

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Vectren Energy Delivery of Ohio, LLC	)	
d/b/a CenterPoint Energy Ohio for	)	Case No. 23-0273-GA-RDR
Authority to Adjust Its Distribution	)	
Replacement Rider Charges.	)	

**APPLICATION**

Vectren Energy Delivery of Ohio, LLC d/b/a CenterPoint Energy Ohio (CEOH) respectfully requests that the Commission approve an adjustment to its Distribution Replacement Rider (DRR) charges as described and supported herein. In support of this Application, CEOH states:

1. CEOH is an Ohio corporation engaged in the business of providing natural gas distribution service in west central Ohio and, as such, is a “natural gas company” and “public utility” as defined by R.C. 4905.03(E) and 4905.02(A), respectively.
2. On January 7, 2009, in Case No. 07-1080-GA-AIR, the Commission first approved the DRR to recover the costs of the Company’s accelerated bare-steel and cast-iron replacement program (the Replacement Program). The DRR was approved to be in effect for a five-year period ending in February 2014 beginning on the date rates approved in that case were implemented.
3. On August 22, 2013, in Case No. 13-1571-GA-ALT, CEOH filed an application to expand the scope of the Replacement Program and to extend the DRR to recover the associated costs incurred through the end of calendar year 2017. On January 17, 2014, CEOH and the Commission’s Staff entered into a Stipulation and Recommendation (the 13-1571 Stipulation), which the Commission approved in an Opinion and Order dated February 19, 2014 (the 13-1571 Order).

4. On March 30, 2018, CEOH filed an application in Case Nos. 18-0298-GA-AIR and 18-0299-GA-ALT (the 2018 Rate Case Application) requesting, among other things, an increase in base rates and an extension of the Replacement Program and the DRR to cover investment through December 31, 2023. As explained in the 2018 Rate Case Application, CEOH reflected in its proposed rate base all Replacement Program investments through December 31, 2017.

5. On January 4, 2019, CEOH, Commission Staff, and other parties to the 2018 Rate Case entered into a Stipulation and Recommendation (the 2018 Rate Case Stipulation), which the Commission approved pursuant to the August 28, 2019 Opinion and Order in Case Nos. 18-0298-GA-AIR, 18-0299-GA-ALT, and 18-0049-GA-ALT (the 2018 Rate Case Order). The 2018 Rate Case Stipulation stated that the DRR balance as of December 31, 2017 is included in stipulated base rates. The 2018 Rate Case Stipulation also extended the DRR program for six years, for investment from January 1, 2018 through December 31, 2023.

6. On August 10, 2022, in Case No. 22-0455-GA-RDR, the Commission also approved CEOH's application that established the current DRR charges for the DRR investment period ending December 31, 2021. Those charges became effective on September 1, 2022.

7. Consistent with the 13-1571 Stipulation and Order and the 2018 Rate Case Stipulation and Order, CEOH proposes to adjust the current DRR charges to recover the following costs that were incurred in 2022:

- The cost of replacing and retiring bare-steel and cast-iron mains and bare-steel service lines;
- The cost of replacing and retiring field-coated steel pipe that was installed prior to 1955;
- The cost of replacing, retiring, and testing field-coated steel pipe installed beginning in 1955 and prior to 1971 and that failed a cathodic-protection test;

- The cost of replacing and retiring obsolete pipe and appurtenances that were encountered within the context of a main replacement project undertaken as part of the Replacement Program;
- The cost of replacing and retiring vintage plastic pipe that was encountered within the context of a main replacement project undertaken as part of the Replacement Program, to the extent that the total footage of vintage-plastic-pipe replacement did not exceed five percent of total replacement program footage in 2018;
- The cost of replacing and retiring segments of interspersed plastic pipe, under the following conditions:
  - For any individual segment of plastic pipe that meets the length and diameter limitations set forth in ¶ 5 of the 13-1571 Stipulation, such costs shall be included;
  - For segments of interspersed plastic pipe in excess of the limitations set forth in ¶ 5 of the 13-1571 Stipulation, such costs may be included unless it is shown that it was less economical to replace the segment than to tie it into the existing plastic segment;
- The cost of replacing segments of pipe that included target pipe where (a) CEOH's pipe was in a public right-of-way, (b) CEOH was required to relocate its facilities at the request of a governmental entity, and (c) the plastic pipe associated with the relocation was less than or equal to 25 percent of the total footage of that governmental relocation; and
- The incremental costs of assuming ownership and repair of customer service lines.

(13-1571 Stipulation at 2–4.)

8. The 13-1571 Stipulation provided that CEOH would work with Staff to agree on a methodology that accurately identified CEOH's actual incremental service-line costs and investment. (*Id.* at 3–4.) In Case No. 14-813-GA-RDR, following discussions with Staff, CEOH proposed a methodology to accurately identify actual incremental service-line costs and investments. Staff recommended approval of CEOH's 14-813 Application, including the treatment of service lines, without modification (*see* Staff Comments at 4–5), and the Commission approved. *See* 14-813 Opin. & Order at 3–4 (Aug. 27, 2014). As described in the

Direct Testimony of Mason Butler IV, CEOH's Application in this case uses the same methodology approved in Case No. 14-813-GA-RDR.

9. Costs recoverable in the DRR have been offset by operations and maintenance (O&M) savings, which CEOH has calculated using a credit of \$5,882 per mile of bare-steel and cast-iron main replaced (the O&M Savings Credit). This calculation is consistent with the 2018 Rate Case Stipulation and Order. Given that CEOH replaced a cumulative 288.72 miles of bare-steel and cast-iron main from 2018-2022, the O&M Savings Credit is \$1,698,251. CEOH also calculated actual O&M savings by comparing 2022 actual O&M costs to the O&M baseline reflected in the 2018 Rate Case Stipulation, but this amount was \$588,227 and thus less than the O&M Savings Credit.

10. CEOH requests that the Commission establish the revised DRR charge to be effective on September 1, 2023, for the subsequent 12-month period and that this application not be considered an application to increase rates and charges.

11. As a part of this Application, CEOH has provided support for the following:

- The return of and on the plant investment, inclusive of capitalized interest or post-in-service carrying costs charges (PISCC) at the rate of 5.07% (effective January 1, 2019) for the accumulated infrastructure investment amounts in the DRR from the date that the applicable assets are placed in service until the effective date of the next subsequent DRR;
- The incremental costs of assuming ownership and repair of customer service lines;
- The incremental revenue requirement for the year and for each component of the DRR;
- A summary of its construction plans for the next year, including expected investment, expected location of the infrastructure replacement work, and the expected miles to be replaced; and
- The calculation of the O&M Savings Credit and of actual annual savings of O&M expenses compared to the O&M baseline reflected in the 2018 Rate Case Stipulation.

12. To demonstrate the justness and reasonableness of the proposed DRR charges and the underlying revenue requirement, CEOH submits the following exhibits:

- CEOH Exhibit 1.0: Direct Testimony and Exhibits of Mason Butler IV;
- CEOH Exhibit 2.0: Direct Testimony and Exhibits of Marisa J. Johnson; and
- CEOH Exhibit 3.0: Direct Testimony and Exhibits of Katie J. Tieken.

13. The data and information contained in the Application and supporting testimony support the following revised DRR charges, which include adjustments attributable to the reconciliation of costs recoverable and costs actually recovered during the prior DRR rate effective period:

<b>Rate Schedule</b>	<b>\$ Per Month</b>	<b>\$ Per Billing Ccf</b>
310, 311 and 315	\$9.85	
320, 321 and 325 (Group 1)	\$12.80	
320, 321 and 325 (Group 2 and 3)		\$0.03230
345		\$0.01357
360		\$0.00773

14. The calculation of the proposed DRR charge applicable to residential customers is consistent with the Commission's approval of CEOH's alternative rate plan in the 2018 Rate Case and complies with the residential rate cap per the 2018 Rate Case Stipulation of \$12.00 per month for the DRR investment period as of December 31, 2022, exclusive of any variances, applicable to those same customers during the period September 1, 2023, through August 31, 2024. The calculation of the proposed DRR charge applicable to small general service (Group 1) customers complies with the provisions of the 2018 Rate Case Stipulation and is consistent with the Commission's approval of CEOH's alternative rate plan in the 2018 Rate Case, requiring the calculation of this charge to be 130% of the residential DRR charge.

15. A redlined and clean revised tariff Sheet No. 45, Fourth Revised Page 1 of 1, which reflects the revised DRR charges, is included as Exhibit No. KJT-3 to the Direct Testimony of Katie J. Ticken.

WHEREFORE, CEOH respectfully requests that the Commission approve the DRR charges, approve the proposed Sheet No. 45, Fourth Revised Page 1 of 1, and grant all other necessary and proper relief.

Dated: May 1, 2023.

Respectfully submitted,

/s/ Christopher T. Kennedy

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ATTORNEYS FOR VECTREN ENERGY

DELIVERY OF OHIO, LLC D/B/A

CENTERPOINT ENERGY OHIO

**CERTIFICATE OF SERVICE**

I hereby certify that a courtesy copy of this Application and Attachments was served by electronic mail this 1st day of May 2023, to the following:

John H. Jones, Acting Section Chief  
Assistant Attorneys General  
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/s/ Christopher T. Kennedy  
One of the Attorneys for Vectren Energy  
Delivery of Ohio, LLC d/b/a CenterPoint  
Energy Ohio

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**DIRECT TESTIMONY OF**

**MASON BUTLER IV**

**DIRECTOR OF GAS ENGINEERING INDIANA AND OHIO**

**ON BEHALF OF**

**VECTREN ENERGY DELIVERY OF OHIO, LLC**

**D/B/A CENTERPOINT ENERGY OHIO**

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**Direct Testimony of  
Mason Butler IV**

**I. INTRODUCTION**

**Q1. Please state your name, business address and occupation.**

A. My name is Mason Butler IV. My address is Sixteen Thousand Allisonville Rd, Noblesville, Indiana, 46060. I am the Director of Gas Engineering for the Indiana and Ohio Region of CenterPoint Energy, Inc. Vectren Energy Delivery of Ohio, LLC d/b/a CenterPoint Energy Ohio (CEOH), Indiana Gas Company, Inc. d/b/a CenterPoint Energy Indiana North (CEI North), and Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South (CEI South) and are all indirect subsidiaries of CenterPoint Energy, Inc.

**Q2. What are your duties in your present position?**

A. I have responsibility for gas engineering and technical support for the natural gas utility operations of CEOH, CEI North, and CEI South. My specific responsibilities include gas transmission and distribution engineering, gas transmission project management, gas capital management and gas geospatial systems.

**Q3. Please describe your work experience.**

A. My work experience began in 2005 with the Engineering and Transportation Department of a local government entity as an Office Assistant where I was responsible for the issuance of encroachment permits, field investigations, and engineering support. Next, I worked in the natural gas industry estimating, designing, assisting with commissioning, and managing the construction of internal combustion engine fuel systems. Since 2012, when I joined CenterPoint Energy, Inc., I have held several positions of increasing responsibility, ranging from engineer to engineering manager. My responsibilities have

1 also ranged from individual contributor to manager and included pipeline design, project  
2 management, estimating, system planning, capital budget management, and design  
3 approval. In June 2022, I was promoted to my current position.

4 **Q4. What is your educational background?**

5 A. I received a Bachelor of Engineering degree from Vanderbilt University in 2005 with a  
6 discipline in Mechanical Engineering.

7 **Q5. Have you previously testified before this Commission?**

8 A. I am currently testifying in CEOH's Alternative Rate Plan, Case No. 22-0738-GA-ALT,  
9 to extend the DRR beyond 2023 investment. I have also provided testimony before the  
10 Indiana Utility Regulatory Commission on behalf of CEI North and CEI South.

11 **Q6. What is the purpose of your testimony in this proceeding?**

12 A. First, I will provide details on the progress of CEOH's accelerated bare-steel and cast-  
13 iron (BSCI) and ineffectively coated steel replacement program (the Replacement  
14 Program). I will discuss the status of pipe replacement and retirement, the costs incurred,  
15 and the benefits identified in 2022. I will discuss certain other issues, such as meter  
16 relocations and plastic pipe retirements, and how these are addressed within the  
17 Replacement Program. I will discuss the processes used to assess and award the  
18 construction work associated with the Replacement Program. I will conclude this section  
19 by discussing the plan for the Replacement Program in 2023 (2023 Replacement Plan).

20  
21 The second portion of my testimony will discuss CEOH's experience with the change in  
22 service line ownership and responsibilities, which took effect in 2009, and CEOH's  
23 incremental investments in 2022 that resulted from this change.

The final portion of my testimony will discuss CEOH's calculation of operations and maintenance (O&M) savings for the 2022 investments, in accordance with the Stipulation approved in Case No. 13-1571-GA-ALT (the 13-1571 Stipulation) and the Stipulation approved in Case Nos. 18-0298-GA-AIR and 18-0299-GA-ALT (the 2018 Rate Case Stipulation).

**Q7. What Exhibits are you sponsoring in this proceeding?**

A. I am sponsoring the following exhibits:

- Exhibit No. MBIV-1 – 2022 CEOH Replacement Program Progress
- Exhibit No. MBIV-2 – 2022 CEOH Plastic Main Retirement Causes
- Exhibit No. MBIV-3 – CEOH 2023 BS/CI Replacement Plan
- Exhibit No. MBIV-4 – CEOH Operating & Maintenance Savings Calculation
- Exhibit No. MBIV-5 – CEOH 2022 Maintenance Expense - BS/CI & Service Line Ownership

**II. BARE-STEEL AND CAST-IRON REPLACEMENT PROGRAM INCLUDING INEFFECTIVELY COATED STEEL PROJECTS**

**Q8. Please provide a brief description of CEOH's Replacement Program.**

A. As of the end of 2022, CEOH had a total of approximately one hundred fifty-one miles of bare steel and nine miles of cast iron main remaining in its system.<sup>1</sup> Additionally, CEOH has identified approximately 658 miles of ineffectively coated steel remaining in its system.

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<sup>1</sup> Due to both the completion of retirements from the prior year and the continual updating of CEOH's GIS data, there are differences between the remaining mileage and retirement figures reported in 2014 through 2022.

**Q9. How much bare steel and cast-iron infrastructure did CEOH retire in 2022 as part of the Replacement Program?**

A. In 2022, CEOH retired approximately 85 miles under the Replacement Program, including approximately 58.5 miles of bare steel and 5.5 miles of cast iron for projects placed in service in 2022. The amount of plastic main interspersed and retired with the bare steel and cast iron projects was approximately eight and a half miles in 2022. CEOH also retired 5,250 service lines associated with the bare steel and cast iron projects, with 4,927 of those being replaced or partially replaced for projects placed in service in 2022. The amount of bare steel and cast iron mileage is less than the 67 miles of combined bare steel and cast iron planned for retirement in 2022 due to the 8 miles of interspersed plastic pipe replacement that was estimated at approximately 6 miles.

**Q10. When does CEOH expect to complete the retirement of its remaining bare-steel and cast-iron assets?**

While CEOH continues to exercise its best efforts to maintain a pace of replacement to complete the Replacement Program as soon as practicable, based on the various factors described in more detail below, the Company currently projects the completion of bare steel cast iron assets by the end of 2025. The Replacement Program, provided it is extended beyond 2023, would then continue to replace assets associated with ineffectively coated steel in 2026. In accordance with the 2018 Rate Case Stipulation, because CEOH's authority to recover the costs of the Replacement Program via the DRR terminates with investments made after December 31, 2023, CEOH filed Case No. 22-0738-GA-ALT to request an extension of the DRR through 2026 (the 2022 DRR Extension Case).

1 As discussed in prior DRR filings, several factors have caused CEOH to request an  
2 extension of the Replacement Program beyond 2023. Specifically, they are:

3 1) Increasing replacement costs driven by more projects being completed in non-rural  
4 areas with higher restoration costs associated with extensive pavement in the work  
5 areas and municipal mandates related to the repair or replacement of roadways and  
6 sidewalks. As these costs increase and further mandates are imposed on CEOH and  
7 its contractors, CEOH expects to be constrained by its capital budget in its efforts to  
8 replace the targeted miles annually.

9 2) The identification of additional bare steel mains as the Replacement Program and  
10 other project work is executed and on-going review of historical records and maps.  
11 CEOH continues to find aging pipe beyond what is indicated in its historical project  
12 records as it completes work in its Replacement Program and continues its  
13 Distribution Integrity Management Program. As previously described in prior DRR  
14 filings, bare steel quantities have increased despite achieving replacement targets in  
15 previous years. This was due to additional historical work order and geographic  
16 information system (GIS) analysis, which resulted in the inclusion of several miles of  
17 bare-steel main primarily consisting of newly identified shorter, scattered isolated  
18 segments.

19 3) As discussed in the prior DRR filings, cascading effects from construction delays in  
20 2020 and 2021 due to the COVID-19 pandemic have contributed to extending the  
21 Replacement Program.

22 4) The need to replace targeted ineffectively coated steel pipelines.

**Q11. How much did CEOH invest in the Replacement Program in 2022?**

A. The Replacement Program investment for bare steel, cast iron, and ineffectively coated steel projects in 2022 was \$64,071,667. Exhibit No. MBIV-1 provides a detailed list of bare steel, cast iron, and ineffectively coated steel projects under the Replacement Program in 2022, the costs of each project as of December 31, 2022, and the amount of pipe (main footage and number of service lines) retired and replaced. For some projects completed in 2022, additional trailing charges (such as restoration costs) will be incurred in 2023. These costs will be included in a future DRR filing.

**Q12. Describe the difference between Exhibit No. MBIV-1 and the Capital Plant In Service found on Exhibit No. MJJ-2a and Exhibit No. MJJ-3a?**

A. The capital expenditures detailed in Exhibit No. MBIV-1 reflect the Company's investment for replacement of its distribution assets to the betterment of the rate payer. The investment of \$64,071,677 represents the capital work for the calendar year 2022. Not all of this work was tracked on an SAP work order that could be closed and moved to Plant In Service status by December 31, 2022. In these cases, the capital work was attached to superior orders that still remain open. The Company will include any capital investment that is within Exhibit No. MBIV-1 and not included in this filing's revenue requirement in a future filing for recovery.

**Q13. Were any of the projects completed as part of the Replacement Program in 2022 the result of a public improvement project?**

A. Yes. Thirty-six bare-steel and cast-iron projects included in the 2022 Replacement Program originated as the result of public improvement projects. Project groups V-1073, V-1076, V-1153, V-1166, V-1220, V-1282, V-1292, V-1294, V-1310, V-1311, V-1313, V-1314, V-1666, V-1668, V-1943, V-2042, V-2086, V-2330, V-2439, V-2448, V-2492, V-2494, V-2523, V-2529, V-2640, V-379, V-736, V-737, V-740, V-753, V-754,

V-778, V-781, V-822, V-921, and V-989 (the Public Improvement Projects) are identified in the list of completed projects in Exhibit No. MBIV-1.

**Q14. The Stipulation approved in Case No. 13-1571-GA-ALT provided that CEOH may recover the costs of replacing segments of pipe where CEOH's pipe is in a public right-of-way and the Company is required to relocate its facilities at the request of a governmental entity, provided the plastic pipe being relocated is less than or equal to 25% of the total footage relocated. Was the footage of plastic pipe retired on each of the Public Improvement Projects less than or equal to 25% of the total footage of those government projects?**

A. No. The footage of plastic pipe retired on thirty-two of the projects was less than 25% of the total footage relocated on these projects. The plastic pipe retired on four of the projects – V-2086, V-736, V-753, and V-822 – was more than 25% of the total footage of the public improvement projects. The specific footage retired on the projects may be found in Exhibit No. MBIV-1.

**Q15. Why did the footage on four of the Public Improvement Projects exceed the 25% threshold?**

A. The plastic main retired as part of project groups V-2086, V-736, V-753, and V-822, was 34%, 37%, 31%, and 38%, respectively, of the total main retired. CEOH assesses and uses the most cost-effective methods to complete all replacement projects. While it is not typical for the percentage of plastic main retired with a Public Improvement Project included in the Replacement Program to exceed 25% of the total main retired, there are circumstances where it is less costly to retire plastic main than attempt to salvage it for ongoing service.

Project V-2086 was necessary to retire two, three, four, and six inch low pressure pipe due to the cost difference to insert versus install four inch medium pressure plastic around the public square. Leaving more of the plastic main in place by inserting the pipe would

have resulted in additional costs associated with more complicated piping connections, installation of excess flow valves under pavement, and more extensive restoration. The main was also retired to prevent service disruptions to local businesses.

Project V-736 was necessary to retire two, four, and six inch low pressure plastic and two, three, and six inch medium pressure plastic. The pipe was retired due to the requirement to install excess flow valves on service lines tied into the medium pressure main and the elimination of street crossings no longer needed due to the newly installed main.

Project V-753 was necessary to retire three and four inch low pressure plastic that was inserted into existing plastic. The difficulty to cut the existing plastic and install excess flow valves would have cost more than installing new plastic main to tie-in existing service lines with excess valves.

Project V-822 was necessary to retire three, four, and six inch low pressure plastic that was installed in the road ROW. Retiring the plastic main and installing in a non-paved area was more cost effective. Leaving the existing main in place and installing excess flow valves would have incurred increased restoration costs.

**Q16. Is CEOH seeking recovery of the amount in excess of the 25% threshold in its proposed DRR rate as part of this application?**

A. No. CEOH has reduced the requested cost recovery for the four projects by using the cost per foot of total retired main for each project multiplied by the quantity of retired plastic main in excess of the 25% threshold. This calculation is consistent with CEOH's excluded amounts agreed to within the 2021 DRR proceeding, Case No. 21-0491-GA-RDR. The



cost attributed to the plastic main footage greater than 25% of the total retirement on each of these project groups is as follows:

V-2086	\$68,800
V-736	\$117,700
V-753	\$83,200
V-822	\$188,600

As noted within the exhibits presented by CEOH witnesses Marissa J. Johnson and Katie J. Tieken, CEOH has reflected these adjusted amounts in its Revenue Requirement and its proposed DRR rates.

**Q17. What total quantity of plastic main did CEOH retire as part of the Replacement Program in 2022?**

A. CEOH retired a total of 55,212 feet of plastic main within the replacement projects completed in 2022. Exhibit No. MBIV-2 provides a brief description of the cause of retirement of plastic for each applicable project. As discussed in CEOH's 2018 Rate Case and past DRR annual updates, the primary reasons for the retirement of plastic mains are listed below:

- Short segments of plastic main existed within the bare-steel or cast-iron systems. It would have been more costly to attempt to salvage these segments than to replace them;
- Sections of plastic main at the ends of distribution systems were retired because those segments no longer served any customers and there was no reason to continue to maintain them;
- Sections of plastic main that were intended to be reused failed pressure tests and needed to be replaced;

- Segments of plastic mains were interspersed with bare steel replacement completed as part of public improvement projects where it was necessary to relocate both the bare steel and plastic segments; and
- To facilitate the installation of excess flow valves on service lines and avoid excavation and restoration of streets, it was also necessary to retire and relocate some plastic mains to areas behind curb lines.

**Q18. The Stipulation approved in Case No. 13-1571-GA-ALT provided that CEOH may recover the costs of replacing and retiring individual segments of plastic pipe that exceeded certain diameter and length criteria, unless it is shown that it was less economical to replace the segment than to tie it in. Did any segments of plastic pipe exceed the criteria provided in the Stipulation?**

A. Yes. Exhibit No. MBIV-2 identifies the plastic pipe retired on each project (where applicable) and identifies the length of the longest individual segment retired. CEOH completed six projects in which segments of 2-inch plastic pipe longer than the applicable criterion of 435 feet were retired, seventeen projects in which segments of 4-inch or 3-inch plastic pipe longer than the applicable criterion of 365 feet were retired, and six projects in which a segment of 6-inch plastic pipe longer than the applicable criterion of 250 feet, for a total of twenty-five projects that exceeded diameter and length criteria.

**Q19. Was it more economical to replace the segments that both exceeded diameter and length criteria of the Stipulation, and were associated with the projects involving pipeline replacements than to tie them into the existing system?**

A. Yes.

Projects V-X-4698, V-X-4700, V-X-4701, V-X-DIMP 64.1, V-X-DIMP 64.2, and V-X-DIMP 64.3 had sections of existing plastic main and service lines tested to operate at a higher pressure and failed the required pressure test due to mechanical couplings on the

1 main. Specific leak locations could not be readily identified, and it was more cost  
2 effective to replace the plastic segment than to locate and remediate the leaks.

3  
4 The additional 6" plastic retired on project V-1273 was due to both 1980's vintage pipe  
5 segments and mechanical couplings on the main which typically fail required pressure  
6 tests.

7  
8 Segments of plastic main in Projects V-1292, V-1795, V-1827, V-2026, V-736, V-740,  
9 V-753, V-822, V-989, V-1076, V-1153, V1304, V-2523, V-921, V-X-4698, V-X-4700,  
10 V-X-4701, and V-X-OHMOD-5 were retired because the existing mains were located in  
11 the street where the cost of relocating the main to between the curb and sidewalk was less  
12 than the cost of installing excess flow valves on services located in the street and  
13 restoring the affected roadway.

14  
15 V-1789, V-2448, and V-619 segments were retired because the existing plastic main was  
16 entirely abandoned when services were relocated to the existing medium pressure system  
17 in the area.

18  
19 V-1945 and V-2086 required the installation of new main and subsequent retirement of  
20 the plastic main because the existing one-way supply could not be taken out of service  
21 and tested without resulting in multiple customer outages.

V-1166 included the retirement and installation of new main to optimize labor resources and continue boring the new main installation to reduce construction costs.

V-1313 and V-2486 required the installation of new main and retirement of the plastic main that was installed in alleys, rear and side lot easements, presenting access challenges.

V-1943 included segments of main that were retired due to municipality requirements to maintain newly paved infrastructure.

V-754 required the retirement of main because the new main was installed in a new location.

**Q20. Did CEOH move any meters outside as part of the Replacement Program?**

A. Yes. CEOH moved 3,637 meters outside in 2022 as part of the bare steel and cast iron and ineffectively coated steel replacement projects. Because the newly installed mains operate at a higher pressure (requiring the installation of a service regulator), the cost associated with moving the meters outside was less than if the meter remained inside and the necessary service regulator was installed outside. In addition to better utilization of CEOH's capital, moving the meters outside will improve operational efficiency associated with future meter order work and will eliminate the need for inside atmospheric corrosion inspections. CEOH has employed this meter move-out approach since the Replacement Program was first implemented.

**Q21. Does CEOH believe that the Replacement Program is achieving or will achieve the expected benefits?**

A. Yes. CEOH expects to continue to experience improved service reliability and safety through the reduction of leakage and the replacement of the mains and service lines that contribute most to system leaks. Proactive replacement of this pipe, moving meters outside, and retiring the older assets will also drive workforce efficiencies. Customers and property owners will experience a reduction in the number and frequency of disturbances and inconveniences (such as leak repair, service interruptions, etc.) as the older sections of main are retired. Through the Replacement Program and DRR, CEOH has been able to repair, on average, five to six class 2 and class 3 leaks per mile per year for every year of the program. Additionally, as quantified below, there are active leaks and meter orders that will be eliminated as a result of replacing bare steel and cast iron infrastructure. Reducing active leaks is necessary to address lost and unaccounted for gas. CEOH also expects long-term benefits in terms of reduced impacts on the communities where public infrastructure improvements may occur after these projects are completed. Finally, elimination of leaks that are more common on bare-steel and cast-iron mains positively impacts the environment through reduction of greenhouse gas emissions.

**Q22. What operational benefits did CEOH achieve as a result of the Replacement Program in 2022?**

A. CEOH has achieved several operational benefits as a result of the Replacement Program:

- The replacement of bare-steel and cast-iron infrastructure reduces active leaks in CEOH's system, is expected to reduce the occurrence of future leaks and leak repair work, and will reduce interruptions, inconveniences, and disturbances to customers. Specifically, the replacement of bare-steel and cast-iron infrastructure from 2022 has

1           allowed CEOH to eliminate 226 active leaks on the affected assets, 62 of which  
2           would have required a more immediate and less efficient repair.

- 3           • Over the past ten years, the Company has experienced an average of 350 asset  
4           condition related meter orders on the types of assets that were replaced in 2022.

5           CEOH will experience a reduction in the number of these meter orders (Outside Gas  
6           Leak, Gas Emergency, Water in Line, and No Gas orders) through the retirement of  
7           bare-steel and cast-iron infrastructure.

- 8           • CEOH moved 3,637 inside meters outside as part of the bare steel and cast iron and  
9           ineffectively coated steel projects. This will eliminate the requirement for a separate  
10          atmospheric corrosion check.

- 11          • Certain system components, such as the 173 drips used to remove water from low-  
12          pressure mains, that had been used to address issues associated with assets in poor  
13          condition have been eliminated in 2022.

- 14          • Additional operational efficiencies resulting from the retirement of regulator stations,  
15          valves, casings, test stations for cathodic protection, and reduced frequency of leak  
16          surveys.

17  
18          Ultimately, these types of improvements provide reliability and safety benefits to  
19          CEOH's customers, as well as property owners who live in the vicinity of the  
20          replacement projects.

**Q23. Did CEOH derive cost savings for the 2022 replacement projects?**

A. Yes. CEOH calculated 2022 O&M savings associated with the DRR investments consistent with the 13-1571 Stipulation and the 2018 Rate Case. This topic will be discussed later in my testimony.

**Q24. Were the construction projects within the 2022 Replacement Program competitively bid?**

A. Yes.

**Q25. How were the bid packages organized, bid, and awarded?**

A. Based on the geographical location of the projects, CEOH divided the planned 2022 projects into forty-nine bid packages of which forty-nine were awarded. All contractors were allowed to bid on any of the forty-nine packages but were not required to bid on all packages. Each bid package was independently evaluated.

Nine different construction contractors were invited to provide bids for the work.

Information was provided on each project, and contractors had an opportunity to ask questions about the work to be performed and the bids to be submitted. Each contractor was provided with copies of drawings for all the projects and given time to visit the project sites prior to submitting bids.

Five contractors submitted bids based on unit pricing; that is, a fixed price for a given unit of work to be performed. CEOH used the unit prices and the estimated work units for each project to create comparative cost estimates. These comparative estimates were then summarized for each bid package. Each package was evaluated based on overall cost and the contractor's capacity. If a contractor submitted bids on several projects, the

contractor's capacity was evaluated to ensure that the potential award did not exceed their capacity. CEOH awarded contracts to five of the contractors that provided bids.

CEOH continues to solicit and aid potential contractors to become qualified and submit bids on DRR projects.

**Q26. What is CEOH's replacement plan for 2023?**

A. CEOH's planned replacement projects for 2023 are identified in Exhibit No. MBIV-3. In 2023, CEOH plans to spend approximately \$60 million on bare-steel and cast-iron projects, retiring approximately sixty-seven miles of bare-steel and cast-iron main, along with the bare-steel service lines served from those mains. An estimated six miles of interspersed plastic main included in the projects results in a total approximate retirement of seventy-three miles of combined bare-steel, cast-iron, and plastic mains. As was the case in 2022, CEOH reserves the right to modify the plan as necessary, including to accommodate higher priority projects as circumstances may change throughout the year.

**Q27. Is CEOH also planning on replacing some ineffectively coated steel pipelines in its 2023 Replacement Program?**

A. Yes. In 2023, CEOH plans to spend approximately \$14 million under the Replacement Program to replace approximately fifteen miles of ineffectively coated steel mains and associated services. A list of these projects can be found in Exhibit No. MBIV-3.

**III. SERVICE LINE RESPONSIBILITY**

**Q28. How does CEOH view the transition to service line responsibility?**

A. CEOH continues to view the transfer of service line responsibility to the Company as a positive for both the Company and its customers. In general, CEOH's assumption of service line responsibility has been a benefit to its customers. Customers no longer are



required to schedule the services of a plumber to repair or replace their service line, minimizing inconvenience and out of pocket costs for customers. CEOH's response times to leak calls and its repair activities reduce the amount of time customers are out of service, which also aligns with Ohio's minimum gas service standards. The Company's ability to adjust to an ever-changing schedule to meet the needs of customers has also been a benefit. Confusion over customer responsibility for the service line has been essentially eliminated because there is now a clear delineation of responsibility between the customer and CEOH. CEOH continues to respond to numerous leak calls, many on bare steel or ineffectively coated steel service lines that have required replacement. Because CEOH (and its customers) have a significant number of aged service line assets, the annual amount of service line replacements is significant and will remain so for the foreseeable future.

**Q29. Does CEOH continue to experience incremental costs as a result of assuming service line responsibility?**

A. Yes. CEOH continues to repair several gas leaks on the portion of the buried service line and the above-ground meter setting that had previously been maintained by the customer. Incremental capital replacement costs related to service line responsibility are included in the DRR revenue requirement supported by CEOH witness Johnson.

**Q30. Has CEOH devoted incremental investment to the replacement of service lines?**

A. Yes. When CEOH assumed responsibility for the replacement of service lines, which includes the portion of the service line beyond the curb valve (formerly the customer's responsibility for installation or replacement), it began incurring incremental investments.

**Q31. Can you explain how CEOH identified its actual incremental service line costs?**

A. Yes. The first step identified portions of the service line representing incremental investment for CEOH. Figure 1 below is a drawing of a standard service line. The entire service line runs from the main to the meter setting, and the drawing shows the three distinct segments of the line: the portion from the main to the curb valve; the portion from the curb valve to the meter; and the meter setting.

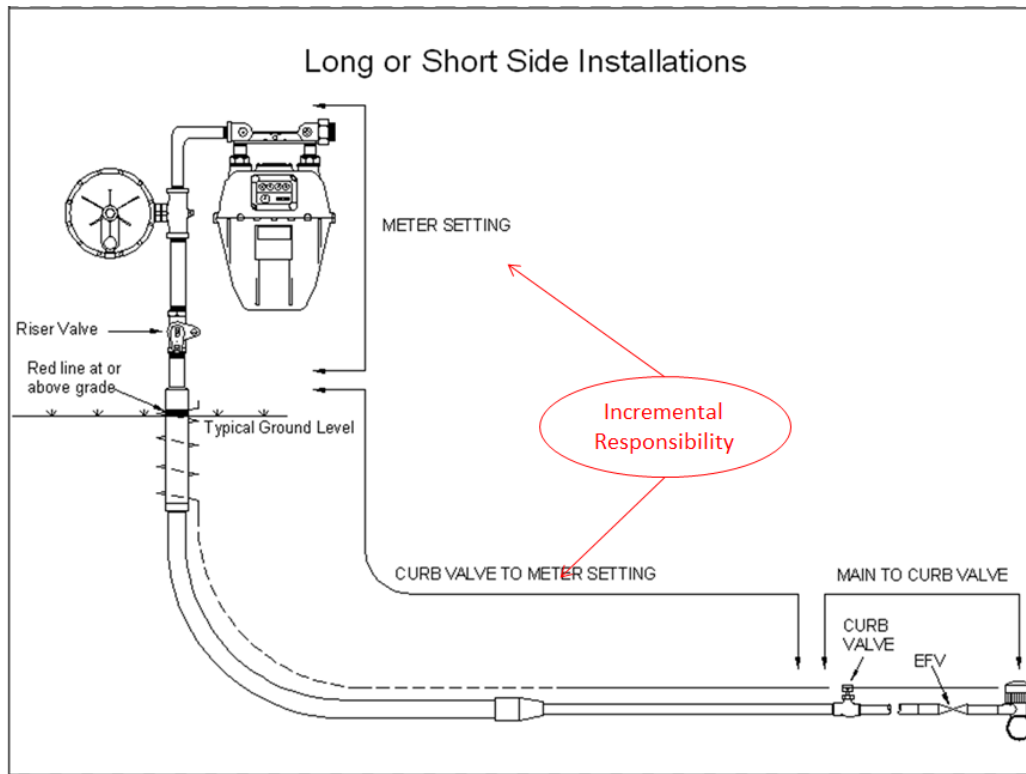


Figure 1: Standard Service Line Installation

**Q32. What types of service line replacements does CEOH perform, and which replacements represent incremental investment?**

A. There are four types of service line replacements that CEOH may perform, which correspond to the service line and individual segments described above.

1) A Main to Meter replacement means the entire service line is replaced from the connection at the main, upstream of the curb valve, to the outlet side of the meter

setting. Only a portion of this type of replacement is incremental, namely, from the curb valve to the outlet of the meter setting.

2) A Main to Curb Valve replacement replaces the service line from the connection at the main to the outlet side of the curb valve and is *not* an incremental investment.

3) A Curb Valve to Meter Setting replacement replaces the service line from the outlet side of the curb valve to the inlet side of the meter setting and is entirely incremental.

Prior to CEOH's assumption of responsibility for service lines, the customer would have borne the cost for this type of replacement.

4) A Meter Setting replacement replaces the service from the inlet side of the meter setting through the meter bar to the connection with the customer's fuel line and is entirely incremental. Prior to CEOH's assumption of responsibility for service lines, the customer would have borne the cost for this type of replacement.

**Q33. Not including service lines that were part of Replacement Program projects, how many service lines did CEOH replace in 2022?**

A. In 2022, CEOH replaced all or part of 1,830 service lines. This represents an increase from 2021. The breakdown of service replacement types is as follows:

Service Line Replacement Type	Quantity
Curb to Meter	641
Main to Curb	160
Main to Meter	998
Meter Set Replacement	31
<b>Grand Total</b>	<b>1830</b>

CEOH invested \$4,899,401 in the replacement of these service lines.

**Q34. What caused the number of service replacements in 2022 to increase compared to prior years?**

A. In 2022, service line replacements increased because CEOH allocated resources to investigate and remove PermaLock© tapping tees that have an increased risk of leaking

due to manufacturing standards and installation practices when the assets were placed in service during the 1980s. CEOH pressure tests the service line to ensure there are no leaks on the service line or fittings. If the service line fails then the pressure test and the leak cannot be repaired then the service line is replaced to ensure safe operation. The additional focus on investigating and removing these mechanical fittings resulted in increased service line replacements.

**Q35. How did CEOH identify the value of the investment associated with each replacement?**

A. CEOH used the work type for each service replacement to determine which costs were applicable to each work order. The overall cost of the service line replacement is captured and accurate based on the work type alone; although historically, CEOH has included length, size, and material in its analysis. As CEOH continues to modify its work processes to align with SAP's functionality, the Company expects to provide more detailed information in DRR filings. The Company is currently in the process of Phase 2 of its Enterprise Integration Program to align work processes and continued software integration across platforms, including SAP.

**Q36. How did CEOH identify 2022 incremental investment in service line replacements?**

A. CEOH identified incremental investment with a detailed review of service line work orders, through which it determined how many orders pertained to the various segments of the service line (Main to Meter Setting, Main to Curb Valve, Curb Valve to Meter Setting, or Meter Setting) and utilized an historical allocation to determine how much of the investment should be considered incremental or non-incremental. CEOH's incremental investment in service line replacements was \$2,867,164.

**Q37. How did CEOH identify and differentiate the work orders in question?**

A. CEOH queried its work order management system for all service replacement work orders completed between January 1, 2022, and December 31, 2022. It then reviewed each order and identified the type of service replacement as being one of the following: Main to Meter, Main to Curb Valve, Curb Valve to Meter, or Meter Setting replacements. This allowed CEOH to identify whether the service line investment was fully incremental, partially incremental, or not incremental.

**Q38. How did CEOH determine the applicable costs?**

A. Due to the lack of detailed work order information for 2022 DRR investments explained earlier in my testimony, CEOH utilized an historical allocation to differentiate incremental and non-incremental costs based on work order type. Within supporting DRR exhibits<sup>2</sup> CEOH historically provided costs for service replacement work that was generally based on pre-defined unit rates for certain activities, such as a cost per foot installed, cost per meter setting installed, and cost for sewer locates through review of detailed work orders. Based on this information, CEOH was able to provide detailed exhibits distinguishing between fixed and variable cost allocation for each service replacement type in its prior DRR filings. As CEOH continues to refine current work practices to align with the functionality of SAP, CEOH expects to provide detailed cost allocation information for service line replacements in future DRR filings.

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<sup>2</sup> The 2022 DRR Proceeding, Case No. 22-0455-GA-RDR, included exhibits detailing Annual Service Replacement Cost Summary (Exhibit No. SAH-4), Service Replacement Unit Rates and Cost Allocations (Exhibit No. SAH-5) and Service Replacement Work Order Detail & Cost Allocation (Exhibit No. SAH-6).

**Q39. What is CEOH’s planned investment amount for service line replacements outside of the Replacement Program in 2023?**

A. CEOH’s planned investment amount for service line replacements outside of the Replacement Program is approximately \$10 million. The increased investment amount is due to the continuation of the PermaLock<sup>®</sup> tapping tee assembly replacement initiative and increased focus on class 3 service leak replacements.

**IV. OPERATING AND MAINTENANCE SAVINGS**

**Q40. Has CEOH calculated any O&M savings associated with the 2021 DRR investments?**

A. Yes. Consistent with the 2018 Rate Case, the O&M savings from the retirement of bare-steel and cast-iron through 2017 is reflected in the base rate case test year expenses. In addition, consistent with the 13-1571 Stipulation and the 2018 Rate Case, CEOH has calculated the O&M savings for the 2018 DRR investments based on a credit of \$5,882 per mile of bare-steel and cast-iron main retired for the Replacement Program period from January 1, 2022, through December 31, 2022. This calculation resulted in a cumulative O&M Savings Credit of \$1,698,251 (288.72 miles in 2018 through 2022 times \$5,882). See Exhibit No. MBIV-4 for the calculation of this savings credit.

**Q41. Did CEOH also calculate actual O&M savings in 2022 compared to a baseline amount?**

A. Yes. The 13-1571 Stipulation also required CEOH “to calculate actual O&M savings by comparing actual O&M costs to the O&M baseline established in the 2007 Rate Case and used in previous annual DRR filings.” CEOH in its 2018 Rate Case agreed to continue performing this calculation in future DRR proceedings, in conjunction with the extension of the Replacement Program and the DRR. The only difference is that the baseline for this Application and future DRR applications will be the baseline established in the 2018

Rate Case. In this Application, CEOH compared the maintenance expense incurred in 2022 with the baseline maintenance expense amount of \$1,191,604 reflected in the 2018 Rate Case. The actual comparable maintenance expenses in 2022 were \$603,377, resulting in a cumulative savings against the baseline of \$588,227. This amount is broken into expense reductions attributable to mains of \$465,034 and expense reductions attributable to service lines, now owned or maintained by CEOH, of \$123,193 for a total savings of \$588,227. Additionally, CEOH experienced a decrease in maintenance expenses of \$360,824 for those service lines that are not bare steel. Exhibit No. MBIV-5 provides the actual 2022 maintenance expenses and a comparison against the baseline expense amount. Additionally, this exhibit provides a breakdown of the maintenance expenses between mains and services.

**Q42. What amount of O&M savings does CEOH propose to include as a credit in this DRR filing as a result of the Replacement Program?**

A. Because the O&M Savings Credit is greater than the savings reached under the baseline-comparison method, CEOH will apply the credit of \$1,698,251.

**V. CONCLUSION**

**Q43. Does this conclude your direct testimony?**

A. Yes.

2022 CEOH Replacement Program Progress

Mains										Services		Actual Meter Move-Outs					
A	B	C	D	E	F	G	J	I	J	K	L	J+K+L	O	P	R	S	
Superior WO	SAP	In Service Date	Category	Group#	City	Public Imp?	Utility Plant Additions <sup>(1)</sup> (Total To-Date Actual Cost)	Main Installed (Feet)	Total BS and Other Types Retired (Feet)	Total CI Retired (Feet)	Total PL Retired (Feet)	Total Main Retired (Feet)	Total # Services Installed	Total # Services Retired	Total # Meter Move-Outs	Total # Meter Installations Retired	
99122452	98789014	5/6/2022	BSCI	V-1071	DAYTON-DW		\$897,841	6,800	6,420	0	205	6,625	91	100	74	74	
99122460	98785754	6/16/2022	BSCI	V-1073	DAYTON-DW	Yes	\$1,116,277	5,860	4,365	685	320	5,370	120	128	94	94	
99122631	98785761	5/5/2022	BSCI	V-1076	DAYTON-DW	Yes	\$1,527,600	11,164	8,785	1,090	1,805	11,680	148	169	150	150	
99122718	98789015	12/29/2022	BSCI	V-1153	DAYTON-DW	Yes	\$836,429	7,436	7,160	200	960	8,320	103	117	71	71	
99123021	98789005	11/4/2022	BSCI	V-1166	DAYTON-DW	Yes	\$770,892	7,901	7,975	0	260	8,235	119	134	80	80	
99123514	98785499	11/9/2022	BSCI	V-1220	DAYTON-CN	Yes	\$557,375	4,251	9,195	20	40	9,255	45	60	32	32	
99125260	98789194	4/27/2022	BSCI	V-1282	OAKWOOD	Yes	\$1,574,894	9,767	9,145	0	190	9,335	270	270	132	132	
99125450	98789204	11/2/2022	BSCI	V-1286	DAYTON-CN		\$749,702	4,999	4,924	0	28	4,952	98	100	82	82	
99127281	98789211	9/29/2022	BSCI	V-1289	OAKWOOD		\$804,092	5,563	6,850	0	55	6,905	70	70	45	45	
99127511	98785174	12/12/2022	BSCI	V-1292	DAYTON-CN	Yes	\$808,908	6,923	8,437	0	905	9,342	68	70	46	46	
99128120	98785836	9/14/2022	BSCI	V-1294	DAYTON-CN	Yes	\$1,180,079	6,848	9,081	0	115	9,196	137	138	106	106	
99128464	98788994	6/17/2022	BSCI	V-1304	EATON		\$807,661	5,891	4,095	0	3,150	7,245	83	7	14	14	
99128563	98785427	8/25/2022	BSCI	V-1310	DAYTON-DW	Yes	\$572,220	3,087	2,965	0	205	3,170	73	104	44	44	
99128731	98785434	8/17/2022	BSCI	V-1311	KETTERING-CN	Yes	\$674,436	12,704	7,039	0	0	7,039	83	83	61	61	
99128740	98785442	5/25/2022	BSCI	V-1313	KETTERING-CN	Yes	\$712,522	7,519	4,731	0	528	5,259	72	72	54	54	
99128864	98785473	3/4/2022	BSCI	V-1314	KETTERING-CN	Yes	\$256,897	2,830	2,668	0	0	2,668	41	42	34	34	
99129148	98785465	10/21/2022	BSCI	V-1387	RUSSELLS POINT		\$764,017	8,913	5,750	0	385	6,135	83	88	0	0	
99129351	98789269	3/30/2022	BSCI	V-1666	CENTERVILLE	Yes	\$1,023,900	9,287	8,840	0	0	8,840	57	58	32	32	
99129576	98788869	3/3/2022	BSCI	V-1668	CENTERVILLE	Yes	\$661,231	3,892	5,140	0	0	5,140	66	66	49	49	
99129835	98786054	1/5/2022	BSCI	V-1789	GREENVILLE		\$477,131	5,272	3,602	0	615	4,217	58	58	27	27	
99129992	98786057	1/11/2022	BSCI	V-1795	GREENVILLE		\$817,261	8,956	8,147	0	775	8,922	110	114	58	58	
99130151	98785403	12/21/2022	BSCI	V-1827	WASHINGTON CH		\$1,522,536	10,728	6,415	0	5,400	11,815	147	151	7	7	
99130288	98789867	6/6/2022	BSCI	V-1943	DAYTON-FA	Yes	\$1,733,890	10,565	7,685	0	440	8,125	137	142	83	83	
99136842	98785838	10/19/2022	BSCI	V-1945	DAYTON-CN		\$870,982	6,378	2,134	0	2,946	5,080	67	69	42	42	
99136898	98785741	9/9/2022	BSCI	V-2025	SIDNEY		\$1,503,127	12,548	7,052	0	153	7,205	176	176	80	80	
99137107	98785840	4/21/2022	BSCI	V-2026	PLEASANT HILL		\$584,846	4,977	3,657	0	1,782	5,439	78	83	19	19	
99137550	98786166	1/13/2022	BSCI	V-2042	RIVERSIDE	Yes	\$576,840	3,525	3,150	0	0	3,150	70	70	51	51	
99138334	98789257	3/18/2022	BSCI	V-2086	TROY	Yes	\$790,324	1,438	2,333	0	1,186	3,519	35	36	0	0	
99138342	98785455	5/3/2022	BSCI	V-2089	OAKWOOD		\$616,353	5,045	1,655	340	110	2,105	32	32	19	19	
99140312	98784393	10/6/2022	BSCI	V-2090	DAYTON-DW		\$3,099,437	6,296	4,015	590	0	4,605	24	26	26	26	
99140318	98785983	12/9/2022	BSCI	V-2255	FAIRBORN		\$628,480	4,714	4,110	0	15	4,125	104	109	24	24	
99140323	98785447	7/26/2022	BSCI	V-2330	WILMINGTON	Yes	\$863,111	7,389	8,670	0	130	8,800	0	0	54	54	
99140866	98784413	9/21/2022	BSCI	V-2418	DAYTON-DW		\$1,425,229	3,903	3,940	610	45	4,595	96	105	56	56	
99141177	98785692	3/9/2022	BSCI	V-2439	DAYTON-DW	Yes	\$1,590,763	8,315	1,135	310	330	1,775	111	114	93	93	
99141183	98785461	12/21/2022	BSCI	V-2448	NEW PARIS	Yes	\$901,544	10,820	7,065	0	915	7,980	134	140	16	16	
99141514	98785261	11/7/2022	BSCI	V-2472	DAYTON-CN		\$434,945	3,142	4,395	0	0	4,395	41	42	27	27	
99141524	98785462	6/21/2022	BSCI	V-2486	VERSAILLES		\$1,162,254	9,704	6,686	0	1,875	8,561	71	71	27	27	
99141924	98785419	12/9/2022	BSCI	V-2492	DAYTON-DW	Yes	\$744,063	6,775	6,030	0	135	6,165	123	146	68	68	
99141928	98789833	3/3/2022	BSCI	V-2494	DAYTON-DW	Yes	\$651,161	4,858	3,525	0	0	3,525	68	89	43	43	
99142342	98786298	6/21/2022	BSCI	V-2523	DAYTON-DW	Yes	\$1,231,011	5,550	9,760	630	490	10,880	39	45	42	42	
99142348	98786986	12/2/2022	BSCI	V-2529	DAYTON-DW	Yes	\$567,606	5,650	6,900	1,415	320	8,635	56	75	27	27	
99158418	98785659	9/16/2022	BSCI	V-2640	DAYTON-DW	Yes	\$782,062	4,563	2,950	1,455	0	4,405	67	72	83	83	
101294430	101294281	2/21/2022	BSCI	V-2718	DAYTON-CN		\$62,210	758	0	0	0	0	2	2	2	2	
99158426	98783956	11/10/2022	BSCI	V-379	OAKWOOD	Yes	\$1,927,960	EST	8,050	12,610	0	390	12,610	47	47	41	41
99158575	98785588	11/9/2022	BSCI	V-619	PIQUA		\$1,541,288	8,094	6,321	0	3,802	10,123	188	203	99	99	
99158585	98785410	8/3/2022	BSCI	V-736	DAYTON-CN	Yes	\$961,639	4,160	1,810	3,685	3,260	8,755	79	79	29	29	
99159363	98785712	12/14/2022	BSCI	V-737	DAYTON-CN	Yes	\$1,050,128	8,079	5,515	4,515	485	10,515	56	74	30	30	
99160610	98785834	4/5/2022	BSCI	V-740	DAYTON-DW	Yes	\$979,692	5,729	5,718	1,950	970	8,638	81	99	27	27	
99160700	98785476	5/6/2022	BSCI	V-753	DAYTON-DW	Yes	\$1,334,512	7,078	855	5,575	2,920	9,350	112	164	78	78	
99160747	98785421	12/28/2022	BSCI	V-754	DAYTON-CN	Yes	\$495,831	3,199	2,265	3,140	900	6,305	22	36	10	10	
99160993	98785423	3/17/2022	BSCI	V-778	DAYTON-DW	Yes	\$863,898	6,710	5,055	0	300	5,355	102	111	91	91	
99161149	98785430	9/8/2022	BSCI	V-781	DAYTON-DW	Yes	\$467,932	3,530	4,040	1,765	35	5,840	33	69	25	25	
99161182	98785858	3/2/2022	BSCI	V-822	DAYTON-CN	Yes	\$1,406,701	8,587	4,350	0	2,712	7,062	218	224	172	172	
99161459	98785860	12/22/2022	BSCI	V-834	DAYTON-DW		\$478,597	5,799	6,210	320	0	6,530	44	14	16	16	
99161579	98785451	11/18/2022	BSCI	V-921	DAYTON-DW	Yes	\$1,139,006	8,665	4,825	510	1,085	6,420	109	115	91	91	
99161815	98785864	12/14/2022	BSCI	V-970	DAYTON-DW		\$219,438	1,585	3,885	0	125	4,010	32	37	34	34	
99162013	98785726	9/8/2022	BSCI	V-989	SIDNEY	Yes	\$1,233,796	10,031	7,989	0	1,660	9,649	131	135	50	50	
BSCI Totals						36	\$54,034,556	372,800	310,024	28,805	45,457	383,896	4,927	5,250	2,967	2,967	
Miles							70.61	58.72	5.46	8.61	72.71						



2022 CEOH Replacement Program Progress

Mains										Services		Actual Meter Move-Outs					
A	B	C	D	E	F	G	J		I	J	K	L	J+K+L	O	P	R	S
Superior WO	SAP	In Service Date	Category	Group#	City	Public Imp?	Utility Plant Additions <sup>(1)</sup> (Total To-Date Actual Cost)		Main Installed (Feet)	Total BS and Other Types Retired (Feet)	Total CI Retired (Feet)	Total PL Retired (Feet)	Total Main Retired (Feet)	Total # Services Installed	Total # Services Retired	Total # Meter Move-Outs	Total # Meter Installations Retired
Ineffectively Coated Steel Projects:																	
99570875	98786201	6/20/2022	MOD-ICS	V-X-4698	DAYTON-DW		\$521,055		4,805	2,865	0	695	3,560		67	75	75
99570881	98786202	8/31/2022	MOD-ICS	V-X-4700	DAYTON-DW		\$595,349		4,604	1,600	0	1,900	3,500		82	58	58
99571518	98786203	11/7/2022	MOD-ICS	V-X-4701	DAYTON-DW		\$650,727		5,366	4,415	0	3,150	7,565		63	43	43
101308845	101308842	5/9/2022	MOD-ICS	V-X-979XT	MIAMISBURG		\$143,719		2,032	1,150	0	165	1,315		8	0	0
104922815	104864898	3/21/2022	MOD-ICS	V-XA-12288	RUSSELLS POINT		\$36,084		0	262	0	0	262		0	0	0
105218704	105218704	12/22/2022	MOD-ICS	V-XA-12306	BROOKVILLE		\$13,155		0	782	0	0	782		0	0	0
98955089	98786124	3/11/2022	MOD-ICS	V-X-DIMP 64.1	KETTERING-CN		\$317,842		3,441	3,103	0	883	3,986		60	47	47
99216038	98786125	3/10/2022	MOD-ICS	V-X-DIMP 64.2	KETTERING-CN		\$443,077		4,591	3,103	0	853	3,956		77	51	51
99059867	98786127	2/25/2022	MOD-ICS	V-X-DIMP 64.3	KETTERING-CN		\$558,171		4,963	5,481	0	1,043	6,524		94	60	60
99216537	98786128	2/15/2022	MOD-ICS	V-X-DIMP 64.4	KETTERING-CN		\$916,303		10,610	3,698	0	406	4,104		117	79	79
99245021	98786131	2/25/2022	MOD-ICS	V-X-DIMP 64.5	KETTERING-CN		\$812,275		7,986	7,355	0	0	7,355		123	74	74
99113213	99112949	4/8/2022	MOD-ICS	V-X-OHMOD 10	NEW CARLISLE		\$1,279,767		10,929	8,665	0	0	8,665		11	0	0
99253509	98786314	3/8/2022	MOD-ICS	V-X-OHMOD 2	DAYTON-DW		\$533,150		3,634	2,530	0	0	2,530		56	43	43
99253826	98786433	5/5/2022	MOD-ICS	V-X-OHMOD 3	DAYTON-DW		\$568,630		4,169	2,525	0	140	2,665		70	60	60
99569162	98786111	5/5/2022	MOD-ICS	V-X-OHMOD 4	DAYTON-DW		\$488,629		3,008	2,825	0	0	2,825		62	42	42
99569506	98786114	5/17/2022	MOD-ICS	V-X-OHMOD 5	DAYTON-DW		\$486,340		2,350	2,025	0	520	2,545		55	38	38
98785428	98785428	1/13/2022	MOD-ICS	V-X-4734	DAYTON-DW		\$19,270		57	75	0	0	75		0	0	0
100685181	98785163	2/21/2022	MOD-ICS	V-X-1281	DAYTON-DW		\$1,653,569		4,213	2345	0	0	2345		8	0	0
ICS Totals						0	\$10,037,111		76,758	54,804	0	9,755	64,559	953	1,012	670	670
Miles									14.54	10.38	0.00	1.85	12.23				
BSCI & ICS Totals						36	\$64,071,667		449,558	364,828	28,805	55,212	448,455	5,880	6,262	3,637	3,637
Total Miles									85.14	69.10	5.46	10.46	84.93				

<sup>1</sup> Utility plant additions do not include cost of removal or 2022 trailing charge activity associated with BS/CI groups placed in service prior to January 1, 2023

2022 CEOH BS/CI Replacement Program  
Plastic Main Retirement Causes

Work Order Number	In Service Date	Group#	City	Size of Main Installed (inches)	Size of Main Retired (inches)	Total PL Retired (Feet)	Size of Longest PL Segment Retired (inches)	Longest PL Segment Retired (Feet)	Requires Justification?	Comments
20046803052215	5/6/2022	V-1071	DAYTON-DW	2"	2"	205	2"	205	No	205 FEET OF 2" LPP APPEARED TO BE INSTALLED OUTSIDE OF ROAD RIGHT OF WAY AND COULD NOT FIND EASEMENT AGREEMENT.
20046803052216	6/16/2022	V-1073	DAYTON-DW	2", 6"	3", 4"	320	3"	265	No	55 FEET OF 4" LPP IN PAVEMENT ACROSS MAPLELAWN ; 265 FEET OF LPP IN PAVEMENT UNDER CLIFF STREET.
20046803052217	5/5/2022	V-1076	DAYTON-DW	2"	3", 4"	1,805	3"	1,025	Yes	***510 FEET OF 3" LPP UNDER PAVEMENT AT NIAGARA AND LINDA VISTA INTERSECTION. 410 FEET OF 3" LPP UNDER PAVEMENT ALONG SANTA CLARA AVE. 390 FEET OF 4" LPP UNDER PAVEMENT ALONG RICHMOND AVE.
20046803052219	12/29/2022	V-1153	DAYTON-DW	2", 4"	2", 6"	960	6"	905	Yes	***885 FEET OF OF EXISTING 6" PLASTIC COULD NOT BE RETESTED AND ELEVATED DUE TO BOLT ON SERVICE TEES WITH METAL BANDS. RETIRED 55' OF 2" PLASTIC THAT WAS UNDER PAVEMENT.
20046803052220	11/4/2022	V-1166	DAYTON-DW	2", 6"	6"	260	6"	260	Yes	RETIRED 260 FEET OF 6" PLASTIC ALONG EUCLID BECAUSE MORE COST EFFECTIVE TO CONTINUE TO BORE NEW 2" PLASTIC PAST THIS SECTION OF 6" PLASTIC.
18046903052219	11/9/2022	V-1220	DAYTON-CN	2", 6", 8"	4"	40	4"	40	No	RETIRED 40 FEET OF 4" LPP ON BROADWAY - SHORT SECTION OF 4" LP MAIN BEING RETIRED.
20046903052217	4/27/2022	V-1282	OAKWOOD	2", 4", 8"	2", 3"	190	2"	130	No	60 FEET OF 3" LPP UNDER PAVEMENT INTERSECTION OF THRUSTON AND HATHAWAY. 130 FEET OF 2" LPP UNDER PAVEMENT ALONG ACORN DRIVE.
20046903052218	11/2/2022	V-1286	DAYTON-CN	2", 6"	6"	28	6"	28	No	RETIRED 28' 6" LP PL UNDER WILMINGTON PIKE PAVEMENT
20046903052219	9/29/2022	V-1289	OAKWOOD	2", 4"	6"	55	6"	55	No	RETIRE 30 FEET OF 6" PLASTIC UNDER PAVEMENT ALONG RIDGEWAY. RETIRE 25 FEET OF 6" PLASTIC UNDER PAVEMENT ACROSS FORRER AT DEVEREUX.
20046903052228	12/12/2022	V-1292	DAYTON-CN	2", 6", 8"	2", 3", 4", 8"	905	3"	731	Yes	38' OF 2" MP PL, 731' OF 3" LP PL, 57' OF 4" MP PL, 79' OF 8" LP PL WERE RETIRED IN THE STREET DUE TO EXCESS FLOW VALVE REQUIREMENTS AND ALSO STREET CROSSINGS NO LONGER NEEDED.
18046903052222	9/14/2022	V-1294	DAYTON-CN	2", 4", 8"	4", 6"	115	4"	61	No	61' 4" LP PL 54' 6" LP PL
20046803052224	6/17/2022	V-1304	EATON	2", 4"	2", 3", 4", 6"	3,150	3"	1,969	Yes	***1,969 FEET OF 3" LPP, 1,004 FEET OF 4" LPP AND 86' OF 6" LPP WERE RETIRED BECAUSE PLASTIC GAS MAIN WAS UNDER PAVEMENT ALONG DEEM STREET, BARRON STREET AND MONFORT STREET. NEW PLASTIC MAINS WERE INSTALL OUTSIDE OF PAVEMENT.
20046803052225	8/25/2022	V-1310	DAYTON-DW	2", 4"	3", 6"	205	3"	195	No	RETIRED 10 FEET OF 6" LPP ALONG KENSINGTON AS PART OF TEST AND ELEVATE. RETIRED 195 FEET OF 3" LPP UNDER PAVEMENT ON KIPLING DRIVE.
20046903052221	5/25/2022	V-1313	KETTERING-CN	2", 4"	2"	528	2"	528	Yes	385 FEET OF 2" LPP RETIRED IN SIDE AND REAR EASEMENTS. 143 FEET OF 2" LPP IN SIDE EASEMENT.
20048203052212	10/21/2022	V-1387	RUSSELLS POINT	2", 4"	1", 2"	385	2"	270	No	
20048103052210	1/5/2022	V-1789	GREENVILLE	2"	1 1/4", 4"	615	1 1/4"	557	Yes	557' OF 1 1/4"LPP, 58' OF 4"LPP WERE RETIRED IN THE STREET DUE TO EXCESS FLOW VALVE REQUIREMENTS AND ALSO 1 1/4" MAIN IS NO LONGER USED AND IS BEING REPLACED.
20048103052212	1/11/2022	V-1795	GREENVILLE	2"	2", 3", 4"	775	2"	445	Yes	445' OF 2" LP PL, 292' OF 3" LP PL, 38' OF 4" LP PL WERE RETIRED IN THE STREET DUE TO EXCESS FLOW VALVE REQUIREMENTS AND ALSO STREET CROSSINGS NO LONGER NEEDED.
20046703052210	12/21/2022	V-1827	WASHINGTON CH	2"	2", 3", 4", 6"	5,400	4"	2,390	Yes	560' OF 2"LPP, 2065' OF 3"LPP, 2390' OF 4"LPP, 385' OF 6"LPP WERE RETIRED IN THE STREET DUE TO EXCESS FLOW VALVE REQUIREMENTS AND ALSO STREET CROSSINGS NO LONGER NEEDED.
20046603052214	6/6/2022	V-1943	DAYTON-FA	2", 4"	6"	440	6"	440	Yes	440' OF 6"LPP WAS RETIRED BECAUSE CITY OF DAYTON HAD JUST REPLACED THE CURB AND STREET.
18046903052225	10/19/2022	V-1945	DAYTON-CN	2", 4"	2", 4", 6", 8"	2,946	8"	2,867	Yes	27' OF 2" LP PL, 37' OF 4" LP PL, 15' OF 6" LP PL, 2867' OF 8" LP PL WERE RETIRED DUE TO THE COST DIFFERENCE TO TEST & ELEVATE RATHER THAN INSTALL 4"MPP AND ALSO DIRUPTION IT WOULD HAVE CAUSED TO BUSINESSES WITHIN THE PROJECT..
20048103052218	9/9/2022	V-2025	SIDNEY	2", 3", 4", 6"	3", 4"	153	3"	115	No	

2022 CEOH BS/CI Replacement Program  
Plastic Main Retirement Causes

Work Order Number	In Service Date	Group#	City	Size of Main Installed (inches)	Size of Main Retired (inches)	Total PL Retired (Feet)	Size of Longest PL Segment Retired (inches)	Longest PL Segment Retired (Feet)	Requires Justification?	Comments
18048103052212	4/21/2022	V-2026	PLEASANT HILL	2", 4"	2", 2", 3", 4", 4"	1,782	4"	1,449	Yes	18' OF 2"LPP, 26' OF 2"MPP, 265' OF 3"MPP, 1449' OF 4"LPP, 24' OF 4"MPP WERE RETIRED IN THE STREET DUE TO EXCESS FLOW VALVE REQUIREMENTS AND ALSO STREET CROSSINGS NO LONGER NEEDED.
21048103052210	3/18/2022	V-2086	TROY	2", 4"	2", 3", 4", 6"	1,186	4"	1,086	Yes	23' OF 2"LPP, 6' OF 3"LPP, 1086' OF 4"LPP, 71' OF 6"LPP WERE RETIRED DUE TO THE COST DIFFERENCE TO INSERT 4"MPP RATHER THAN INSTALL 4"MPP AROUND PUBLIC SQUARE AND ALSO DISRUPTION IT WOULD HAVE CAUSED TO BUSINESSES WITHIN THE PROJECT..
20046903052223	5/3/2022	V-2089	OAKWOOD	2", 4"	2", 3", 4"	110	4"	60	No	RETIRED 60 FEET OF 4" PLASTIC AND 25 FEET OF 2" PLASTIC AS PART OF R 866-SD-OAK RETIREMENT. RETIRED 25 FEET OF 3" PLASTIC THAT CROSSED OAKWOOD AVE AT THORNHILL.
19046603052217	12/9/2022	V-2255	FAIRBORN	2"	4"	15	4"	15	No	15' 4" LP PL
20046703052212	7/26/2022	V-2330	WILMINGTON	2", 4"	4"	130	4"	130	No	130' 4" MP PL
17046803052231	9/21/2022	V-2418	DAYTON-DW	2", 4", 6"	4"	45	4"	45	No	45' 4" LP PL
19046803052215	3/9/2022	V-2439	DAYTON-DW	2", 4"	2", 3"	330	3"	295	No	295 FEET OF 3" LPP RETIRED BECAUSE UNDER PAVEMENT. 35 FEET OF LPP RETIRED BECAUSE UNDER PAVEMENT.
20046803052227	12/21/2022	V-2448	NEW PARIS	2", 3", 4", 6"	1 1/4", 2"	915	2"	585	Yes	330' OF ,1-1/4" MP PL, 585' OF 2" MP PL WERE RETIRED IN THE STREET DUE TO EXCESS FLOW VALVE REQUIREMENTS AND ALSO 1 1/4" MAIN IS NO LONGER USED AND IS BEING REPLACED.
20048103052214	6/21/2022	V-2486	VERSAILLES	2", 4", 6", 8"	2", 3", 3", 4", 4"	1,875	3"	1,148	Yes	185' OF 2"LPP, 1148' OF 3"LPP, 16' OF 3"MPP, 463' OF 4"LPP, 63' OF 4"MPP WAS RETIRED IN ALLEYS AND REAR EASEMENTS WHEN NEW MAIN WAS MOVED TO FRONT OF THE HOUSES.
20046803052228	12/9/2022	V-2492	DAYTON-DW	2", 4"	4"	135	4"	135	No	RETIRED 135 FEET OF 4" LPP ON W SECOND STREET EAST OF WHTMORE AVE BECAUSE UNDER PAVEMENT.
20046803052213	6/21/2022	V-2523	DAYTON-DW	2", 4", 6", 8"	2", 4", 6", 8"	490	8"	230	Yes	***160' OF 8" LPP & 105' OF 6" LPP UNDER PAVEMENT BROADWAY & SUPERIOR. 40' OF 2" LPP AND 40' OF 4" LPP AND 40' OF 8" LPP UNDER PAVEMENT ALONG SUPERIOR. 30' OF 8" MPP UNDER PAVEMENT STODDARD.
20046803052214	12/2/2022	V-2529	DAYTON-DW	2", 4", 6"	4"	320	4"	320	No	RETIRED 320 FEET OF 4"LPP ALONG SUPERIOR AND ROSEDALE UNDER PAVEMENT.
16046903052225	11/10/2022	V-379	OAKWOOD	2", 4", 6", 8"	2", 4"	390	2"	240	No	EST
20048103052215	11/9/2022	V-619	PIQUA	2", 4", 8"	1 1/4", 2", 2", 3", 4", 6"	3,802	4"	2,886	Yes	452' OF 1-1/4" LP PL, 319' OF 2" LP PL, 26' OF 2" MP PL, 26' OF 3" LP PL, 2,886' OF 4" LP PL, 93' OF 6" LP PL WERE RETIRED IN THE STREET DUE TO EXCESS FLOW VALVE REQUIREMENTS AND ALSO STREET CROSSINGS NO LONGER NEEDED. ALSO NO LONGER USING 1 1/4" AS MAIN
20046903052225	8/3/2022	V-736	DAYTON-CN	2"	2", 2", 3", 4", 6", 6"	3,260	6"	1,390	Yes	450' OF 2" LP PL, 220' OF 2" MP PL, 50' OF 3" MP PL, 540' OF 4" LP PL, 1390' OF 6" LP PL, 610' OF 6" MP PL WERE RETIRED IN THE STREET DUE TO EXCESS FLOW VALVE REQUIREMENTS AND ALSO STREET CROSSINGS NO LONGER NEEDED.
20046903052230	12/14/2022	V-737	DAYTON-CN	2", 4", 6", 8"	2", 4", 6"	485	4"	395	Yes	***40 FEET OF 6" LLP RETIRED ALONG BROADSTREET - WAS UNDER EXISTING PAVEMENT. 395 FEET OF 4" LPP ALONG MIAMI CHAPEL - PARTIALLY UNDER PAVEMENT AND NEW MPP RAN A DIFFERENT ROUTE.
18046803052219	4/5/2022	V-740	DAYTON-DW	2"	4", 6", 8"	970	4"	795	Yes	795' OF 4" LP PL, 110' OF 6" LP PL, 65' OF 8" LP PL WERE RETIRED IN THE STREET DUE TO EXCESS FLOW VALVE REQUIREMENTS AND ALSO STREET CROSSINGS NO LONGER NEEDED.
20046803052236	5/6/2022	V-753	DAYTON-DW	2"	3", 4"	2,920	3"	2,525	Yes	2525' OF 3"LPP NAD 395' OF 4"LPP WAS RETIRED IN THE STREET MOST OF THE EXISTING MAIN WAS INSERTED WHICH WOULD HAVE MADE IT DIFFICULT TO CUT-IN EXCESS FLOW VALVES AND ELEVATING PIPE.
20046903052226	12/28/2022	V-754	DAYTON-CN	2"	4", 6"	900	6"	825	Yes	825 FEET OF 6" LPP AND 75 OF 4" RETIRED AND NEW MAIN NOT IN SAME LOCATION.
20046803052230	3/17/2022	V-778	DAYTON-DW	2", 4"	3"	300	3"	300	No	RETIRED 300 FEET OF 3" PLASTIC BECAUSE UNDER BENSON DRIVE PAVEMENT AND GAS MAIN IS NO LONGER REQUIRED ALONG THIS SECTION OF BENSON DRIVE.
20046803052231	9/8/2022	V-781	DAYTON-DW	2", 4", 8"	4", 8"	35	8"	25	No	10 FEET OF 4" LPP & 25" LPP RETIRED DUE TO BEING UNDER PAVEMENT AT PORTER AND SUPERIOR.

2022 CEOH BS/CI Replacement Program  
Plastic Main Retirement Causes

Work Order Number	In Service Date	Group#	City	Size of Main Installed (inches)	Size of Main Retired (inches)	Total PL Retired (Feet)	Size of Longest PL Segment Retired (inches)	Longest PL Segment Retired (Feet)	Requires Justification?	Comments
18046903052232	3/2/2022	V-822	DAYTON-CN	2"	3", 4", 6"	2,712	3"	2,555	Yes	2555' OF 3"LPP, 114' OF 4"LPP & 43' OF 6"LPP WAS ALL LOCATED IN THE STREET AND BECAUSE OF INSTALLING EXCESS FLOW VALVE REQUIREMENT WE DECIDED TO INSTALL NEW 2"MPP BEHIND THE CURB.
20046803052232	11/18/2022	V-921	DAYTON-DW	2", 4"	3", 4"	1,085	3"	555	Yes	***70' OF 3" LPP RETIRE UNDER PAVEMENT AT EMERSON AND SALEM. 485' OF 3" LPP RETIRED UNDER PAVEMENT ALONG CUMBERLAND. 325' OF 4" LPP RETIRED UNDER PAVEMENT ALONG SALEM. 160' OF 4" LPP RETIRED UNDER PAVEMENT ALONG WABASH.
18046803052228	12/14/2022	V-970	DAYTON-DW	2"	4"	125	4"	125	No	125' 4" LP PL
20048103052217	9/8/2022	V-989	SIDNEY	2", 4", 6"	2", 3", 4"	1,660	3"	989	Yes	24' OF 2" LP PL, 989' OF 3" LP PL, 647' OF 4" LP PL WERE RETIRED IN THE STREET DUE TO EXCESS FLOW VALVE REQUIREMENTS AND ALSO STREET CROSSINGS NO LONGER NEEDED.
20046803G50220	6/20/2022	V-X-4698	DAYTON-DW	2"	3", 4"	695	4"	545	Yes	***PE MAIN WAS RETIRED DUE TO MECHANICAL FITTINGS NOT HOLDING PRESSURE TEST, ALSO THE PE MAIN WAS UNDER PAVEMENT. 150' 3" LP PL, 545' 4" LP PL
20046803G50221	8/31/2022	V-X-4700	DAYTON-DW	2"	3", 6"	1,900	3"	1,645	Yes	***PE MAIN WAS RETIRED DUE TO MECHANICAL FITTINGS NOT HOLDING PRESSURE TEST, ALSO THE PE MAIN WAS UNDER PAVEMENT. 1,645' 3" LP PL, 255' 6" LP PL
20046803G50224	11/7/2022	V-X-4701	DAYTON-DW	2"	3", 4"	3,150	3"	2,205	Yes	***PE MAIN WAS RETIRED DUE TO MECHANICAL FITTINGS NOT HOLDING PRESSURE TEST, ALSO THE PE MAIN WAS UNDER PAVEMENT. 2,205' 3" LP PL, 945' 4" LP PL
20046903050215	5/9/2022	V-X-979XT	MIAMISBURG	4"	2"	165	2"	165	No	165' 2" MP PL
20046903G50212	3/11/2022	V-X-DIMP 64.1	KETTERING-CN	2"	2"	883	2"	883	Yes	PE MAIN WAS RETIRED DUE TO MECHANICAL FITTINGS NOT HOLDING PRESSURE TEST. 883' 2" MP PL
20046903G50213	3/10/2022	V-X-DIMP 64.2	KETTERING-CN	2"	2", 4"	853	2"	656	Yes	PE MAIN WAS RETIRED DUE TO MECHANICAL FITTINGS NOT HOLDING PRESSURE TEST. 656' 2" MP PL, 197' 4" MP PL
20046903G50214	2/25/2022	V-X-DIMP 64.3	KETTERING-CN	2"	2", 4"	1,043	2"	941	Yes	PE MAIN WAS RETIRED DUE TO MECHANICAL FITTINGS NOT HOLDING PRESSURE TEST. 941' 2" MP PL, 102' 4" MP PL
20046903G50215	2/15/2022	V-X-DIMP 64.4	KETTERING-CN	2"	2"	406	2"	406	No	406' 2" MP PL
20046803G50213	5/5/2022	V-X-OHMOD 3	DAYTON-DW	2"	3", 4"	140	3"	90	No	90' 3" LP PL 50' 4" LP PL
20046803G50215	5/17/2022	V-X-OHMOD 5	DAYTON-DW	2"	6"	520	6"	520	Yes	***PLASTIC REPLACED DUE TO BEING UNDER PAVEMENT. 520' 6" LP PL
										***UNDER PAVEMENT - IT IS MORE COST EFFECTIVE TO REPLACE THAN KEEP THE SERVICES AND INCUR ADDITIONAL RESTORATION COSTS.

CEOH 2023 Bare Steel / Cast Iron Replacement Plan

Project Group #	Division	Operating Center	City	Street (First street affected if multiple)	Estimated Install Footage	Estimated Retire Footage	Estimated Project Services	Total Authorized Dollars	Most Recent Construction Est. Start Date	Most Recent Construction Est. Completion Date
V-1069	VEDO	DW	DAYTON-DW	NOTTINGHAM RD	6,165	5,675	88	\$1,163,345	1/1/2023	3/31/2023
V-1072	VEDO	DW	DAYTON-DW	SIEBENTHALER AVE	10,750	8,675	148	\$1,876,536	3/20/2023	7/10/2023
V-1121	VEDO	DW	DAYTON-DW	PHILADELPHIA DR	4,080	4,955	36	\$796,787	1/1/2023	7/10/2023
V-1129	VEDO	DW	DAYTON-DW	SPRINGBROOK BLVD	7,630	8,255	154	\$1,301,207	3/27/2023	6/16/2023
V-1134	VEDO	DW	DAYTON-DW	SIEBENTHALER AVE	10,480	10,335	144	\$1,770,172	1/3/2023	3/31/2023
V-1152	VEDO	DW	DAYTON-DW	SHAFTESBURY RD	10,640	8,965	218	\$2,628,225	7/1/2023	11/1/2023
V-1182	VEDO	DW	DAYTON-DW	ELMHURST AVE	6,745	7,330	130	\$1,272,526	1/1/2023	7/10/2023
V-1186	VEDO	DW	DAYTON-DW	UPLAND AVE	4,835	4,645	110	\$1,059,748	2/1/2023	7/10/2023
V-1188	VEDO	DW	DAYTON-DW	GETTYSBURG AVE	7,085	9,690	105	\$1,410,463	5/1/2023	8/1/2023
V-1193	VEDO	DW	DAYTON-DW	JAMES H MCGEE BLVD	6,305	8,140	50	\$814,673	9/1/2023	11/1/2023
V-1202	VEDO	DW	DAYTON-DW	RIVERSIDE DR	6,565	8,175	32	\$1,984,964	2/1/2023	7/31/2023
V-1239	VEDO	CN	DAYTON-CN	MCARTHUR AVE	8,950	9,880	167	\$1,755,494	2/1/2023	7/30/2023
V-1259	VEDO	CN	DAYTON-CN	OAKLEAF DR	7,565	7,570	165	\$1,848,017	4/1/2023	7/30/2023
V-1281	VEDO	CN	OAKWOOD	SHAFOR BLVD	5,050	5,725	50	\$812,021	4/1/2023	7/1/2023
V-1319	VEDO	CN	OAKWOOD	FAR HILLS	4,095	6,625	78	\$900,160	3/1/2023	5/30/2023
V-1330	VEDO	FA	KETTERING-FA	DEVON AVE	6,090	6,350	77	\$1,068,425	1/4/2023	4/20/2023
V-1339	VEDO	TR	PIQUA	BROADWAY ST	3,095	3,185	69	\$792,621	7/3/2023	9/20/2023
V-1466	VEDO	TR	VERSAILLES	ALLEY N/O WARD ST	6,750	6,640	83	\$1,046,112	9/11/2023	12/15/2023
V-1496	VEDO	TR	TROY	S RIDGE AVE	2,945	3,075	32	\$477,241	4/17/2023	7/28/2023
V-1538	VEDO	FA	XENIA	COLUMBUS ST	5,545	5,890	63	\$756,813	1/3/2023	2/4/2023
V-1667	VEDO	CN	CENTERVILLE	MAPLE ST	7,280	8,225	102	\$2,001,181	7/27/2023	11/18/2023
V-1766	VEDO	BF	RUSSELLS POINT	WARDEN ST.	6,605	6,650	74	\$714,655	4/1/2023	8/1/2023
V-1846	VEDO	WC	WASHINGTON CH	HIGH ST.	5,955	6,900	99	\$921,056	3/14/2023	4/22/2023
V-1859	VEDO	DW	EATON	MAIN ST.	6,865	5,885	99	\$1,207,412	10/16/2023	12/21/2023
V-1860	VEDO	DW	EATON	E. DECATUR ST.	4,560	4,790	70	\$685,596	10/9/2023	12/21/2023
V-1867	VEDO	BF	BELLEFONTAINE	W. WILLIAMS AVE.	7,720	9,395	116	\$967,674	8/1/2023	11/1/2023
V-1933	VEDO	TR	SIDNEY	POPLAR ST.	1,910	4,245	42	\$742,557	8/28/2023	11/15/2023
V-1936	VEDO	TR	SIDNEY	BUCKEYE AVE.	4,165	5,900	74	\$869,413	7/27/2023	11/15/2023
V-2032	VEDO	TR	WEST MILTON	PARK AVE	9,890	14,495	183	\$2,720,802	2/27/2023	6/24/2023
V-2038	VEDO	DW	DAYTON-DW	VALEWOOD LA	6,115	6,285	158	\$1,640,708	6/1/2023	11/10/2023
V-2081	VEDO	CN	DAYTON-CN	GERMANTOWN ST	4,480	4,985	36	\$564,611	1/1/2023	2/15/2023
V-2273	VEDO	DW	DAYTON-DW	RAVENWOOD AVE	9,095	10,315	131	\$1,563,656	4/1/2023	7/1/2023
V-2344	VEDO	DW	DAYTON-DW	IMOGENE RD	2,425	4,515	44	\$416,187	4/1/2023	6/1/2023
V-2345	VEDO	DW	DAYTON-DW	POE AVE.	3,020	4,190	50	\$449,854	4/10/2023	5/19/2023
V-2403	VEDO	DW	DAYTON-DW	WAMPLER AVE	3,880	4,515	69	\$838,802	4/13/2023	4/21/2023
V-2406	VEDO	TR	SIDNEY	BROADWAY AVE	7,040	4,850	59	\$877,873	8/14/2023	11/15/2023
V-2427	VEDO	CN	OAKWOOD	RUBICON DR	6,965	7,100	72	\$1,160,782	6/1/2023	9/1/2023
V-2449	VEDO	DW	DAYTON-DW	BRIAR PL	5,410	6,060	75	\$916,932	10/1/2023	12/21/2023
V-2460	VEDO	BF	RUSSELLS POINT	ORCHARD ISLAND RD.	5,360	5,695	41	\$748,337	7/1/2023	9/29/2023
V-2474	VEDO	CN	DAYTON-CN	TACOMA ST	3,070	4,885	49	\$763,755	1/16/2023	3/31/2023
V-2485	VEDO	TR	BRADFORD	W OAKWOOD ST	4,055	4,425	70	\$956,639	5/29/2023	7/14/2023
V-2502	VEDO	CN	KETTERING-CN	LENOX DR	4,085	4,260	74	\$778,580	5/29/2023	8/17/2023
V-2503	VEDO	DW	DAYTON-DW	OAKRIDGE AVE	8,630	7,025	140	\$1,496,587	2/1/2023	7/10/2023
V-2509	VEDO	CN	OAKWOOD	R/W WEST OF SCHANTZ AVE	4,385	4,690	49	\$666,553	9/1/2023	11/1/2023
V-2519	VEDO	FA	FAIRBORN	BROAD ST	480	2,975	7	\$121,964	5/30/2023	6/8/2023
V-2656	VEDO	CN	KETTERING-CN	TALL TIMBER	8,945	7,380	93	\$1,086,186	1/4/2023	3/30/2023
V-2703	VEDO	CN	CENTERVILLE	N. MAIN ST (S.R. 48)	1,780	2,420	11	\$248,076	6/26/2023	11/11/2023
V-2705	VEDO	WC	GREENFIELD	MCKELL AVE	3,960	3,720	37	\$502,078	4/25/2023	5/27/2023
V-2715	VEDO	FA	XENIA	CHURCH ST	3,965	5,270	76	\$840,199	2/7/2023	3/11/2023
V-2719	VEDO	TR	TROY	S WALNUT ST	4,315	4,595	92	\$1,046,519	3/27/2023	6/2/2023
V-2731	VEDO	DW	DAYTON-DW	VERONA	1,520	1,900	2	\$525,000	6/1/2023	9/1/2023
V-359	VEDO	DW	DAYTON-DW	N MAIN ST	12,665	9,240	160	\$1,793,573	7/1/2023	11/1/2023
V-742	VEDO	CN	DAYTON-CN	BOYER AVE	9,655	13,180	98	\$1,601,641	1/1/2023	7/10/2023
V-762	VEDO	CN	OAKWOOD	R/W N OF WONDERLY AVE	4,105	2,410	71	\$768,754	2/1/2023	4/30/2023
V-848	VEDO	DW	DAYTON-DW	FOREST GLEN AVE	6,745	6,580	86	\$1,451,647	1/16/2023	2/28/2023
V-975	VEDO	CN	DAYTON-CN	ARLINGTON AVE	1,300	5,275	11	\$226,186	9/1/2023	10/1/2023
<b>Total BSCI</b>					<b>323,765</b>	<b>355,005</b>	<b>4719</b>	<b>\$60,417,573</b>		

Ineffectively Coated Steel Projects:

Project Group #	Division	Operating Center	City	Street (First street affected if multiple)	Estimated Install Footage	Estimated Retire Footage	Estimated Project Services	Total Authorized Dollars	Most Recent Construction Est. Start Date	Most Recent Construction Est. Completion Date
V-X-1064	VEDO	DW	DAYTON-DW	ELM HILL ST	14,440	13,475	199	\$2,047,396	7/10/2023	12/29/2023
V-X-1074	VEDO	DW	DAYTON-DW	VALLEY VIEW DR	6,765	7,530	194	\$2,147,010	7/1/2023	11/1/2023
V-X-1074.2	VEDO	DW	DAYTON-DW	RUGBY RD	5,415	5,420	154	\$1,585,197	6/1/2023	10/1/2023
V-X-1306	VEDO	FA	DAYTON-FA	R/W N. OF AMESBOROUGH	5,540	8,715	105	\$1,233,178	4/24/2023	6/30/2023
V-X-1307	VEDO	FA	KETTERING-FA	HORLACHER ST	10,814	8,695	212	\$1,764,935	1/4/2023	5/10/2023
V-X-2651	VEDO	DW	DAYTON-DW	E MONUMENT	7,200	11,720	16	\$1,462,830	1/1/2023	5/30/2023
V-X-939	VEDO	TR	TROY	VINCENT AVE	4,500	5,530	80	\$717,499	6/5/2023	8/31/2023
V-X-940	VEDO	TR	TROY	YOUNG ST	10,345	7,335	146	\$1,613,102	5/1/2023	8/31/2023
V-XA-12282	VEDO	TR	SIDNEY	BROADWAY AVE	1,340	945	10	\$167,098	2/1/2023	3/30/2023
V-XA-12339	VEDO	CN	DAYTON-CN	S. KILMER ST	20	20	0	\$89,836	3/28/2023	3/28/2023
V-XA-12340	VEDO	DW	DAYTON-DW	ARLENE AVE	0	70	1	\$11,710	2/7/2023	2/7/2023
V-X-OHMOD 13	VEDO	DW	DAYTON-DW	PARKHILL DR	5,485	8,260	90	\$1,358,432	2/1/2023	5/30/2023
<b>Total ICS</b>					<b>71,864</b>	<b>77,715</b>	<b>1,207</b>	<b>\$14,198,223</b>		

**Operating & Maintenance Savings Calculation**

		A	B	C	
				Baseline Savings	
1	Savings from 2018 Retired BS/CI Mileage	56.49	\$ 5,882	\$ 332,274	A1xB1
2	Savings from 2019 Retired BS/CI Mileage	49.55	\$ 5,882	\$ 291,453	A2xB2
3	Savings from 2020 Retired BS/CI Mileage	56.72	\$ 5,882	\$ 333,627	A3xB3
4	Savings from 2021 Retired BS/CI Mileage	61.79	\$ 5,882	\$ 363,449	A4xB4
5	Savings from 2022 Retired BS/CI Mileage	64.17	\$ 5,882	\$ 377,448	A5xB5
6	Total Savings:			<b>\$ 1,698,251</b>	C1

\* Baseline savings prior to 2018 are in base rates

CEOH 2022 Maintenance Expense - BS/CI & Service Line Ownership

Service O&M Expense Change

	A		B		C	
Meter Order Management						
	Baseline		2022		Change from Baseline	
1 Meter Orders						
2 Outside Leaks	3,616		2,985			
3 Investigate Gas Emergency	685		651			
4 No Gas	1,756		1,629			
5 Water in Service	2		-			
6 Total	6,059		5,265			
7 % Allocated to BS/CI Facilities	30%		24% <sup>*1</sup>			
Orders applicable to BS/CI	1,806	A5 * A6	1,248	B5 * B6		
Maintenance Expenses						
	Baseline		2022			
8 Total Meter Orders	141,145		108,610			
9 Meter Order Mgmt Actuals	\$ 5,364,831		\$ 6,163,820			
10 Average Cost per Order	38.01	A9/A8	56.75	B9/B8		
11 Average cost per Asset Condition based Order	76.02	2 * A10	113.50	2 * B10		
<small>* Leak Investigation order averages approximately 2x's longer than average meter order</small>						
Maintenance Expenses Reduction Opportunity						
	Baseline (C1x C2)		2022		Change from Baseline	
12 Orders Applicable to BS/CI x Average Order Cost per Asset Condition based Order	\$ 137,258	A7 * A11	\$ 141,631	B7 * B11	\$ (4,372)	A12 - B12

Leak Repair & Management						
	Baseline		2022		Change from Baseline	
13 Service Leak Repair Actuals	\$ 510,754		\$ 22,365		\$ 488,389	A13-B13
14 % of Service BS/CI Leak Repairs	26%		14% <sup>*1</sup>			
15 Incremental Service O&M Expenses attributable to BS/CI	\$ 130,753	A13*A14	\$ 3,188	B13*B14	\$ 127,565	A15-B15
16 Incremental Service O&M Expenses attributable to All Other Asset Types	\$ 380,001	A13-A15	\$ 19,177	B13-B15	\$ 360,824	A16-B16
17 TOTAL BS/CI SERVICE MAINTENANCE EXPENSES	\$ 268,011	A12+A15	\$ 144,818	B12+B15	\$ 123,193	A17-B17

MAIN O&M Expense Change

Leak Repair & Management						
	Baseline		2022		Change from Baseline	
18 Total Main Leak Repair Actuals	\$ 2,854,630		\$ 1,854,647			
19 Cost Associated with Soft Surface Repairs	\$ 2,198,065		\$ 1,297,697			
20 % of Soft Surface Repairs on BS/CI Main Leaks	28%		16% <sup>*1</sup>			
21 Cost Associated with Hard Surface Repairs	\$ 656,565		\$ 556,950			
22 % of Hard Surface Repairs on BS/CI Main Leaks	48%		45% <sup>*1</sup>			
23 Main O&M Expenses attributable to BS/CI	\$ 923,593	(A19*A20)+(A21*A22)	\$ 458,558	(B19*B20)+(B21*B22)	\$ 465,034	A23-B23
24 Total O&M Maintenance Expenses (Main + Services)	\$ 1,191,604	A17+A23	\$ 603,377	B17+B23	\$ 588,227	A24-B24

\*1 - Leak percentages based on 2019-2020 data



**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Vectren Energy Delivery of Ohio, LLC	)	
d/b/a CenterPoint Energy Ohio for	)	Case No. 23-0273-GA-RDR
Authority to Adjust Its Distribution	)	
Replacement Rider Charges.	)	

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**DIRECT TESTIMONY**

**OF**

**MARISA J. JOHNSON**

**MANAGER, REGULATORY REPORTING**

**ON BEHALF OF**

**VECTREN ENERGY DELIVERY OF OHIO, LLC**

**D/B/A CENTERPOINT ENERGY OHIO**

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**Direct Testimony of  
Marisa J. Johnson**

**I. INTRODUCTION**

**Q1. Please state your name and business address.**

A. My name is Marisa J. Johnson and my business address is 211 NW Riverside Drive, Evansville, Indiana 47708.

**Q2. What position do you hold with Applicant CenterPoint Energy Ohio (CEOH or the Company)?**

A. I am Manager, Regulatory Reporting for CenterPoint Energy Services Company, LLC (Service Company), a wholly-owned subsidiary of CenterPoint Energy, Inc. (CenterPoint). The Service Company provides centralized support services to CenterPoint Energy, Inc.'s operating units, of which Vectren Energy Delivery of Ohio, LLC d/b/a CenterPoint Energy Ohio (CEOH or Company) is one. I also hold this same position with two other utility subsidiaries of CenterPoint – Indiana Gas Company, Inc. d/b/a CenterPoint Energy Indiana North (CEI North) and Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South (CEI South).

**Q3. Please describe your educational background.**

A. I am a 2001 graduate of the University of Southern Indiana with a Bachelor of Science degree in Finance, and a 2010 graduate of the University of Southern Indiana with a Master of Business Administration.

**Q4. Please describe your professional experience.**

A. From 2001 to 2002, I was employed by SIGECOM, LLC as a junior accountant and from 2002 to 2005, I was employed by Harding, Shymanski & Company P.S.C. as a staff accountant. From 2005 to 2015, I was employed by Ascension St. Vincent Evansville as a senior financial analyst in financial reporting, business development, and financial

1 planning & analysis. I began working for the Company in 2015 as a senior operational  
2 analyst promoted to lead operational analyst in 2016 in financial planning & analysis. I  
3 transitioned to regulatory reporting in 2020 and was promoted to Manager, Regulatory  
4 Reporting in January 2023.

5 **Q5. What are your present duties and responsibilities as Manager, Regulatory**  
6 **Reporting?**

7 A. I am responsible for the financial analysis and implementation of regulatory initiatives for  
8 the Service Company's regulated utility operations covering Indiana and Ohio. These  
9 duties include preparation of accounting exhibits submitted in various regulatory  
10 proceedings for these operations, including CEOH.

11 **Q6. Are you familiar with the books, records, and accounting procedures of CEOH?**

12 A. Yes, I am.

13 **Q7. Are CEOH's books and records maintained in accordance with the Uniform System**  
14 **of Accounts (USoA) and generally accepted accounting principles?**

15 A. Yes.

16 **Q8. Have you previously testified before this Commission or any other state regulatory**  
17 **commission?**

18 A. Yes, I am currently testifying before the Public Utilities Commission of Ohio on behalf  
19 of CEOH in its Capital Expenditure Program (CEP) proceeding, Case No. 23-0620-GA-  
20 RDR. Additionally, I have testified before the Indiana Utility Regulatory Commission  
21 (IURC) on behalf of CEI North and CEI South.

22 **Q9. What is the purpose of your testimony in this proceeding?**

23 A. My testimony explains the calculation of the revenue requirement for CEOH's DRR,  
24 which includes the bare-steel and cast-iron replacement program (the Replacement  
25 Program) and incremental costs associated with the Company's assumption of service

line responsibility. I will also provide an explanation of the accounting procedures the Company uses to record and segregate the costs recoverable in the DRR.

**Q10. What Exhibits are you sponsoring in this proceeding?**

A. The following exhibits are attached to my testimony:

- Exhibit No. MJJ-1 – Summary of DRR Revenue Requirement
- Exhibit No. MJJ-2 – Revenue Requirement for Main Replacement Program
- Exhibit No. MJJ-2a – Utility Plant Additions for Main Replacement Program
- Exhibit No. MJJ-2b – Utility Plant Retirements for Main Replacement Program
- Exhibit No. MJJ-2c – Accumulated Depreciation for Main Replacement Program
- Exhibit No. MJJ-2d – Cost of Removal for Main Replacement Program
- Exhibit No. MJJ-2e – Post in Service Carrying Costs (PISCC) for Main Replacement Program
- Exhibit No. MJJ-2f – Annualized Property Tax Expense for Main Replacement Program and Annual Property Tax Expense True-Up
- Exhibit No. MJJ-2g – Deferred Taxes on Liberalized Depreciation for Main Replacement Program
- Exhibit No. MJJ-2h – Deferred Depreciation Regulatory Asset Balance for Main Replacement Program
- Exhibit No. MJJ-3 – Revenue Requirement for Service Line and Completed Riser Replacement Program
- Exhibit No. MJJ-3a – Utility Plant Additions for Service Line and Riser Replacement Program
- Exhibit No. MJJ-3b – Utility Plant Retirements for Service Line and Riser Replacement Program
- Exhibit No. MJJ-3c – Accumulated Depreciation for Service Line and Riser Replacement Program
- Exhibit No. MJJ-3d – Cost of Removal for Service Line and Riser Replacement Program
- Exhibit No. MJJ-3e – PISCC for Service Line and Riser Replacement Program

- Exhibit No. MJJ-3f – Annualized Property Tax Expense for Service Line and Riser Replacement Program and Annual Property Tax Expense True-Up
- Exhibit No. MJJ-3g – Deferred Taxes on Liberalized Depreciation for Service Line and Riser Replacement Program
- Exhibit No. MJJ-3h – Deferred Depreciation Regulatory Asset Balance for Service

## II. BACKGROUND

### **Q11. Has the Commission approved changes to the DRR since it was originally approved in Case No. 07-1080-GA-AIR?**

A. Yes. The Commission’s February 19, 2014, Order in Case No. 13-1571-GA-ALT approved a Stipulation and Recommendation (the 13-1571 Stipulation) between CEOH and the Staff of the Public Utilities Commission of Ohio. In the 13-1571 Stipulation, the Commission approved continuation of the DRR, which was originally approved in Case No. 07-1080-GA-AIR (the 2007 Rate Case). The 13-1571 Stipulation allowed CEOH to recover a return on and of investments made by the Company under an accelerated bare-steel and cast-iron pipeline replacement program, inclusive of capitalized interest (or post-in-service carrying costs, or PISCC) associated with the Replacement Program, and to recover the incremental costs of assuming responsibility for service lines.

### **Q12. How did the 13-1571 Stipulation modify the DRR?**

A. The 13-1571 Stipulation provided that Replacement Program costs incurred through December 31, 2017 are recoverable in the DRR. It also accelerated the pace of the Replacement Program and clarified and expanded the scope of costs recoverable in the

1 DRR. These and other modifications are described in further detail in the 13-1571  
2 Stipulation itself.

3 **Q13. Has CEOH been granted an extension of the DRR beyond 2017?**

4 A. Yes. The 2018 Rate Case extended the DRR and Replacement Program for six years, for  
5 investments made starting in 2018 through 2023. The 2018 Rate Case specifically  
6 reflected agreement, within the Stipulation and Recommendation, by the signatory parties  
7 to continue the DRR and Replacement Program for this six-year period.

8 **III. DRR REVENUE REQUIREMENT**

9 **Q14. Please explain the work order process that CEOH uses to segregate and record the**  
10 **capital costs of the bare steel and cast iron replacement and riser/service line**  
11 **replacement programs (collectively, the Programs) while the projects are under**  
12 **construction (the Program Construction Costs).**

13 A. To ensure proper accumulation and segregation of Program Construction Costs, a project  
14 number is assigned to each capital work order. All Program Construction Costs, as  
15 incurred, are recorded to the assigned project number and are maintained in the  
16 Company's financial system. The project number is required for the recording of all  
17 Program Construction Costs into the Company's financial system. Total Program  
18 Construction Costs incurred can be viewed and/or reported by the project number at any  
19 point in time as the Programs progress.

20 **Q15. What costs did CEOH include in the value of the property for the DRR rate base**  
21 **additions?**

22 A. The DRR includes the construction costs of the Programs, as well as engineering and  
23 project management, permitting, consulting services, site preparation, equipment and  
24 installation, cost of retirement, an allocation of administrative overhead, and other related  
25 expenses.

**Q16. Is an allowance for funds used during construction (AFUDC) included in the Program Construction Costs?**

A. Yes, AFUDC has been recorded as part of the Program Construction Costs in accordance with USoA. The 2022 AFUDC rate used for all other CEOH construction projects was 1.52%.

**Q17. When does CEOH discontinue recording AFUDC on the Program Construction Costs?**

A. CEOH ceases the accrual of AFUDC when each work order is placed in service and begins accruing PISCC. In accordance with the Order in Case No. 20-101-GA-RDR, the PISCC rate is 5.07%, effective January 1, 2019. The Commission's order in the 2007 Rate Case approved the accrual of PISCC after the work order in-service date, along with the fixed rate utilized. The net PISCC deferred for the calendar year ended December 31, 2022 has been reflected on Exhibit No. MJJ-2, Line 11 for mains and Exhibit No. MJJ-3, Line 16 for service lines. In accordance with the 2018 Rate Case, all PISCC deferred through December 31, 2017 have been included in base rates and removed from the DRR.

**Q18. What is PISCC?**

A. PISCC stands for post-in-service carrying costs and is an allocation of interest cost to the infrastructure investments made in the Programs and is accumulated from the in-service date through the date each project's costs are included for recovery in the DRR or in base rates.

**Q19. What rate of return is used to calculate the DRR revenue requirement?**

A. In accordance with the terms of the 2018 Rate Case, the pre-tax rate of return applicable to DRR-recoverable investments is 8.81%.

**Q20. Does the DRR revenue requirement include retirements and the cost of removal of utility plant assets?**

A. Yes. Existing bare-steel and cast-iron mains and service lines are being retired as part of the Program. CEOH had discontinued the installation of bare-steel and cast-iron pipe by the 1950s; therefore, any retirements of these types of mains and service lines represent fully depreciated plant in service. As the retirements are performed, CEOH is also recording the cost to retire or remove the bare-steel and cast-iron assets as part of the Replacement Program.

**Q21. How did CEOH account for the asset retirements and associated cost of removal?**

A. In accordance with the USoA, the retirement of utility assets, at original cost, and the retirement's related cost of removal made necessary by the Replacement Program were charged to the associated depreciation reserve(s). The Replacement Program's original cost retirements are reflected on Exhibit No. MJJ-2, Lines 4 and 9 for mains, and on Exhibit No. MJJ-3, Lines 6 and 7 and Lines 13 and 14 for service lines, and cost of removal is reflected on Exhibit No. MJJ-2, Line 8 for mains and Exhibit No. MJJ-3, Line 12 for service lines.

**Q22. What operating expenses are included in the DRR revenue requirement?**

A. CEOH has reflected the incremental property tax (Exhibit No. MJJ-2, Line 20 (mains) and Exhibit No. MJJ-3, Line 27 (service lines)), prior year annualized property tax expense true-up (Exhibit No. MJJ-2, Line 21 (mains) and Exhibit No. MJJ-3 Line 28 (services)), and annualized depreciation expense (Exhibit No. MJJ-2, Line 22 (mains) and Exhibit No. MJJ-3, Line 29 and 30 (service lines)) based on the net additions to plant in service shown on Exhibit No. MJJ-2, Line 5, mains, and Exhibit No. MJJ-3, Line 8, service lines. The annualized depreciation expense was calculated using the depreciation



rates approved in the 2018 Rate Case (2.57%), and property tax expense is supported by Exhibit No. MJJ-2f (mains) and Exhibit No. MJJ-3f (service lines and risers).

CEOH has also included in the DRR revenue requirement the incremental cost associated with assuming ownership of service lines. This expense is reflected on Exhibit No. MJJ-3, Line 34. CEOH witness Mason Butler IV provides the support for the incremental expense in Exhibit No. MBIV-5.

**Q23. Are there maintenance expense adjustments associated with the Replacement Program?**

A. Yes. As approved in the 2018 Rate Case, operations and maintenance (O&M) savings attributed to the Replacement Program are included as an offset to the costs recoverable in the DRR. In this case, the amount of the offset, reflected on CEOH witness Butler IV's Exhibit No. MBIV-4, was determined by a credit of \$5,882 per mile of cumulative bare-steel and cast-iron main retired, which results in a total O&M Savings Credit of \$1,698,251. As the 2018 Rate Case captured the impact of savings reflected for miles replaced through 2017, this credit captures savings for 2018 and beyond. This credit is reflected in the DRR revenue requirement on Exhibit No. MJJ-2, Line 25 for mains and Exhibit No. MJJ-3, Line 35 for services. CEOH witness Butler IV discusses the determination of this O&M savings credit.

**IV. EXPLANATION OF EXHIBITS**

**Q24. Please explain Exhibit No. MJJ-1.**

A. Exhibit No. MJJ-1 summarizes the annualized revenue requirement exclusive of variances for the Programs. The revenue requirement is supported by Exhibit Nos. MJJ-2 and MJJ-3.

**Q25. Please explain Exhibit No. MJJ-2 and Exhibit No. MJJ-3.**

A. Exhibit No. MJJ-2 and Exhibit No. MJJ-3 represent the revenue requirement calculation for CEOH's DRR charges based on net rate base at December 31, 2022, inclusive of PISCC and deferred taxes related to depreciation and PISCC. Exhibit No. MJJ-2 represents the revenue requirement calculation for the main replacement program, and Exhibit No. MJJ-3 represents the revenue requirement calculation for service line replacements.

**Q26. Please explain Exhibit No. MJJ-2a and Exhibit No. MJJ-3a.**

A. Exhibit No. MJJ-2a and Exhibit No. MJJ-3a provide the actual plant additions by month for the twelve months ended December 31, 2022, to determine utility plant additions at December 31, 2022. As further discussed by CEOH witness Butler IV, the difference between Exhibit No. MBIV-1 and the Capital Plant In Service found on Exhibit No. MJJ-2a and Exhibit No. MJJ-3a will be included in a future filing for recovery. Exhibit No. MJJ-2a provides information for the main replacement program, and Exhibit No. MJJ-3a provides information for the service line replacement programs.

**Q27. Please explain Exhibit No. MJJ-2b and Exhibit No. MJJ-3b.**

A. Exhibit No. MJJ-2b and Exhibit No. MJJ-3b provide the actual original cost retired by month for projects completed during the twelve months ended December 31, 2022, to calculate the Replacement Program's total original cost retirements. Exhibit No. MJJ-2b provides information for the main replacement program, and Exhibit No. MJJ-3b provides information for the service line replacement programs.

**Q28. Please explain Exhibit No. MJJ-2c and Exhibit No. MJJ-3c.**

A. Exhibit No. MJJ-2c and Exhibit No. MJJ-3c provide the actual provision for depreciation by month for the twelve months ended December 31, 2022, to calculate the accumulated

depreciation provision at December 31, 2022. The depreciation rates utilized for this period reflect those approved in the 2018 Rate Case for January 1, 2019 and thereafter. Exhibit No. MJJ-2c provides information for the main replacement program, and Exhibit No. MJJ-3c provides information for the service line replacement programs.

**Q29. Please explain Exhibit No. MJJ-2d and Exhibit No. MJJ-3d.**

A. Exhibit No. MJJ-2d and Exhibit No. MJJ-3d provide the actual cost of removal by month for the twelve months ended December 31, 2022, to calculate the Program's total cost of removal through December 31, 2022. Exhibit No. MJJ-2d provides information for the main replacement program, and Exhibit No. MJJ-3d provides information for the service line replacement programs.

**Q30. Please explain Exhibit No. MJJ-2e and Exhibit No. MJJ-3e.**

A. Exhibit No. MJJ-2e and Exhibit No. MJJ-3e provide the PISCC activity by month for the twelve months ended December 31, 2022, to calculate the PISCC regulatory asset balance at December 31, 2022. These schedules also provide the amortization of PISCC by month for the twelve months ended December 31, 2022, and an accumulated PISCC amortization balance at December 31, 2022. Furthermore, these schedules provide the Net PISCC Regulatory Asset at December 31, 2022. Effective January 1, 2019, with the order in the 2018 Rate Case Order, the PISCC rate is updated to 5.07%. Exhibit No. MJJ-2e provides information for the main replacement program, and Exhibit No. MJJ-3e provides information for the service line replacement programs.

**Q31. Please explain Exhibit No. MJJ-2f and Exhibit No. MJJ-3f.**

A. Exhibit No. MJJ-2f and Exhibit No. MJJ-3f contain two pages. Page one provides the calculation of the annualized property tax expense based on the net additions (mains, service lines, and risers) to Plant In-Service under the Programs. This calculation follows

the process used in CEOH's Annual Report to the Ohio Department of Taxation to determine the Net Property Valuation and uses the latest known personal property tax rate. Page 1 of 2 of Exhibit No. MJJ-2f provides information for the net main additions, and page 1 of 2 of Exhibit No. MJJ-3f provides information for the net service line additions. Page 2 of 2 trues up the last known personal property tax rate to the actual rate for prior year accrual of property tax expense once that rate is known to CEOH (typically CEOH receives property tax bills showing the actual tax rate each spring).

**Q32. Please explain Exhibit No. MJJ-2g and Exhibit No. MJJ-3g.**

A. Exhibit No. MJJ-2g (mains) and Exhibit No. MJJ-3g (service lines) provide the calculation of depreciation-related deferred taxes for the Programs' capital investments placed in service during 2022.

**Q33. Please explain Exhibit No. MJJ-2h and Exhibit No. MJJ-3h.**

A. Exhibit No. MJJ-2h (mains) and Exhibit No. MJJ-3h (service lines) provide the deferred depreciation activity by month for the twelve months ended December 31, 2022, to calculate the deferred depreciation regulatory asset balance as of December 31, 2022. These schedules also provide the amortization of deferred depreciation by month for the twelve months ended December 31, 2022, and an accumulated deferred depreciation amortization balance at December 31, 2022. Furthermore, these schedules provide the net deferred depreciation Regulatory Asset at December 31, 2022. Exhibit No. MJJ-2h provides information for the main replacement program, and Exhibit No. MJJ-3h provides information for the service line replacement programs.

1     **V.   CONCLUSION**

2     **Q34.   Does this conclude your direct testimony?**

3     **A.     Yes.**

**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
DISTRIBUTION REPLACEMENT RIDER  
SUMMARY OF DRR REVENUE REQUIREMENT**

<u>Line</u>	<u>Description</u>	<u>Amount</u>	<u>Reference</u>
1	Mains Revenue Requirement	\$ 21,156,212	Exhibit No. MJJ-2, Line 27
2	Service Lines Revenue Requirement	<u>23,123,469</u>	Exhibit No. MJJ-3, Line 37
3	<b>Annual DRR Revenue Requirement</b>	<b><u>\$ 44,279,682</u></b>	<b>Line 1 + Line 2</b>

**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO**  
**DISTRIBUTION REPLACEMENT RIDER**  
**ANNUAL REVENUE REQUIREMENT - MAINS**

Line	Description	Amount	Reference
1	<b><u>Return on Investment:</u></b>		
2	Plant In-Service at December 31, 2022		
3	Additions - Main Replacements	\$ 161,932,637	Exhibit MJJ-2a, Column O, Line 2
4	Original Cost - Retired Mains	(3,898,221)	Exhibit MJJ-2b, Column P, Line 2
5	Total Plant In-Service	\$ 158,034,416	Line 3 + Line 4
6	<b><u>Less: Accumulated Depreciation at December 31, 2022</u></b>		
7	Depreciation Expense - Mains	\$ (9,367,924)	Exhibit MJJ-2c, Column O, Line 2
8	Cost of Removal - Mains	6,065,984	Exhibit MJJ-2d, Column O, Line 2
9	Original Cost - Retired Mains	3,898,221	-Line 4
10	Total Accumulated Depreciation	\$ 596,281	Sum of Lines 7 - 9
11	Net Deferred Post In-Service Carrying Costs (PISCC) <sup>(3)</sup>	\$ 8,093,895	Exhibit MJJ-2e, Column O, Line 4
12	Deferred Depreciation Regulatory Asset Balance - Mains	\$ 3,434,588	Exhibit MJJ-2h, Column B, Line 3
13	Net Deferred Tax Balance - PISCC	\$ (1,699,718)	-Line 11 x 21%
14	Deferred Taxes on Depreciation	\$ (5,079,377)	Exhibit No. MJJ-2g, Line 18
15	Deferred Taxes on Deferred Depreciation Regulatory Asset	\$ (721,263)	-Line 12 x 21%
16	Net Rate Base	\$ 162,658,821	Sum of Lines 5 and 10 thru 15
17	Pre-Tax Rate of Return	8.81%	(4)
18	<b>Annualized Return on Rate Base - Mains</b>	<b>\$ 14,330,242</b>	Line 16 x Line 17
19	<b><u>Operations and Maintenance Expenses</u></b>		
20	Annualized Property Tax Expense	\$ 3,602,695	Exhibit No. MJJ-2f Page 1 of 2, Line 17
21	Prior Year Annualized Property Tax Expense True-Up	\$ (8,876)	Exhibit No. MJJ-2f Page 2 of 2, Line 19
22	Annualized Depreciation Expense	\$ 4,061,484	Line 5 x 2.57% <sup>(1)</sup>
23	Annualized PISCC Amortization Expense	\$ 118,054	Exhibit MJJ-2e, Column D, Line 13
24	Annualized Deferred Depreciation Amortization Expense - Mains	\$ 49,892	Exhibit MJJ-2h, Column C, Line 21
25	Annualized Maintenance Adjustment	\$ (997,280)	(2)
26	<b>Total Incremental Operating Expenses - Mains</b>	<b>\$ 6,825,970</b>	Sum of Lines 20-25
27	<b>Total Annual Revenue Requirement - Mains</b>	<b>\$ 21,156,212</b>	Line 18 + Line 26
		<b>(To Exhibit No. MJJ-1)</b>	

- (1) FERC Account 676 depreciation rate as approved in Case No. 18-0298-GA-AIR.  
(2) Support provided by CEOH Witness Mason Butler IV, Exhibit No. MBIV-4, Column C, Line 6.  
Allocation of Exhibit No. MBIV-4 between Mains and Services based upon cumulative gross investment.  
(3) PISCC is accrued at an annual rate of 5.07% from the in-service date until investments are reflected in the DRR rate as approved in Case No. 18-0298-GA-AIR.  
(4) Rate of Return as approved in Case No. 18-0298-GA-AIR.

VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
Distribution Replacement Rider (DRR)  
Mains - Plant Additions  
Twelve Months Ended December 31, 2022

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Line No.	Description	Balance at 12/31/2021	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	11/30/2022	Balance at 12/31/2022	
1	Cumulative Balance														
2	Mains	\$ 127,691,348	\$ 128,413,543	\$ 129,444,326	\$ 130,167,555	\$ 132,078,775	\$ 136,177,393	\$ 142,011,706	\$ 142,251,901	\$ 146,458,416	\$ 149,889,377	\$ 152,932,770	\$ 156,405,871	\$ 161,932,637	To MJJ-2, Line 3
3	Current Year Activity		1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	11/30/2022	12/31/2022	Activity for Twelve Months Ended 12/31/2022
4	Mains		\$ 722,195	\$ 1,030,783	\$ 723,229	\$ 1,911,221	\$ 4,098,618	\$ 5,834,313	\$ 240,195	\$ 4,206,515	\$ 3,430,960	\$ 3,043,394	\$ 3,473,101	\$ 5,526,766	\$ 34,241,289



VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
Distribution Replacement Rider (DRR)  
Mains - Retirements  
Twelve Months Ended December 31, 2022

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Line		Retirements at													Total Retirements for Work Orders Placed in Service by <u>12/31/2022</u>
No.	Description	<u>12/31/2021</u>	<u>1/31/2022</u>	<u>2/28/2022</u>	<u>3/31/2022</u>	<u>4/30/2022</u>	<u>5/31/2022</u>	<u>6/30/2022</u>	<u>7/31/2022</u>	<u>8/31/2022</u>	<u>9/30/2022</u>	<u>10/31/2022</u>	<u>11/30/2022</u>	<u>12/31/2022</u>	
1	<u>Cumulative Balance</u>														
2	Mains	\$ (3,301,607)	\$ (3,301,607)	\$ (3,307,050)	\$ (3,712,172)	\$ (3,874,456)	\$ (3,871,752)	\$ (3,883,493)	\$ (3,883,493)	\$ (3,889,052)	\$ (3,889,052)	\$ (3,889,052)	\$ (3,889,052)	\$ (3,898,221)	\$ (3,898,221) To MJJ-2, Line 4
3	<u>Current Year Activity</u>		<u>1/31/2022</u>	<u>2/28/2022</u>	<u>3/31/2022</u>	<u>4/30/2022</u>	<u>5/31/2022</u>	<u>6/30/2022</u>	<u>7/31/2022</u>	<u>8/31/2022</u>	<u>9/30/2022</u>	<u>10/31/2022</u>	<u>11/30/2022</u>	<u>12/31/2022</u>	Retirements for Work Orders Placed In Service in 2022
4	Mains		\$ -	\$ (5,444)	\$ (405,122)	\$ (162,284)	\$ 2,703	\$ (11,741)	\$ -	\$ (5,558)	\$ -	\$ -	\$ -	\$ (9,170)	\$ (596,615)

VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
Distribution Replacement Rider (DRR)  
Mains - Depreciation  
Twelve Months Ended December 31, 2022

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
Line No.	Description	Accumulated Depreciation at													
		<u>12/31/2021</u>	<u>1/31/2022</u>	<u>2/28/2022</u>	<u>3/31/2022</u>	<u>4/30/2022</u>	<u>5/31/2022</u>	<u>6/30/2022</u>	<u>7/31/2022</u>	<u>8/31/2022</u>	<u>9/30/2022</u>	<u>10/31/2022</u>	<u>11/30/2022</u>	<u>12/31/2022</u>	
1	<u>Cumulative Balance</u>														
2	Mains	\$ (5,782,939)	\$ (6,056,411)	\$ (6,331,430)	\$ (6,608,657)	\$ (6,887,432)	\$ (7,170,301)	\$ (7,461,948)	\$ (7,766,089)	\$ (8,070,746)	\$ (8,384,411)	\$ (8,705,424)	\$ (9,032,955)	\$ (9,367,924)	To MJJ-2, Line 7
3	<u>Current Year Activity</u>	Depreciation Rate	<u>1/31/2022</u>	<u>2/28/2022</u>	<u>3/31/2022</u>	<u>4/30/2022</u>	<u>5/31/2022</u>	<u>6/30/2022</u>	<u>7/31/2022</u>	<u>8/31/2022</u>	<u>9/30/2022</u>	<u>10/31/2022</u>	<u>11/30/2022</u>	<u>12/31/2022</u>	Depreciation Expense
4	Mains <sup>(1)(2)</sup>	2.570%	\$ (273,472)	\$ (275,019)	\$ (277,227)	\$ (278,776)	\$ (282,869)	\$ (291,647)	\$ (304,142)	\$ (304,656)	\$ (313,665)	\$ (321,013)	\$ (327,531)	\$ (334,969)	\$ (3,584,985)

Notes:

- (1) FERC Account 676 depreciation rate of 2.57% implemented on 9/1/2019 and approved in Case No. 18-0298-GA-AIR.  
(2) Monthly depreciation activity represents this rate divided by 12 months. Depreciation on in-service activity in the current month receives no depreciation, and the cumulative balance from the prior month receives a full month of depreciation.

VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
Distribution Replacement Rider (DRR)  
Mains - Cost of Removal  
Twelve Months Ended December 31, 2022

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Line No.	Description	Cost of Removal <u>12/31/2021</u>	<u>1/31/2022</u>	<u>2/28/2022</u>	<u>3/31/2022</u>	<u>4/30/2022</u>	<u>5/31/2022</u>	<u>6/30/2022</u>	<u>7/31/2022</u>	<u>8/31/2022</u>	<u>9/30/2022</u>	<u>10/31/2022</u>	<u>11/30/2022</u>	Balance at <u>12/31/2022</u>	
1	<u>Cumulative Balance</u>														
2	Mains	\$ 3,940,096	\$ 4,205,487	\$ 4,344,624	\$ 4,745,798	\$ 4,908,171	\$ 5,072,316	\$ 5,515,763	\$ 5,610,136	\$ 5,656,781	\$ 5,897,807	\$ 5,957,336	\$ 6,022,083	\$ 6,065,984	To MJJ-2, Line 8
3	<u>Current Year Activity</u>		<u>1/31/2022</u>	<u>2/28/2022</u>	<u>3/31/2022</u>	<u>4/30/2022</u>	<u>5/31/2022</u>	<u>6/30/2022</u>	<u>7/31/2022</u>	<u>8/31/2022</u>	<u>9/30/2022</u>	<u>10/31/2022</u>	<u>11/30/2022</u>	<u>12/31/2022</u>	Activity for Twelve Months Ended <u>12/31/2022</u>
4	Mains		\$ 265,391	\$ 139,137	\$ 401,174	\$ 162,373	\$ 164,145	\$ 443,446	\$ 94,373	\$ 46,646	\$ 241,026	\$ 59,529	\$ 64,747	\$ 43,900	\$ 2,125,888

VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
Distribution Replacement Rider (DRR)  
Mains - Post In Service Carrying Costs (PISCC)  
Twelve Months Ended December 31, 2022

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Line No.	Description	PISCC at 12/31/2021	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	11/30/2022	Balance at 12/31/2022	
1	Cumulative Balance														
2	Mains-PISCC	\$ 6,621,852	\$ 6,752,300	\$ 6,885,799	\$ 7,023,654	\$ 7,164,564	\$ 7,313,548	\$ 7,479,850	\$ 7,670,802	\$ 7,862,768	\$ 7,942,059	\$ 8,035,845	\$ 8,142,490	\$ 8,263,809	
3	Mains-PISCC Amortization	\$ (91,088)	\$ (97,000)	\$ (102,911)	\$ (108,823)	\$ (114,735)	\$ (120,646)	\$ (126,558)	\$ (132,470)	\$ (138,382)	\$ (146,265)	\$ (154,148)	\$ (162,031)	\$ (169,914)	
4	Deferred PISCC - Mains	\$ 6,530,764	\$ 6,655,300	\$ 6,782,888	\$ 6,914,831	\$ 7,049,829	\$ 7,192,902	\$ 7,353,292	\$ 7,538,332	\$ 7,724,386	\$ 7,795,794	\$ 7,881,698	\$ 7,980,459	\$ 8,093,895	To MJJ-2, Line 11
5	Current Year Activity	PISCC Rate (1)	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	11/30/2022	12/31/2022	Activity for Twelve Months Ended 12/31/2022
6	2021 Mains - Deferred PISCC	5.070%	\$ 130,448	\$ 130,448	\$ 130,448	\$ 130,448	\$ 130,448	\$ 130,448	\$ 130,448	\$ 130,448	\$ -	\$ -	\$ -	\$ -	\$ 1,043,584
7	2022 Mains - Deferred PISCC	5.070%	\$ -	\$ 3,051	\$ 7,406	\$ 10,462	\$ 18,537	\$ 35,854	\$ 60,504	\$ 61,518	\$ 79,291	\$ 93,787	\$ 106,645	\$ 121,319	\$ 598,373
8	Total 2022 Deferred PISCC		\$ 130,448	\$ 133,499	\$ 137,854	\$ 140,910	\$ 148,985	\$ 166,302	\$ 190,952	\$ 191,966	\$ 79,291	\$ 93,787	\$ 106,645	\$ 121,319	\$ 1,641,957
9	Mains-PISCC Amortization (2)	1.429%	\$ (5,912)	\$ (5,912)	\$ (5,912)	\$ (5,912)	\$ (5,912)	\$ (5,912)	\$ (5,912)	\$ (5,912)	\$ (7,883)	\$ (7,883)	\$ (7,883)	\$ (7,883)	\$ (78,826)
10	Annualized PISCC Amortization														
11	2022 Cumulative PISCC		\$ 8,263,809												
12	Amortization % (2)		1.43%												
13	Annualized PISCC Amortization		\$ 118,054												To MJJ-2, Line 23

Notes:

- (1) The PISCC rate of 5.07% was approved in Case No. 18-0298-GA-AIR  
(2) FERC Account 676 depreciation rate's average service life of 70 years, as approved in Case No. 18-0298-GA-AIR.

VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
DISTRIBUTION REPLACEMENT RIDER  
ANNUALIZED PROPERTY TAX EXPENSE - MAIN REPLACEMENTS

Line	Description							Reference
		<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>Total</u>	
1	Mains Replacements - Book Value	\$ 32,898,125	\$ 28,954,262	\$ 34,963,687	\$ 30,875,274	\$ 34,241,289	\$ 161,932,637	Exhibit No. MJJ-2, Line 3
2	Less: Capitalized Interest / AFUDC	\$ (56,425)	\$ (38,460)	\$ (88,729)	\$ (163,439)	\$ (181,931)	\$ (528,984)	
3	Net Cost of Taxable Property	\$ 32,841,700	\$ 28,915,802	\$ 34,874,958	\$ 30,711,835	\$ 34,059,358	\$ 161,403,653	Line 1 + Line 2
4	% Good <sup>(1)</sup>	85.0%	88.3%	91.7%	95.0%	98.3%		
5	Tax Value	\$ 27,915,445	\$ 25,532,653	\$ 31,980,337	\$ 29,176,243	\$ 33,480,349	\$ 148,085,027	Line 3 x Line 4
6	x Valuation Percentage (25%) <sup>(2)</sup>	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	
7	Taxable Value/Assessment	\$ 6,978,861	\$ 6,383,163	\$ 7,995,084	\$ 7,294,061	\$ 8,370,087	\$ 37,021,257	Line 5 x Line 6
8	CEOH's Estimated 2022 Personal Property Tax Rate <sup>(4)</sup>						9.770%	
9	<b>Annual Property Tax Expense - Main Replacements</b>						<b>\$ 3,616,977</b>	Line 7 x Line 8
10	Mains Retired - Property Tax Basis	\$ (665,386)	\$ (574,117)	\$ (932,533)	\$ (1,129,570)	\$ (596,615)	\$ (3,898,221)	Exhibit No. MJJ-2, Line 4
11	% Good <sup>(3)</sup>	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	
12	Tax Value	\$ (99,808)	\$ (86,118)	\$ (139,880)	\$ (169,436)	\$ (89,492)	\$ (584,733)	Line 10 x Line 11
13	x Valuation Percentage (25%) <sup>(2)</sup>	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	
14	Taxable Value/Assessment	\$ (24,952)	\$ (21,529)	\$ (34,970)	\$ (42,359)	\$ (22,373)	\$ (146,183)	Line 12 x Line 13
15	CEOH's Estimated 2022 Personal Property Tax Rate <sup>(4)</sup>						9.770%	
16	<b>Annual Property Tax Reduction - Main Retirements</b>						<b>\$ (14,282)</b>	Line 14 x Line 15
17	<b>Annualized Property Tax Expense - Mains</b>						<b>\$ 3,602,695</b>	Line 9 + Line 16
								<b>(To Exhibit No. MJJ-2, Line 20)</b>

**Notes:**

- (1) Per Ohio Department of Taxation Annual Natural Gas Property Tax Report, Schedule C, Distribution Plant.  
(2) Per Ohio Department of Taxation Annual Natural Gas Property Tax Report, Schedule G.  
(3) Per Ohio Department of Taxation Annual Natural Gas Property Tax Report, Schedule C(2), Distribution Plant.  
(4) CEOH's estimated 2022 personal property tax rate is based on 2021's actual tax rate.

**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
DISTRIBUTION REPLACEMENT RIDER  
PRIOR YEAR ANNUALIZED PROPERTY TAX EXPENSE - SERVICE LINES TRUE-UP**

Line	Description		Reference
		<b>Totals per 2022 DRR Filing</b>	
1	Mains Replacements - Book Value	\$ 127,691,348	Case No. 22-0455-GA-RDR CMB-2f, Line 1
2	Less: Capitalized Interest / AFUDC	\$ (347,054)	Case No. 22-0455-GA-RDR CMB-2f, Line 2
3	Net Cost of Taxable Property	\$ 127,344,295	Line 1 + Line 2
4	% Good <sup>(1)</sup>		
5	Tax Value	\$ 118,835,955	<b>Line 3 x Line 4</b>
6	x Valuation Percentage (25%)	25.0%	
7	Taxable Value/Assessment	\$ 29,708,989	Line 5 x Line 6
8	CEOH's 2021 Property Tax Rate - As Filed	9.80%	Case No. 22-0455-GA-RDR CMB-2f, Line 8
9	CEOH's 2021 Property Tax Rate - Actual	9.77%	Exhibit MJJ-2f, Line 8
10	CEOH's Personal Property Tax Rate True-Up Percentage <sup>(1)</sup>	-0.030%	
11	<b>Annual Property Tax Expense - Main Replacements - True-up</b>	<b>\$ (8,913)</b>	Line 7 x Line 10
12	Mains Retired - Property Tax Basis	\$ (3,301,607)	Case No. 22-0455-GA-RDR CMB-2f, Line 10
13	% Good	15.0%	
14	Tax Value	\$ (495,241)	Line 12 x Line 13
15	x Valuation Percentage (25%)	25.0%	
16	Taxable Value/Assessment	\$ (123,810)	Line 14 x Line 15
17	CEOH's Personal Property Tax Rate True-Up Percentage <sup>(1)</sup>	-0.030%	
18	<b>Annual Property Tax Reduction - Main Retirements - True-up</b>	<b>\$ 37</b>	Line 16 x Line 17
19	<b>Annualized Property Tax Expense - Mains - True-up</b>	<b>\$ (8,876)</b>	Line 11 + Line 18
		<b>(To Exhibit No. MJJ-2, Line 21)</b>	

**Notes:**

(1) Represents the difference between actual property tax rate for 2021 and the estimated property tax rate for 2021 used in 2022 filing.

**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO**  
**DISTRIBUTION REPLACEMENT RIDER**  
**DEFERRED TAXES ON LIBERALIZED DEPRECIATION - MAINS**

Line	Description							
		<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>Total</u>	<u>Reference</u>
1	<b><u>Plant in Service at December 31, 2022:</u></b>							
2	Mains - Bare Steel/Cast Iron Replacements	\$ 32,898,125	\$ 28,954,262	\$ 34,963,687	\$ 30,875,274	\$ 34,241,289	\$ 161,932,637	Exhibit No. MJJ-2, Line 3
3	Book to Tax Basis Adjustment - Capitalized Interest	\$ 46,734	\$ 21,197	\$ 55,086	\$ 10,817	\$ 124,736	\$ 258,569	
4	Book to Tax Basis Adjustment-Bonus Depreciation	-	-	-	-	-	\$ -	[2]
5	Total Income Tax 20 year MACRS Depreciation Base	\$ 32,944,859	\$ 28,975,459	\$ 35,018,773	\$ 30,886,090	\$ 34,366,024	\$ 162,191,206	Sum of Lines 2-4
6	<b><u>Tax Depreciation:</u></b>							
7	MACRS Rate - 15 Year	37.680%	30.750%	23.050%	14.500%	5.000%		
8	MACRS Rate - 20 Year	29.536%	23.823%	17.646%	10.969%	3.750%		
9	MACRS Depreciation - 15 Year	\$ -	\$ -	\$ -		\$ -		[1]
10	MACRS Depreciation - 20 Year	9,730,594	6,902,824	6,179,413	3,387,895	1,288,726	\$ 27,489,451	[1]
11	Bonus Depreciation	-	-	-		-	\$ -	[2]
12	Cost of Removal Incurred	2,198,137	324,139	314,900	1,102,920	2,125,888	\$ 6,065,984	Exhibit No. MJJ-2, Line 8
13	Total Tax Depreciation	\$ 11,928,730	\$ 7,226,963	\$ 6,494,313	\$ 4,490,815	\$ 3,414,614	\$ 33,555,435	Sum of Lines 9-12
14	<b><u>Book Depreciation:</u></b>							
15	Mains						\$ 9,367,924	-Exhibit No. MJJ-2, Line 7
16	Tax Depreciation in Excess of Book Depreciation						\$ (24,187,511)	Line 15 - Line 13
17	Federal Deferred Taxes at 21%						21%	[2]
18	<b>Deferred Tax Balance at December 31, 2022 - Mains</b>						<b>\$ (5,079,377)</b>	Line 16 * Line 17
							(To Exhibit No. MJJ-2, Line 14)	

**Notes:**

[1] Per Internal Revenue Code ("IRC") Sec 168(e)(3)(E)(viii), gas utility distribution facilities placed in service before January 1, 2011 have a MACRS life of 15 years. For utility distribution facilities placed in service after January 1, 2011, MACRS life is 20 years per IRC Rev. Proc. 87-56. Below is the formula for tax depreciation by year.

[2] On December 22, 2017, the United States government enacted comprehensive tax legislation commonly referred to as the Tax Cuts and Jobs Act ("TCJA" or "the Act"). Prior to the enactment of the TCJA, Internal Revenue Code rules and regulations permitted 50% bonus depreciation to be claimed. The Act repealed Bonus Depreciation for assets used in regulated utility operations and established the corporate tax rate to be 21%.

**Formula:**

Line 10 = Line 5 \* Line 8

VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
Distribution Replacement Rider (DRR)  
Mains - Deferred Depreciation Regulatory Asset Balance  
Twelve Months Ended December 31, 2022

A														B		C	
Line	Description	Deferred Depr at 12/31/2021	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Total Balance at Dec-22			
	<b>Cumulative Balance</b>																
1	Mains - Deferred Depreciation	\$ 2,690,367	\$ 2,737,666	\$ 2,783,833	\$ 2,814,949	\$ 2,855,184	\$ 2,935,548	\$ 3,090,147	\$ 3,108,579	\$ 3,157,328	\$ 3,203,411	\$ 3,226,981	\$ 3,363,621	\$ 3,492,464			
2	Mains - Deferred Depreciation Amortization	(27,623)	(29,803)	(31,984)	(34,164)	(36,344)	(38,524)	(40,705)	(42,885)	(45,065)	(48,268)	(51,471)	(54,674)	(57,876)			
3	Mains - Deferred Depreciation	\$ 2,662,744	\$ 2,707,863	\$ 2,751,850	\$ 2,780,785	\$ 2,818,840	\$ 2,897,024	\$ 3,049,443	\$ 3,065,695	\$ 3,112,262	\$ 3,155,143	\$ 3,175,510	\$ 3,308,947	\$ 3,434,588		To MJJ-2, Line 12	
Line	Description		Activity for Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total Balance by Calendar Year		
4	Mains In-Service Activity	2022 Filing Exhibit No. CMB-2h Line 10	\$ 1,807,414	\$ 1,453,739	\$ 1,568,666	\$ 573,590	\$ 1,098,221	\$ 5,076,636	\$ 925,697	\$ 774,808	\$ 1,380,817	\$ 623,597	\$ 7,853,456	\$ 7,738,633	\$ 30,875,274		
5	Less: Retirements	2022 Filing Exhibit No. CMB-2h Line 11	(39,802)	(40,832)	(110,432)	25,808	3,650	(420,293)	-	(30,064)	22,249	(8,753)	(312,491)	(218,609)	(1,129,570)		
6	Net Main Additions	Line 4 + Line 5	\$ 1,767,612	\$ 1,412,908	\$ 1,458,233	\$ 599,398	\$ 1,101,871	\$ 4,656,343	\$ 925,697	\$ 744,743	\$ 1,403,066	\$ 614,844	\$ 7,540,964	\$ 7,520,024	\$ 29,745,704		
7	Monthly Depreciation Rate	(1)	0.21%	0.21%	0.21%	0.21%	0.21%	0.21%	0.21%	0.21%	0.21%	0.21%	0.21%	0.21%			
8	# of Months from 1/1/2022 to Effective Date of DRR Rates, 9/1/2022		8	8	8	8	8	8	8	8	8	8	8	8			
9	Depreciation Expense Recognized - 1/1/2022 to 9/1/2022	Line 6 x Line 7 x Line 8	\$ 30,285	\$ 24,208	\$ 24,984	\$ 10,270	\$ 18,879	\$ 79,779	\$ 15,860	\$ 12,760	\$ 24,039	\$ 10,534	\$ 129,202	\$ 128,843	\$ 509,643		
															\$ -		
Line	Description		Activity for Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Total Balance by Calendar Year		
10	Mains In-Service Activity	Exhibit No. MJJ-2a	\$ 722,195	\$ 1,030,783	\$ 723,229	\$ 1,911,221	\$ 4,098,618	\$ 5,834,313	\$ 240,195	\$ 4,206,515	\$ 3,430,960	\$ 3,043,394	\$ 3,473,101	\$ 5,526,766	\$ 34,241,289		
11	Less: Retirements	Exhibit No. MJJ-2b	-	(5,444)	(405,122)	(162,284)	2,703	(11,741)	-	(5,558)	-	-	-	(9,170)	(596,615)		
12	Net Main Additions	Line 10 + Line 11	\$ 722,195	\$ 1,025,339	\$ 318,107	\$ 1,748,937	\$ 4,101,321	\$ 5,822,572	\$ 240,195	\$ 4,200,957	\$ 3,430,960	\$ 3,043,394	\$ 3,473,101	\$ 5,517,596	\$ 33,644,674		
13	Monthly Depreciation Rate - Post Rate Case		0.21%	0.21%	0.21%	0.21%	0.21%	0.21%	0.21%	0.21%	0.21%	0.21%	0.21%	0.21%			
14	# of Months from In-Service Date to Effective Date of DRR Rate, 9/1/2023		19	18	17	16	15	14	13	12	11	10	9	8			
15	Depreciation Expense Recognized - In-Service to 9/1/2023	Line 12 x Line 13 x Line 14	\$ 29,387	\$ 39,527	\$ 11,582	\$ 59,930	\$ 131,755	\$ 174,580	\$ 6,687	\$ 107,965	\$ 80,828	\$ 65,179	\$ 66,944	\$ 94,535	\$ 868,899		
16	Deferred Depreciation Expense - Calendar Year 2022		\$ 17,014	\$ 21,959	\$ 6,132	\$ 29,965	\$ 61,486	\$ 74,820	\$ 2,572	\$ 35,988	\$ 22,044	\$ 13,036	\$ 7,438	\$ -	\$ 292,454		
17	Deferred Depreciation Expense - Calendar Year 2023		\$ 12,374	\$ 17,567	\$ 5,450	\$ 29,965	\$ 70,269	\$ 99,760	\$ 4,115	\$ 71,976	\$ 58,784	\$ 52,143	\$ 59,506	\$ 94,535	\$ 576,445		
18	Mains - Deferred Depreciation Amortization	(2)	\$ (2,180)	\$ (2,180)	\$ (2,180)	\$ (2,180)	\$ (2,180)	\$ (2,180)	\$ (2,180)	\$ (2,180)	\$ (3,203)	\$ (3,203)	\$ (3,203)	\$ (3,203)	\$ (30,253)		
19	Net Mains 2022 activity Deferred Depreciation	Line 9 Column C + Line 16 Column C													\$ 3,492,464		
20	Average Service Life - Mains	(2)													1.43%		
21	Annual Amortization Expense	Line 19 x Line 20													\$ 49,892		
																To MJJ-2, Line 24	

Notes:  
(1) FERC Account 676 depreciation rate approved in Case No. 18-0298-GA-AIR.  
(2) FERC Account 676 depreciation rate's average service life or 70 years, as approved in Case No. 18-0298-GA-AIR.



**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO**  
**DISTRIBUTION REPLACEMENT RIDER**  
**ANNUAL REVENUE REQUIREMENT - SERVICE LINES**

Line	Description	Amount	Reference
1	<b><u>Return on Investment:</u></b>		
2	<u>Plant In-Service at December 31, 2022</u>		
3	Additions - Services Replacements (Bare Steel/Cast Iron)	\$ 113,819,657	Exhibit MJJ-3a, Column O, Line 2
4	Additions - Meter Installation (Bare Steel/Cast Iron)	27,189,106	Exhibit MJJ-3a, Column O, Line 3
5	Additions - Services Replacements (Service Line Responsibility)	21,961,571	Exhibit MJJ-3a, Column O, Line 4
6	Original Cost - Retired Services	(1,414,174)	Exhibit MJJ-3b, Column P, Line 2
7	Original Cost - Retired Meter Installation	(243,888)	Exhibit MJJ-3b, Column P, Line 3
8	Total Plant In-Service	\$ 161,312,273	Sum of Lines 3 - 7
9	<u>Less: Accumulated Depreciation at December 31, 2022</u>		
10	Depreciation Expense - Services	\$ (14,704,388)	Exhibit MJJ-3c, Column O, Line 2
11	Depreciation Expense - Meter Installation	(1,979,548)	Exhibit MJJ-3c, Column O, Line 3
12	Cost of Removal - Services	5,682,900	Exhibit MJJ-3d, Column O, Line 2
13	Original Cost - Retired Services	1,414,174	-Line 6
14	Original Cost - Retired Meter Installation	243,888	-Line 7
15	Total Accumulated Depreciation	\$ (9,342,974)	Sum of Lines 10 - 14
16	Net Deferred Post In-Service Carrying Costs (PISCC) <sup>(3)</sup>	\$ 10,676,053	Exhibit MJJ-3e, Column O, Line 9
17	Deferred Depreciation Regulatory Asset Balance - Services	\$ 7,096,479	Exhibit MJJ-3h, Page 1, Column B, Line 3
18	Deferred Depreciation Regulatory Asset Balance - Meter Installation	\$ 740,762	Exhibit MJJ-3h, Page 2, Column B, Line 3
19	Net Deferred Tax Balance - PISCC	\$ (2,241,971)	-Line 16 x 21%
20	Deferred Taxes on Depreciation	\$ (4,166,719)	Exhibit No. MJJ-3g, Line 23
21	Deferred Taxes on Deferred Depreciation Regulatory Asset - Services	\$ (1,490,261)	-Line 17 x 21%
22	Deferred Taxes on Deferred Depreciation Regulatory Asset - Meter Installation	\$ (155,560)	-Line 18 x 21%
23	Net Rate Base	\$ 162,428,082	Sum of Lines 8 and 15-22
24	Pre-Tax Rate of Return	8.81%	(5)
25	<b>Annualized Return on Rate Base -Service Lines</b>	<b>\$ 14,309,914</b>	Line 23 x Line 24
26	<b><u>Operations and Maintenance Expenses</u></b>		
27	Annualized Property Tax Expense	\$ 3,599,942	Exhibit No. MJJ-3f, Line 17
28	Prior Year Annualized Property Tax Expense True-Up	\$ (10,221)	Exhibit No. MJJ-3f.2, Line 19
29	Annualized Depreciation Expense - Services	\$ 5,173,132	(Line 3+ Line 5+ Line 6) x 3.85% <sup>(1)</sup>
30	Annualized Depreciation Expense - Meter Installation	\$ 808,357	(Line 4 + Line 7) x 3.00% <sup>(1)</sup>
31	Annualized PISCC Amortization Expense	\$ 176,696	Exhibit No. MJJ-3e, Column D, Line 29
32	Annualized Deferred Depreciation Amortization Expense - Services	\$ 112,222	Exhibit MJJ-3h, Page 1, Column C, Line 23
33	Annualized Deferred Depreciation Amortization Expense - Meter Installation	\$ 15,223	Exhibit MJJ-3h, Page 2, Column C, Line 21
34	Incremental O&M - Service Line Responsibility	\$ (360,824)	(2)
35	Annualized Maintenance Adjustment	\$ (700,971)	(4)
36	<b>Total Incremental Operating Expenses - Service Lines</b>	<b>\$ 8,813,555</b>	Sum of Lines 27-35
37	<b>Total Revenue Requirement - Service Lines</b>	<b>\$ 23,123,469</b> (To Exhibit No. MJJ-1)	Line 25 + Line 36

- (1) FERC Account 680 (Line 29) and FERC Account 682 (Line 30) depreciation rates as approved in Case No. 18-0298-GA-AIR.  
(2) Support provided by CEOH Witness Mason Butler IV, Exhibit No. MBIV-5, Column C, Line 16.  
(3) PISCC is accrued at an annual rate of 5.07% from the in-service date until investments are reflected in the DRR rate as approved in Case No. 18-0298-GA-AIR.  
(4) Support provided by CEOH Witness Mason Butler IV, Exhibit No. MBIV-4, Column C, Line 6.  
Allocation of Exhibit No. MBIV-4 between Mains and Services based upon cumulative gross investment.  
(5) Rate of Return as approved in Case No. 18-0298-GA-AIR.

VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
Distribution Replacement Rider (DRR)  
Service Lines - Plant Additions  
Twelve Months Ended December 31, 2022

A	B		C	D	E	F	G	H	I	J	K	L	M	N	O	P
Line No.	Description	Reference	Balance at 12/31/2021	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	11/30/2022	Balance at 12/31/2022	
1	Cumulative Balance															
2	Services		\$ 104,159,090.21	\$ 104,922,614	\$ 105,050,356	\$ 106,133,069	\$ 107,876,091	\$ 106,620,453	\$ 108,163,310	\$ 109,746,136	\$ 110,444,913	\$ 111,275,036	\$ 112,278,106	\$ 112,633,854	\$ 113,819,657	To MJJ-3, Line 3
3	Meter Installation		\$ 22,147,018.94	\$ 22,415,724	\$ 22,626,536	\$ 23,159,574	\$ 23,743,853	\$ 23,902,741	\$ 24,474,533	\$ 25,043,932	\$ 25,461,606	\$ 25,887,744	\$ 26,366,622	\$ 26,643,954	\$ 27,189,106	To MJJ-3, Line 4
4	Service Line Responsibility		\$ 20,370,014.74	\$ 20,476,696	\$ 20,568,024	\$ 20,614,022	\$ 20,735,548	\$ 20,861,699	\$ 21,057,488	\$ 21,188,635	\$ 21,401,471	\$ 21,553,768	\$ 21,682,982	\$ 21,812,552	\$ 21,961,571	To MJJ-3, Line 5
5	Total Service Line Additions	Sum of Lines 2-4	\$ 146,676,124	\$ 147,815,033	\$ 148,244,916	\$ 149,906,665	\$ 152,355,492	\$ 151,384,893	\$ 153,695,331	\$ 155,978,703	\$ 157,307,990	\$ 158,716,548	\$ 160,327,710	\$ 161,090,359	\$ 162,970,334	
6	Current Year Activity			1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	11/30/2022	12/31/2022	Activity for Twelve Months Ended 12/31/2022
7	Services			\$ 763,523	\$ 127,742	\$ 1,082,713	\$ 1,743,022	\$ (1,255,638)	\$ 1,542,857	\$ 1,582,826	\$ 698,777	\$ 830,123	\$ 1,003,070	\$ 355,748	\$ 1,185,803	\$ 9,660,567
8	Meter Installation (1)			\$ 268,705	\$ 210,813	\$ 533,038	\$ 584,278	\$ 158,889	\$ 571,792	\$ 569,399	\$ 417,674	\$ 426,138	\$ 478,878	\$ 277,331	\$ 545,152	\$ 5,042,087
9	Service Line Responsibility			\$ 106,681	\$ 91,328	\$ 45,998	\$ 121,526	\$ 126,150	\$ 195,789	\$ 131,147	\$ 212,836	\$ 152,297	\$ 129,213	\$ 129,570	\$ 149,020	\$ 1,591,557
10	Total Service Line Additions	Sum of Lines 7-9		\$ 1,138,909	\$ 429,884	\$ 1,661,749	\$ 2,448,826	\$ (970,599)	\$ 2,310,438	\$ 2,283,372	\$ 1,329,287	\$ 1,408,558	\$ 1,611,161	\$ 762,650	\$ 1,879,975	\$ 16,294,210

(1) Also includes Meter Installation from Service Line Responsibility.

VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
Distribution Replacement Rider (DRR)  
Service Lines - Retirements  
Twelve Months Ended December 31, 2022

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Line No.	Description	Retirements at 12/31/2021	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	11/30/2022	12/31/2022	Total Retirements for Work Orders Placed in Service by 12/31/2022
1	<u>Cumulative Balance</u>														
2	Services	\$ (1,354,339)	\$ (1,354,339)	\$ (1,354,695)	\$ (1,399,013)	\$ (1,407,032)	\$ (1,397,802)	\$ (1,411,917)	\$ (1,411,917)	\$ (1,413,086)	\$ (1,413,086)	\$ (1,413,256)	\$ (1,413,525)	\$ (1,414,174)	\$ (1,414,174) To MJJ-3, Line 6
3	Meter Installations	\$ (117,706)	\$ (117,706)	\$ (244,358)	\$ (243,247)	\$ (243,392)	\$ (243,792)	\$ (243,951)	\$ (243,951)	\$ (244,045)	\$ (244,045)	\$ (244,045)	\$ (244,045)	\$ (243,888)	\$ (243,888) To MJJ-3, Line 7
4	<u>Current Year Activity</u>		1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	11/30/2022	12/31/2022	Retirements for Work Orders Placed In Service in 2022
5	Services		\$ -	\$ (355)	\$ (44,318)	\$ (8,019)	\$ 9,230	\$ (14,115)	\$ -	\$ (1,169)	\$ -	\$ (170)	\$ (269)	\$ (649)	\$ (59,834)
6	Meter Installations		\$ -	\$ (126,652)	\$ 1,111	\$ (145)	\$ (400)	\$ (159)	\$ -	\$ (93)	\$ -	\$ -	\$ -	\$ 156	\$ (126,182)

VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
Distribution Replacement Rider (DRR)  
Service Lines - Depreciation  
Twelve Months Ended December 31, 2022

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Line No.	Description	Accumulated Depreciation at 12/31/2021	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	11/30/2022	12/31/2022	
1	Cumulative Balance														
2	Services <sup>(2)</sup>	\$ (9,726,254)	\$ (10,125,785)	\$ (10,528,108)	\$ (10,931,134)	\$ (11,337,781)	\$ (11,750,410)	\$ (12,159,415)	\$ (12,573,998)	\$ (12,994,081)	\$ (13,417,088)	\$ (13,843,247)	\$ (14,273,039)	\$ (14,704,388)	To MJJ-3, Line 10
3	Meter Installation	\$ (1,249,864)	\$ (1,305,231)	\$ (1,361,270)	\$ (1,417,837)	\$ (1,475,736)	\$ (1,535,095)	\$ (1,594,852)	\$ (1,656,039)	\$ (1,718,648)	\$ (1,782,302)	\$ (1,847,022)	\$ (1,912,938)	\$ (1,979,548)	To MJJ-3, Line 11
4	Current Year Activity	Depreciation Rate	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	11/30/2022	12/31/2022	Depreciation Expense
5	BS/CI Service Lines	3.850%	\$ (334,177)	\$ (336,627)	\$ (337,037)	\$ (340,510)	\$ (346,102)	\$ (342,074)	\$ (347,024)	\$ (352,102)	\$ (354,344)	\$ (357,007)	\$ (360,226)	\$ (361,367)	\$ (4,168,597)
6	Incremental Service Line Responsibility	3.850%	\$ (65,354)	\$ (65,696)	\$ (65,989)	\$ (66,137)	\$ (66,527)	\$ (66,931)	\$ (67,559)	\$ (67,980)	\$ (68,663)	\$ (69,152)	\$ (69,566)	\$ (69,982)	\$ (809,536)
7	Services <sup>(1)(2)</sup>	Line 5 + Line 6	\$ (399,531)	\$ (402,323)	\$ (403,026)	\$ (406,647)	\$ (412,629)	\$ (409,005)	\$ (414,583)	\$ (420,082)	\$ (423,007)	\$ (426,159)	\$ (429,792)	\$ (431,349)	\$ (4,978,133)
8	Meter Installation <sup>(2)(3)(4)</sup>	3.000%	\$ (55,368)	\$ (56,039)	\$ (56,566)	\$ (57,899)	\$ (59,360)	\$ (59,757)	\$ (61,186)	\$ (62,610)	\$ (63,654)	\$ (64,719)	\$ (65,917)	\$ (66,610)	\$ (729,685)

**Notes:**

- (1) FERC Account 680 depreciation rate of 3.85% as approved in Case No. 18-0298-GA-AIR.  
Depreciation on in-service activity in the current month receives no depreciation, and the cumulative balance from the prior month receives a full month of depreciation.
- (2) Monthly depreciation activity represents the depreciation rate divided by 12 months.
- (3) FERC Account 682 depreciation rate of 3.00% as approved in Case No. 18-0298-GA-AIR.  
Depreciation on in-service activity in the current month receives no depreciation, and the cumulative balance from the prior month receives a full month of depreciation.
- (4) This line includes depreciation activity for utility plant additions for BS/CI service replacements and service line responsibility.

VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
Distribution Replacement Rider (DRR)  
Service Lines - Cost of Removal  
Twelve Months Ended December 31, 2022

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Line No.	Description	Cost of Removal at 12/31/2021	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	11/30/2022	Balance at 12/31/2022	
1	Cumulative Balance														
2	Services	\$ 4,155,867	\$ 4,217,230	\$ 4,309,138	\$ 4,453,530	\$ 4,600,136	\$ 4,773,451	\$ 4,929,246	\$ 5,065,695	\$ 5,193,465	\$ 5,313,289	\$ 5,457,786	\$ 5,592,204	\$ 5,682,900	To MJJ-3, Line 12
3	Current Year Activity		1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	11/30/2022	12/31/2022	Activity for Twelve Months Ended 12/31/2022
4	Services		\$ 61,363	\$ 91,908	\$ 144,392	\$ 146,606	\$ 173,314	\$ 155,795	\$ 136,449	\$ 127,771	\$ 119,823	\$ 144,497	\$ 134,418	\$ 90,696	\$ 1,527,034

VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
Distribution Replacement Rider (DRR)  
Service Lines - Post In Service Carrying Costs (PISCC)  
Twelve Months Ended December 31, 2022

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Line No.	Description	PISCC at 12/31/2021	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	11/30/2022	Balance at 12/31/2022	
1	Cumulative Balance														
2	Service Lines-PISCC	\$ 6,263,484	\$ 6,379,684	\$ 6,499,109	\$ 6,619,075	\$ 6,743,615	\$ 6,875,519	\$ 7,002,118	\$ 7,135,236	\$ 7,275,041	\$ 7,301,599	\$ 7,331,663	\$ 7,365,966	\$ 7,401,772	
3	Meter Installation-PISCC (3)	1,389,780	\$ 1,410,731	\$ 1,432,817	\$ 1,455,794	\$ 1,481,022	\$ 1,508,720	\$ 1,537,088	\$ 1,567,873	\$ 1,601,063	\$ 1,615,067	\$ 1,630,872	\$ 1,648,699	\$ 1,667,700	
4	Service Line Responsibility-PISCC	1,774,876	\$ 1,788,284	\$ 1,802,142	\$ 1,816,387	\$ 1,830,826	\$ 1,845,778	\$ 1,861,263	\$ 1,877,575	\$ 1,894,442	\$ 1,898,800	\$ 1,903,801	\$ 1,909,348	\$ 1,915,443	
5	Gross Deferred PISCC - Services	\$ 9,428,140	\$ 9,578,698	\$ 9,734,068	\$ 9,891,255	\$ 10,055,463	\$ 10,230,017	\$ 10,400,469	\$ 10,580,684	\$ 10,770,546	\$ 10,815,465	\$ 10,866,336	\$ 10,924,014	\$ 10,984,915	
6	Service Lines-PISCC Amortization	\$ (145,073)	\$ (153,225)	\$ (161,377)	\$ (169,529)	\$ (177,680)	\$ (185,832)	\$ (193,984)	\$ (202,136)	\$ (210,288)	\$ (220,593)	\$ (230,899)	\$ (241,204)	\$ (251,510)	
7	Meter Installation-PISCC Amortization	(33,094)	\$ (34,968)	\$ (36,842)	\$ (38,716)	\$ (40,590)	\$ (42,464)	\$ (44,338)	\$ (46,212)	\$ (48,087)	\$ (50,403)	\$ (52,719)	\$ (55,035)	\$ (57,352)	
8	Accumulated PISCC Amortization - Services	\$ (178,167)	\$ (188,193)	\$ (198,219)	\$ (208,245)	\$ (218,271)	\$ (228,297)	\$ (238,322)	\$ (248,348)	\$ (258,374)	\$ (270,996)	\$ (283,618)	\$ (296,240)	\$ (308,862)	
9	Net Deferred PISCC - Services	\$ 9,249,973	\$ 9,390,505	\$ 9,535,850	\$ 9,683,011	\$ 9,837,192	\$ 10,001,720	\$ 10,162,147	\$ 10,332,336	\$ 10,512,171	\$ 10,544,469	\$ 10,582,718	\$ 10,627,774	\$ 10,676,053	To MJJ-3, Line 16
10	Current Year Activity	PISCC Rate (1)	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	11/30/2022	12/31/2022	Activity for Twelve Months Ended 12/31/2022
11	2021 Service Lines - Deferred PISCC	5.070%	\$ 116,200	\$ 116,200	\$ 116,200	\$ 116,200	\$ 116,200	\$ 116,200	\$ 116,200	\$ 116,200	\$ -	\$ -	\$ -	\$ -	\$ 929,599
12	2022 Service Lines - Deferred PISCC	5.070%	\$ -	\$ 3,226	\$ 3,766	\$ 8,340	\$ 15,704	\$ 10,399	\$ 16,918	\$ 23,605	\$ 26,558	\$ 30,065	\$ 34,303	\$ 35,806	\$ 208,689
13	Total 2022 Services Deferred PISCC		\$ 116,200	\$ 119,426	\$ 119,965	\$ 124,540	\$ 131,904	\$ 126,599	\$ 133,118	\$ 139,805	\$ 26,558	\$ 30,065	\$ 34,303	\$ 35,806	\$ 1,138,288
14	2021 Meter Installation - Deferred PISCC	5.070%	\$ 20,951	\$ 20,951	\$ 20,951	\$ 20,951	\$ 20,951	\$ 20,951	\$ 20,951	\$ 20,951	\$ -	\$ -	\$ -	\$ -	\$ 167,606
15	2022 Meter Installation - Deferred PISCC	5.070%	\$ -	\$ 1,135	\$ 2,026	\$ 4,278	\$ 6,747	\$ 7,418	\$ 9,834	\$ 12,239	\$ 14,004	\$ 15,805	\$ 17,828	\$ 19,000	\$ 110,312
16	Total 2022 Meter Installation Deferred PISCC		\$ 20,951	\$ 22,086	\$ 22,977	\$ 25,229	\$ 27,697	\$ 28,369	\$ 30,784	\$ 33,190	\$ 14,004	\$ 15,805	\$ 17,828	\$ 19,000	\$ 277,918
17	2021 Service Line Responsibility - Deferred PISCC	5.070%	\$ 13,408	\$ 13,408	\$ 13,408	\$ 13,408	\$ 13,408	\$ 13,408	\$ 13,408	\$ 13,408	\$ -	\$ -	\$ -	\$ -	\$ 107,262
18	2022 Service Line Responsibility - Deferred PISCC	5.070%	\$ -	\$ 451	\$ 837	\$ 1,031	\$ 1,544	\$ 2,077	\$ 2,905	\$ 3,459	\$ 4,358	\$ 5,001	\$ 5,547	\$ 6,095	\$ 33,305
19	Total 2022 Service Line Responsibility Deferred PISCC		\$ 13,408	\$ 13,859	\$ 14,244	\$ 14,439	\$ 14,952	\$ 15,485	\$ 16,312	\$ 16,866	\$ 4,358	\$ 5,001	\$ 5,547	\$ 6,095	\$ 140,567
20	Services-PISCC Amortization (2)	1.538%	\$ (8,152)	\$ (8,152)	\$ (8,152)	\$ (8,152)	\$ (8,152)	\$ (8,152)	\$ (8,152)	\$ (8,152)	\$ (10,306)	\$ (10,306)	\$ (10,306)	\$ (10,306)	\$ (106,437)
21	Meter Installation-PISCC Amortization (3)	2.000%	\$ (1,874)	\$ (1,874)	\$ (1,874)	\$ (1,874)	\$ (1,874)	\$ (1,874)	\$ (1,874)	\$ (1,874)	\$ (2,316)	\$ (2,316)	\$ (2,316)	\$ (2,316)	\$ (24,258)
22	Annualized PISCC Amortization														
23	Net Deferred Service Lines PISCC at 12/31/2022		\$ 9,317,215	Column O, Line 2 + Line 4											
24	Amortization % <sup>(2)</sup>		1.54%												
25	Annualized Service Lines PISCC Amortization		\$ 143,342												
26	Net Deferred Meter Installation PISCC at 12/31/2022		\$ 1,667,700	Column O, Line 3											
27	Amortization % <sup>(3)</sup>		2.00%												
28	Annualized Meter Installation PISCC Amortization		\$ 33,354												
29	Total Annualized Services PISCC Amortization		\$ 176,696	Line 25 + Line 28											
			To MJJ-3, Line 31												

Notes:

- (1) The PISCC rate of 5.07% was approved in Case No. 18-0298-GA-AIR  
(2) FERC Account 680 depreciation rate's average service life or 65 years, as approved in Case No. 18-0298-GA-AIR.  
(3) FERC Account 682 depreciation rate's average service life or 50 years, as approved in Case No. 18-0298-GA-AIR.

VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
DISTRIBUTION REPLACEMENT RIDER  
ANNUALIZED PROPERTY TAX EXPENSE - SERVICE LINES

Line	Description							Reference
		<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>Total</u>	
1	Service and Meter Installation Replacements - Book Value	\$ 37,955,937	\$ 35,451,658	\$ 37,633,416	\$ 35,635,113	\$ 16,294,210	\$ 162,970,334	Exhibit No. MJJ-3, Sum of Lines 3-4
2	Less: AFUDC	(46,238)	(39,849)	(72,402)	(162,002)	(15,940)	(336,431)	
3	Net Cost of Taxable Property	\$ 37,909,699	\$ 35,411,809	\$ 37,561,014	\$ 35,473,111	\$ 16,278,271	\$ 162,633,903	Line 1 + Line 2
4	% Good <sup>(1)</sup>	85.0%	88.3%	91.7%	95.0%	98.3%		
5	Tax Value	\$ 32,223,244	\$ 31,268,628	\$ 34,443,450	\$ 33,699,455	\$ 16,001,540	\$ 147,636,317	Line 3 x Line 4
6	x Valuation Percentage (25%) <sup>(3)</sup>	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	
7	Taxable Value / Assessment	\$ 8,055,811	\$ 7,817,157	\$ 8,610,862	\$ 8,424,864	\$ 4,000,385	\$ 36,909,079	Line 5 x Line 6
8	CEOH's Estimated 2022 Personal Property Tax Rate <sup>(4)</sup>						9.77%	
9	<b>Annual Property Tax Expense - Service Line Replacements</b>						<b>\$ 3,606,017</b>	Line 7 x Line 8
10	Services and Meter Installation Retired - Property Tax Basis	\$ (438,028)	\$ (277,104)	\$ (453,347)	\$ (303,566)	\$ (186,017)	\$ (1,658,062)	Exhibit No. MJJ-3, Sum of Lines 6-7
11	% Good <sup>(3)</sup>	15.0%	15.0%	15.0%	15.0%	15.0%	15.0%	
12	Tax Value	\$ (65,704)	\$ (41,566)	\$ (68,002)	\$ (45,535)	\$ (27,902)	\$ (248,709)	Line 10 x Line 11
13	x Valuation Percentage (25%) <sup>(3)</sup>	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	
14	Taxable Value / Assessment	\$ (16,426)	\$ (10,391)	\$ (17,000)	\$ (11,384)	\$ (6,976)	\$ (62,177)	Line 12 x Line 13
15	CEOH's Estimated 2022 Personal Property Tax Rate <sup>(4)</sup>						9.770%	
16	<b>Annual Property Tax Reduction - Service Line Retirements</b>						<b>\$ (6,075)</b>	Line 14 x Line 15
17	<b>Annualized Property Tax Expense - Service Lines</b>						<b>\$ 3,599,942</b>	Line 9 + Line 16
							(To Exhibit No. MJJ-3, Line 27)	

Notes:

- (1) Per Ohio Department of Taxation Annual Natural Gas Property Tax Report, Schedule C, Distribution Plant.  
(2) Per Ohio Department of Taxation Annual Natural Gas Property Tax Report, Schedule G.  
(3) Per Ohio Department of Taxation Annual Natural Gas Property Tax Report, Schedule C(2), Distribution Plant.  
(4) CEOH's estimated 2022 personal property tax rate is based on 2021's actual tax rate.

**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO**  
**DISTRIBUTION REPLACEMENT RIDER**  
**PRIOR YEAR ANNUALIZED PROPERTY TAX EXPENSE - SERVICE LINES TRUE-UP**

Line	Description		Reference
		<b>Total</b>	
1	Service and Meter Installation Replacements - Book Value	\$ 146,676,124	Case No. 22-0455-GA-RDR CMB-3f, Line 1
2	Less: AFUDC	(320,491)	Case No. 22-0455-GA-RDR CMB-3f, Line 2
3	Net Cost of Taxable Property	\$ 146,355,633	Line 1 + Line 2
4	% Good <sup>(1)</sup>		
5	Tax Value	\$ 136,499,924	Line 3 x Line 4
6	x Valuation Percentage (25%)	25.0%	Case No. 22-0455-GA-RDR CMB-3f, Line 6
7	Taxable Value / Assessment	\$ 34,124,981	Line 5 x Line 6
8	CEOH's 2021 Property Tax Rate - As Filed	9.80%	Case No. 22-0455-GA-RDR CMB-3f, Line 8
9	CEOH's 2021 Property Tax Rate - Actual	9.77%	Exhibit MJJ-3f, Line 8
10	CEOH's Personal Property Tax Rate True-Up Percentage <sup>(1)</sup>	-0.03%	Line 9 - Line 8
11	<b>Annual Property Tax Expense - Service Line Replacements</b>	<b>\$ (10,237)</b>	Line 7 x Line 10
12	Services and Meter Installation Retired - Property Tax Basis	\$ (1,472,045)	Case No. 22-0455-GA-RDR CMB-2f, Line 10
13	% Good	15.0%	Case No. 22-0455-GA-RDR CMB-2f, Line 11
14	Tax Value	\$ (220,807)	Line 12 x Line 13
15	x Valuation Percentage (25%)	25.0%	Case No. 22-0455-GA-RDR CMB-2f, Line 13
16	Taxable Value / Assessment	\$ (55,202)	Line 14 x Line 15
17	CEOH's Personal Property Tax Rate True-Up Percentage <sup>(1)</sup>	-0.030%	
18	<b>Annual Property Tax Reduction - Service Line Retirements</b>	<b>\$ 17</b>	Line 16 x Line 17
19	<b>Annualized Property Tax Expense - Service Lines</b>	<b>\$ (10,221)</b>	Line 11 + Line 18
		(To Exhibit No. MJJ-3, Line 28)	

**Notes:**

(1) Represents the difference between actual property tax rate for 2021 and the estimated property tax rate for 2021 used in 2022 filing.



**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
DISTRIBUTION REPLACEMENT RIDER  
DEFERRED TAXES ON LIBERALIZED DEPRECIATION - SERVICE LINES**

Line	Description	2018	2019	2020	2021	2022	Total	2022 Reference <sup>[1]</sup>
1	<b><u>Plant in Service at December 31, 2022</u></b>							
2	Service Additions - Bare Steel/Cast Iron Replacements	\$ 23,287,924	\$ 25,103,366	\$ 28,264,877	\$ 27,502,923	\$ 9,660,567	\$ 113,819,657	Exhibit No. MJJ-3a, Column P, Line 7
3	Meter Installation Additions - Bare Steel/Cast Iron Replacements	\$ 6,698,504	\$ 5,216,419	\$ 5,273,349	\$ 4,958,747	\$ 5,042,087	27,189,106	Exhibit No. MJJ-3a, Column P, Line 8
4	Service Additions - Service Line Ownership	\$ 7,969,509	\$ 5,131,874	\$ 4,095,190	\$ 3,173,443	\$ 1,591,557	21,961,571	Exhibit No. MJJ-3a, Column P, Line 9
5	Total Plant In Service - Eligible for 50% Bonus Depreciation	\$ 37,955,937	\$ 35,451,658	\$ 37,633,416	\$ 35,635,113	\$ 16,294,210	\$ 162,970,334	Exhibit No. MJJ-3a, Column P, Line 10
6	Book to Tax Basis Adjustment - Capitalized Interest	\$ 37,411	\$ 22,205	\$ 43,721	\$ 15,092	\$ (2,928)	\$ 115,501	
7	Book to Tax Basis Adjustment - Bonus Depreciation	-	-	-	-	-	-	[3]
8	Total Income Tax MACRS Depreciation Base	\$ 37,993,348	\$ 35,473,863	\$ 37,677,137	\$ 35,650,205	\$ 16,291,282	\$ 163,085,835	Sum of Lines 5 - 7
9	<b><u>Tax Depreciation:</u></b>							
10	MACRS - 15 Year Rate	37.680%	30.750%	23.050%	14.500%	5.000%		[2]
11	MACRS - 20 Year Rate	29.536%	23.823%	17.646%	10.969%	3.750%		[2]
12	MACRS - 15 Year	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	[2]
13	MACRS - 20 Year	11,221,715	8,450,938	6,648,508	3,910,471	610,923	30,842,555	[2]
14	Bonus Depreciation	-	-	-	-	-	-	[3]
15	Cost of Removal Incurred	1,179,173	904,172	1,431,374	641,148	1,527,034	5,682,900	Exhibit No. MJJ-3, Line 12
16	Total Tax Depreciation	\$ 12,400,888	\$ 9,355,111	\$ 8,079,881	\$ 4,551,619	\$ 2,137,957	\$ 36,525,456	Sum of Lines 12 - 15
17	<b><u>Book Depreciation:</u></b>							
18	Services						\$ 14,704,388	-Exhibit No. MJJ-3, Line 10
19	Meter Installation						1,979,548	-Exhibit No. MJJ-3, Line 11
20	Total Book Depreciation						\$ 16,683,936	Sum of Lines 18 - 19
21	Tax Depreciation in Excess of Book Depreciation						\$ (19,841,520)	Line 20 - Line 16
22	Federal Deferred Taxes at 21%						21%	
23	<b>Deferred Tax Balance at December 31, 2022 - Service Lines</b>						<b>\$ (4,166,719)</b>	Line 21 * Line 22
							(To Exhibit No. MJJ-3, Line 20)	

**Notes:**

(1) Reference column is applicable to column 2022 under the Plant In Service Year section to the left.

(2) Per Internal Revenue Code ("IRC") Sec 168(e)(3)(E)(viii), gas utility distribution facilities placed in service before January 1, 2011 have a MACRS life of 15 years. For utility distribution facilities placed in service after January 1, 2011, MACRS life is 20 years per IRC Rev. Proc. 87-56. Below is the formula for tax depreciation applicable.

[3] On December 22, 2017, the United States government enacted comprehensive tax legislation commonly referred to as the Tax Cuts and Jobs Act ("TCJA" or "the Act"). Prior to the enactment of the TCJA, Internal Revenue Code rules and regulations permitted 50% bonus depreciation to be claimed. The Act repealed Bonus Depreciation for assets used in regulated utility operations.

**Formula:**

Line 13 = Line 8 \* Line 11

**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO**  
**Distribution Replacement Rider (DRR)**  
**Services, Service Line Responsibility, Risers - Deferred Depreciation Regulatory Asset Balance**  
**Twelve Months Ended December 31, 2022**

A		B												C	
Line	Description	Deferred Depreciation at 12/31/2021	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Total Balance at Dec-22	
	<u>Cumulative Balance</u>														
1	Services - Deferred Depreciation	\$ 6,330,897	\$ 6,414,659	\$ 6,472,702	\$ 6,569,536	\$ 6,633,021	\$ 6,609,913	\$ 6,842,414	\$ 6,906,054	\$ 6,935,375	\$ 6,974,118	\$ 6,999,237	\$ 7,125,770	\$ 7,294,432	
2	Services - Deferred Depreciation Amortization	\$ (113,758)	(120,224)	(126,690)	(133,156)	(139,623)	(146,089)	(152,555)	(159,021)	(165,487)	(173,603)	(181,720)	(189,836)	(197,953)	
3	Services - Deferred Depreciation	\$ 6,217,139	\$ 6,294,435	\$ 6,346,012	\$ 6,436,380	\$ 6,493,398	\$ 6,463,824	\$ 6,689,859	\$ 6,747,033	\$ 6,769,889	\$ 6,800,515	\$ 6,817,517	\$ 6,935,933	\$ 7,096,479	To MJJ-3, Line 17
Line	Description	Activity for Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total Balance by Calendar Year	
4	Services In-Service Activity	2022 Filing Exhibit No. BAF-3a	\$ 1,702,360	\$ 1,618,062	\$ 2,057,707	\$ 403,332	\$ (330,760)	\$ 7,283,141	\$ 1,136,815	\$ 770,231	\$ 1,002,105	\$ 617,123	\$ 4,693,142	\$ 6,549,666	\$ 27,502,923
5	Service Line Responsibility In-Service Activity	2022 Filing Exhibit No. BAF-3a	381,226	432,611	506,201	214,613	421,799	543,016	271,428	(13,952)	142,698	85,556	103,270	84,978	\$ 3,173,443
6	Less: Retirements - Services	2022 Filing Exhibit No. BAF-3b	(16,657)	(62,656)	(11,088)	(1,050)	(11,144)	(61,059)	-	(69,104)	(3,762)	(7,052)	72,818	(63,395)	\$ (234,148)
7	Net Services Additions	Line 4 + Line 5 + Line 6	\$ 2,066,930	\$ 1,988,016	\$ 2,552,820	\$ 616,895	\$ 79,895	\$ 7,765,098	\$ 1,408,243	\$ 687,176	\$ 1,141,041	\$ 695,627	\$ 4,869,229	\$ 6,571,249	\$ 30,442,218
8	Monthly Depreciation Rate	(1)	0.32%	0.32%	0.32%	0.32%	0.32%	0.32%	0.32%	0.32%	0.32%	0.32%	0.32%	0.32%	
9	# of Months from 1/1/2022 to Effective Date of DRR Rates, 9/1/2022		8	8	8	8	8	8	8	8	8	8	8	8	
10	Depreciation Expense Recognized - 1/1/2022 to 9/1/2022	Line 7 x Line 8 x Line 9	\$ 53,051	\$ 51,026	\$ 65,522	\$ 15,834	\$ 2,051	\$ 199,304	\$ 36,145	\$ 17,638	\$ 29,287	\$ 17,854	\$ 124,977	\$ 168,662	\$ 781,350
Line	Description	Activity for Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Total Balance by Calendar Year	
11	Services In-Service Activity	Exhibit No. MJJ-3a	\$ 763,523	\$ 127,742	\$ 1,082,713	\$ 1,743,022	\$ (1,255,638)	\$ 1,542,857	\$ 1,582,826	\$ 698,777	\$ 830,123	\$ 1,003,070	\$ 355,748	\$ 1,185,803	\$ 9,660,567
12	Service Line Responsibility In-Service Activity	Exhibit No. MJJ-3a	106,681	91,328	45,998	121,526	126,150	195,789	131,147	212,836	152,297	129,213	129,570	149,020	\$ 1,591,557
13	Less: Retirements - Services	Exhibit No. MJJ-3b	-	(355)	(44,318)	(8,019)	9,230	(14,115)	-	(1,169)	-	(170)	(269)	(649)	\$ (59,834)
14	Net Services Additions	Line 11 + Line 12 + Line 13	\$ 870,204	\$ 218,715	\$ 1,084,392	\$ 1,856,529	\$ (1,120,257)	\$ 1,724,532	\$ 1,713,973	\$ 910,444	\$ 982,420	\$ 1,132,113	\$ 485,049	\$ 1,334,174	\$ 11,192,289
15	Monthly Depreciation Rate-Per case # 18-0298-GA-AIR (effective 9/1/19)	(1)	0.32%	0.32%	0.32%	0.32%	0.32%	0.32%	0.32%	0.32%	0.32%	0.32%	0.32%	0.32%	
16	# months In-Service at .32% depreciation rate to Effective Date of DRR Rates, 9/1/2023		19	18	17	16	15	14	13	12	11	10	9	8	
17	Depreciation Expense Recognized - In-Service to 9/1/2023	(Line 14 x Line 15 x Line 16)	\$ 53,046	\$ 12,631	\$ 59,145	\$ 95,302	\$ (53,912)	\$ 77,460	\$ 71,487	\$ 35,052	\$ 34,671	\$ 36,322	\$ 14,006	\$ 34,244	\$ 469,453
18	Deferred Depreciation Expense - Calendar Year 2022		\$ 30,711	\$ 7,017	\$ 31,312	\$ 47,651	\$ (25,159)	\$ 33,197	\$ 27,495	\$ 11,684	\$ 9,456	\$ 7,264	\$ 1,556	\$ -	\$ 182,184
19	Deferred Depreciation Expense - Calendar Year 2023		\$ 22,335	\$ 5,614	\$ 27,833	\$ 47,651	\$ (28,753)	\$ 44,263	\$ 43,992	\$ 23,368	\$ 25,215	\$ 29,058	\$ 12,450	\$ 34,244	\$ 287,269
20	Services - Deferred Depreciation Amortization	(2)	\$ (6,466)	\$ (6,466)	\$ (6,466)	\$ (6,466)	\$ (6,466)	\$ (6,466)	\$ (6,466)	\$ (6,466)	\$ (8,117)	\$ (8,117)	\$ (8,117)	\$ (8,117)	\$ (84,195)
21	Net Services Deferred Depreciation at 12/31/2022	Line 1, Column B												\$	7,294,432
22	Average Service Life - Services	(2)													1.54%
23	Annual Amortization Expense	Line 21 x Line 22												\$	112,222

VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
Distribution Replacement Rider (DRR)  
Meter Installation - Deferred Depreciation Regulatory Asset Balance  
Twelve Months Ended December 31, 2022

A														B		C
Line	Description	Deferred Depreciation at 12/31/2021	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Total Balance at Dec-22		
1	Meter Installation - Deferred Depreciation	\$ 601,232	\$ 615,654	\$ 624,714	\$ 643,803	\$ 657,369	\$ 657,868	\$ 690,237	\$ 701,484	\$ 708,675	\$ 714,036	\$ 720,482	\$ 731,507	\$ 761,138		
2	Meter Installation - Deferred Depreciation Amortization	(10,485)	(11,220)	(11,956)	(12,691)	(13,427)	(14,162)	(14,897)	(15,633)	(16,368)	(17,370)	(18,372)	(19,374)	(20,376)		
3	Meter Installation - Deferred Depreciation	\$ 590,747	\$ 604,433	\$ 612,758	\$ 631,111	\$ 643,943	\$ 643,706	\$ 675,339	\$ 685,851	\$ 692,306	\$ 696,666	\$ 702,110	\$ 712,133	\$ 740,762	To MJJ-3, Line 18	
Line	Description		Activity for Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total Balance by Calendar Year	
4	Meter Installation In-Service Activity	2022 Filing Exhibit No. CMB-3a	\$ 351,657	\$ 348,215	\$ 354,853	\$ 94,613	\$ (113,690)	\$ 1,195,064	\$ 206,485	\$ 151,318	\$ 108,892	\$ 202,627	\$ 564,978	\$ 1,493,734	\$ 4,958,747	
5	Less: Retirements - Services	2022 Filing Exhibit No. CMB-3b	(55)	(389)	(1,360)	(406)	(36)	(5,376)	-	(572)	(621)	(50)	(48,404)	(12,150)	\$ (69,418)	
6	Net Meter Installation Additions	Line 4 + Line5	\$ 351,602	\$ 347,826	\$ 353,494	\$ 94,207	\$ (113,726)	\$ 1,189,687	\$ 206,485	\$ 150,746	\$ 108,271	\$ 202,577	\$ 516,575	\$ 1,481,583	\$ 4,889,329	
7	Monthly Depreciation Rate	(1)	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%		
8	# of Months from 1/1/2022 to Effective Date of DRR Rates, 9/1/2022		8	8	8	8	8	8	8	8	8	8	8	8		
9	Depreciation Expense Recognized - 1/1/2022 to 9/1/2022	Line 6 x Line 7 x Line 8	\$ 7,032	\$ 6,957	\$ 7,070	\$ 1,884	\$ (2,275)	\$ 23,794	\$ 4,130	\$ 3,015	\$ 2,165	\$ 4,052	\$ 10,331	\$ 29,632	\$ 97,787	
Line	Description		Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Calendar Year	
10	Meter Installation In-Service Activity	Exhibit No. MJJ-3a	\$ 268,705	\$ 210,813	\$ 533,038	\$ 584,278	\$ 158,889	\$ 571,792	\$ 569,399	\$ 417,674	\$ 426,138	\$ 478,878	\$ 277,331	\$ 545,152	\$ 5,042,087	
11	Less: Retirements - Services	Exhibit No. MJJ-3b	-	(126,652)	1,111	(145)	(400)	(159)	-	(93)	-	-	-	156	\$ (126,182)	
12	Net Meter Installation Additions	Line 10 + Line11	\$ 268,705	\$ 84,160	\$ 534,149	\$ 584,133	\$ 158,489	\$ 571,633	\$ 569,399	\$ 417,580	\$ 426,138	\$ 478,878	\$ 277,331	\$ 545,309	\$ 4,915,905	
13	Monthly Depreciation Rate-Per case # 18-0298-GA-AIR (effective 9/1/19)	(1)	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%		
14	# months In-Service at .25% depreciation rate to Effective Date of DRR Rates, 9/1/2023		19	18	17	16	15	14	13	12	11	10	9	8		
15	Depreciation Expense Recognized - In-Service to 9/1/2023	(Line 12 x Line 13 x Line 14)	\$ 12,763	\$ 3,787	\$ 22,701	\$ 23,365	\$ 5,943	\$ 20,007	\$ 18,505	\$ 12,527	\$ 11,719	\$ 11,972	\$ 6,240	\$ 10,906	\$ 160,438	
16	Calendar Year 2022		\$ 7,389	\$ 2,104	\$ 12,018	\$ 11,683	\$ 2,774	\$ 8,574	\$ 7,117	\$ 4,176	\$ 3,196	\$ 2,394	\$ 693	\$ -	\$ 62,119	
17	Calendar Year 2023		\$ 5,374	\$ 1,683	\$ 10,683	\$ 11,683	\$ 3,170	\$ 11,433	\$ 11,388	\$ 8,352	\$ 8,523	\$ 9,578	\$ 5,547	\$ 10,906	\$ 98,318	
18	Meter Installations - Deferred Depreciation Amortization	(2)	\$ (735)	\$ (735)	\$ (735)	\$ (735)	\$ (735)	\$ (735)	\$ (735)	\$ (735)	\$ (1,002)	\$ (1,002)	\$ (1,002)	\$ (1,002)	\$ (9,891)	
19	Net Meter Installation Deferred Depreciation at 12/31/2022	Line 1, Column B													\$ 761,138	
20	Average Service Life - Services	(2)													2.00%	
21	Annual Amortization Expense	Line 19 x Line 20													\$ 15,223	
															To MJJ-3, Line 33	

Notes:  
(1) FERC Account 682 depreciation rate approved in Case No. 18-0298-GA-AIR.  
(2) FERC Account 682 depreciation rate's average service life or 50 years, as approved in Case No. 18-0298-GA-AIR.

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Vectren	)	
Energy Delivery of Ohio, LLC d/b/a	)	
CenterPoint Energy Ohio for Authority to	)	Case No. 23-0273-GA-RDR
Adjust Its Distribution Replacement Rider	)	
Charges	)	

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**DIRECT TESTIMONY OF**

**KATIE J. TIEKEN**

**DIRECTOR, REGULATORY AND RATES**

**ON BEHALF OF**

**VECTREN ENERGY DELIVERY OF OHIO, LLC**

**D/B/A CENTERPOINT ENERGY OHIO**

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**Direct Testimony of  
Katie J. Tieken**

**I. BACKGROUND AND QUALIFICATIONS**

**Q1. Please state your name and business address.**

A. My name is Katie J Tieken. My business address is 211 NW Riverside Drive, Evansville, Indiana 47708.

**Q2. What position do you hold with Vectren Energy Delivery of Ohio, LLC d/b/a CenterPoint Energy Ohio (CEOH or the Company)?**

A. I am Director, Regulatory and Rates for CenterPoint Energy Services Company, LLC (Service Company), a wholly-owned subsidiary of CenterPoint Energy, Inc. (CenterPoint). The Service Company provides centralized support services to CenterPoint Energy, Inc.'s operating units, of which Vectren Energy Delivery of Ohio, LLC d/b/a CenterPoint Energy Ohio (CEOH or Company) is one. I have the same role with two other utility subsidiaries of CenterPoint – Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South (CEI South) and Indiana Gas Company, Inc. d/b/a CenterPoint Energy Indiana North (CEI North).

**Q3. Please describe your educational background.**

A. I am a 2001 graduate of the University of Evansville with a Bachelor of Science degree in Business Administration with double majors in finance and mathematics.

**Q4. Please describe your professional experience.**

A. From 2002 to 2007, I was employed by EG&G Technical Services as a financial analyst and contract administrator. Since October 2007, I have been employed with CenterPoint in various regulatory capacities. In 2015, I was named Manager, Rates. I was named to Manager, Regulatory and Rates in February 2019. In April 2021, I was named Director, Regulatory and Rates for the above-named utilities.

1 **Q5. What are your present duties and responsibilities as Director, Regulatory and**  
2 **Rates?**

3 A. I am responsible for the Ohio and Indiana regulatory and rate matters of the regulated  
4 utilities within CenterPoint in proceedings before the Ohio and Indiana utility regulatory  
5 commissions. I also have responsibility for the implementation of all regulatory  
6 initiatives of CEOH (and other utility subsidiaries in Indiana), as well as the preparation  
7 of regulatory and rates exhibits submitted in various regulatory proceedings.

8 **Q6. Have you previously testified before any state regulatory commission?**

9 A. Yes, I have testified before the Public Utilities Commission of Ohio (PUCO) in CEOH's  
10 Distribution Replacement Rider (DRR) proceedings, Case Nos. 21-0491-GA-RDR (2021  
11 DRR filing), 22-0455-GA-RDR (2022 DRR filing), and in CEOH's Capital Expenditure  
12 Program (CEP) proceeding Case No 22-620-GA-RDR . I am currently testifying in  
13 CEOH's CEP proceeding, Case No. 23-0620-GA-RDR and CEOH's Alternative Rate  
14 Plan, Case No. 22-0738-GA-ALT, to extend the DRR beyond 2023 investment. I have  
15 also testified before the Indiana Utility Regulatory Commission (IURC) on behalf of CEI  
16 South and CEI North.

17 **Q7. What is the purpose and scope of your testimony in this proceeding?**

18 A. My testimony describes changes to costs recovered through the DRR and supports the  
19 proposed DRR charges, as well as the proposed tariff sheet and associated bill impacts.

20 **Q8. What Exhibits are you sponsoring in this proceeding?**

21 A. The following exhibits are attached to my testimony:

- 22 • Exhibit No. KJT-1 – DRR Revenue Requirement Variance at December 31, 2022
- 23 • Exhibit No. KJT-1a – DRR Recoveries by Tariff
- 24 • Exhibit No. KJT-2 – DRR Derivation of Charges and Bill Impacts; and

- 1           • Exhibit No. KJT-3 – DRR Tariff Sheet

2   **II.    DRR BACKGROUND**

3   **Q9.    Has the Commission approved changes to the DRR since it was originally approved**  
4   **in Case No. 07-1080-GA-AIR?**

5   A.    Yes. The Commission’s February 19, 2014, Order in Case No. 13-1571-GA-ALT  
6       approved a Stipulation and Recommendation (the 13-1571 Stipulation) between CEOH  
7       and the Staff of the Public Utilities Commission of Ohio. In the 13-1571 Stipulation, the  
8       Commission approved continuation of the DRR, which was originally approved in Case  
9       No. 07-1080-GA-AIR (the 2007 Rate Case). The 13-1571 Stipulation allowed CEOH to  
10      recover a return on and of investments made by the Company under an accelerated bare  
11      steel and cast iron pipeline replacement program (the Replacement Program), inclusive of  
12      capitalized interest (or post-in-service carrying costs, or PISCC) associated with the  
13      Replacement Program, and to recover the incremental costs of assuming responsibility  
14      for service lines.

15   **Q10.   How did the 13-1571 Stipulation modify the DRR?**

16   A.    The 13-1571 Stipulation provided that Replacement Program costs incurred through  
17       December 31, 2017, are recoverable in the DRR. It also accelerated the pace of the  
18       Replacement Program and clarified and expanded the scope of costs recoverable in the  
19       DRR. These and other modifications are described in further detail in the 13-1571  
20       Stipulation itself.

21   **Q11.   Has CEOH been granted an extension of the DRR beyond 2017?**

22   A.    Yes. In Case Nos. 18-0298-GA-AIR, 18-0299-GA-ALT, and 18-0049-GA-ALT (the  
23       2018 Rate Case), the Commission extended the DRR and Replacement Program for six  
24       years, for investments made starting in 2018 through 2023. The 2018 Rate Case

specifically reflected agreement, within the Stipulation and Recommendation, by the signatory parties to continue the DRR and Replacement Program for this six-year period with capital investment through December 31, 2023.

**Q12. Please explain the provisions approved in the 2018 Rate Case related to the DRR and the Replacement Program.**

A. The 2018 Rate Case modified the rate of return, post-in-service carrying cost rate, and depreciation rates applicable to the DRR and Replacement Program investments, effective September 1, 2019, with an issuance of the Order in the 2018 Rate Case. The 2018 Rate Case continued the requirement that CEOH employ, subject to Staff's review, prudent and reasonable cost controls, including competitive bidding processes; system planning; and negotiation with municipalities regarding permitting, restoration, fees, and other requirements. The 2018 Rate Case reflected agreement that CEOH shall attempt to complete the Replacement Program by December 31, 2023. CEOH witness Mason Butler IV discusses CEOH's cost control and competitive bidding processes, and progress and expectations for Replacement Program completion within his testimony.

Finally, the 2018 Rate Case established the residential DRR rate caps, as noted in the following table, applicable starting with investments made in 2018.



<b>Rate Effective Period</b>	<b>DRR Investment Period</b>	<b>Residential Rate Cap (per customer, per month)</b>
September 1, 2019-August 31, 2020	As of December 31, 2018	\$2.50
September 1, 2020-August 31, 2021	As of December 31, 2019	\$5.00
September 1, 2021-August 31, 2022	As of December 31, 2020	\$7.50
September 1, 2022-August 31, 2023	As of December 31, 2021	\$10.00
September 1, 2023-August 31, 2024	As of December 31, 2022	\$12.00
September 1, 2024-August 31, 2025	As of December 31, 2023	\$13.75

**Q13. Please explain Exhibit No. KJT-1 and Exhibit No. KJT-1a.**

A. Exhibit No. KJT-1 provides the calculation of the DRR variance at December 31, 2022. This variance is associated with the DRR revenue requirement for the twelve months ended December 31, 2022.

The variance determined on Exhibit No. KJT-1, page 1, is allocated to mains and service lines based upon the approved revenue requirements in CEOH's 2021 DRR filing and 2022 DRR filing.

Exhibit No. KJT-1a reflects DRR recoveries by month by customer group for the twelve months ended December 31, 2022.

1 **Q14. Please describe Exhibit No. KJT-2.**

2 A. This exhibit contains the filing schedules to support the derivation of the Company's  
3 proposed DRR change.

4  
5 Exhibit No. KJT-2, page 1, shows the allocation of the DRR revenue requirement and  
6 variance by rate schedule. The rate schedule allocation factors are as approved in the  
7 order in the 2018 Rate Case, and are multiplied by the total revenue requirement (from  
8 Exhibit No. MJJ-1) to determine the allocated revenue requirement by rate schedule.

9 These same allocations factors are multiplied by the total variance (from Exhibit No.  
10 KJT-1) to determine the allocation variance by rate schedule.

11  
12 The revenue requirement for general service customers is further subdivided by those  
13 customers served by a Group 1 meter (customers served under Rates 320, 321, and 325;  
14 hereinafter collectively referred to as Group 1 Customers) receiving a fixed monthly  
15 charge and the remaining customers (customers served by non-Group 1 meters under  
16 Rates 320, 321, and 325; hereinafter collectively referred to as Group 2 and Group 3  
17 customers) charged volumetrically. The revenue requirement is first allocated to the  
18 Group 1 subclassification as 130% of the calculated monthly residential DRR for 2022  
19 multiplied by the sum of the number of monthly Group 1 customer bills. Group 2 and  
20 Group 3 customers are allocated the residual of the Rate 320, 321, and 325 revenue  
21 requirement less the amounts assigned to the Group 1 customers.

22  
23 Exhibit No. KJT-2, page 2, calculates the residential DRR rate per customer applicable  
24 only to the revenue requirement amount, and evaluates this rate against the approved cap

1 of \$12.00 per customer per month. For the residential rate schedules (Rates 310, 311, and  
2 315), the allocated revenue requirement is divided by the projected number of customers,  
3 and then divided by 12, to determine the monthly DRR charge applicable to residential  
4 customers. For prior periods, any amount in excess of the defined residential rate cap was  
5 deferred and is subsequently included for recovery in the DRR provided the resulting  
6 amount does not exceed the defined cap. The total residential DRR on line 4 is compared  
7 against the cap on line 5, with any amount in excess of the cap deferred for recovery in a  
8 subsequent DRR proceeding. In this proceeding, the revenue requirement for residential  
9 customers results in a rate less than the \$12.00 per customer per month approved cap,  
10 which would allow for the inclusion of the prior deferrals. As of December 31, 2022, the  
11 Company had no prior period deferral to include in this proceeding as discussed below.

12  
13 Exhibit No. KJT-2, page 3, calculates the total DRR rates and charges by taking (1) the  
14 revenue requirement from page 1, (2) the prior deferral of amounts in excess of the cap  
15 from page 2, (3) a reduction for any amounts in excess of the current cap from page 3,  
16 and (4) the variance from page 1. The total amount to be recovered by rate schedule is  
17 used to derive the proposed rates and charges. For the residential rate schedules (Rates  
18 310, 311, and 315), the allocated revenue requirement is divided by the projected number  
19 of customers, and then divided by 12, to determine the monthly DRR charge applicable to  
20 residential customers. The allocated revenue requirement for Group 1 customers,  
21 determined on page 1, is added to the allocated share of recovery variances from page 1,  
22 with this total divided by the annual number of Group 1 bills to derive the monthly per  
23 customer charge. For Group 2 and Group 3 Customers and all customers receiving

1 service under Rates 345 and 360, the allocated revenue requirement and allocated  
2 recovery variances for each rate schedule is divided by the projected annual throughput  
3 for each rate schedule to determine the DRR charge per billing Ccf applicable to those  
4 rate schedules.

5  
6 Exhibit No. KJT-2, page 4, identifies the recoveries applicable to the periods September  
7 2023 through December 2023 and January 2024 through August 2024. These are the 12  
8 months during which the proposed DRR is projected to be in effect. The purpose of this  
9 schedule is to provide the basis for determining the revenue requirement recovery  
10 variance applicable to the period of September through December 2023, since in the next  
11 annual DRR filing CEOH will reconcile actual costs and actual recoveries through  
12 December 2023<sup>1</sup>. In the 2024 DRR filing, the variance applicable to the period of January  
13 through August 2023 will be based upon the recoveries for that period as identified on  
14 page 4. This methodology is consistent with the company's previous annual DRR filings.

15  
16 Exhibit No. KJT-2, page 5, shows the impact of the proposed DRR rates and charges on  
17 each rate schedule.

18  
19 Exhibit No. KJT-2, page 6, shows the annual impact of the proposed DRR rates and  
20 charges on residential customers.

---

<sup>1</sup> Recoveries applicable to January through August 2023 were included in the determination of the DRR revenue requirement in the 2022 DRR filing, Case No. 22-0455-GA-RDR.

**Q15. Does the calculated residential DRR rate per customer exceed the cap identified in the 2018 Rate Case?**

A. No. Consistent with the 2018 Rate Case, the evaluation against the rate cap shall only include the DRR revenue requirement exclusive of variances. As shown on Exhibit No. KJT-2, page 2, the 2022 DRR revenue requirement does not exceed the cap.

**Q16. What are the proposed DRR rates and charges when considering the applicable cap and variances from prior periods?**

A. As reflected on Exhibit No. KJT-2, page 3, the proposed DRR rates and charges are as follows:

Rate Schedule	DRR Rate per Customer per Month	DRR Rate per Billing CCF
310, 311, and 315	\$9.85	
320, 321, and 325 (Group 1)	\$12.80	
320, 321, and 325 (Group 2 and 3)		\$0.03230
345		\$0.01357
360		\$0.00773

**Q17. Please describe Exhibit No. KJT-3.**

A. Exhibit No. KJT-3 illustrates the proposed DRR tariff sheet, with a redlined (page 1) and clean (page 2) version.

### **III. CONCLUSION**

**Q18. Does that conclude your prepared direct testimony?**

A. Yes, it does.

**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
DISTRIBUTION REPLACEMENT RIDER  
DRR REVENUE REQUIREMENT VARIANCE**

(A) Line	(B) Description	(C)	(D) Total	Reference
1	Revenue Requirement for: January 2022 - August 2022 per Case No. 21-0491-GA-RDR, Exhibit KJT-2, Page 4 of 6, Line 14	\$ 22,247,059		
2	Less: DRR Recoveries January 2022 - August 2022	\$ (22,543,971)		-(Sum of Lines 19-26)
3	<b>DRR (Over)/Under Recovery for Eight Months Ended August 31, 2022</b>		<b>\$ (296,912)</b>	<b>Line 1 + Line 2</b>
4	Revenue Requirement for: September 2022 - December 2022 per Case No. 22-0455-GA-RDR, Exhibit KJT-2, Page 4 of 6, Line 5	\$ 12,755,745		
5	Less: DRR Recoveries September 2022 - December 2022	\$ (12,441,102)		-(Sum of Lines 27-30)
6	<b>DRR (Over)/Under Recovery for Four Months Ended December 31, 2022</b>		<b>\$ 314,643</b>	<b>Line 4 + Line 5</b>
7	<b>DRR (Over)/Under Recovery for Twelve Months Ended December 31, 2022</b>		<b>\$ 17,731</b>	<b>Line 3 + Line 6</b>
8	<b><u>(Over)/Under Recovery - Mains and Services Allocation</u></b>			
	<b>Description</b>	<b>Revenue Requirement</b>	<b>%</b>	<b>DRR Variance Allocation</b>
	<b>2021</b>	<b>(E) <sup>(1)</sup></b>	<b>(F)</b>	<b>(G) = Line 3 * (F)</b>
9	Mains	\$ 13,031,487	44.1%	\$ (130,957)
10	Services	\$ 16,514,021	55.9%	\$ (165,954)
11	Total	\$ 29,545,508	100.0%	\$ (296,912) =Line 3
	<b>2022</b>	<b>(E) <sup>(2)</sup></b>	<b>(F)</b>	<b>(G) = Line 6 * (F)</b>
12	Mains	\$ 16,930,677	44.1%	\$ 138,761
13	Services	\$ 21,459,852	55.9%	\$ 175,882
14	Total	\$ 38,390,529	100.0%	\$ 314,643 =Line 6
15	<b>Total Main (Over)/Under Recovery Variance</b>	<b>\$ 7,804</b>	<b>Line 9 + Line 12</b>	<b>To KJT-2, Page 1, Line 14, Column B</b>
16	<b>Total Services (Over)/Under Recovery Variance</b>	<b>\$ 9,927</b>	<b>Line 10 + Line 13</b>	<b>To KJT-2, Page 1, Line 14, Column D</b>
17	<b><u>DRR Recoveries by Month:</u></b>			
		<b>Recovery - \$</b>	<b>Reference</b>	
19	January 2022	\$ 3,267,346	Exhibit No. KJT-1a, Column G, Line 1	
20	February 2022	\$ 3,078,432	Exhibit No. KJT-1a, Column G, Line 2	
21	March 2022	\$ 3,071,095	Exhibit No. KJT-1a, Column G, Line 3	
22	April 2022	\$ 2,696,005	Exhibit No. KJT-1a, Column G, Line 4	
23	May 2022	\$ 2,666,424	Exhibit No. KJT-1a, Column G, Line 5	
24	June 2022	\$ 2,558,966	Exhibit No. KJT-1a, Column G, Line 6	
25	July 2022	\$ 2,453,182	Exhibit No. KJT-1a, Column G, Line 7	
26	August 2022	\$ 2,752,520	Exhibit No. KJT-1a, Column G, Line 8	
27	September 2022	\$ 2,782,102	Exhibit No. KJT-1a, Column G, Line 9	
28	October 2022	\$ 3,179,040	Exhibit No. KJT-1a, Column G, Line 10	
29	November 2022	\$ 3,033,046	Exhibit No. KJT-1a, Column G, Line 11	
30	December 2022	\$ 3,446,915	Exhibit No. KJT-1a, Column G, Line 12	
31	<b>Total DRR Recoveries</b>	<b>\$ 34,985,073</b>		

**Notes:**

(1) Revenue Requirement per Case No. 21-0491-GA-RDR (Exhibit KJT-2, Page 1 of 6, Line 7).

(2) Revenue Requirement per Case No. 22-0455-GA-RDR (Exhibit KJT-2, Page 1 of 6, Line 7).

**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
DISTRIBUTION REPLACEMENT RIDER  
DRR RECOVERIES BY TARIFF**

		(A)	(B)	(C)	(D)	(E)	(F)	(G)
		DRR Recoveries						
<u>Line</u>	<u>Month</u>	<u>310/311/315</u>	<u>320/321/325 - Grp 1</u>	<u>320/321/325 - Grp 2 &amp; 3</u>	<u>345</u>	<u>360/370</u>	<u>Total</u>	
1	Jan-22	\$ 2,413,593	\$ 141,977	\$ 491,967	\$ 105,650	\$ 114,159	\$ 3,267,346	
2	Feb-22	\$ 2,198,576	\$ 136,412	\$ 561,649	\$ 83,418	\$ 98,377	\$ 3,078,432	
3	Mar-22	\$ 2,451,159	\$ 143,985	\$ 307,326	\$ 66,253	\$ 102,372	\$ 3,071,095	
4	Apr-22	\$ 2,187,878	\$ 133,531	\$ 233,460	\$ 54,831	\$ 86,305	\$ 2,696,005	
5	May-22	\$ 2,338,352	\$ 137,467	\$ 75,741	\$ 37,872	\$ 76,993	\$ 2,666,424	
6	Jun-22	\$ 2,282,708	\$ 130,083	\$ 41,113	\$ 33,302	\$ 71,761	\$ 2,558,966	
7	Jul-22	\$ 2,169,054	\$ 131,157	\$ 50,324	\$ 30,017	\$ 72,630	\$ 2,453,182	
8	Aug-22	\$ 2,438,883	\$ 141,051	\$ 61,250	\$ 32,882	\$ 78,454	\$ 2,752,520	
9	Sep-22	\$ 2,447,886	\$ 144,921	\$ 69,195	\$ 28,884	\$ 91,215	\$ 2,782,102	
10	Oct-22	\$ 2,735,522	\$ 164,363	\$ 125,642	\$ 42,406	\$ 111,107	\$ 3,179,040	
11	Nov-22	\$ 2,497,416	\$ 147,645	\$ 215,632	\$ 59,021	\$ 113,331	\$ 3,033,046	
12	Dec-22	\$ 2,647,491	\$ 156,763	\$ 441,810	\$ 73,943	\$ 126,907	\$ 3,446,915	
13	<b>Total</b>	<u>\$ 28,808,517</u>	<u>\$ 1,709,355</u>	<u>\$ 2,675,110</u>	<u>\$ 648,480</u>	<u>\$ 1,143,611</u>	<u>\$ 34,985,073</u>	

**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
DISTRIBUTION REPLACEMENT RIDER  
ALLOCATION OF REVENUE REQUIREMENT**

<u>Line</u>	<u>Rate Schedule</u>	(A) <u>Mains Allocation Factors (1)</u> (%)	(B) <u>Mains Allocated DRR Revenue Requirement</u>	(C) <u>Service Lines Allocation Factors (1)</u> (%)	(D) <u>Service Lines Allocated DRR Revenue Requirement</u>	(E) <u>Total DRR Revenue Requirement</u> (B) + (D)	
1	310/311/315	73.331%	\$ 15,514,062	89.734%	\$ 20,749,614	\$ 36,263,676	(2)
2	320/321/325	14.221%	\$ 3,008,625	9.913%	\$ 2,292,230	\$ 5,300,854	
3	Group 1					\$ 2,062,835	(3)
4	Group 2 & 3					\$ 3,238,019	(4)
5	345	4.618%	\$ 976,994	0.280%	\$ 64,746	\$ 1,041,740	
6	360	7.830%	\$ 1,656,531	0.073%	\$ 16,880	\$ 1,673,412	
7	Total Revenue Requirement (5)	100.000%	\$ 21,156,212	100.000%	\$ 23,123,469	\$ 44,279,682	

(1) Allocation Factors for Mains and Service Lines as presented in Case No. 18-0298-GA-AIR.

(2) To KJT-2, Page 2, Line 2.

(3) Allocation of Group 1 revenue is 130% of the Residential monthly rate multiplied by the projected customer counts.

(4) Allocation of Group 2&3 revenue is the residual of the GS allocation less Group 1 charges.

(5) From MJJ-1, Line 1 (for Column B) and MJJ-1, Line 2 (for Column D).

**ALLOCATION OF VARIANCES**

<u>Line</u>	<u>Rate Schedule</u>	(A) <u>Mains Allocation Factors (1)</u> (%)	(B) <u>Mains Allocated DRR Variance</u>	(C) <u>Service Lines Allocation Factors (1)</u> (%)	(D) <u>Service Lines Allocated DRR Variance</u>	(E) <u>Total DRR Variance</u> (B) + (D)	
8	310/311/315	73.331%	\$ 5,723	89.734%	\$ 8,908	\$ 14,631	
9	320/321/325	14.221%	\$ 1,110	9.913%	\$ 984	\$ 2,094	
10	Group 1					\$ 815	(6)
11	Group 2 & 3					\$ 1,279	(6)
12	345	4.618%	\$ 360	0.280%	\$ 28	\$ 388	
13	360	7.830%	\$ 611	0.073%	\$ 7	\$ 618	
14	Total Variance	100.000%	\$ 7,804	100.000%	\$ 9,927	\$ 17,731	

(6) Allocation of variance credit to 320/321/325 derived by applying the same proportion as used in revenue allocation for Group 1 and Group 2 & 3.



**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
DISTRIBUTION REPLACEMENT RIDER  
CALCULATION OF RESIDENTIAL DRR DEFERRED 310/311/315 REVENUE**

<u>Line</u>	<u>Description</u>	(A) DRR Rate Revenue Requirement	(B) Residential Customer Count	(C) DRR Rate per Customer per Month <u>(A) / (B) / 12</u>
1	Residential Customer Count		306,921	
2	Calculated DRR - Rate 310/311/315	\$ 36,263,676		\$ 9.85
3	<u>Prior Deferred Revenue - Rate 310/311/315</u>	<u>\$ -</u>		
4	<u>Total Residential DRR</u>	<u>\$ 36,263,676</u>		\$ 9.85
5	Residential Rate Cap			<u>\$ 12.00</u>
6	<u>Excess Revenue Requirement Deferred</u>	<u>N/A</u>		N/A
7	<u>Prior Deferred Revenue to be Recovered</u>	<u>\$ -</u>		

**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
DISTRIBUTION REPLACEMENT RIDER  
CALCULATION OF DRR RATES**

<u>Line</u>	<u>Schedule</u>	(A) <u>Revenue Requirement (1)</u>	(B) <u>Prior Deferral</u>	(C) <u>Amount Over Cap (2)</u>	(D) <u>Variance (3)</u>	(E) <u>Recovery by Rate Schedule A + (B-C) + D</u>	(F) <u>Customer Count - or - Volumes</u>	(G) <u>Proposed DRR Per Customer Per Month (E) / (F) / 12</u>	(H) <u>Proposed DRR Per Billing Ccf (E) / (F)</u>
1	310/311/315	\$ 36,263,676	\$ -	\$ -	\$ 14,631	\$ 36,278,307	306,921 #	\$ 9.85	
2	320/321/325	\$ 5,300,854			\$ 2,094	\$ 5,302,948			
3	Group 1	\$ 2,062,835			\$ 815	\$ 2,063,650	13,430 #	\$ 12.80	
4	Group 2 & 3	\$ 3,238,019			\$ 1,279	\$ 3,239,298	100,288,607 Ccf		\$ 0.03230
5	345	\$ 1,041,740			\$ 388	\$ 1,042,128	76,786,289 Ccf		\$ 0.01357
6	360	\$ 1,673,412			\$ 618	\$ 1,674,030	216,474,363 Ccf		\$ 0.00773
7	<u>Total</u>	<u>\$ 44,279,682</u>			<u>\$ 17,731</u>	<u>\$ 44,297,413</u>			

(1) From KJT-2, Page 1, Lines 1-7, Column E.

(2) From KJT-2, Page 2, Line 6.

(3) From KJT-2, Page 1, Lines 8-14, Column E.

**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
DISTRIBUTION REPLACEMENT RIDER  
DETERMINATION OF APPROVED RECOVERIES  
BY CALENDAR MONTH**

	(A)	(B)	(C)
Line	Month	Allocation Factor (1)	Approved Recoveries (2)
1	September-23	7.69%	\$ 3,405,648
2	October-23	8.02%	\$ 3,551,616
3	November-23	8.48%	\$ 3,758,235
4	December-23	9.13%	\$ 4,042,265
5	<u>Subtotal (To Annual DRR Filing in 2024)</u>		<u>\$ 14,757,765</u>
6	January-24	9.43%	\$ 4,178,578
7	February-24	9.00%	\$ 3,987,713
8	March-24	8.72%	\$ 3,861,681
9	April-24	8.20%	\$ 3,632,064
10	May-24	7.96%	\$ 3,527,592
11	June-24	7.82%	\$ 3,462,142
12	July-24	7.79%	\$ 3,448,594
13	August-24	7.77%	\$ 3,441,284
14	<u>Subtotal (To Annual DRR Filing in 2025)</u>		<u>\$ 29,539,648</u>

(1) Based on monthly volumes / customer count (as applicable) as a percentage of annual, in 2023-2024 Budget.

(2) Allocation Factor in Column B times total revenue requirement - inclusive of prior deferrals and variances.

**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
DISTRIBUTION REPLACEMENT RIDER  
RATE SCHEDULE BILL IMPACTS**

		(A)	(B)	(C)	(D)	(E)	(F)	(G)	
<u>Line</u>	<u>Rate Schedule</u>	<u>Present Revenue (1)</u>	<u>Gas Cost Revenue (1)</u>	<u>Revenue Less Gas Cost Revenue (A) - (B)</u>	<u>Previous DRR Revenue Requirement</u>	<u>Current DRR Revenue Requirement (2)</u>	<u>Incremental DRR Revenue Requirement (D) - (E)</u>	<u>% Increase (F) / (C)</u>	
1	310/311/315	\$ 122,189,089	\$ 5,834,923	\$ 116,354,166	\$ 31,402,270	\$ 36,278,307	\$ 4,876,036	4.19%	(3)
2	320/321/325	\$ 28,048,919	\$ 191,118	\$ 27,857,801	\$ 4,496,629	\$ 5,302,948	\$ 806,319	2.89%	(4)
3	345	\$ 7,028,841		\$ 7,028,841	\$ 834,953	\$ 1,042,128	\$ 207,175	2.95%	
4	360	\$ 15,986,151		\$ 15,986,151	\$ 1,330,229	\$ 1,674,030	\$ 343,801	2.15%	
5	<u>Total</u>	<u>\$ 173,253,000</u>	<u>\$ 6,026,041</u>	<u>\$ 167,226,959</u>	<u>\$ 38,064,082</u>	<u>\$ 44,297,413</u>	<u>\$ 6,233,331</u>	3.73%	

(1) Rate Case Revenues (Test Year) under proposed rates.

(2) From Exhibit No. KJT-2, Page 3, Lines 1-2, 5-7, column E.

(3) For column (E), Revenue Requirement equals unit rate times number of customers.

(4) For column (E), Revenue Requirement equals unit rate times number of customers for Group 1, and unit rate times projected volumes for Group 2 & 3.

**VECTREN ENERGY DELIVERY OF OHIO, LLC D/B/A CENTERPOINT ENERGY OHIO  
DISTRIBUTION REPLACEMENT RIDER  
ANNUAL RESIDENTIAL CUSTOMER BILL IMPACT**

<u>Line</u>			<u>Reference</u>
1	Proposed DRR Charge Per Customer Per Month	\$ 9.85	Exhibit No. KJT-2, Page 3
2	Current DRR Charge Per Customer Per Month	<u>\$ 8.55</u> (1)	CN 22-455-GA-RDR
3	Incremental DRR Charge Per Month	\$ 1.30	Line [1] - Line [2]
4	Months	<u>12</u>	
5	Annual Incremental Bill Impact	\$ 15.60	Line [3] x Line [4]
6	Total Annual DRR Bill Amount	\$ 118.20	Line [1] x Line [4]

(1) Investment through December 31, 2017 included in base rates per Case No. 18-0298-GA-AIR.

VECTREN ENERGY DELIVERY OF OHIO, LLC  
Tariff for Gas Service  
P.U.C.O. No. 4

Sheet No. 45  
Fourth Revised Page 1 of 1  
Cancels Third Revised Page 1 of 1

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## **DISTRIBUTION REPLACEMENT RIDER**

### **APPLICABILITY**

The Distribution Replacement Rider ("DRR") is applicable to any Customer served under the Rate Schedules identified below.

- Rate 310 - Residential Default Sales Service
- Rate 311 - Residential Standard Choice Offer Service
- Rate 315 - Residential Transportation Service
- Rate 320 - General Default Sales Service
- Rate 321 - General Standard Choice Offer Service
- Rate 325 - General Transportation Service
- Rate 345 - Large General Transportation Service
- Rate 360 - Large Volume Transportation Service

### **DESCRIPTION**

The DRR will be effective through August 31, 2025 or until new rates become effective as a result of the filing by Company of an application for an increase in rates pursuant to Section 4909.18, Revised Code, or a proposal to establish base rates pursuant to an alternative method of regulation under Section 4929.05, Revised Code, whichever comes first.

The DRR will recover costs associated with Company's accelerated infrastructure replacement program approved by the Commission in Case No. 18-0299-GA-ALT. All applicable Customers shall be assessed either (a) a monthly charge in addition to the Monthly Charge or Customer Charge component of their applicable Rate Schedule, or (b) a volumetric charge applicable to each Billing Ccf of metered gas usage each month.

Actual costs and actual recoveries are reconciled in each annual DRR update, with any under- or over-recovery being recovered or returned over the next twelve (12) month period.

The monthly DRR charge applicable to Rate 310, 311, 315, 320 (Group 1), 321 (Group 1) and 325 (Group 1) customers shall be subject to caps approved by the Commission in Case No. 18-0299-GA-ALT.

### **RECONCILIATION**

The DRR is subject to reconciliation or adjustment annually, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to: (1) the twelve-month period of expenditures upon which the rates were calculated, if determined to be unlawful, unreasonable, or imprudent by the Commission in the docket those rates were approved or the Supreme Court of Ohio; (2) the Commission's orders in Case No. 18-47-AU-COI or any case ordered by the Commission to address tax reform changes.

### **DISTRIBUTION REPLACEMENT RIDER CHARGE**

The charges for the respective Rate Schedules are:

<b><u>Rate Schedule</u></b>	<b><u>\$ Per Month</u></b>	<b><u>\$ Per Billing Ccf</u></b>
310, 311 and 315	\$ <u>9.85</u>	
320, 321 and 325 (Group 1)	\$ <u>12.80</u>	
320, 321 and 325 (Group 2 and 3)		\$ <u>0.03230</u>
345		\$ <u>0.01357</u>
360		\$ <u>0.00773</u>

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Filed pursuant to the Finding and Order dated \_\_\_\_\_ in Case No. 23-0273-GA-RDR of The Public Utilities Commission of Ohio.

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Issued \_\_\_\_\_ Issued by Katie J. Tieken, Director Effective \_\_\_\_\_

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Filed pursuant to the Finding and Order dated \_\_\_\_\_, \_\_\_\_ in Case No. 23-0273-GA-RDR of The Public Utilities Commission of Ohio.

Issued \_\_\_\_\_, \_\_\_\_\_

Issued by Katie J. Tieken, Director

Effective \_\_\_\_\_, \_\_\_\_\_

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

**5/1/2023 5:00:21 PM**

**in**

**Case No(s). 23-0273-GA-RDR**

Summary: Application In the Matter of the Application for Authority to Adjust its Distribution Replacement Rider Charges electronically filed by Christopher T. Kennedy on behalf of Vectren Energy Delivery of Ohio, LLC d/b/a CenterPoint Energy Ohio.