BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc., for Approval of an Alternative Rate Plan)))	18-0049-GA-ALT
In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval of an Increase in Gas Rates)))	18-0298-GA-AIR
In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc., for Approval of an Alternative Rate Plan)	18-0299-GA-ALT

MOTION FOR CONTINUANCE OF HEARING AND REQUEST FOR EXPEDITED RULING OF VECTREN ENERGY DELIVERY OF OHIO, INC.

In accordance with Ohio Adm. Code 4901-1-13, Vectren Energy Delivery of Ohio, Inc. (VEDO) files this Motion for Continuance of the Hearing currently scheduled in this case for December 4, 2018. Good cause exists to grant this Motion and to grant an expedited ruling for the reasons that follow.

A. Request for Continuance of Hearing.

On October 3, 2018, the Attorney Examiner issued an Entry setting December 4, 2018, as the hearing date in this case. The parties have been engaged in confidential settlement discussions, and additional time is needed to allow those discussions to continue. Accordingly, VEDO requests that the Commission reschedule the hearing to begin January 7, 2019. No party objects to the requested continuance.

B. Impact on Distribution Replacement Rider and May 1, 2019 Cost Recovery Filing.

In requesting this extension, VEDO would clarify its intentions regarding its Bare

Steel/Cast Iron Pipeline Replacement Program (Replacement Program) and the associated

Distribution Replacement Rider (DRR). One element of VEDO's pending application pertains to

the extension of the DRR to recover Replacement Program costs incurred during calendar years 2018 through 2023. Under VEDO's existing authorization, *see* Case No. 13-1571-GA-ALT, the 2017 investment year was the final year for which VEDO was authorized to request cost recovery, and it filed for such recovery on May 1, 2018. *See* Case No. 18-762-GA-RDR.

Throughout 2018, VEDO has continued to make investments in furtherance of the Replacement Program, and expects to make its next annual cost recovery filing (to include 2018 investments) on May 1, 2019. No party has objected in this case to the continuation of the Replacement Program, the continuation of the DRR, or the DRR rate cap that would be associated with the May 1, 2019 filing. In the event the present case does not settle, however, it is possible that VEDO will not have an order in this proceeding authorizing a DRR cost recovery filing by May 1.

In conjunction with requesting a continuance in this case, VEDO has discussed with Staff and the parties its intention to take the following steps if it appears that VEDO will not have an order authorizing continuation of the DRR by May 1, 2018:

- VEDO will apply for cost recovery on May 1, 2019, for the 2018 investment year.
- Before making such filing, VEDO will confer with Staff to determine the proper presentation, inputs, and other details of the filing.
- If any terms or conditions of the final order in this case differ from any terms or conditions reflected in, or approved as part of, the May 1, 2019 DRR cost recovery filing, the final order in this case shall control.
- VEDO will include an appropriate reconciliation or adjustment in its May 1, 2020 DRR cost recovery filing to reverse any such differences from the final order in this case.

Given the general lack of objection to the continuation of the DRR, and given VEDO's willingness to reconcile to the terms and conditions of the final order, the Company believes that

this approach would be just and reasonable, while eliminating a significant disincentive to continuing the hearing date for the Company.

VEDO has presented this proposal to the parties, and all parties and Staff responded.

With the exception of the Ohio Consumers' Counsel (OCC), the parties and Staff indicated that

they did not have an objection to VEDO's proposal to permit an "interim" filing, if necessary

and subject to reconciliation. In discussions with counsel, OCC indicated that it reserves the right

to take any position regarding an "interim" filing, but does not object to an expedited ruling on

this Motion. VEDO acknowledges that the parties and Staff are not waiving the right to take

positions regarding the details of the 2019 DRR cost recovery filing, VEDO's 2018 investments,

or the details of any reconciliation adjustment.

C. Request for an Expedited Ruling.

Given that the hearing date is scheduled to begin in less than a week, VEDO requests an

expedited ruling on this Motion. VEDO has contacted all parties, and VEDO's undersigned

counsel certifies that no party objects to the issuance of a ruling on this Motion without the filing

of memoranda.

For the foregoing reasons, and subject to the understanding set forth in Section B. of this

Motion, VEDO requests that the Commission grant this Motion, its request for an expedited

ruling, and any other necessary and appropriate relief.

Dated: November 28, 2018

Respectfully submitted,

/s/ Andrew J. Campbell

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(pro hac vice pending)

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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 28th day of November, 2018:

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

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Case No(s). 18-0049-GA-ALT, 18-0298-GA-AIR, 18-0299-GA-ALT

Summary: Motion for Continuance of Hearing and Request for Expedited Ruling electronically filed by Mr. Andrew J Campbell on behalf of Vectren Energy Delivery of Ohio