



CenterPoint Energy Ohio
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September 16, 2022

Ms. Tanowa M. Troupe
Secretary of the Commission
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215-3793

Re: In Vectren Energy Delivery of Ohio, LLC d/b/a CenterPoint Energy Ohio, Case No. 22-420-GA-PIP

Dear Ms. Troupe:

Enclosed please find the Audit Report of Deloitte & Touche LLP of Vectren Energy Delivery of Ohio, LLC d/b/a CenterPoint Energy Ohio's PIPP Rider to be filed in the above referenced case.

Respectfully submitted,

/s/ Katie J. Tieken
Director, Regulatory and Rates

Enclosure

INDEPENDENT ACCOUNTANT'S REPORT

To Vectren Energy Delivery of Ohio:

We have performed the procedures enumerated below related to the Company's compliance with Percentage of Income Payment Plan Rider ("PIPP") related to Public Utility Commission of Ohio ("PUCO") Case No. 22-420-GA-PIP for the period from May 1, 2021 to April 30, 2022 (the "subject matter"). Vectren Energy Delivery of Ohio, LLC d/b/a CenterPoint Energy Ohio ("CEOH") (the "Company") is responsible for the subject matter. Effective June 13, 2022, Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio became a limited liability company with the legal name Vectren Energy Delivery of Ohio, LLC.

The Company has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of the engagement, as described above. Additionally, the Company and the Public Utility Commission of Ohio have acknowledged that the procedures performed are appropriate for their purposes.

We make no representation regarding the appropriateness of the procedures performed either for the purpose for which our report has been requested or for any other purpose. Accordingly, this report may not be suitable for either the purpose of which this report has been requested or for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures and the associated findings are as follows:

Percentage of Income Payment Plan Recovery Mechanism

1. We obtained from Company management the monthly accounting schedule summarizing the following items included as a component of the PIPP rider for the period May 1, 2021 to April 30, 2022:

- a. PIPP balance change activity for the period of May 1, 2021 to April 30, 2022 of \$(901,588).
- b. Billed and unbilled PIPP rider recoveries for the period of May 1, 2021 to April 30, 2022 of \$(975,863).
- c. PIPP program credits for the period of May 1, 2021 to April 30, 2022 of \$1,614,605.
- d. Net carrying charge/recoveries for the period of May 1, 2021 to April 30, 2022 of \$(1,539).

We proved the arithmetic accuracy of each monthly accounting schedule from May 2021 through April 2022, noting no exceptions, aside from rounding differences which were less than \$1.

2. We selected four (4) months included in the schedule obtained in Step 1. above and performed the following procedures:

- a. We agreed the applicable PIPP rider rates used by the Company in the Percentage of Income Payment Rate Calculation report with those permitted by the PUCO, as outlined in Case Nos. 21-420-GA-PIP and 22-420-GA-PIP and found no exceptions.

- b. We agreed the monthly accounting schedule obtained in Step 1. above to the supporting schedules for the PIPP balance change, billed and unbilled PIPP rider recoveries, PIPP program credits, and transportation penalties, and found such amounts to be in agreement. There were no transportation penalties included in the schedule provided by Company management. For purposes of reporting findings, only differences greater than \$1,000 will be reported.
 - c. We compared the interest rates utilized by the Company to calculate carrying charges included in the schedule obtained in Step 1.d. above to interest rates included in a supporting schedule we obtained from Company management and found the interest rates to be in agreement. We recalculated carrying charges utilizing interest rates provided by the Company and the balance included in the monthly accounting schedule obtained in Step 1.d. above, noting no exceptions.
3. We selected 25 PIPP credits from the PIPP program credits outlined within the monthly accounting schedule obtained in Step 1.c. above, issued during the period May 1, 2021 to April 30, 2022. We allocated those selections across types of program credits, including unused incentive credits, delta credits and arrearage credits. We performed the following procedures:
- a. For unused incentive credits, we agreed the selected amount to customer billing history and identified no exceptions.
 - b. For delta credits, we recalculated the selected program credit based on amounts included in the customer bill and the PIPP payment amount determined by the State of Ohio. We obtained the date of the PIPP payment amount determined by the Ohio Community and Energy Assistance Network and determined whether such payment was received prior to the issuance of the customer's next bill, based on information provided by management. We identified no exceptions.
 - c. For arrearage credits, we recalculated the selected program credit based on information obtained from Banner. Our recalculation of each PIPP program credit agreed to the detailed population, noting no exceptions.
4. For the months selected in Step 2. above, we agreed billed and unbilled PIPP recoveries in the monthly accounting schedule to the PIPP Rider recovery amounts in the Percentage of Income Payment Analytical Analysis report and identified no exceptions. We obtained the revenue listing by cycle of monthly billed PIPP rider revenue from management. Subsequently, we selected a billing cycle within each month and obtained the Banner detail, totaling monthly billed PIPP Rider revenue by customer and premise. Using this method, we selected ten (10) customers, in aggregate, from the Banner detail totaling monthly billed PIPP rider revenue by customer and premise for the period May 1, 2021 to April 30, 2022. We performed the following procedures:
- a. We obtained each customer's bill detail from the Customer History Card in Banner for the selected month.
 - b. We agreed customer and premise numbers from each selection to the customer bill and identified no exceptions
 - c. For each customer, we agreed the customer rate code included in the Banner detail to the CEOH Rate Reference schedule and, based on the customer code included in the Banner detail, determined if the customer appeared eligible for the PIPP rider rate. We noted no exceptions.
 - d. We recalculated the PIPP portion of each selected customer's bill and agreed the rate in each selected customer's bill to the corresponding PIPP rider rates found on the PUCO website. We noted no exceptions.
 - e. We agreed the recalculated PIPP rider revenue to the Customer History Card in Banner and agreed total charges per the Customer History Card to the customer invoice. We noted no exceptions.

5. We obtained the sum of regulatory asset balances at April 30, 2022 from the Company's general ledger for the PIPP and PIPP carrying charges, respectively, and compared the balance to the monthly accounting schedule obtained in Step 1. above, and found them to be in agreement. For purposes of reporting findings, only differences greater than \$1,000 will be reported.

We were engaged by the Company to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the subject matter. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Company and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Company and the PUCO, and is not intended to be, and should not be, used by anyone other than these specified parties.

Deloitte & Touche LLP

September 16, 2022

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

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in

Case No(s). 22-0420-GA-PIP

Summary: Audit Audit Report electronically filed by Ms. Katie J Tieken on behalf of
Vectren Energy Delivery of Ohio, LLC d/b/a CenterPoint Energy Ohio