

## Andrew J. Campbell

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September 20, 2019

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

Re: In re Appl. of One Source Energy, LLC, Case No. 16-1181-GA-ACE

Dear Ms. McNeal:

By an Entry dated September 11, 2019, the Commission granted the request of One Source Energy LLC (One Source) to "extend the September 6, 2019 deadline to abandon and retire its system to September 20, 2019," and also directed that One Source and Northeast Ohio Natural Gas (NEO) "should complete the transfer of One Source's assets and its natural gas system to NEO on or before that date and immediately notify the Commission." Entry ¶ 29.

By the same Entry, The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO) was directed "to continue to provide transportation service to One Source until September 20, 2019," *id.*, which is today. DEO has not received any additional information or communication from One Source or NEO regarding either the transfer of the system to NEO or any plans for coordinating the disconnection and potential reconnection of service.

As DEO confronts this situation, it observes that the September 11 Entry did *not* expressly direct DEO to cease providing transportation service to One Source on September 20. Rather, it stated that DEO should "continue to provide" such service "until September 20, 2019." *Id.* This appeared tied to the requirement that One Source sell and transfer its system by the same date. The Entry, however, did not expressly state what DEO was to do if the transfer had not occurred. In this way, the September 11 Entry is unlike the July 31 Second Finding and Order, which explicitly and affirmatively directed DEO to "cease transportation service to One Source on September 6, 2019." 2d Finding & Order ¶ 38. In short, it is not clear to DEO what is required of it, assuming that the transfer does not occur by the end of this day.

DEO would also observe that, while the *disconnection* of a master-meter system is simple enough to accomplish, the *reconnection* of such a system is far more complex. It requires coordination between the companies involved, and all of the customers being relit, to ensure that

public safety is preserved. DEO also observes that the Commission has not thus far viewed any safety issues associated with the One Source system as being of such severity as to require immediate disconnection. All else equal, DEO would like to spare One Source's customers the inconvenience first of experiencing a loss of service, and then again of providing access to permit the reconnection of service—particularly if a transfer of the system is soon to occur.

For all of the foregoing reasons, it is not clear to DEO that cessation of transportation service on this date is either required by the Commission's September 11 Entry or advisable as matter of prudence. DEO thus files this notice to advise the Commission that the Company does *not* intend to disconnect service on this date. If DEO has misunderstood the September 11 Entry, and the Commission wishes DEO to disconnect service on this date, DEO requests that an additional Entry be issued to that effect, with which DEO will promptly comply. DEO's sole intention is to act in accordance with the Commission's Orders and Entries entered in this case.

Please let me know if there are any questions.

Respectfully submitted,

Andrew J. Campbell,

Counsel for The East Ohio Gas Company d/b/a

Dominion Energy Ohio

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Summary: Correspondence electronically filed by Mr. Andrew J Campbell on behalf of The East Ohio Gas Company d/b/a Dominion Energy Ohio