

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

|  |   |                         |
|--|---|-------------------------|
| In the Matter of the Application of The    | ) |                         |
| East Ohio Gas Company d/b/a Dominion       | ) | Case No. 21-1109-GA-ALT |
| Energy Ohio for Approval of an Alternative | ) |                         |
| Form of Regulation                         | ) |                         |

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**OBJECTIONS OF INTERSTATE GAS SUPPLY, INC. TO THE APPLICATION AND  
STAFF REPORT OF INVESTIGATION**

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**I. INTRODUCTION**

The East Ohio Gas Company, d/b/a Dominion Energy Ohio (“Dominion”), seeks approval from the Public Utilities Commission of Ohio (“PUCO” or “Commission”) to continue and expand its portfolio of demand-side management (“DSM”)/energy-efficiency (“EE”) programs and to recover the associated incremental costs through its existing DSM Rider.<sup>1</sup> The application seeks to expand two existing DSM/EE programs and to introduce eight new programs for residential and small commercial customers.<sup>2</sup>

In this proceeding, Dominion is seeking to not only continue its existing DSM/EE programs through the year 2027, but also to expand its DSM/EE portfolio by introducing eight new programs for residential and small commercial customers. Specifically, Dominion seeks Commission approval to introduce a Residential EE Marketplace Program, High Efficiency Residential Gas Equipment Program, and Commercial Customer Program, among others.<sup>3</sup> Dominion also proposes to maintain its current DSM collaborative to elicit and receive input on its DSM/EE

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<sup>1</sup> *In the Matter of the Application of The East Ohio Gas company d/b/a Dominion Energy Ohio for Approval of an Alternative Form of Regulation* at 1, Case No. 21-1109-GA-ALT (Nov. 30, 2021). (hereinafter “Application”)

<sup>2</sup> *Id.* at 2.

<sup>3</sup> *Id.* at 7.

programs from interested stakeholders.<sup>4</sup> The Staff Report of Investigation (“Staff Report”) was filed with the Public Utilities Commission of Ohio (“Commission”) on March 29, 2022. The report sets forth the Commission Staff’s (“Staff”) findings regarding the Application.<sup>5</sup>

Pursuant to R.C. 4909.19 and 4929.05 and Rule 4901:1-19-07 of the Ohio Administrative Code, Interstate Gas Supply, Inc. (“IGS”) hereby files its Objections to the Application and Staff Report in the above-captioned matters. IGS reserves the right to contest through cross-examination, testimony, or exhibits any newly raised issues, issues raised by any other party, or any position set forth in the Staff Report that changes prior to the close of the record.

## **II. OBJECTIONS**

### **Objection 1: The Staff Report fails to recommend that any rebates be available to third parties to offer directly to customers.**

Dominion seeks to expand its DSM/EE portfolio by introducing eight new programs for residential and small commercial customers.. For example, under the Residential EE Marketplace, Dominion proposes to develop an online store to encourage customers to purchase discounted energy efficient products available directly from DEO’s website.<sup>6</sup> Such discounts are made available through instant rebate incentives funded by the DSM/EE portfolio.

IGS has also provided energy efficient products to customers, including the deployment of energy efficient “smart thermostats.” The Residential EE Marketplace and other program incentives as proposed should not be approved because it is structured in way that unreasonably and unnecessarily frustrates the competitive

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<sup>4</sup> *Id.* at 13.

<sup>5</sup> *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion Energy Ohio for Approval of an Alternative Form of Regulation*, Case No. 21-1109-GA-ALT Staff Review and Recommendation (“Staff Report”).

<sup>6</sup> Direct Testimony of Jim Herndon at 7.

market. The Staff Report failed to address the discriminatory nature of the Residential EE Marketplace and other incentives available through the DSM/EE portfolio.

The Staff Report should have recommended that, to the extent the portfolio plan is implemented, a competitive retail natural gas service provider that promotes energy savings and the use of Dominion's energy savings programs shall be eligible to be considered a third party to whom the customer may convey an energy savings incentive associated with participation in a utility program, subject to the customer's written consent and verification of the customer's identity.

Accordingly, the request for authorization of the Residential EE Marketplace and other incentives as proposed in the Application should not be approved.

**Objection 2: The Staff Report fails to recommend that the Home Performance with Energy Star program be expanded to include commercial customers.**

The Home Performance with Energy Star program provides residential customers a home energy assessment by a certified auditor. Residential customers receive a customized report with recommendations on how to save energy and improve their home's comfort, as well as information on available DEO financial incentives for recommended weatherization and equipment. <sup>7</sup>

The Staff Report should have recommended that, to the extent the Home Performance with Energy Star Program is implemented, it should be expanded to include commercial customers. There is an opportunity to create a parallel program to the residential Energy Star Program for commercial customers of varying sizes. Commercial customers should not be excluded from a program where the same overall system benefits can be achieved. Due to the different needs and energy use patterns of commercial customers versus a typical residential those customers should be permitted to self-direct the home energy assessment to a vendor of their choosing under the same total financial incentives available to other customers.

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<sup>7</sup> Direct Testimony of Jim Herndon at 5.

Accordingly, the request for authorization of the Home Performance with Energy Star Program and other incentives as proposed in the Application should not be approved.

Respectfully Submitted,

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## **CERTIFICATE OF SERVICE**

I certify that this *Objections of Interstate Gas Supply, Inc. to the Application and Staff Report of Investigation* was filed electronically with the Docketing Division of the Public Utilities Commission of Ohio on this 28th day of April 2022.

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s/ Stacie Cathcart  
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**Case No(s). 21-1109-GA-ALT**

Summary: Objection Objections of by Interstate Gas Supply, Inc. to the Staff Report of Investigation and Application. electronically filed by Stacie Cathcart on behalf of Interstate Gas Supply