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January 18, 2022

Ms. Tanowa Troupe
Secretary – Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

RE: ***In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. d/b/a/ CenterPoint Energy Ohio for Authority to Issue Long-Term Debt, to Issue and Sell Common Stock, Receive Equity Infusions, Enter into Interest Rate Risk Management Transactions, and for Approval of, and Authority to enter into, a Revised Financial Services Agreement and In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. d/b/a/ CenterPoint Energy Ohio for Approval of Accounting Methodology, Case Nos. 21-0299-GA-AIS and 21-0984-GA-AAM***

Dear Secretary Troupe,

Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio ("CEOH" or "Company") filed a Supplemental Application on September 24, 2021, in the above-captioned matter. On January 6, 2022, the Staff of the Public Utilities Commission of Ohio ("Commission") issued its review and recommendation. Staff recommends approval of the application subject to seven recommendations. As noted in more detail below, the Company accepts the Staff's recommendations.

In recommendation five, Staff recommends that the Company track early redemption costs as a merger "Transition Cost" that can be reviewed in the Company's next base rate case, but otherwise supports the Company's proposal to treat the redemption cost like an issuance cost and record the cost as part of the Company's embedded cost of debt. The Company accepts Staff's recommendation and will track these costs as a "Transition Cost" and make information available for Staff's review in the next rate case.

In recommendation six, Staff recommends that the Commission deny the Company's request to defer direct incremental expenses, such as legal and consultant fees, accounting/auditor fees, or other expenses, associated with the refinancing. The Company accepts Staff's recommendation.

In recommendation seven, Staff recommends that the Company file a report in this docket within 60 days of completing the financial restructuring. The Company accepts Staff's recommendation

The remaining four recommendations are customary recommendations that Staff makes in the Company's annual financing cases, and the Company accepts each of these recommendations.

Respectfully submitted,

/s/ Matthew R. Pritchard
Matthew R. Pritchard

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in

Case No(s). 21-0299-GA-AIS, 21-0984-GA-AAM

Summary: Letter of Notification Accepting Staff's Recommendations electronically filed by Mr. Matthew R. Pritchard on behalf of Vectren Energy Delivery of Ohio, Inc.