

**talexander@calfee.com**  
**614.621.7774 Direct**

January 25, 2019

Ms. Sarah Parrot, Esq.  
Attorney Examiner  
Public Utilities Commission of Ohio  
180 East Broad Street, 11<sup>th</sup> Floor  
Columbus, Ohio 43215-3793

Re: *In the Matter of Vectren Energy Delivery of Ohio, Inc.*; Case No. 18-1027-GA-UNC

Dear Attorney Examiner Parrot:

On June 28, 2018, the City of Dayton (“City”) filed a motion to intervene (“Motion”) in the above-captioned case. As a large customer and the largest municipality in the service territory of Vectren Energy Delivery of Ohio, Inc. (“VEDO”), the City has a real and substantial interest in the outcome of this proceeding since VEDO’s merger application could have significantly impacted rates and service.<sup>1</sup> To ensure that the City’s interest is adequately articulated for the Commission’s consideration of its pending Motion, this letter serves to clarify the City’s intent in intervening in this proceeding and intentions for the remainder of this case.

On June 15, 2018, VEDO filed a Notice of Parent Company Merger regarding the execution of a merger agreement between Vectren Corporation and CenterPoint Energy, Inc. According to VEDO, upon closing of this merger, Vectren Corporation will become a wholly owned subsidiary of CenterPoint Energy and will continue to exist. This will impact VEDO’s provision of service in Dayton.

The City sought to intervene in this proceeding for several reasons. Most notably, the City sought intervention to ensure that any proposed merger does not impair or otherwise adversely impact the rates and charges paid by the City and its residents, particularly its low-income and elderly residents. Additionally, the City sought intervention to ensure that VEDO’s merger related costs were not imposed on customers. Further, the City sought intervention to ensure that

---

<sup>1</sup> The City’s Motion to Intervene mistakenly defined the word “Application” to relate to VEDO’s pending rate proceeding, Case 18-298-GA-AIR et al. The City intended to refer to the Application filed in this proceeding, but as a result of the definitional error did not. Counsel for the City regrets the error, and asks that this letter and the corrected definition of Application to refer to this proceeding be used in interpreting the Motion.

the merger will, in fact, promote public convenience and result in the provision of adequate natural gas service to the City and its residents.

In light of Staff's comments in this proceeding, as well as VEDO's helpful response accepting most of Staff's comments, the City's position has been adequately addressed. The City will accordingly not be making any substantive response to either Staff or VEDO.

Very truly yours,

A handwritten signature in blue ink, reading "N. Trevor Alexander /ck". The signature is fluid and cursive, with a large initial "N" and a stylized "A".

N. Trevor Alexander

**CERTIFICATE OF SERVICE**

I certify that the foregoing was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 25<sup>th</sup> day of January, 2019. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ N. Trevor Alexander

Attorney for the City of Dayton

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**1/25/2019 9:57:16 AM**

**in**

**Case No(s). 18-1027-GA-UNC**

Summary: Letter of Notification Letter Clarifying Dayton Intent electronically filed by Mr. Trevor Alexander on behalf of City of Dayton