# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Vectren	)	
Energy Delivery of Ohio for Approval to	)	Case No. 15-1741-GA-AAM
Change Accounting Methods	)	

## ANNUAL REPORT OF VECTREN ENERGY DELIVERY OF OHIO, INC.

Vectren Energy Delivery of Ohio, Inc. (VEDO or the Company), pursuant to the Commission's November 3, 2016 Opinion and Order adopting the Distribution Accelerated Risk Reduction (DARR) program, respectfully submits its annual report detailing VEDO's DARR-related and deferral eligible expenses incurred in calendar year 2017. In support of its annual report, VEDO states as follows:

- 1. VEDO is an Ohio corporation engaged in the business of providing natural gas service to customers in Ohio and, as such, is a "natural gas company" and "public utility" as defined by R.C. 4905.03(E) and 4905.02(A), respectively.
- 2. On November 3, 2016, in accordance with R.C. 4905.13, the Commission approved VEDO's application to establish a regulatory asset to defer up to \$4 million annually through the DARR to reduce key risks, continue to ensure the safe and reliable operation of its system, and ensure compliance with pipeline safety laws. The Commission required VEDO to file an annual report for its DARR by June 1 each year, beginning in 2017 for calendar year 2016 expenditures, detailing the deferred expenses, baseline performance levels for each safety initiative, safety performance improvements compared to the baselines, results of ongoing and future investigations, any mid-term adjustments, and efforts towards identifying efficiencies and implementing cost-savings measures. The Commission further required VEDO's annual report to include an audit report prepared by VEDO's external auditor summarizing its findings with respect to the accuracy of VEDO's accounting for DARR-related expenditures.

- 3. The Commission also established that, with the filing of the annual report, Staff should conduct an annual review of reported program expenditures and file a Staff Report no later than 90 days subsequent to the annual report. Once the Staff Report is filed, VEDO is granted 30 days to accept Staff's recommendations or to object thereto.
  - 4. In support of this annual report, VEDO includes the following appendices:
    - Attachment A Audit Report prepared by VEDO's independent auditor, Deloitte & Touche, LLP
    - **Attachment B** DARR Summary of Deferred Expenses and Programmatic Review for the six initiatives supported by the DARR
- 5. The programmatic review contains various metrics, statistics, and other measures to assist in gauging and improving the effectiveness of these programs. (*See* Application ¶ 8 (Oct. 9, 2015).) In accordance with the stipulation and application, these measures are subject to change based on further internal review and discussions with Staff. As the Company gains additional experience implementing and analyzing the programs, including newly available data, it may be determined that new or refined metrics provide better measures of program effectiveness.
- 6. VEDO notes that Deloitte's Audit Report, included as Attachment A, found no issues. In accordance with Staff's August 30, 2017 recommendation, VEDO has worked with Deloitte to ensure the report contains detail substantially similar to the report produced by Columbia Gas of Ohio, Inc. VEDO would note that given some differences between its program and Columbia's, the reports are not identical. VEDO believes that Staff's recommendation has been satisfied, but VEDO is willing to work with Staff to ensure all appropriate information is reasonably presented.
  - 7. In accordance with Staff's other recommendation provided on August 30, 2017,

VEDO is also providing a breakdown of DARR Program expenses both monthly and per year in future annual reports.

WHEREFORE, VEDO respectfully submits this annual report for Commission Staff's review, and requests a recommendation that all 2017 DARR-related expenses be deferred.

Dated: June 1, 2018 Respectfully submitted,

/s/ Andrew J. Campbell

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(All counsel willing to accept service by email.)

ATTORNEYS FOR VECTREN ENERGY DELIVERY OF OHIO, INC.

## **CERTIFICATE OF SERVICE**

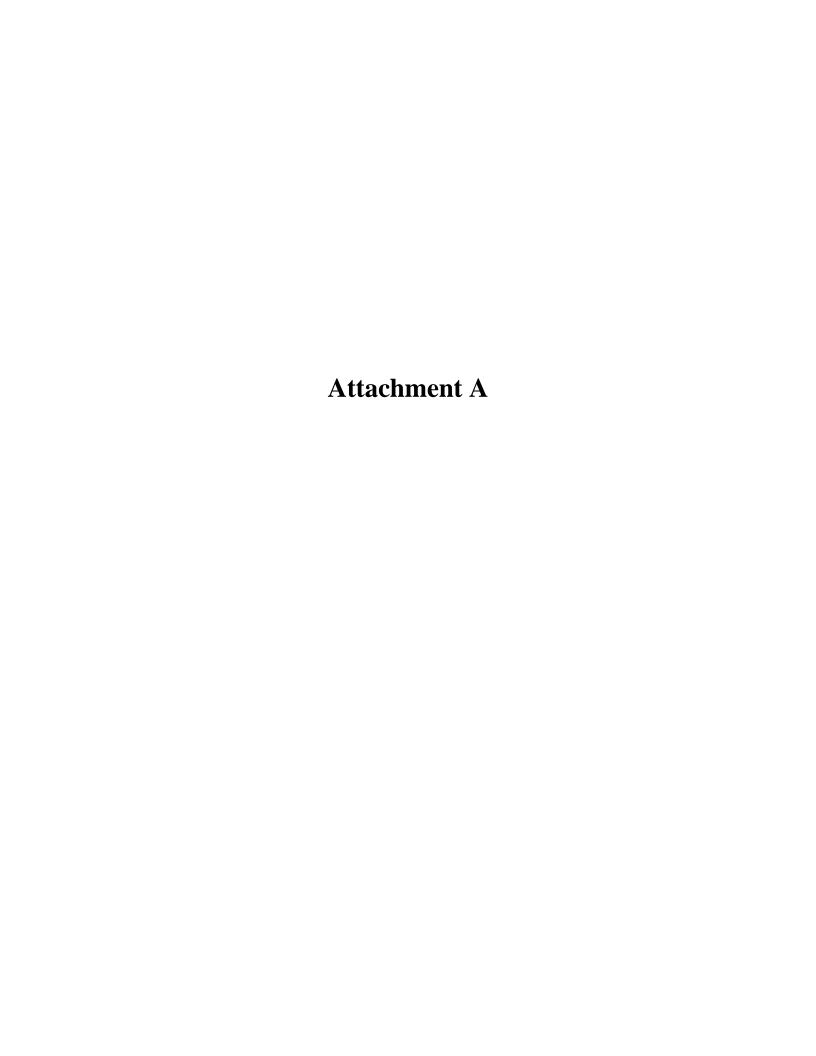
I hereby certify that a copy of this Annual Report was served by electronic mail this 1st

day of June 2018 to the following:

Thomas Lindgren
Office of the Ohio Attorney General
Public Utilities Section
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/s/ Andrew J. Campbell

One of the Attorneys for Vectren Energy Delivery of Ohio, Inc.





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# INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

To the Board of Directors of Vectren Energy Delivery of Ohio:

We have performed the procedures enumerated below, which were agreed to by Vectren Energy Delivery of Ohio (the "Company") and provided to the Public Utilities Commission of Ohio (the "PUCO")(collectively, the "specified parties"), solely to assist the specified parties in the evaluation of the accuracy of the Company's accounting for cost deferrals associated with the Distribution Accelerated Risk Reduction ("DARR") Program for the period January 1, 2017 through December 31, 2017 (the "specified period"), in conjunction with the PUCO Entry regarding Case No. 15-1741-GA-AAM. Management is responsible for the accuracy of the Company's accounting for cost deferrals associated with the DARR Program. The sufficiency of these procedures is solely the responsibility of the specified parties. Consequently, we make no representation regarding the sufficiency of the procedures enumerated below either for the purpose for which this report has been requested or for any other purpose.

The procedures that we performed and our findings are as follows:

### **DARR Program**

- 1. We obtained from Company management a schedule of the detail of DARR program cost deferrals for the period from January 1, 2017 to December 31, 2017 and agreed the sum of the cost deferrals to the annual report filed with the Public Utilities Commission of Ohio (PUCO) related to Case No. 15-1741-GA-AAM (the "Filing"). We did not identify a difference. We also performed the following procedures:
  - a. Agreed the sum of cost deferrals included in the schedule obtained in Step 1 above to the "2017 activity" column in a reconciliation of the balance in account 1908937 at December 31, 2017 provided by management, as reflected in the Company's general ledger.
  - b. Randomly selected 4 months included in the schedule obtained in Step 1 above. For each month selected, we randomly selected 12 individual cost deferrals from the schedule, for a total of 48 selections. We allocated the selections across the Company's six sub-programs within the DARR Program and agreed, reconciled, or recalculated each cost deferral selection to or based on the supporting documentation provided by management (e.g., invoices or payroll records).

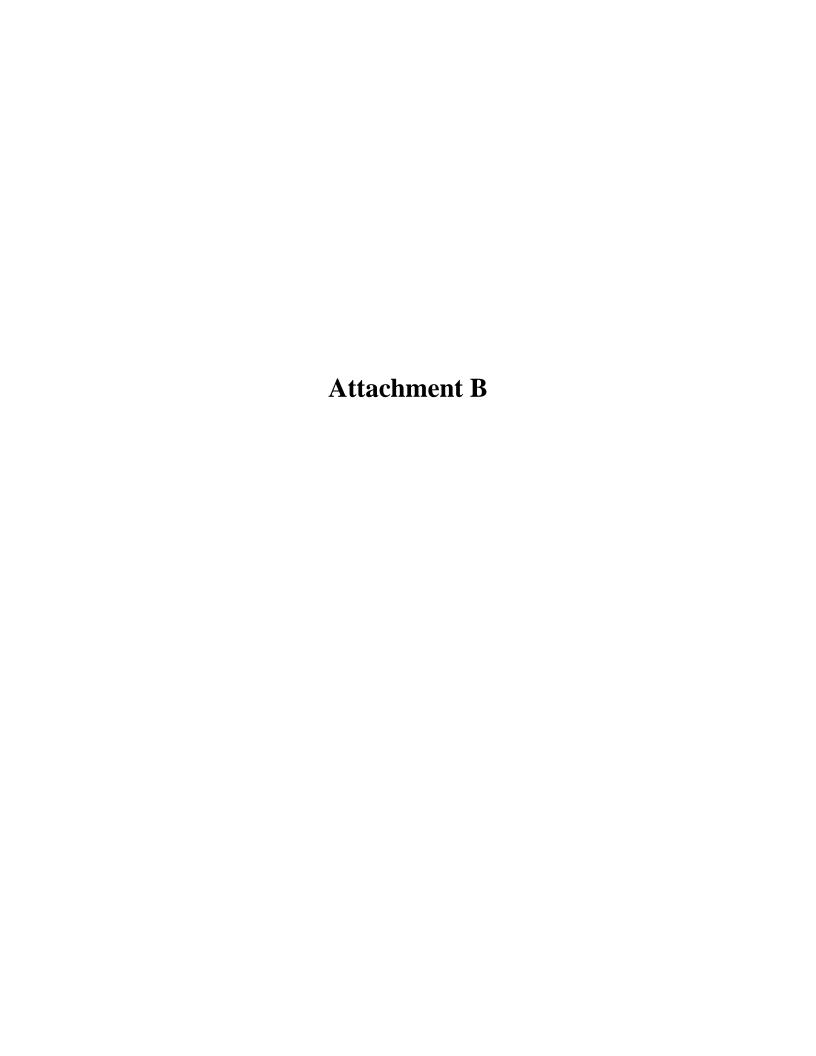
- c. For each individual cost deferral amount selected in Step 1.b. above, we performed the following procedures:
  - i. We selected 14 labor charges and recalculated the amount using total hours charged by the employee to a time card multiplied by the employee labor rate. We agreed the total hours and the labor rate for each selection to a screenshot from Workforce and the Company's payroll records. We identified seven selections with a difference of less than \$1 due to rounding.
  - ii. We selected 13 vendor charges and agreed the selection to a vendor invoice and identified no differences.
  - iii. We selected 20 vendor charges for which the amount selected represented the allocation of a charge to VEDO. We agreed the selected charge (i.e., the amount allocated to VEDO) to the Company's supporting calculation. We then agreed the total charge (i.e., the pre-allocated amount) to the Company's supporting calculation and to a vendor invoice and identified no differences.
  - iv. We selected 1 employee expense charge and agreed the total cost to a US Bank Screenshot for the employee purchasing card charges and identified no difference.
- d. We obtained from management an analysis comparing the amount of cost deferrals included in the Filing related to the Leak Management Program and the baseline of \$1,918,234 established in the application for PUCO Case No. 15-1741-GA-AAM. Management's analysis indicated Leak Management Program costs exceeded the baseline by \$2,132,866. We recalculated the amount by which the Leak Management Program costs exceeded the baseline. We did not identify a difference in our recalculation.

This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination, the objective of which would be the expression of an opinion or conclusion, respectively, on the Company's compliance with the DARR Program in accordance with the PUCO letter regarding Case No. 15-1741-GA-AAM. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be, and should not be, used by anyone other than the specified parties.

June 1, 2018

Deloitte & Touche LLP







# Distribution Accelerated Risk Reduction Program Management

Distribution Accelerated Risk Reduction 3-Year Plan Update

Program Element	2016 - Actuals	2017 – Plan	2017 - Actuals	2018 – Plan
Expanded Leak Management Program	\$1,399,326	\$1,500,000	\$2,132,866	\$2,000,000
Enhanced Damage Prevention Program	\$274,412	\$770,000	\$468,670	\$625,000
Public Awareness	\$183,324	\$200,000	\$280,285	\$230,000
Workforce Training and Qualification for New Requirements	\$197,774	\$255,840	\$208,886	\$295,000
Pipeline Safety Management System Implementation	\$61,119	\$110,441	\$230,347	\$112,000
Enhanced Risk Modeling and Threat Analysis	\$133,228	\$250,000	\$633,110	\$665,000
Grand Total	\$2,249,183	\$3,086,281	\$3,954,164	\$3,927,000

## Plan Variance Commentary

- Vectren reduced the number of leaks left open in the system from 2016 and completed approximately 1,000 more in 2017.
   Resource availability and favorable weather allowed leak mitigation efforts to continue through fall and winter months, accounting for the variance of approximately \$630,000.
- Enhanced damage prevention efforts focused on mapping accuracy improvements, records availability, and data
  enhancements in systems used to support locating. Since this information is used for the asset-based risk modeling, these
  projects were executed by distribution integrity management data resources, and the actual spend is reflected in the Enhanced
  Risk Modeling and Threat Analysis program.
- Vectren conducted an increased number of partnered root-cause analysis exercises based on the threats identified by the risk register and current events throughout 2017 to determine root-cause and developed and implemented mitigation plans including process enhancements, additional training and qualifications, and data and system enhancements.
- Vectren adjusted the 2018 planned spend for the Expanded Leak Management to \$2.0M to continue to leverage the existing
  level of resources dedicated to eliminate the grade 3 leak backlog and the additional grade 3 leaks that have been discovered
  since January 2016 and ensure a backlog of leaks is not created.
- The average annual spend program-to-date is \$3.1M and is projected to increase to \$3.4M at the end of 2018.



# Distribution Accelerated Risk Reduction 2017 Monthly Actual Spend

Program Element	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2017
Expanded Leak Management Program	-	-	-	-		-	\$120,467	\$394,473	\$318,299	\$368,002	\$366,668	\$564,956	\$2,132,866
Enhanced Damage Prevention Program	\$20,573	\$46,406	\$34,386	\$41,450	\$38,963	\$50,515	\$37,454	\$42,877	\$8,199	\$60,953	\$40,918	\$45,975	\$468,670
Public Awareness	-	-	\$10,150	\$58,650	\$49,657	\$(2,028)	-	-	\$64,008	\$30,012	\$77,504	\$(7,668)	\$280,285
Workforce Training and Qualification for New Requirements	\$14,017	\$16,412	\$16,987	\$12,814	\$16,773	\$16,908	\$14,953	\$13,144	\$18,562	\$18,556	\$13,549	\$36,210	\$208,886
Pipeline Safety Management System Implementation	\$8,777	\$9,410	\$17,905	\$12,125	\$11,095	\$20,099	\$37,075	\$52,021	\$26,865	\$11,024	\$10,001	\$13,949	\$230,347
Enhanced Risk Modeling and Threat Analysis	\$4,473	\$3,233	\$941	\$450	\$8,392	\$9,647	\$8,867	\$30,016	\$133,745	\$176,885	\$187,530	\$68,929	\$633,110
Grand Total	\$47,841	\$75,462	\$80,369	\$125,490	\$124,880	\$95,142	\$218,817	\$532,532	\$569,678	\$665,432	\$696,171	\$722,351	\$3,954,164

The Expanded Leak Management Program costs met the baseline of \$1,918,234 in July 2017. Costs incurred for leak repairs
above the baseline from July through December are reflected in the actual costs of the Expanded Leak Management Program
for grade 3 leak remediation.

Vectren Energy Delivery of Ohio | 2017 DARR Report





# Expanded Leak Management Program

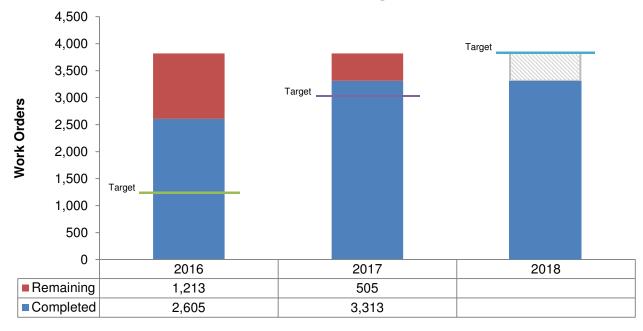
This section focuses on the performance of the grade 3 leak reduction program and demonstrates progress toward eliminating the grade 3 leak backlog and repairing grade 3 leaks as they occur in the system. The grade 3 leak backlog was assessed as of January 3, 2016, and identified 3,818 grade 3 leaks to be evaluated and resolved. The leaks were prioritized for evaluation using a base set of criteria including above ground or below ground, asset type, vintage, and historical remediation information.

Expanded Leak Management Program Measure	Data
Number of Grade 3 Backlog Leaks Resolved (12/31/2017)	3,313
Percent of Backlog Leaks Completed	87%

#### 2017 Status

- In 2017, Vectren focused on remediating grade 3 leaks from the backlog as well as remediating newly discovered leaks to reduce the total amount of open leaks in the system.
- Additionally, 1,331 grade 1 and 1,216 grade 2 leaks have been remediated.
- Vectren completed approximately 1,000 more leaks in 2017 than in 2016 and almost doubled the number of above ground leaks completed.
- Vectren reduced the number of leaks left open in the system by almost 1,000 from 2016 to 2017.

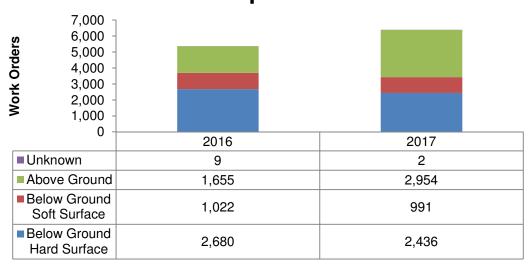
# **Ohio Leak Backlog Status**



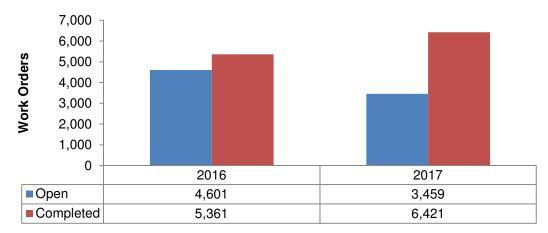


# Expanded Leak Management Program

# **Total Completed Leaks**



# Leak Status at Year-end



## **2018 Focus**

- In 2018, the focus of grade 3 leak repair will be to continue to remediate grade 3 leaks as they are discovered as well as work on the backlog, resulting in a lower percentage of the backlog being mitigated as compared to 2017, but still remaining on target to eliminate the original backlog (from January 1, 2016) by the end of 2018.
- In 2017, an additional 2,890 grade 3 leaks were discovered that are being addressed.
- Any new grade 3 leaks discovered during 2018 leak surveys will be remediated to avoid rebuilding a backlog of leaks for repair.
- Vectren has discovered that some leak reports are duplicates, as the leaks had been reported from a previous survey. We are working towards process enhancements to resolve duplicate reporting, which will remediate a number of grade 3 backlog leaks.





## **Enhanced Damage Prevention Program**

This section focuses on the reduction of damages to distribution assets. The initiative includes:

- projects to improve the data and information used to locate distribution facilities;
- the addition of a damage prevention specialist to assist in targeted contractor relations and additional presence at projects with a higher potential to damage facilities;
- conduct quality audits and training with our contract locators; and
- the development and implementation of a ticket risk assessment model to predict one-call tickets with a high potential for damage to occur and assign mitigative actions to reduce the likelihood of a damage.

Measures	2016 Data	2017 Data
Number of Locate Tickets	89,303	84,540
Damage Rate (2017 Target 2.10)	2.27	1.85

#### 2017 Status

- The Ohio damage prevention specialist (DPS) engages with excavators both on job sites and in structured educational meetings held throughout the year. The DPS evaluates excavator damage history to work with both their field crews and leadership to create safe excavation practices around pipeline assets.
- Excavators were at-fault for 51% of all 2017 excavation damages. In 2017, there were 29 excavation damages due to the person excavating not using the 811 system and 37 excavations related to the failure to hand dig in the tolerance zone. We have enhanced our 811 awareness messaging to target specific industry groups. We have also increased education around hand tools usage.

Enhanced Damage Prevention Program Measures	2015	2016	2017
Damage Rate	2.53	2.27	1.85
Target	N/A	2.25	2.10

## Ticket Risk Assessment

Measure	2016 Data	2017 Data
Number of Ticket Risk Assessment (TRA) Tickets Worked	5,350	7,716

#### 2017 Status

- The TRA team consists of 4 highly trained and experienced contract locator technicians. This program was a key factor in exceeding the 2017 targets and getting Ohio below 2.0 damage rate for the first time.
- 2017 Percent of Total Damages due to Incorrect/Unavailable Records includes Stubs which are 80% of the total.

## Damage Reduction Data Improvements

Measure	2016 Data	2017 Data
Percent of Total Damages due to Incorrect/Unavailable Records	7%	16%

### **2018 Focus**

- In 2018, Vectren will continue to educate excavators on safe digging practices and using ticket risk assessment to provide more attention to locate tickets with a higher likelihood of damage.
- Vectren will conduct a pilot main cameraing program to locate and map stubbed off mains/services.
- An additional focus for 2018 is enhancing our public awareness messaging to target stakeholders that are less aware of the state laws and best practices around safe digging.
- The metrics will continue to be evaluated annually to determine program performance and identify enhancements.



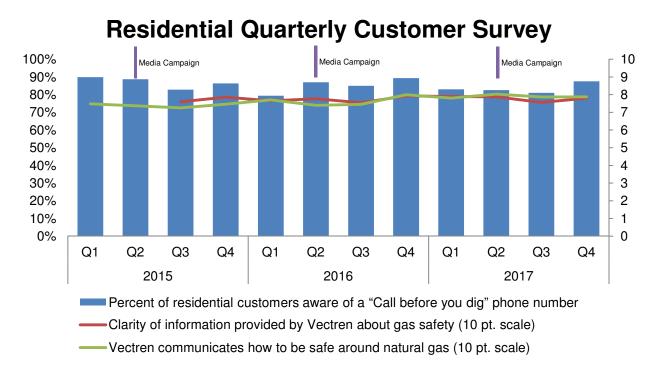


# **Public Awareness**

The focus of this section is to describe the increased communications to support pipeline safety in regard to our increased work within pipeline right-of-way in communities. These communications efforts are directly connected to our pipeline modernization programs and also continue to sustain public awareness of the importance in calling 811 before digging to locate facilities and decrease the chance of a facility damage.

Media	Total Impressions	Click-Throughs	# of Spots
Digital (YouTube, Facebook, Twitter, Pandora, Weather.com, Hulu, Display Ads)	1,957,663	3,629	N/A
Network & Cable TV	2,720,009	N/A	569
Radio	957,000	N/A	186

Data included above is from April-June 2017.



Source: Quarterly Online Customer Satisfaction Survey and Quarterly Online Customer Satisfaction Survey

#### 2017 Status

Awareness campaigns have successfully maintained gas safety and "Call before you dig" phone number awareness within our gas service and pipeline safety working areas.

Awareness communications focused on public notification of pipeline modernization project work in their areas. Messaging was designed to alert customers of the increase in work crews in order to safely navigate around the work zones. Messaging also reiterated that the pipeline replacement program is to maintain a reliable, safe gas delivery system. Continued messaging was used to communicate recognizing a gas leak and calling 811 before digging. Messaging media included network and cable television, radio, digital, social media, newspaper, and bill inserts/messaging.





## Workforce Training & Qualifications Performance

This section focuses on the increased activities in workforce training and qualifications required by new and increasingly stringent regulations. Vectren evaluated the current operator qualification program, identified activities critical to maintaining and operating the pipeline system, and is increasing hands-on performance evaluation forms (PEFs) to ensure personnel have appropriate training and skills to perform those tasks to ensure pipeline safety, reduce risk, and meet increased regulatory requirements for operator qualification.

Vectren added internal resources dedicated to support the increased training and performance evaluations as well as tracking, reporting, and maintenance of the workforce training and qualification information systems. Vectren utilizes contract and internal resources to develop the content for the training materials, performance evaluations, and simulations.

Covered tasks increased from 48 to 153. Vectren continues to identify additional necessary covered tasks as a result of developing policies and procedures required by new pipeline safety regulations.

Measure	2016 Data	2017 Data
Number of Evaluations Completed and Processed	2,498	1,838
Number of Employees Evaluated	103	132

#### 2017 Status

- Assigned and/or completed 923 new evaluations and other reoccurring tasks from first and second phase PEF deployments, continuing through 2018.
- Continued to review and complete evaluations from the 32 remaining covered tasks identified in the PEF project's third phase (target date of completion of third phase items is June 30, 2018).
- Maintained current qualifications by requalifying employees on items coming due through the end of 2017. In 2016, 97 employees had completed the new training standard and PEFs and in 2017, the number of personnel fully completing the additional PEFs rose to 121.
- Continued to monitor PEF completion rates and audit to ensure any deviation from evaluation protocols is investigated.
- Reviewed covered task list for additional evaluations that may need to be developed, consolidated, or removed based on Vectren's evolving operational requirements/procedures.

#### **2018 Focus**

Vectren will continue to develop content for additional tasks for our training programs and conduct performance evaluations to enhance the qualifications of staff for activities impacting gas assets with a target to train all staff performing the additional covered tasks. Vectren expects the number of required covered tasks to fluctuate as it implements new plans, policies, and procedures to comply with new pipeline safety regulations and as updates to Vectren's infrastructure continues.





# Pipeline Safety Management System Implementation

This section focuses on the development and implementation of a pipeline safety management system (PSMS) supported by Pipeline Hazardous Materials and Safety Administration's (PHMSA's) "Guidance for Strengthening Pipeline Safety through Rigorous Program Evaluation and Meaningful Metrics" and the American Petroleum Institute (API) issued recommended practice 1173 "Pipeline Safety Management System Requirements." A PSMS is a comprehensive change management lifecycle framework, which drives a safety culture including pipeline safety, employee safety, and public safety.

The PSMS implementation plan includes:

- Organizational restructuring focused on safety
- Implementing a safety control framework
- Increased staff dedicated to managing, planning, developing, and implementing the safety management system including:
  - Documenting processes and developing control points
  - Enhancing the operator qualification plan, the compliance plan, change management process, and the integrity management risk models
  - Performing quality assurance of pipeline safety processes

Measure	2016	2017	2018 (Targets)
Percent Complete of Implementation Plan Milestones	55%	80%	N/A*
Percent Complete of Planned Mitigation Activities	15%	70%	75%
Percent Complete of 2 Year Project Plan Milestones*	N/A	N/A	50%

### 2017 Status

- 80% of the milestones to develop and implement the foundational elements of the PSMS have been completed.
- Milestone achievements include the development and population of a risk register, evaluation and prioritization of register items to address, and the identification and assignment of mitigating actions.
- 45 risk register items were identified exceeding the initial threshold for evaluation. 70% of the mitigative actions developed to address those items are complete.
- 45 of the 45 risk register items above the threshold for evaluation have been addressed.
- Completed 87 PSMS risk mitigation activities aimed to reduce risk or strengthen controls to determine root cause, establish mitigation plans and process enhancements, and communicate lessons learned.
- Initiated 8 testing plans.
- Conducted a mock drill to test emergency response to a pipeline event detected through Gas Control.
- Vectren volunteered to complete PHMSA's inaugural review of PSMS.
- \*Completed PricewaterhouseCoopers (PwC) reassessment and established new 2 year project plan.

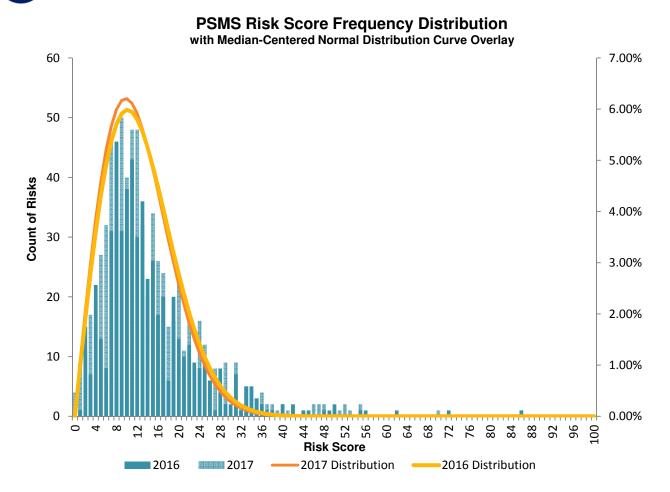
## 2018 Focus

- Vectren will continue to:
  - execute improvement opportunities for implementation of the PSMS;
  - implement operational control testing processes;
  - conduct activities to maintain the risk register, develop mitigating actions to reduce risk of the reported items, and measure the effectiveness of those activities; and
  - hold communication meetings to report progress on implementation of the PSMS and associated activities to reduce pipeline risk.





# Pipeline Safety Management System Implementation



## 2017 Status

- The PSMS risk register profile shows that the items reported range in risk score from 0 to 87 with the majority falling within the 7–15 range. This initial population provided the baseline, established in 2016, of the PSMS risk register items to compare year-over-year.
- The risk score takes into account the likelihood of the event occurring and the consequence of the event.
- Register items may be added at any time. The entire register listing will be reviewed annually, and risk may be adjusted considering status of mitigative actions, industry events, operational activities, etc.
- Mitigative actions are focused around higher risk register items first.

### **2018 Focus**

 The 2018 focus includes executing the mitigation plans and measuring their impact to the PSMS risk score. The target is an additional 3% reduction.





## Enhanced Risk Modeling And Threat Analysis

This section focuses on the progress of developing asset-based risk models, improving the quality and completeness of data on distribution assets, and enhancements to the threat identification and analysis processes by developing additional or more robust reporting, data integration, data mapping, and data viewing tools. This initiative contains many specific projects to enhance the risk modeling and threat analysis processes.

Measure	Year	Status
Develop 2016 Targeted Distribution Risk Models	2016	100%
Implement 2017 Targeted Distribution Risk Models	2017	100%

#### 2017 Status

• In 2017, Vectren has focused on the development of three specific asset-based risk models for distribution assets. Asset types were evaluated and prioritized for 2017 model building for completion of models covering the asset categories below:

- Pipeline
- Valves
- Regulator
- Accomplishments include:
  - Enhanced data extract, transfer, and load process
  - Validated Pipeline model with subject-matter experts (SMEs)
  - Tested outputs for all three models
  - Created maps for easy review for all models
  - Created procedure for running/update models
  - Identified and prioritized data quality enhancements related to risk
  - Dashboard developed for Pipeline
  - Completed Indirect Survey on high pressure distribution (HPD) line
- PSMS Risk Register
  - We have completed a total of 11 bowties in 2017.
  - There is a total of 15 bowties with completed mitigation plans.
  - There is a total of 138 action items assigned. 20 were assigned in 2017.
  - 80% of 2017 assigned action items are complete.





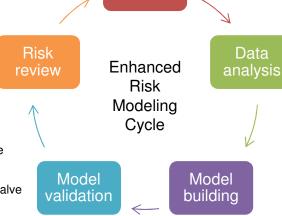


# **Enhanced Risk Modeling And Threat Analysis**

#### **2018 Focus**

 In 2018, Vectren will focus on the development of three specific asset-based risk models for distribution assets.
 Asset types were evaluated and prioritized for 2018 model building for completion of models covering the asset categories below:

- Service Line
- Meter Setting
- Fitting
- Other risk model initiatives will include:
  - Interface to the modernization project database
  - Cycle of check and adjust on the previously developed models—Pipeline, Regulator, and Valve



Data

collection

- In 2018, there will be a high focus on data to support risk modeling and identify threats. Initiatives include:
  - Develop a data health report for data being used in the distribution risk models
  - Create data governance to direct and approve data projects
  - Complete Indirect Survey for HPD lines
- PSMS Risk Register
  - Continue analyzing asset related risks and threats to develop bowtie analysis and mitigation plans for high risk items.

This foregoing document was electronically filed with the Public Utilities

**Commission of Ohio Docketing Information System on** 

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Case No(s). 15-1741-GA-AAM

Summary: Text 2018 DARR Annual Report electronically filed by Ms. Rebekah J. Glover on behalf of Vectren Energy Delivery of Ohio, Inc.