

cc: Parties of Record

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Vectren Energy Delivery of Ohio, Inc. Case No. 18-444-GA-RDR

OVERVIEW

On January 7, 2009, in Case No. 07-1080-GA-AIR, the Commission approved a Stipulation¹ providing for the establishment of an Energy Efficiency Funding Rider (EEFR), initially set to zero, that would be utilized to fund the low-income weatherization program for customers whose income is between 200% and 300% of federal poverty levels.

Subsequently, on August 26, 2009, in Case No. 09-254-GA-ATA, the Commission issued a Finding and Order authorizing Vectren Energy Delivery of Ohio, Inc. (Vectren) to establish and implement an initial EEFR rate of \$0.00320 per Ccf, which became effective on January 1, 2010.

On March 15, 2018, Vectren filed the pending application to revise its current EEFR rate. Vectren is proposing in its application to decrease its EEFR rate from \$0.00558 per Ccf to \$0.00518 per Ccf, a rate change of \$0.0004 per Ccf. Vectren proposes this decrease in the EEFR based on its actual EEFR recoveries through December 2017 and forecasted recoveries through December 2018. Staff has reviewed the application and makes its findings and recommendations in this Staff letter.

STAFF REVIEW

Staffs audit of Vectren's EEFR consisted of an analysis of the incurred costs in order to evaluate prudency and appropriateness for recovery, as well as confirmations of the calculations to verify the accuracy of the revenue requirement calculation. Staff conducted this audit through a combination of document reviews and interrogatories as needed.

In its review, Staff made minor adjustments to Vectren's EEFR recoveries and sales volumes, however, the Staff adjustments did not affect Vectren's proposed EEFR rate.

CONCLUSION

Staff completed its review of Vectren's EEFR for calendar year 2017 and believes that the Company appropriately calculated the rider rate in the pending application and recommends the proposed rate of \$0.00518 per Ccf be approved.

¹ Signatory Parties include Vectren Energy Delivery of Ohio, Inc., the Ohio Consumers' Counsel, Ohio Partners for Affordable Energy and Staff.