

**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)
For Adjustment of its Percentage of)
Income Payment Plan Rider.)

Case No. 21-420-GA-PIP

APPLICATION

Matthew R. Pritchard (Reg. No. 0088070)
(Counsel of Record)
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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. 21-420-GA-PIP
For Adjustment of its Percentage of)
Income Payment Plan Rider.)

APPLICATION

Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio (CEOH or the Company), hereby requests the approval of the Public Utilities Commission of Ohio (“Commission”) for authority to modify its Percentage of Income Payment Plan (“PIPP”) Rider rate. In support of this request, CEOH states as follows:

1. CEOH is an Ohio corporation engaged in the business of providing natural gas service to customers in Ohio and, as such, is a public utility as defined by R.C. 4905.02 and 4905.03.
2. As part of its approval of CEOH’s PIPP Rider, the Commission requires CEOH to make an annual filing with the Commission identifying the level of PIPP recoveries and the rate, if applicable.¹ The Commission also requires CEOH to file to adjust its PIPP Rider rate if the calculation of new rates

¹ *In the Matter of the Five-Year Review of Natural Gas Company Uncollectible Riders*, Case No. 08-1229-GA-COI, Finding and Order at 16 (Dec.14, 2011); *see also In the Matter of the Review of the Interim Emergency and Temporary PIP Plan Riders Contained in the Approved Rate Schedules of Electric and Gas Companies*, Case Nos. 88-1115-GE-PIP, *et al.*, Finding and Order (Dec. 2, 1993).

would yield an increase of 10 percent or greater, or any decrease in PIPP rates.²

3. The calculation of new PIPP Rider rates produces a decrease. Pursuant to the methodology established in Case Nos. 88-1115-GE-PIP, there are three components to calculate the PIPP Rider rate: (1) PIPP customer account balances existing as of April 30, 2021 that have aged for a period of greater than 60 days; (2) an amount of arrears expected to continue to occur in the succeeding 12-month period; and (3) projected carrying costs. The rate is then calculated based on collecting the sum of these three components over a 12-month period. Based on this methodology, CEOH calculates the proposed PIPP Rider rate as \$0.00299 per Billing Ccf. CEOH's current PIPP Rider rate is \$0.00390 per Billing Ccf.
4. Proposed and red-lined tariff sheets reflecting the proposed PIPP Rider rate are attached as Exhibit A.
5. Calculations supporting the proposed PIPP Rider rate are included as Exhibit B, which include Attachments 1 through 8.
6. The proposed PIPP Rider rate is just and reasonable and should be approved.
7. CEOH's Application to adjust its PIPP Rider rate is subject to a 45-day automatic approval process.³ Absent Commission action, CEOH will

² *Id.*

³ Tariff Sheet 40 ("The PIPP Rider rate shall be updated from time-to-time in accordance with" previous Commission Orders). The relevant orders are in Case Nos. 99-751-GE-PIP, 88-1115-GE-PIP, and 93-1000-EL-EFR, and establish a 45-day automatic approval process. In Case No. 99-751-GE-PIP, the Commission summarized a prior order in Case Nos. 88-1115-GE-PIP, *et al.* as "essentially allow[ing] [a utility] to implement its new [PIPP] rates on the 46th day after its application, absent action by the Commission." *In the Matter of the Application of The Dayton Power and Light Company for Adjustment of*

implement the proposed PIPP Rider rate for all usage on or after July 13, 2021.

WHEREFORE, CEOH respectfully requests that the Commission approve this Application, which approval shall automatically occur on the forty-fifth day after the filing of this Application absent Commission action.

Respectfully submitted,

/s/ Matthew R. Pritchard

Matthew R. Pritchard (Reg. No. 0088070)

(Counsel of Record)

Rebekah J. Glover (Reg. No. 0088798)

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**ATTORNEYS FOR VECTREN ENERGY DELIVERY OF OHIO,
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its Gas and Electric Interim Emergency and Temporary Percentage of Income Payment Plan Riders, Case No. 99-751-GE-PIP, Entry at 1 (Aug. 19, 1999); see also *In the Matter of the Commission Procedure for the Recovery of Emission Fees Levied Upon an Electric Light Company, Pursuant to Substitute Senate Bill 359*, Case No. 93-1000-EL-EFR, Entry at 2, Attachment C (Nov. 24, 1998) (establishing a 45-day automatic approval process for rider updates).

Exhibit A

Proposed Tariff Sheet

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PERCENTAGE OF INCOME PAYMENT PLAN RIDER

APPLICABILITY

The Percentage of Income Payment Plan ("PIPP") Rider shall be applicable to all Customers served under the following Rate Schedules and to certain other Customers pursuant to contract:

- Rate 310 – Residential Default Sales Service
- Rate 311 – Residential Standard Choice Offer Service
- Rate 315 – Residential Transportation Service
- Rate 320 – General Default Sales Service
- Rate 321 – General Standard Choice Offer Service
- Rate 325 – General Transportation Service

DESCRIPTION

The PIPP Charge shall be the product of the monthly Billing Ccf and the PIPP Rider Rate.

The PIPP Rider Rate shall be updated from time-to-time in accordance with previous Commission Orders.

RECONCILIATION

The PIPP Rider is subject to reconciliation or adjustment annually, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to: (1) 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; (2) the Commission's orders in Case No. 18-47-AU-COI or any case ordered by the Commission to address tax reform changes.

PIPP RIDER RATE

The PIPP Rider Rate is \$0.00299 per Billing Ccf

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Filed pursuant to Case No. 21-0420-GA-PIP of The Public Utilities Commission of Ohio.

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

PERCENTAGE OF INCOME PAYMENT PLAN RIDER

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- Rate 315 – Residential Transportation Service
- Rate 320 – General Default Sales Service
- Rate 321 – General Standard Choice Offer Service
- Rate 325 – General Transportation Service

DESCRIPTION

The PIPP Charge shall be the product of the monthly Billing Ccf and the PIPP Rider Rate.

The PIPP Rider Rate shall be updated from time-to-time in accordance with previous Commission Orders.

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Filed pursuant to Case No. 21-0420-GA-PIP of The Public Utilities Commission of Ohio.

Issued _____

Issued by Katie J. Tieken, Director

Effective _____

Exhibit B

**Attachment 1 through
Attachment 8**

**Calculations Supporting the
Proposed PIPP Rider Rate**

VECTREN ENERGY DELIVERY OF OHIO, INC. D/B/A CENTERPOINT ENERGY OHIO				
PIPP RATE CALCULATION				
21-0420-GA-PIP				
April 2021 Actual Data				
Line	Description	Calculation	Gas Utility	
1	Projected Volumes for the 12 Months Ended 04/30/22	(Attachment 7, Column M, Line 6)	319,852,100	Ccf
2	Continuing Rate: Projected Transfers 05/01/21 to 04/30/22 [Forms the Basis for Continuing Recovery]		\$1,800,000	
3	Annual Rate	(2)/(1)	\$0.00563	/ Ccf
4	Rate Adjustment: (Over)/Under Recovery - PIPP Rider	(Attachment 2, Line 6)	(\$809,071)	
5	(Over)/Under Recovery - Carrying Costs	(Attachment 2, Line 14)	(\$36,461)	
6	Total (Over)/Under Recovery	(4)+(5)	(\$845,532)	
7	Annual Rate	(6)/(1)	(\$0.00264)	/ Ccf
8	Continuing Carrying Cost Rate: Net Projected Carrying Costs	(Attachment 8, Line 6)	(\$910)	
9	Annual Rate	(8)/(1)	\$0.00000	/ Ccf
10	Total Annual Rate	(3)+(7)+(9)	\$0.00299	/ Ccf

Current PIPP Rate	\$0.00390 / Ccf
Increase/(Decrease)	(\$0.00091) / Ccf
% Change	-23.33%

VECTREN ENERGY DELIVERY OF OHIO, INC. D/B/A CENTERPOINT ENERGY OHIO
PIPP Rider
Annual Filing Balance Reconciliation

Line No.	Description	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	Total	
PIPP Regulatory Asset															
1	Balance - Beginning of Month	(798,026) \$	(719,830) \$	(609,387) \$	(468,982) \$	(444,253) \$	(474,575) \$	(539,422) \$	(742,578) \$	(970,811) \$	(1,153,385) \$	(1,190,624) \$	(1,000,881)	\$ (798,026)	
2	PIPP Balance Change (Attachment 4)	50,463	28,075	90,157	(7,568)	(62,163)	(58,228)	(166,167)	(119,778)	(100,689)	(4,178)	53,021	39,970	\$ (257,083)	
3	Recovery - PIPP Rider (Attachment 5)	(79,788)	(31,745)	(23,327)	(26,081)	(25,284)	(68,464)	(114,432)	(216,038)	(241,580)	(247,688)	(142,869)	(89,637)	\$ (1,306,933)	
4	PIPP Program Credits (Attachment 6)	\$107,521	\$114,112	\$73,574	\$58,378	\$57,126	\$61,844	\$77,443	\$107,583	\$159,694	\$214,627	\$279,590	\$241,477	\$ 1,552,971	
5	Transportation Penalties (Attachment 7)													-	
6	Balance - End of Month	Sum [1 - 5]	(719,830)	(609,387)	(468,982)	(444,253)	(474,575)	(539,422)	(742,578)	(970,811)	(1,153,385)	(1,190,624)	(1,000,881)	(809,071)	\$ (809,071)
7	Monthly carrying charge rate	0.04083%	0.02667%	0.02083%	0.01750%	0.01583%	0.01417%	0.01417%	0.01583%	0.01500%	0.01417%	0.01500%	0.01500%	0.01875%	
8	Gross Carrying Charges	[1 + 6] x 50% x [7]	(310)	(177)	(112)	(80)	(73)	(72)	(136)	(159)	(166)	(164)	(136)	\$ (1,676)	
9	Income Tax on Carrying Charges	Tax Rate x [8]	(65)	(37)	(24)	(17)	(15)	(19)	(28)	(33)	(35)	(35)	(29)	\$ (352)	
10	Net Carrying Charges	[8 - 9]	(245)	(140)	(89)	(63)	(57)	(57)	(107)	(126)	(131)	(130)	(107)	\$ (1,324)	
Carrying Charges Regulatory Asset															
11	Beginning Balance	(44,651) \$	(44,586) \$	(44,603) \$	(44,558) \$	(44,422) \$	(44,287) \$	(43,821) \$	(43,019) \$	(41,477) \$	(39,759) \$	(37,999) \$	(37,038)	\$ (44,651)	
12	Carrying Charge Recovery - PIPP Rider	Line 17	310	123	134	199	193	523	874	1,649	1,844	1,891	1,091	\$ 9,514	
13	Interest Incurred	Line 10	(245)	(140)	(89)	(63)	(57)	(57)	(72)	(107)	(126)	(131)	(130)	\$ (1,324)	
			65	(17)	45	136	136	466	802	1,718	1,760	961	577	\$ 8,190	
14	Ending Balance	Sum [11 - 13]	(44,586)	(44,603)	(44,558)	(44,422)	(44,287)	(43,821)	(43,019)	(41,477)	(39,759)	(37,999)	(37,038)	\$ (36,461)	
15	Volumes (Ccf) (Attachment 5)	15,482,095	6,144,103	5,167,280	6,424,031	6,403,165	17,415,372	29,120,471	54,964,872	61,467,761	63,023,212	36,354,412	22,814,613	324,781,187	
16	Rate	(0.00002)	(0.00002)	(0.00003)	(0.00003)	(0.00003)	(0.00003)	(0.00003)	(0.00003)	(0.00003)	(0.00003)	(0.00003)	(0.00003)	(0.00003)	
17	Carrying Charge Recovery - PIPP Rider	[15] x [16]	(310)	(123)	(134)	(199)	(193)	(523)	(874)	(1,649)	(1,844)	(1,891)	(1,091)	(684)	\$ (9,514)

**VECTREN ENERGY DELIVERY OF OHIO, INC. D/B/A CENTERPOINT ENERGY OHIO
PIPP RIDER
PIPP PLAN INFORMATION AS OF
April 30, 2021**

Line No.	Description	Amount
1	PIPP Accounts Receivable Balances 2 months in Arrears (Attachment 4, Column B, Line 13)	\$55,811,255
2	Amount Recovered to Date (Attachment 5, Column E, Line 13)	\$109,618,315
3	PIPP Dollars Distributed Per Settlement in Case No. 91-415-GA-AIR (Forgiveness and Graduate) PIPP Plus Program Case No. 08-723-GA-ORD (Attachment 6, Column C, Line 13)	\$54,417,551
4	Transportation Penalties Refunded Case No. 03-571-GA-AIR No transportation penalties after October 2008.	\$1,419,561
5	Catch-up Recovery (1) - (2) + (3) - (4) To Attachment 1, Line 4	(\$809,071)

**VECTREN ENERGY DELIVERY OF OHIO, INC. D/B/A CENTERPOINT ENERGY OHIO
PIPP RIDER
PRE-PIPP & PIPP BALANCES**

Line No.	A Month		B Gas		C Monthly Change
1	May 1, 2020	\$	56,068,338	1)	\$ 50,463
2	June 1, 2020	\$	56,118,801		\$ 28,075
3	July 1, 2020	\$	56,146,876		\$ 90,157
4	August 1, 2020	\$	56,237,033		\$ (7,568)
5	September 1, 2020	\$	56,229,465		\$ (62,163)
6	October 1, 2020	\$	56,167,303		\$ (58,228)
7	November 1, 2020	\$	56,109,074		\$ (166,167)
8	December 1, 2020	\$	55,942,907		\$ (119,778)
9	January 1, 2021	\$	55,823,129		\$ (100,689)
10	February 1, 2021	\$	55,722,441		\$ (4,178)
11	March 1, 2021	\$	55,718,263		\$ 53,021
12	April 1, 2021	\$	55,771,284		\$ 39,970
13	May 1, 2021	\$	55,811,255		

1) Reported in Case No. 20-0420-GA-PIP

VECTREN ENERGY DELIVERY OF OHIO, INC. D/B/A CENTERPOINT ENERGY OHIO PIPP RIDER PIPP PLAN RECOVERIES					
Line No.	A Month	B Volumes(Ccf)	C Recovery Rates	D Current Month	E To Date
1	Reported in Case No. 20-0420-GA-PIP				\$ 108,311,382
2	May-20	15,482,095	\$ 0.00515	\$ 79,788	\$ 108,391,170
3	Jun-20	6,144,103	\$ 0.00517	\$ 31,745	\$ 108,422,915
4	Jul-20	5,167,280	\$ 0.00451	\$ 23,327	\$ 108,446,242
5	Aug-20	6,424,031	\$ 0.00406	\$ 26,081	\$ 108,472,323
6	Sep-20	6,403,165	\$ 0.00395	\$ 25,284	\$ 108,497,607
7	Oct-20	17,415,372	\$ 0.00393	\$ 68,464	\$ 108,566,071
8	Nov-20	29,120,471	\$ 0.00393	\$ 114,432	\$ 108,680,503
9	Dec-20	54,964,672	\$ 0.00393	\$ 216,038	\$ 108,896,541
10	Jan-21	61,467,761	\$ 0.00393	\$ 241,580	\$ 109,138,120
11	Feb-21	63,023,212	\$ 0.00393	\$ 247,688	\$ 109,385,809
12	Mar-21	36,354,412	\$ 0.00393	\$ 142,869	\$ 109,528,678
13	Apr-21	22,814,613	\$ 0.00393	\$ 89,637	\$ 109,618,315

**VECTREN ENERGY DELIVERY OF OHIO, INC. D/B/A CENTERPOINT ENERGY OHIO
PIPP DOLLARS DISTRIBUTED
PER CASE NOS. 91-415-GA-AIR AND 08-723-GA-ORD
(FORGIVENESS, GRADUATE AND PIPP PLUS PROGRAM)**

Line No.	A Month	B Monthly Change	C Ending Balance
1	Reported in Case No. 20-0420-GA-PIP		\$52,864,579
2	May 2020	\$107,521	\$52,972,101
3	June	\$114,112	\$53,086,213
4	July	\$73,574	\$53,159,787
5	August	\$58,378	\$53,218,166
6	September	\$57,126	\$53,275,291
7	October	\$61,844	\$53,337,135
8	November	\$77,443	\$53,414,578
9	December	\$107,583	\$53,522,161
10	January 2021	\$159,694	\$53,681,856
11	February	\$214,627	\$53,896,483
12	March	\$279,590	\$54,176,074
13	April	\$241,477	\$54,417,551

VECTREN ENERGY DELIVERY OF OHIO, INC. D/B/A CENTERPOINT ENERGY OHIO
PIPP Rider
Projected Sales Volumes (CCF)

<u>Line No.</u>	<u>Tariff</u>	<u>A</u> <u>May-21</u> <u>Amount</u>	<u>B</u> <u>Jun-21</u> <u>Amount</u>	<u>C</u> <u>Jul-21</u> <u>Amount</u>	<u>D</u> <u>Aug-21</u> <u>Amount</u>	<u>E</u> <u>Sep-21</u> <u>Amount</u>	<u>F</u> <u>Oct-21</u> <u>Amount</u>	<u>G</u> <u>Nov-21</u> <u>Amount</u>	<u>H</u> <u>Dec-21</u> <u>Amount</u>	<u>I</u> <u>Jan-22</u> <u>Amount</u>	<u>J</u> <u>Feb-22</u> <u>Amount</u>	<u>K</u> <u>Mar-22</u> <u>Amount</u>	<u>L</u> <u>Apr-22</u> <u>Amount</u>	<u>M</u> <u>Annual</u> <u>Amount</u>
1	Rate 310/311 - Residential DSS/SCO Service	4,260,111	3,068,624	2,051,190	2,164,782	2,362,284	6,780,888	13,776,678	23,449,110	27,314,992	20,540,215	17,032,058	9,223,080	132,024,012
2	Rate 315 - Residential Transportation Service	2,856,072	2,057,273	1,375,163	1,451,318	1,583,727	4,546,056	9,236,187	15,720,797	18,312,569	13,770,610	11,418,665	6,183,355	88,511,792
3	Rate 320/321 - General DSS/SCO Service	1,452,484	1,045,057	698,014	736,151	803,369	2,305,707	4,682,476	7,976,268	9,301,550	6,998,101	5,796,783	3,132,817	44,928,777
4	Rate 325 - General Transportation Service	1,479,236	1,064,305	710,870	749,710	818,165	2,348,174	4,768,719	8,123,177	9,472,868	7,126,994	5,903,550	3,190,518	45,756,284
5	School Customers	171,702	116,026	203,456	27,082	184,712	525,904	1,246,020	1,176,303	1,812,396	1,145,637	1,223,890	798,107	8,631,235
6	Total Sales Volumes	10,219,605	7,351,284	5,038,694	5,129,043	5,752,256	16,506,728	33,710,080	56,445,655	66,214,375	49,581,557	41,374,946	22,527,877	319,852,100

PIPP Carrying Cost Support for Projection
Most Recent Twelve Months Ended April 30, 2021

Line No.			
1	Beginning PIPP Rider Asset	(Attachment 1, Line 4)	(\$809,071)
2	Projected Ending PIPP Rider Asset		\$0
3	Total Beginning and Projected Ending Asset	(Line 1 + Line 2)	<u>(\$809,071)</u>
4	Average Balance	(Line 3 /2)	(\$404,535)
5	Projected Carrying Cost Rate		<u>0.22500%</u>
6	Projected PIPP Carrying Costs for the Twelve Months Ended April 30, 2022	(Line 4 * Line 5) (to Attachment 1, Line 8)	<u>(\$910)</u>

This foregoing document was electronically filed with the Public Utilities

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Case No(s). 21-0420-GA-PIP

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