

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Vectren Energy Delivery of Ohio, Inc.)	Case No. 21-320-GA-UEx
d/b/a CenterPoint Energy Ohio for)	
Approval of an Adjustment to its)	
Uncollectible Expense Rider Rate.)	

APPLICATION

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MAY 28, 2021

**ATTORNEYS FOR VECTREN ENERGY DELIVERY OF OHIO,
INC., D/B/A CENTERPOINT ENERGY OHIO**

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Vectren Energy Delivery of Ohio, Inc.,)	
d/b/a CenterPoint Energy Ohio)	Case No. 21-320-GA-UEX
for Approval of an Adjustment to its)	
Uncollectible Expense Rider Rate.)	

APPLICATION

Vectren Energy Delivery of Ohio, Inc., d/b/a CenterPoint Energy Ohio (CEOH or the Company), hereby submits its annual Uncollectible Expense (“UEX”) Rider Report and respectfully requests approval to revise its UEX Rider rate. In support of its Application, CEOH states as follows:

1. In 2003, the Public Utilities Commission of Ohio (“Commission”) approved the Company’s UEX Rider.¹ As part of its initial approval of the UEX Rider, the Commission directed the Company to file a yearly report that identifies amounts recovered, deferred, and amortized pursuant to the UEX Rider.² The annual balance reconciliation is Attachment 1 to this Application.³
2. The Commission also directed the Company to include in its annual filing: the UEX balance at the beginning of the reporting year; additions to the UEX

¹ *In the Matter of the Joint Application of The East Ohio Gas Company d.b.a Dominion East Ohio, Columbia Gas of Ohio Inc., Vectren Energy Delivery of Ohio, Northeast Ohio Natural Gas Corp., and Oxford Natural Gas Company for Approval of an Adjustment Mechanism to Recover Uncollectible Expenses*, Case No. 03-1127-GA-UNC, Finding and Order (Dec. 17, 2003).

² *Id.* at 13-14.

³ The annual filing is submitted in the format requested by Commission Staff. *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval of Proposed Tariff Revisions to Recover Uncollectible Expenses*, Case No. 03-2571-GA-ATA, Staff Summary, Comments and Recommendation (Mar. 9, 2004).

balance, including the vintage of the additions during the calendar year; and credits to the UEX balance during the calendar year.⁴ The Company has incorporated this additional information into Attachment 3 to this Application.⁵

3. Sheet No. 39 of CEOH's tariff further provides that CEOH shall file an application with the Commission requesting approval to change the UEX Rider rate if CEOH determines that an adjustment of more than plus or minus ten percent is needed.
4. The calculation of the UEX Rider rate is more than ten percent less than the currently effective rate. The calculation of the proposed UEX Rider rate is comprised of: (1) the balance of deferred uncollectible accounts expense net of recoveries as of April 30, 2021 and (2) an estimate of net uncollectible accounts expense and recoveries for the 12 months ending April 30, 2022. The calculation yields a proposed UEX Rider rate of \$0.00276 per Billing Ccf. The calculation of the revised rate is shown on Attachment 2.
5. Copies of the proposed and red-lined tariff sheets are included as Attachment 4 of this Application.
6. The proposed rate of \$0.00276 per Billing Ccf is just and reasonable and should be approved.

⁴ *In the Matter of the Five-Year Review of Natural Gas Company Uncollectible Rider*, Case No. 08-1229-GA-COI, Finding and Order at 6 (Aug. 19, 2009).

⁵ The information on Attachment 3 also allows an identification of the portion of the proposed UEX Rider rate attributable to estimated UEX, which can be derived by subtracting from the estimated charge-off amount the estimated dollars attributable to agency assistance and customer payments.

WHEREFORE, CEOH respectfully requests that the Commission approve the new UEX Rider tariff sheet and UEX Rider rate proposed herein.

Respectfully submitted,

/s/ Matthew R. Pritchard

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(Counsel of Record)

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**ATTORNEYS FOR VECTREN ENERGY DELIVERY OF OHIO,
INC., D/B/A CENTERPOINT ENERGY OHIO**

ATTACHMENT 1

[ANNUAL BALANCE RECONCILIATION]

VECTREN ENERGY DELIVERY OF OHIO, INC. D/B/A CENTERPOINT ENERGY OHIO
Uncollectible Expense Rider
2021 Annual Balance Reconciliation

Line No.	Description	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Total
1	Balance - Beginning of Month	\$ 885,181	\$ 527,619	\$ 213,583	\$ (36,929)	\$ (189,390)	\$ (123,683)	\$ 142,755	\$ 236,645	\$ 231,934	\$ 154,056	\$ (35,840)	\$ (244,314)	\$ 885,181
2	Bad Debts Written Off (b)	\$ 48,883	\$ 120,144	\$ 17,672	\$ 54,873	\$ 217,189	\$ 353,314	\$ 140,980	\$ 74,286	\$ 13,446	\$ (10,611)	\$ 43,377	\$ 270,369	\$ 1,343,921
3	Other													\$ -
4	Recovery - Uncollectible Expense Rider (a)	\$ 381,715	\$ 389,573	\$ 241,820	\$ 174,988	\$ 108,934	\$ 43,206	\$ 38,569	\$ 49,787	\$ 50,200	\$ 136,655	\$ 228,599	\$ 431,467	\$ 2,275,511
5	Recovery - Other (b)	\$ 25,651	\$ 45,063	\$ 26,512	\$ 32,240	\$ 42,498	\$ 43,673	\$ 8,551	\$ 29,243	\$ 41,148	\$ 42,636	\$ 23,236	\$ 35,804	\$ 396,256
6	Incremental Uncollectible Expense [[2 + 3 - (4 + 5)]]	\$ (358,483)	\$ (314,492)	\$ (250,660)	\$ (152,355)	\$ 65,757	\$ 266,436	\$ 93,859	\$ (4,744)	\$ (77,902)	\$ (189,903)	\$ (208,458)	\$ (196,902)	\$ (1,327,847)
7	Balance Subtotal [1+ 6]	\$ 526,699	\$ 213,127	\$ (37,077)	\$ (189,285)	\$ (123,633)	\$ 142,753	\$ 236,614	\$ 231,901	\$ 154,032	\$ (35,847)	\$ (244,298)	\$ (441,216)	\$ (442,665)
8	Carrying Charges [(((1+7) X 79%) X .50 X (c))] *	\$ 920	\$ 456	\$ 148	\$ (105)	\$ (50)	\$ 2	\$ 31	\$ 32	\$ 24	\$ 7	\$ (16)	\$ (43)	\$ 1,406
9	Balance - End of Month [7 + 8]	\$ 527,619	\$ 213,583	\$ (36,929)	\$ (189,390)	\$ (123,683)	\$ 142,755	\$ 236,645	\$ 231,934	\$ 154,056	\$ (35,840)	\$ (244,314)	\$ (441,259)	\$ (441,259)

(a) Represents calendar uncollectible expense rider revenues.

(b) See write-off vintage and recovery source detail required by Case No. 08-1229-GA-COI on Attachment 3. Bad debt write-offs include account balances restored due to the moratorium

(c) Monthly carrying charge rate 0.16500% 0.15583% 0.21167% 0.11750% 0.04083% 0.02667% 0.02083% 0.01750% 0.01583% 0.01417% 0.01417% 0.01583%

* Income Tax Rate Changed from 35% to 21% in JAN-18

VECTREN ENERGY DELIVERY OF OHIO, INC. D/B/A CENTERPOINT ENERGY OHIO
Uncollectible Expense Rider
2021 Annual Balance Reconciliation

Line No.	Description	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total
1	Balance - Beginning of Month	\$ (441,259)	\$ (988,643)	\$ (1,448,683)	\$ (1,733,553)									\$ (441,259)
2	Bad Debts Written Off (b)	\$ (24,988)	\$ 66,172	\$ 55,677	\$ 124,713									\$ 221,574
3	Other													\$ -
4	Recovery - Uncollectible Expense Rider (a)	\$ 482,547	\$ 494,809	\$ 285,465	\$ 179,062									\$ 1,441,884
5	Recovery - Other (b)	\$ 39,764	\$ 31,267	\$ 54,892	\$ 28,990									\$ 154,914
6	Incremental Uncollectible Expense [[2 + 3 - (4 + 5)]]	\$ (547,299)	\$ (459,904)	\$ (284,681)	\$ (83,340)									\$ (1,375,223)
7	Balance Subtotal [1+ 6]	\$ (988,558)	\$ (1,448,547)	\$ (1,733,364)	\$ (1,816,892)									\$ (1,816,483)
8	Carrying Charges [((1+7) X 79%) X .50 X (c)] *	\$ (85)	\$ (136)	\$ (189)	\$ (210)									\$ (620)
9	Balance - End of Month [7 + 8]	\$ (988,643)	\$ (1,448,683)	\$ (1,733,553)	\$ (1,817,103)									\$ (1,817,103)

(a) Represents calendar uncollectible expense rider revenues.

(b) See write-off vintage and recovery source detail required by Case No. 08-1229-GA-COI on Attachment 3. Bad debt write-offs include account balances restored due to the moratorium.

(c) Monthly carrying charge rate 0.01500% 0.01417% 0.01500% 0.01500%

ATTACHMENT 2

[CALCULATION OF REVISED RATE]

VECTREN ENERGY DELIVERY OF OHIO, INC. D/B/A CENTERPOINT ENERGY OHIO
Uncollectible Expense Rider Calculation
Report for May 2021

Line No.	Col. A Amount	Col. B Applicable Volumes (Billing Ccf)	Col. C Unit Rate / Billing Ccf
1	Actual Deferred Uncollectible Expense Balance through April 2021	\$ (1,817,103)	
2	Projected Net Uncollectible Expense: May 2021 - April 2022	<u>\$ 2,700,000</u>	
3	Unit Rate on which to Collect	\$ 882,897 319,852,100	<u>\$ 0.00276</u>
4	Prior approved UEX Rider Rate Effective July 16, 2020		\$ 0.00785
5	Increase/(Decrease) in Uncollectible Expense Rider		<u><u>\$ (0.00509)</u></u>
6	Percentage Difference		-64.8%

ATTACHMENT 3

[WRITE-OFFS AND COLLECTIONS SUMMARY]

VECTREN ENERGY DELIVERY OF OHIO, INC. D/B/A CENTERPOINT ENERGY OHIO
Uncollectible Expense Rider
Write-Off and Collection Summary

Line # <u>Bad Debts Written off by Vintage (a)</u>														Total
<u>Vintage</u>		2020 May	2020 June	2020 July	2020 August	2020 September	2020 October	2020 November	2020 December	2021 January	2021 February	2021 March	2021 April	
1	1-6 Months	(355,268)	(481,882)	(202,375)	(140,403)	(111,167)	(133,797)	(177,350)	(436,796)	(92,090)	(161,154)	(169,248)	(223,630)	(2,685,159.88)
2	6-12 months	22,743	3,815	2,453	3,381	4,514	28,168	23,337	6,313	8,737	8,394	5,319	4,444	121,617.84
3	> 12 months (b)	73,951	30,139	38,985	42,541	135,097	160,013	203,099	176,616	134,614	123,624	137,056	108,942	1,364,677
4	Subtotal	(258,573)	(447,928)	(160,936)	(94,480)	28,443	54,384	49,086	(253,867)	51,261	(29,137)	(26,874)	(110,244)	(1,198,865)
5	Other Write-Off Activity	-	-	-	-	-	-	-	-	-	-	-	-	-
6	PIPP Bad Debt Write-Offs	(41,385)	(94,614)	(19,956)	(20,194)	41,889	43,773	92,463	16,502	26,273	37,036	28,803	14,469	125,058
7	Total Bad Debts Written Off (Attachment 1)	(217,189)	(353,314)	(140,980)	(74,286)	(13,446)	10,611	(43,377)	(270,369)	24,988	(66,172)	(55,677)	(124,713)	(1,323,923)

<u>Collections by Type</u>														Total
		2020 May	2020 June	2020 July	2020 August	2020 September	2020 October	2020 November	2020 December	2021 January	2021 February	2021 March	2021 April	
8	From Customers	61,513	48,960	56,081	46,856	50,969	57,910	43,714	51,293	59,732	47,518	62,159	57,253	643,958.55
9	From Collection Agencies	5,935	6,835	5,174	10,375	14,788	10,308	5,871	6,625	7,982	6,680	12,165	8,622	101,360
10	From Other	-	(175)	-	-	-	-	600	274	231	814	350	(350)	1,744
11	Subtotal	67,448	55,619	61,255	57,231	65,757	68,218	50,185	58,193	67,945	55,012	74,674	65,526	747,063
12	Other Activity	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Collection Agency Commissions	17,830	3,411	43,421	22,201	18,291	21,392	22,216	17,826	19,364	18,563	14,202	28,679	247,395.91
14	Collections from PIPP Customers	7,120	8,536	9,282	5,787	6,318	4,190	4,732	4,562	8,818	5,182	5,580	7,856	77,963.23
15	Total Recovery - Other (Attachment 1)	42,498	43,673	8,551	29,243	41,148	42,636	23,236	35,804	39,764	31,267	54,892	28,990	421,703

(a) - Bad debt write-offs include account balances restored due to the moratorium.
(b) - Write-offs without a print date have been categorized as greater than twelve months.

ATTACHMENT 4

[COPIES OF RED-LINED AND PROPOSED TARIFF SHEETS]

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UNCOLLECTIBLE EXPENSE RIDER

APPLICABILITY

The Uncollectible Expense Rider Rate shall be applicable to all Customers responsible for payment of Company's Percentage of Income Payment Plan Rider on Sheet No. 40.

DESCRIPTION

The Uncollectible Expense Rider Rate shall be applied to all billed Ccf for Gas Service rendered to Customers served under the applicable Rate Schedules.

The Rider shall recover costs associated with uncollectible accounts arising from those Customers in those Rate Schedules responsible for paying the Uncollectible Expense Rider.

Company's actual uncollectible expense for the applicable Rate Schedules, including carrying charges, shall be reconciled annually, with any over or under collection being reflected as a charge or credit in a subsequent update of the Rider Rate.

Company shall file an application with the Commission requesting approval to change the Uncollectible Expense Rider Rate if Company determines that an adjustment of more than plus or minus ten percent (10%) is needed.

RECONCILIATION

The Uncollectible Expense Rider is subject to reconciliation or adjustment annually, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of expenditures upon which the rates were calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.

UNCOLLECTIBLE EXPENSE RIDER RATE

The Uncollectible Expense Rider Rate is \$~~0.00276~~ per Billing Ccf.

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Filed pursuant to the Finding and Order dated _____ in Case No. 21-0320-GA-UEx of The Public Utilities Commission of Ohio.

Issued _____ Issued by Katie J. Tieken, Director Effective _____

UNCOLLECTIBLE EXPENSE RIDER

APPLICABILITY

The Uncollectible Expense Rider Rate shall be applicable to all Customers responsible for payment of Company's Percentage of Income Payment Plan Rider on Sheet No. 40.

DESCRIPTION

The Uncollectible Expense Rider Rate shall be applied to all billed Ccf for Gas Service rendered to Customers served under the applicable Rate Schedules.

The Rider shall recover costs associated with uncollectible accounts arising from those Customers in those Rate Schedules responsible for paying the Uncollectible Expense Rider.

Company's actual uncollectible expense for the applicable Rate Schedules, including carrying charges, shall be reconciled annually, with any over or under collection being reflected as a charge or credit in a subsequent update of the Rider Rate.

Company shall file an application with the Commission requesting approval to change the Uncollectible Expense Rider Rate if Company determines that an adjustment of more than plus or minus ten percent (10%) is needed.

RECONCILIATION

The Uncollectible Expense Rider is subject to reconciliation or adjustment annually, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to the twelve-month period of expenditures upon which the rates were calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio.

UNCOLLECTIBLE EXPENSE RIDER RATE

The Uncollectible Expense Rider Rate is \$0.00276 per Billing Ccf.

Filed pursuant to the Finding and Order dated _____, _____ in Case No. 21-0320-GA-UEx of The Public Utilities Commission of Ohio.

Issued _____

Issued by Katie J. Tieken, Director

Effective _____

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Case No(s). 21-0320-GA-UEx

Summary: Application of CenterPoint Energy Ohio electronically filed by Ms. Rebekah J. Glover on behalf of Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio