

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Amendment of the Rules in)	
Ohio Adm.Code Chapter 4901:1-43 Regarding)	Case No. 21-10-GA-ORD
Recovery of Infrastructure Development Costs.)	

**JOINT INITIAL COMMENTS OF THE EAST OHIO GAS COMPANY D/B/A
DOMINION ENERGY OHIO, VECTREN ENERGY DELIVERY OF OHIO, INC. D/B/A
CENTERPOINT ENERGY OHIO, AND COLUMBIA GAS OF OHIO, INC.**

In accordance with the Commission’s March 10, 2021 Entry in this proceeding, The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO), Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio (CEOH), and Columbia Gas of Ohio, Inc. (Columbia) (collectively, the Companies) hereby file joint initial comments in support of Staff’s proposed change to eliminate current Rule 4901:1-43-03(3)(a).

The existing rule, Rule 4901:1-43-03(3)(a), requires a natural gas company filing for approval of an economic development project (EDP) to provide the “[e]stimated state and local taxable base increase” associated with the project. The Companies, however, generally have neither knowledge of, nor access to, the information necessary to reasonably estimate the state and local tax base increase. In addition, R.C. 4929.163 does not specifically require EDP applications to contain this information. Since the information is neither required by statute nor within the Companies’ possession or control, the Companies, in connection with their EDP notices, typically request that this requirement be waived—requests that the Commission has previously granted. *See, e.g.*, Case No. 20-1703-GA-EDP, Entry (Dec. 7, 2020). For these reasons, the Companies believe that Staff’s proposed change to eliminate this requirement is appropriate and justified.

Wherefore, the Companies recommend that the Commission approve Staff’s proposed change and reserve the right to file reply comments in response to any other amendments to the

rules in this chapter proposed by other parties in their initial comments.

Dated: April 19, 2021

Respectfully submitted,

/s/ Christopher T. Kennedy

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Summary: Comments Joint Initial Comments electronically filed by Christopher T Kennedy on behalf of The East Ohio Gas Company d/b/a Dominion Energy Ohio and Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio and Columbia Gas of Ohio, Inc.