

**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. 23-320-GA-UEx
Approval of an Adjustment to its)	
Uncollectible Expense Rider Rate.)	

APPLICATION

Matthew R. Pritchard (Reg. No. 0088070)
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**ATTORNEYS FOR VECTREN ENERGY DELIVERY OF OHIO,
LLC D/B/A CENTERPOINT ENERGY OHIO**

MAY 31, 2023

**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)	Case No. 23-320-GA-UEx
for Approval of an Adjustment to its)	
Uncollectible Expense Rider Rate.)	

APPLICATION

Vectren Energy Delivery of Ohio, LLC d/b/a CenterPoint Energy Ohio (CEOH or the Company), hereby submits its annual Uncollectible Expense (“UEx”) Rider Report and respectfully requests approval to revise its UEx Rider rate. In support of its Application, CEOH states as follows:

1. In 2003, the Public Utilities Commission of Ohio (“Commission”) approved the Company’s UEx Rider.¹ As part of its initial approval of the UEx Rider, the Commission directed the Company to file a yearly report that identifies amounts recovered, deferred, and amortized pursuant to the UEx Rider.² The annual balance reconciliation is Attachment 1 to this Application.³
2. The Commission also directed the Company to include in its annual filing: the UEx balance at the beginning of the reporting year; additions to the UEx

¹ *In the Matter of the Joint Application of The East Ohio Gas Company d.b.a Dominion East Ohio, Columbia Gas of Ohio Inc., Vectren Energy Delivery of Ohio, Northeast Ohio Natural Gas Corp., and Oxford Natural Gas Company for Approval of an Adjustment Mechanism to Recover Uncollectible Expenses*, Case No. 03-1127-GA-UNC, Finding and Order (Dec. 17, 2003).

² *Id.* at 13-14.

³ The annual filing is submitted in the format requested by Commission Staff. *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval of Proposed Tariff Revisions to Recover Uncollectible Expenses*, Case No. 03-2571-GA-ATA, Staff Summary, Comments and Recommendation (Mar. 9, 2004).

balance, including the vintage of the additions during the calendar year; and credits to the UEX balance during the calendar year.⁴ The Company has incorporated this additional information into Attachment 3 to this Application.⁵

3. Sheet No. 39 of CEOH's tariff further provides that CEOH shall file an application with the Commission requesting approval to change the UEX Rider rate if CEOH determines that an adjustment of more than plus or minus ten percent is needed.
4. The calculation of the UEX Rider rate increases the currently effective rate by more than ten percent. The calculation of the proposed UEX Rider rate is comprised of: (1) the balance of deferred uncollectible accounts expense net of recoveries as of April 30, 2023 and (2) an estimate of net uncollectible accounts expense and recoveries for the 12 months ending April 30, 2024. The calculation yields a proposed UEX Rider rate of \$0.01361 per Billing Ccf. The calculation of the revised rate is shown on Attachment 2.
5. Copies of the proposed and red-lined tariff sheets are included as Attachment 4 of this Application.
6. The proposed rate of \$0.01361 per Billing Ccf is just and reasonable and should be approved.

⁴ *In the Matter of the Five-Year Review of Natural Gas Company Uncollectible Rider*, Case No. 08-1229-GA-COI, Finding and Order at 6 (Aug. 19, 2009).

⁵ The information on Attachment 3 also allows an identification of the portion of the proposed UEX Rider rate attributable to estimated UEX, which can be derived by subtracting from the estimated charge-off amount the estimated dollars attributable to agency assistance and customer payments.

WHEREFORE, CE OH respectfully requests that the Commission approve the new UEX Rider tariff sheet and UEX Rider rate proposed herein.

Respectfully submitted,

/s/ Matthew R. Pritchard

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**ATTORNEYS FOR VECTREN ENERGY DELIVERY OF OHIO,
LLC d/B/A CENTERPOINT ENERGY OHIO**

ATTACHMENT 1

[ANNUAL BALANCE RECONCILIATION]

**VECTREN ENERGY DELIVERY OF OHIO, LLC
D/B/A CENTERPOINT ENERGY OHIO
Uncollectible Expense Rider
2023 Annual Balance Reconciliation**

Line No.	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	Total
1	Balance - Beginning of Month	\$ (371,179)	\$ (835,486)	\$ (964,722)	\$ (1,023,985)	\$ (1,017,854)	\$ (778,251)	\$ (643,831)	\$ (163,397)	\$ 678,523	\$ 1,541,421	\$ 2,179,153	\$ 2,078,521	\$ (371,179)
2	Bad Debts Written Off (b)	\$ (197,379)	\$ 55,159	\$ 63,267	\$ 128,209	\$ 303,823	\$ 200,568	\$ 533,945	\$ 844,563	\$ 1,007,145	\$ 839,117	\$ 128,186	\$ 294,938	\$ 4,201,543
3	Other													\$ -
4	Recovery - Uncollectible Expense Rider (a)	\$ 205,338	\$ 148,469	\$ 111,357	\$ 68,951	\$ 25,224	\$ 16,120	\$ 13,899	\$ 18,036	\$ 23,494	\$ 62,753	\$ 121,960	\$ 214,254	\$ 1,029,854
5	Recovery - Other (b)	\$ 61,514	\$ 35,790	\$ 10,885	\$ 52,731	\$ 38,389	\$ 49,335	\$ 39,071	\$ (14,947)	\$ 122,840	\$ 142,926	\$ 112,806	\$ 77,208	\$ 728,548
6	Incremental Uncollectible Expense [(2 + 3 - (4 + 5))]	\$ (464,231)	\$ (129,100)	\$ (58,975)	\$ 6,527	\$ 240,211	\$ 135,113	\$ 480,975	\$ 841,475	\$ 860,810	\$ 633,438	\$ (106,580)	\$ 3,476	\$ 2,443,140
7	Balance Subtotal [1+ 6]	\$ (835,410)	\$ (964,585)	\$ (1,023,697)	\$ (1,017,457)	\$ (777,643)	\$ (643,138)	\$ (162,856)	\$ 678,077	\$ 1,539,333	\$ 2,174,859	\$ 2,072,573	\$ 2,081,998	\$ 2,071,961
8	Carrying Charges [((1+7) X 79%) X .50 X (c)] *	\$ (75)	\$ (136)	\$ (288)	\$ (396)	\$ (609)	\$ (692)	\$ (542)	\$ 446	\$ 2,088	\$ 4,294	\$ 5,948	\$ 6,327	\$ 16,363
9	Balance - End of Month [7 + 8]	\$ (835,486)	\$ (964,722)	\$ (1,023,985)	\$ (1,017,854)	\$ (778,251)	\$ (643,831)	\$ (163,397)	\$ 678,523	\$ 1,541,421	\$ 2,179,153	\$ 2,078,521	\$ 2,088,325	\$ 2,088,325

(a) Represents calendar uncollectible expense rider revenues.

(b) See write-off vintage and recovery source detail required by Case No. 08-1229-GA-COI on Attachment 3. Bad debt write-offs include account balances restored due to the moratorium.

(c) Monthly carrying charge rate 0.01583% 0.01917% 0.03667% 0.04917% 0.08583% 0.12333% 0.17000% 0.21917% 0.23833% 0.29250% 0.35417% 0.38500%

**VECTREN ENERGY DELIVERY OF OHIO, LLC
D/B/A CENTERPOINT ENERGY OHIO
Uncollectible Expense Rider
2023 Annual Balance Reconciliation**

Line No.	Description	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Total
1	Balance - Beginning of Month	\$ 2,088,325	\$ 1,983,252	\$ 1,828,377	\$ 1,773,084									\$ 2,088,325
2	Bad Debts Written Off (b)	\$ 124,424	\$ 42,874	\$ 143,393	\$ 269,049									\$ 579,740
3	Other													\$ -
4	Recovery - Uncollectible Expense Rider (a)	\$ 174,726	\$ 145,687	\$ 146,461	\$ 74,311									\$ 541,184
5	Recovery - Other (b)	\$ 61,168	\$ 58,187	\$ 57,598	\$ (94,889)									\$ 82,064
6	Incremental Uncollectible Expense $[(2 + 3 - (4 + 5))]$	\$ (111,469)	\$ (161,000)	\$ (60,667)	\$ 289,627									\$ (43,509)
7	Balance Subtotal [1+ 6]	\$ 1,976,856	\$ 1,822,252	\$ 1,767,710	\$ 2,062,711									\$ 2,044,815
8	Carrying Charges $[(1+7) \times 79\% \times .50 \times (c)]^*$	\$ 6,396	\$ 6,125	\$ 5,374	\$ 6,490									\$ 24,386
9	Balance - End of Month [7 + 8]	\$ 1,983,252	\$ 1,828,377	\$ 1,773,084	\$ 2,069,201									\$ 2,069,201

(a) Represents calendar uncollectible expense rider revenues.

(b) See write-off vintage and recovery source detail required by Case No. 08-1229-GA-COI on Attachment 3. Bad debt write-offs include account balances restored due to the moratorium.

(c) Monthly carrying charge rate
0.39833% 0.40750% 0.37833% 0.42833%

ATTACHMENT 2

[CALCULATION OF REVISED RATE]

VECTREN ENERGY DELIVERY OF OHIO, LLC
D/B/A CENTERPOINT ENERGY OHIO
Uncollectible Expense Rider Calculation
Report for May 2023

Line No.		Col. A Amount	Col. B Applicable Volumes (Billing Ccf)	Col. C Unit Rate / Billing Ccf
1	Actual Deferred Uncollectible Expense Balance through April 2023	\$ 2,069,201		
2	Projected Net Uncollectible Expense: May 2023 - April 2024	<u>\$ 2,750,000</u>		
3	Unit Rate on which to Collect	\$ 4,819,201	354,179,758	\$ 0.01361
4	Prior approved UEX Rider Rate Effective July 28, 2022			<u>\$ 0.00351</u>
5	Increase/(Decrease) in Uncollectible Expense Rider			<u>\$ 0.01010</u>
6	Percentage Difference			287.8%

ATTACHMENT 3

[WRITE-OFFS AND COLLECTIONS SUMMARY]

VECTREN ENERGY DELIVERY OF OHIO, LLC
D/B/A CENTERPOINT ENERGY OHIO
Uncollectible Expense Rider
Write-Off and Collection Summary

Line #	Bad Debts Written off by Vintage (a)		2022 May	2022 June	2022 July	2022 August	2022 September	2022 October	2022 November	2022 December	2023 January	2023 February	2023 March	2023 April	Total
1	Vintage														
1	1-6 Months		(368,940)	(239,653)	(632,903)	(961,756)	(1,124,940)	(954,575)	(406,616)	(444,597)	(269,512)	(191,799)	(250,606)	(320,293)	(6,166,190)
2	6-12 months		2,981	96	1,339	2,405	(19,166)	(4,206)	54,385	38,926	31,894	37,328	15,300	(4,065)	157,216
3	> 12 months (b)		24,926	21,542	23,312	37,731	31,972	116,968	327,336	199,027	166,427	163,379	124,725	52,900	1,290,243
4	Subtotal	Sum of Lines 1-3	(341,033)	(218,015)	(608,252)	(921,620)	(1,112,135)	(841,813)	(24,896)	(206,644)	(71,190)	8,907	(110,581)	(271,458)	(4,718,731)
5	Other Write-Off Activity		-	-	-	-	-	-	-	-	-	-	-	-	-
6	PIPP Bad Debt Write-Offs		(37,210)	(17,447)	(74,307)	(77,057)	(104,991)	(2,696)	103,291	88,294	53,234	51,781	32,811	(2,409)	13,295
7	Total Bad Debts Written Off (Attachment 1)	Sum of Lines 4, 5 - Line 6	(303,823)	(200,568)	(533,945)	(844,563)	(1,007,145)	(839,117)	(128,186)	(294,938)	(124,424)	(42,874)	(143,393)	(269,049)	(4,732,026)
Collections by Type															
			2022 May	2022 June	2022 July	2022 August	2022 September	2022 October	2022 November	2022 December	2023 January	2023 February	2023 March	2023 April	Total
8	From Customers		39,543	54,827	52,110	57,920	173,203	152,076	149,890	85,929	63,035	62,601	55,238	51,148	997,521
9	From Collection Agencies		3,799	2,440	2,764	4,071	3,783	5,183	1,958	2,781	1,182	1,135	4,414	6,180	39,688
10	From Other		-	-	-	-	-	-	2,725	1,670	854	1,447	615	511	7,821
11	Subtotal	Sum of Lines 8-10	43,342	57,267	54,874	61,991	176,985	157,259	154,573	90,379	65,070	65,183	60,266	57,840	1,045,029
12	Other Activity														
13	Collection Agency Commissions		(498)	(38)	6,148	66,991	28,897	5,744	33,539	2,251	-	-	(849)	146,358	288,544
14	Collections from PIPP Customers		5,451	7,969	9,654	9,947	25,248	8,588	8,228	10,921	3,902	6,996	3,517	6,371	106,793
15	Total Recovery - Other (Attachment 1)	Line 11 - Sums Lines 12-14	38,389	49,335	39,071	(14,947)	122,840	142,926	112,806	77,208	61,168	58,187	57,598	(94,889)	649,693

(a) - Bad debt write-offs include account balances restored due to the moratorium.
(b) - Write-offs without a print date have been categorized as greater than twelve months.

ATTACHMENT 4

[COPIES OF RED-LINED AND PROPOSED TARIFF SHEETS]

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UNCOLLECTIBLE EXPENSE RIDER

APPLICABILITY

The Uncollectible Expense Rider shall be applicable to all Customers responsible for payment of Company's Percentage of Income Payment Plan Rider on Sheet No. 40.

DESCRIPTION

The Uncollectible Expense Rider Rate shall be applied to all Billing Ccf for Gas Service rendered to Customers served under the applicable Rate Schedules.

The Rider shall recover costs associated with uncollectible accounts arising from those Customers in those Rate Schedules responsible for paying the Uncollectible Expense Rider.

Company's actual uncollectible expense for the applicable Rate Schedules, including carrying charges, shall be reconciled annually, with any over or under collection being reflected as a charge or credit in a subsequent update of the Rider Rate.

Company shall file an application with the Commission requesting approval to change the Uncollectible Expense Rider Rate if Company determines that an adjustment of more than plus or minus ten percent (10%) is needed.

RECONCILIATION

The Uncollectible Expense Rider is subject to reconciliation or adjustment annually, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to 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.

UNCOLLECTIBLE EXPENSE RIDER RATE

The Uncollectible Expense Rider Rate is \$0.01361 per Billing Ccf.

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Filed pursuant to the Finding and Order dated _____, 2023 in Case No. 23-0320-GA-UEx of The Public Utilities Commission of Ohio.

Issued _____, 2023 Issued by Katie J. Tieken, Director Effective _____, 2023

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UNCOLLECTIBLE EXPENSE RIDER

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Company's actual uncollectible expense for the applicable Rate Schedules, including carrying charges, shall be reconciled annually, with any over or under collection being reflected as a charge or credit in a subsequent update of the Rider Rate.

Company shall file an application with the Commission requesting approval to change the Uncollectible Expense Rider Rate if Company determines that an adjustment of more than plus or minus ten percent (10%) is needed.

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The Uncollectible Expense Rider is subject to reconciliation or adjustment annually, including but not limited to, increases or refunds. Such reconciliation or adjustment shall be limited to 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.

UNCOLLECTIBLE EXPENSE RIDER RATE

The Uncollectible Expense Rider Rate is \$0.01361 per Billing Ccf.

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in

Case No(s). 23-0320-GA-UEX

Summary: Application for Approval of an Adjustment to its Uncollectible Expense
Rider Rate electronically filed by Mr. Matthew R. Pritchard on behalf of Vectren
Energy Delivery of Ohio LLC.