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September 3, 2019

Ms. Barcy F. McNeal
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

Re: *In re Vectren Energy Delivery of Ohio, Inc.*, Curtailment Plan, Case No. 89-8005-GA-TRF

Dear Ms. McNeal:

In accordance with Ohio Administrative Code 4901:5-25-02(D), Vectren Energy Delivery of Ohio, Inc. (VEDO) hereby submits proposed revisions, in final form and in redline, to its curtailment plan in the above-captioned case. Please note that in accordance with the Commission's Opinion and Order, issued on August 28, 2019, in Case Nos. 18-0049-GA-ALT, 18-0298-GA-AIR, and 18-0299-GA-ALT, approving the Stipulation and Recommendation, filed on January 4, 2019, VEDO's "Curtailment Procedures" were removed from the final tariff sheets for P.U.C.O. No. 4, effective September 1, 2019. VEDO's curtailment plan will remain on file with the Commission and any future proposed revisions in subsequent years will be filed in the above-captioned case.

Please note that this correspondence is being electronically filed in the above-captioned case through the Commission's Docketing Information System (DIS).

Respectfully submitted,

/s/ Christopher T. Kennedy
Counsel for Vectren Energy Delivery of Ohio, Inc.

CLEAN CURTAILMENT PLAN

**Vectren Energy Delivery of Ohio, Inc.
Gas Curtailment Plan**

CURTAILMENT PROCEDURES

When sufficient capacity or quantities of gas are not available to Company to meet existing and reasonably anticipated demands for Gas Service or to protect and replenish gas storage reserves, which determinations shall be within Company's reasonable discretion, Company shall have the right to curtail Gas Service within any of its Operational Systems so affected in accordance with the provisions of the Curtailment Procedures.

A. Definitions. For the purpose of this Procedure, the following terms shall have the meanings defined below:

- (1) **Average Daily Throughput.** The Average Daily Throughput for any Base Period billing month shall be the Firm Curtailment Customer's metered Throughput during such month divided by the number of days in the month.
- (2) **Base Period.** The Base Period is any twelve consecutive billing months as established by Company.
- (3) **Firm Curtailment Customer.** A Firm Curtailment Customer shall mean any Customer being served under Rate 345 or 360 whose Average Daily Throughput in any billing month during or subsequent to the Base Period exceeds 1,000 Ccf.
- (4) **Plant Protection Level** - The minimum quantity of Gas Service for Firm Curtailment Customers required by Customer to prevent endangering the health or safety of personnel, or to prevent extensive damage to Customer's facilities, equipment, or other property. This includes the protection of such material currently in process at the time a Curtailment is called which would otherwise be destroyed, but shall not include Gas Service required to maintain plant production.
- (5) **Priority Use** - As defined in Ohio Administrative Code 4901:5-25-01

B. Pre-Curtailment and Curtailment Activities.

Company's obligation to preserve system reliability shall include the right to curtail Gas Service to its Customers according to the following sequence of activities.

When necessary in the sole opinion of Company, Gas Service shall be maintained to Priority Use Customers or other Customers who would otherwise be curtailed, to the extent necessary and practicable under the circumstances. Company shall resort to the next step in the sequence if the previous step does not restore operating pressures to acceptable levels in the affected areas.

The following sequence shall be implemented in the same manner regardless as to whether the risk to system reliability is due to supply or capacity constraints given both have similar impact with regard to system interruption. Company reserves the right to deviate from these sequences at its sole discretion, and at any time, to mitigate compromising system integrity.

**Vectren Energy Delivery of Ohio, Inc.
Gas Curtailment Plan**

Pre-Curtailment Sequence

1. Pool Operators, Choice Suppliers, and SCO Suppliers shall be subject to an OFO and may be subject to specific delivery requirements and or restrictions specified by Company.
 - a. If a Pool Operator has nominated insufficient volumes relative to its Pool's usage, Pool Operator will be subject to the applicable Non-Compliance Charges. Company will also request that Pool Operator increase their nominated volume to the appropriate level; if Pool Operator does not comply with that request, Company will require usage reduction by the Pool's Transportation Customers to their respective Plant Protection Level.
 - b. If a Choice Supplier or SCO Supplier nominates insufficient volumes relative to its Customers' usage, Company will require that supplier increase its nominated volume to the appropriate level; otherwise the Choice or SCO Supplier will be subject to the applicable non-compliance charges.
2. Next, Company may contact Pool Operators, Choice Suppliers, and/or SCO Suppliers to request additional deliveries, on a voluntary basis, to appropriate city gates to support operating pressures in the affected areas.
3. Next, Company shall request Firm Curtailment Customers to voluntarily reduce usage to their respective Plant Protection Level. In such circumstances, Pool Operator shall not reduce its deliveries to reflect such voluntary Customer usage reductions, unless instructed otherwise by Company.
4. Next, Company shall request all Rate 345 and Rate 360 Customers to voluntarily reduce usage to their respective Plant Protection levels. In such circumstances, Pool Operator shall not reduce its deliveries to reflect such voluntary Customer usage reductions, unless instructed otherwise by Company.

Declaration of Curtailment and Curtailment Sequence

5. If Steps 1 through 4 do not restore operating pressures to acceptable levels in the affected area(s), Company shall at its sole discretion declare a formal Curtailment. **When communicating the following Curtailment events to Customers and Pool Operators, Company shall communicate that a Curtailment is in effect.** Such Curtailment shall be effective as of the date and time specified in the notice to Customers and Pool Operators.
6. First, Rate 345 and Rate 360 Customers' transportation gas quantities on Company's system shall be limited to Customers' respective Plant Protection Levels, and the remainder of the Pool's delivered gas supply shall be diverted for use by other Customers.
7. Next, all Customers shall be requested to voluntarily reduce gas usage in an effort to divert supplies to affected areas or to Priority Use Customers.
 - a. Company will communicate the Curtailment to Customers via Company's website, mass media, or other means and will request that all Residential and Commercial Customers voluntarily reduce their gas usage where possible.

**Vectren Energy Delivery of Ohio, Inc.
Gas Curtailment Plan**

8. Next, Company will initiate procedures to discontinue Gas Service for those Rate 345 and Rate 360 Customer(s) that have not complied with reducing usage to their Plant Protection Level.
9. Next, Company will initiate procedures to discontinue Gas Service on a non-discriminatory basis that will minimize the number of Customers impacted, but provide maximum potential to divert supplies to maintain service to Priority Use Customers. Customers curtailed shall be based on the size and location of the facilities so as to minimize the total number of Customers affected. No distinction will be made between Rate Schedules in this stage.

C. Disposition of Diverted Gas

When Company diverts gas supplies delivered to its system during a Curtailment, Company will reimburse the Pool Operator for the cost of gas diverted at a rate equal to 110% of the Columbia Daily Index price, as reported in Platts Inside FERC Gas Market Report for the applicable day for "Columbia Gas Appalachia" under the heading "Midpoint" plus applicable variable costs including fuel retention and pipeline variable charges. Such gas costs shall be recoverable through Company's Exit Transition Cost Rider.

D. Lifting of Curtailment

Any Curtailment shall be lifted in reverse order of the Curtailment Sequence.

E. Unauthorized Gas Usage

During a Curtailment,

- (a) The Unauthorized Gas Usage Charge set forth in Sheet No. 30 will apply.
- (b) Customer shall have no entitlement to Unauthorized Gas Usage. In the event Customer continues Unauthorized Gas Usage, Company may, in its sole discretion, discontinue Gas Service to Customer. The assessment of the Unauthorized Gas Usage Charge and the exercise of the right to discontinue Gas Service by Company shall be in addition to any other rights Company may have with respect to Customer's Unauthorized Gas Usage.

REDLINE CURTAILMENT PLAN

CURTAILMENT PROCEDURES

When sufficient capacity or quantities of gas are not available to Company to meet existing and reasonably anticipated demands for Gas Service or to protect and replenish gas storage reserves, which determinations shall be within Company's reasonable discretion, Company shall have the right to curtail Gas Service within any of its Operational Systems so affected in accordance with the provisions of [the Curtailment Procedures](#).

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A. **Definitions.** For the purpose of this Procedure, the following terms shall have the meanings defined below:

- (1) **Average Daily Throughput.** The Average Daily Throughput for any Base Period billing month shall be the Firm Curtailment Customer's metered Throughput during such month divided by the number of days in the month.
- (2) **Base Period.** The Base Period is any twelve consecutive billing months as established by Company.
- (3) **Firm Curtailment Customer.** A Firm Curtailment Customer shall mean any Customer being served under Rate 345 or 360 whose Average Daily Throughput in any billing month during or subsequent to the Base Period exceeds 1,000 Ccf.
- (4) **Plant Protection Level** - The minimum quantity of Gas Service for Firm Curtailment Customers required by Customer to prevent endangering the health or safety of personnel, or to prevent extensive damage to Customer's facilities, equipment, or other property. This includes the protection of such material currently in process at the time a Curtailment is called which would otherwise be destroyed, but shall not include Gas Service required to maintain plant production.
- (5) **Priority Use** – As defined in Ohio Administrative Code 4901:5-25-01

Moved down [1]: **<#>Firm Curtailment Customer.** A Firm Curtailment Customer shall mean any Customer being served under Rate 320, 321, 325, 345, or 360 whose Average Daily Throughput in any billing month during or subsequent to the Base Period exceeds 1,000 Ccf.¶
<#>¶

Moved (insertion) [1]

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Deleted: **<#>Normal Monthly Throughput.** The Normal Monthly Throughput shall be the Firm Curtailment Customer's metered Throughput during each billing month of the Base Period. These quantities may be adjusted by Company for unusual circumstances.¶

<#>¶
<#>Human Needs Customers. Human Needs Customers shall include hospitals, medical centers, nursing homes, and other Customers as determined by Company, whose Curtailment could adversely affect public health or safety.¶

<#>¶
<#>Gas Supply Curtailment. Curtailment resulting from insufficient quantities of SCO-Supplied gas to meet the demands of SCO and DSS Customers.¶

<#>¶
<#>Capacity Curtailment. Curtailment resulting from insufficient system capacity to supply Gas Services to Company's Gas Service Customers.¶
<#>¶

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Deleted: Such Curtailment shall be effective as of the date and time specified in the notice to Customer. ...

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B. Pre-Curtailment and Curtailment Activities.

Company's obligation to preserve system reliability shall include the right to curtail Gas Service to its Customers according to the following sequence of activities.

When necessary in the sole opinion of Company, Gas Service shall be maintained to **Priority Use** Customers or other Customers who would otherwise be curtailed, to the extent necessary and practicable under the circumstances. **Company shall resort to the next step in the sequence if the previous step does not restore operating pressures to acceptable levels in the affected areas.**

The following sequence shall be implemented in the same manner regardless as to whether the risk to system reliability is due to supply or capacity constraints given both have similar impact with regard to system interruption. Company reserves the right to deviate from these sequences at its sole discretion, and at any time, to mitigate compromising system integrity.

Pre-Curtailment Curtailment Sequence.

1. Pool Operators, Choice Suppliers, and SCO Suppliers shall be subject to an OFO and subject to the specific delivery requirements and or restrictions specified by Company.
 - a. If a Pool Operator has nominated insufficient volumes relative to its Pool's usage, Pool Operator will be subject to the applicable Non-Compliance Charges. Company will also request that Pool Operator increase their nominated volume to the appropriate level; if Pool Operator does not comply with that request, Company will require usage reduction by the Pool's Transportation Customers to their respective Plant Protection Level.
 - b. If a Choice Supplier or SCO Supplier nominates insufficient volumes relative to its Customers' usage, Company will require that supplier increase its nominated volume to the appropriate level; otherwise the Choice or SCO Supplier will be subject to the applicable non-compliance charges.
2. Next, Company may contact Pool Operators, Choice Suppliers, and/or SCO Suppliers to request additional deliveries, on a voluntary basis, to appropriate city gates to support operating pressures in the affected areas.
3. Next, Company shall request Firm Curtailment Customers to voluntarily reduce usage to their respective Plant Protection Level. In such circumstances, Pool Operator shall not reduce its deliveries to reflect such voluntary Customer usage reductions, unless instructed otherwise by Company.
4. Next, Company shall request all Rate 345 and Rate 360 Customers to voluntarily reduce usage to their respective Plant Protection levels. In such circumstances, Pool Operator shall not reduce its deliveries to reflect such voluntary Customer usage reductions, unless instructed otherwise by Company.

Declaration of Curtailment and Curtailment Sequence

5. If Steps 1 through 4 do not restore operating pressures to acceptable levels in the affected area(s), Company shall at its sole discretion declare a formal Curtailment. When communicating the following Curtailment events to Customers and Pool Operators, Company shall communicate that a Curtailment is in effect. Such Curtailment shall be effective as of the date and time specified in the notice to Customers and Pool Operators.
6. First, Rate 345 and Rate 360 Customers' transportation gas quantities on Company's system shall be limited to Customers' respective Plant Protection Levels, and the remainder of the Pool's delivered gas supply shall be diverted to use by other Customers.
7. Next, all Customers shall be requested to voluntarily reduce gas usage in an effort to divert supplies to affected areas or to Priority Use Customers.
 - a. Company will communicate the Curtailment to Customers via Company's website, mass media, or other means and will request that all Residential and Commercial Customers voluntarily reduce their gas usage where possible.

Deleted: B1. -- Gas Supply

Deleted: First, Rate 345 and Rate 360 Non-Pooling Customers, and

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Deleted: shall be subject to the Cold Weather OFO set forth in Nomination and Balancing Provisions (Large General, Large Volume, and Pool Operator). Rate 385 and Rate 396 Suppliers ...

Deleted: Next, Rate 341 Customers' purchases of SCO-Supplied Gas for Spaceheating shall be interrupted 100%.¶

Deleted: Next, as determined by Company, all Rate 320 and Rate 321 Firm Curtailment Customers' purchases of SCO-Supplied Gas shall be limited to either:¶ their respective Average Daily Throughput each day over any portion of the billing month, or¶ their respective Normal Monthly Throughput.¶ Next, as determined by Company, all Rate 320 and Rate 321 Firm Curtailment Customers' purchases of SCO-Supplied gas shall be curtailed prorata, either:¶ on a daily basis for any period specified by Company by application of a uniform percentage curtailment to their respective Average Daily Throughput, or¶ on a billing month basis by application of a uniform percentage curtailment to their respective Normal Monthly Throughput.¶ At this point in the Curtailment sequence, Firm Curtailment Customers shall not be curtailed to a daily quantity less than their respective Plant Protection Levels.¶ Next, all Rate 320 and Rate 321 Firm Curtailment Customers' purchases of SCO-Supplied Gas shall be curtailed to a daily quantity equal to their respective Plant Protection Levels.¶

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Deleted: <#>Next, Rate 325 Customers' transportation gas quantities on Company's system shall be limited to Customers' respective Plant Protection Levels, and the remainder of their delivered gas supply shall be diverted to use for higher priority Customers.¶ <#>In the event further Curtailment is required to maintain Gas Service, Company shall be entitled to curtail or interrupt Gas Service to any Customer.¶ <#>Compensation for the diversion of Customers' transportation gas quantities as ... [1]

8. Next, Company will initiate procedures to discontinue Gas Service for those Rate 345 and Rate 360 Customer(s) that have not complied with reducing usage to their Plant Protection Level.

9. Next, Company will initiate procedures to discontinue Gas Service on a non-discriminatory basis that will minimize the number of Customers impacted, but provide maximum potential to divert supplies to maintain service to Priority Use Customers. Customers curtailed shall be based on the size and location of the facilities so as to minimize the total number of Customers affected. No distinction will be made between Rate Schedules in this stage.

C. Disposition of Diverted Gas

When Company diverts gas supplies delivered to its system during a Curtailment, Company will reimburse the Pool Operator for the cost of gas diverted at a rate equal to 110% of the Columbia Daily Index price, as reported in Platts Inside FERC Gas Market Report for the applicable day for "Columbia Gas Appalachia" under the heading "Midpoint" plus applicable variable costs including fuel retention and pipeline variable charges. Such gas costs shall be recoverable through Company's Exit Transition Cost Rider.

Deleted: **Curtailment Notification**

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D. Lifting of Curtailment

Any Curtailment shall be lifted in reverse order of the Curtailment Sequence.

Deleted: Company shall give notification of Curtailment in the most effective manner possible and as much in advance as reasonably possible with regard to the existing circumstances and the number of Customers to be notified.

E. Unauthorized Gas Usage

During a Curtailment,

a. The Unauthorized Gas Usage Charge set forth in Sheet No. 30 will apply.

b. Customer shall have no entitlement to Unauthorized Gas Usage. In the event Customer continues Unauthorized Gas Usage, Company may, in its sole discretion, discontinue Gas Service to Customer. The assessment of the Unauthorized Gas Usage Charge and the exercise of the right to discontinue Gas Service by Company shall be in addition to any other rights Company may have with respect to Customer's Unauthorized Gas Usage.

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<#>If reasonably possible, Firm Curtailment Customers shall be given seven days advance notice of any Curtailment.¶

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<#>In the event of Curtailment of Firm Curtailment Customers, Company shall provide notice to each Firm Curtailment Customer of its Normal Monthly Throughput and Average Daily Throughput.¶

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Deleted: Assessment of Unauthorized Gas Usage Charge. When a Curtailment is in effect pursuant to the provisions of paragraph B of this Procedure, gas usage by Customer in excess of the quantity permitted for such Customer shall constitute Unauthorized Gas Usage and shall be subject to t...

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<#>During the Curtailment Period,

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in

Case No(s). 89-8005-GA-TRF

Summary: Correspondence Correspondence re VEDO curtailment plan electronically filed by Mr. Christopher T Kennedy on behalf of Vectren Energy Delivery of Ohio, Inc.