

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The East)	
Ohio Gas Company d/b/a Dominion Energy)	
Ohio for Authority to Continue Deferring)	Case No. 21-907-GA-AAM
Pipeline Infrastructure Replacement (PIR))	
Program Costs.)	

**APPLICATION AND
REQUEST FOR EXPEDITED TREATMENT**

In accordance with R.C. 4905.13, The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO or the Company) respectfully requests that the Commission issue an order temporarily authorizing DEO to continue deferring Pipeline Infrastructure Replacement (PIR) Program costs after December 31, 2021, while the Commission considers DEO's Application in Case No. 20-1634-GA-ALT. In support of this Application, DEO states as follows:

1. DEO is an Ohio corporation engaged in the business of providing natural gas service to customers in Ohio and, as such, is a "natural gas company" as defined by R.C. 4905.03(E), and a "public utility" as defined by R.C. 4905.02.

2. Under R.C. 4905.13, the Commission "may establish a system of accounts to be kept by public utilities" and "may prescribe the manner in which such accounts shall be kept." Rule 4901:1-13-13(B) further provides that the Commission "reserves to itself the right to require the creation and maintenance of such additional accounts as may hereafter be prescribed to cover the accounting procedures of gas or natural gas companies operating within the state of Ohio."

3. In its Opinion and Order in Case No. 15-362-GA-ALT, the Commission approved the continuation and current term of the PIR Program and PIR Cost Recovery Charge for investments made through December 31, 2021.

4. In its Application in Case No. 20-1634-GA-ALT (the PIR Extension Case), DEO requests authority to continue the PIR Program and PIR Cost Recovery Charge for PIR investments and deferrals after December 31, 2021, and continuing through December 31, 2026. The PIR Extension Case is currently pending before the Commission.

5. As currently authorized under the PIR Program, the Company records monthly deferrals associated with certain costs and activities under the Program, including incremental depreciation and property tax expenses as well as post-in-service carrying costs (PISCC) associated with PIR investments not yet incorporated into the PIR cost recovery charge.

6. DEO intends to continue to make PIR investments and defer PIR Program costs after December 31, 2021. DEO is filing this separate application for the sole purpose of ensuring that its deferral authority under the PIR Program does not lapse in the event an order has not been issued resolving the PIR Extension Case by December 31, 2021. To that end, the Company requests that the Commission issue an order in this case confirming that DEO is authorized to continue deferral authority under the PIR Program beyond December 31, 2021, until such time as the Commission issues an order resolving the PIR Extension Case.

7. For sake of clarity, DEO's position is not that it would necessarily lack deferral authority absent the approval of this Application. DEO filed the PIR Extension Case on December 8, 2020, well in advance of the expiration of the PIR Program's current term, and requested authority to continue to defer costs under the PIR Program beyond December 31, 2021. For this reason, even if an order in the PIR Extension Case were issued later in 2021, DEO

believes that its authorization to recover PIR investments and to record associated deferrals would continue to be effective beyond December 31, 2021, given the timeliness of its filing and the nature of its request. Nevertheless, to avoid any doubt concerning its authority to record such deferrals, DEO files this Application to confirm its authority to continue deferring PIR-related costs beyond December 31, 2021, until the PIR Extension Case is resolved.

8. Any deferral authority under this Application is subject to and intended to reflect the outcome of the PIR Extension Case. To the extent the Commission were to directly or indirectly modify DEO's deferral authority in the PIR Extension Case, DEO's authority under this Application would also be modified, and any previously recorded deferrals would be adjusted to correspond to the Commission's final order.

9. Nothing in this Application is intended to waive or modify any right of DEO's to seek rehearing, appeal, or otherwise contest the outcome of the PIR Extension Case.

10. DEO requests an expedited ruling on the Application no later than December 31, 2021. DEO believes that an order in the PIR Extension Case, even if issued after 2021, would continue the Company's deferral authority beyond December 31, 2021. However, so that DEO can have regulatory certainty that it can continue to make deferrals under the PIR Program beyond December 31, 2021, DEO believes that there is a good cause for expedited treatment and a ruling on this Application by December 31, 2021.

WHEREFORE, DEO respectfully requests that the Commission approve this Application no later than December 31, 2021, and confirm that DEO may continue recording deferrals associated with the PIR Program, subject to and until such time as the Commission issues its opinion and order in the PIR Extension Case.

Dated: August 31, 2021

Respectfully submitted,

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Summary: Application Application for Authority to Continue Deferring Pipeline Infrastructure Replacement (PIR) Program Costs electronically filed by Christopher T. Kennedy on behalf of The East Ohio Gas Company d/b/a Dominion Energy Ohio