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September 1, 2021

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

Re: Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio Gas Curtailment Plan,
Case No. 89-8005-GA-TRF

Dear Ms. McNeal:

In accordance with Ohio Adm.Code 4901:5-25-02(D), Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio (CEOH or the Company) states that it has made revisions to its Gas Curtailment Plan (the Plan). These revisions (1) update the name of the Company to include the new trade name; (2) update the Pre-Curtailment Sequence described in Paragraph 4 and new Paragraph 5 on Page 2 of the Plan; and (3) update the Curtailment Sequence described in Paragraph 7 on Pages 2-3 of the Plan. A copy of the updated Plan is attached.

Please note that a copy of this correspondence will be filed electronically in the above-captioned docket. Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Christopher T. Kennedy
Counsel for Vectren Energy Delivery of Ohio, Inc.
d/b/a CenterPoint Energy Ohio

**Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio
Gas Curtailment Plan**

CURTAILMENT PROCEDURES

When sufficient capacity or quantities of gas are not available to Company to meet existing and reasonably anticipated demands for Gas Service or to protect and replenish gas storage reserves, which determinations shall be within Company's reasonable discretion, Company shall have the right to curtail Gas Service within any of its Operational Systems so affected in accordance with the provisions of the Curtailment Procedures.

A. Definitions. For the purpose of this Procedure, the following terms shall have the meanings defined below:

- (1) **Average Daily Throughput.** The Average Daily Throughput for any Base Period billing month shall be the Firm Curtailment Customer's metered Throughput during such month divided by the number of days in the month.
- (2) **Base Period.** The Base Period is any twelve consecutive billing months as established by Company.
- (3) **Firm Curtailment Customer.** A Firm Curtailment Customer shall mean any Customer being served under Rate 345 or 360 whose Average Daily Throughput in any billing month during or subsequent to the Base Period exceeds 1,000 Ccf.
- (4) **Plant Protection Level** - The minimum quantity of Gas Service for Firm Curtailment Customers required by Customer to prevent endangering the health or safety of personnel, or to prevent extensive damage to Customer's facilities, equipment, or other property. This includes the protection of such material currently in process at the time a Curtailment is called which would otherwise be destroyed, but shall not include Gas Service required to maintain plant production.
- (5) **Priority Use** - As defined in Ohio Administrative Code 4901:5-25-01

B. Pre-Curtailment and Curtailment Activities.

Company's obligation to preserve system reliability shall include the right to curtail Gas Service to its Customers according to the following sequence of activities.

When necessary in the sole opinion of Company, Gas Service shall be maintained to Priority Use Customers or other Customers who would otherwise be curtailed, to the extent necessary and practicable under the circumstances. Company shall resort to the next step in the sequence if the previous step does not restore operating pressures to acceptable levels in the affected areas.

The following sequence shall be implemented in the same manner regardless as to whether the risk to system reliability is due to supply or capacity constraints given both have similar impact with regard to system interruption. Company reserves the right to deviate from these sequences at its sole discretion, and at any time, to mitigate compromising system integrity.

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Pre-Curtailment Sequence

1. Pool Operators, Choice Suppliers, and SCO Suppliers shall be subject to an OFO and may be subject to specific delivery requirements and or restrictions specified by Company.
 - a. If a Pool Operator has nominated insufficient volumes relative to its Pool's usage, Pool Operator will be subject to the applicable Non-Compliance Charges. Company will also request that Pool Operator increase their nominated volume to the appropriate level; if Pool Operator does not comply with that request, Company will require usage reduction by the Pool's Transportation Customers to their respective Plant Protection Level.
 - b. If a Choice Supplier or SCO Supplier nominates insufficient volumes relative to its Customers' usage, Company will require that supplier increase its nominated volume to the appropriate level; otherwise the Choice or SCO Supplier will be subject to the applicable non-compliance charges.
2. Next, Company may contact Pool Operators, Choice Suppliers, and/or SCO Suppliers to request additional deliveries, on a voluntary basis, to appropriate city gates to support operating pressures in the affected areas.
3. Next, Company shall request Firm Curtailment Customers to voluntarily reduce usage to their respective Plant Protection Level. In such circumstances, Pool Operator shall not reduce its deliveries to reflect such voluntary Customer usage reductions, unless instructed otherwise by Company.
4. Next, Company shall request any or all Rate 345 and Rate 360 Customers to voluntarily reduce usage to their respective Plant Protection levels to the extent their usage impacts the system reliability issue. In such circumstances, Pool Operator shall not reduce its deliveries to reflect such voluntary Customer usage reductions, unless instructed otherwise by Company.
5. Finally, if Company still determines system reliability issues persist, the Company shall request all Rate 345 and Rate 360 Customers to voluntarily reduce usage to their respective Plant Protection levels. In such circumstances, Pool Operator shall not reduce its deliveries to reflect such voluntary Customer usage reductions, unless instructed otherwise by Company.

Declaration of Curtailment and Curtailment Sequence

6. If Steps 1 through 5 do not restore operating pressures to acceptable levels in the affected area(s), Company shall at its sole discretion declare a formal Curtailment. **When communicating the following Curtailment events to Customers and Pool Operators, Company shall communicate that a Curtailment is in effect.** Such Curtailment shall be effective as of the date and time specified in the notice to Customers and Pool Operators.
7. First, Rate 345 and Rate 360 Customers' transportation gas quantities on Company's system shall be limited to Customers' respective Plant Protection Levels, and the remainder of the Pool's delivered gas supply shall be diverted for use by other Customers. In such

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circumstances, Pool Operator shall not reduce its deliveries to reflect such Customer usage reductions, unless instructed otherwise by Company.

8. Next, all Customers shall be requested to voluntarily reduce gas usage in an effort to divert supplies to affected areas or to Priority Use Customers.
 - a. Company will communicate the Curtailment to Customers via Company's website, mass media, or other means and will request that all Residential and Commercial Customers voluntarily reduce their gas usage where possible.
9. Next, Company will initiate procedures to discontinue Gas Service for those Rate 345 and Rate 360 Customer(s) that have not complied with reducing usage to their Plant Protection Level.
10. Next, Company will initiate procedures to discontinue Gas Service on a non-discriminatory basis that will minimize the number of Customers impacted, but provide maximum potential to divert supplies to maintain service to Priority Use Customers. Customers curtailed shall be based on the size and location of the facilities so as to minimize the total number of Customers affected. No distinction will be made between Rate Schedules in this stage.

C. Disposition of Diverted Gas

When Company diverts gas supplies delivered to its system during a Curtailment, Company will reimburse the Pool Operator for the cost of gas diverted at a rate equal to 110% of the Columbia Daily Index price, as reported in Platts Inside FERC Gas Market Report for the applicable day for "Columbia Gas Appalachia" under the heading "Midpoint" plus applicable variable costs including fuel retention and pipeline variable charges. Such gas costs shall be recoverable through Company's Exit Transition Cost Rider.

D. Lifting of Curtailment

Any Curtailment shall be lifted in reverse order of the Curtailment Sequence.

E. Unauthorized Gas Usage

During a Curtailment,

- (a) The Unauthorized Gas Usage Charge set forth in Sheet No. 30 will apply.
- (b) Customer shall have no entitlement to Unauthorized Gas Usage. In the event Customer continues Unauthorized Gas Usage, Company may, in its sole discretion, discontinue Gas Service to Customer. The assessment of the Unauthorized Gas Usage Charge and the exercise of the right to discontinue Gas Service by Company shall be in addition to any other rights Company may have with respect to Customer's Unauthorized Gas Usage.

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Summary: Correspondence Correspondence re: Revisions to Gas Curtailment Plan electronically filed by Christopher T. Kennedy on behalf of Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio