

September 5, 2023

Ms. Barcy F. McNeal  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215

Re: *The East Ohio Gas Company d/b/a Dominion Energy Ohio*, Case No. 23-419-GA-PIP

Dear Ms. McNeal:

Please find attached the Independent Accountant's Report on Applying Agreed-Upon Procedures, supplied in accordance with the Commission's March 8, 2023 Entry in the above-captioned case. The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO) does not object to the adoption by the Commission of the findings set forth in the audit report.

Please note that a copy of this correspondence will be filed electronically in the above-captioned docket. Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Christopher T. Kennedy  
*Counsel for The East Ohio Gas Company d/b/a  
Dominion Energy Ohio*

## **INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES**

To the Board of Directors  
The East Ohio Gas Company  
Cleveland, Ohio

RE: Public Utility Commission of Ohio Case No. 23-419-GA-PIP

We have performed the procedures enumerated below to assist The East Ohio Gas Company d/b/a Dominion Energy Ohio (a wholly-owned subsidiary of Dominion Energy, Inc.) ("DEO" or the "Company") and the Public Utility Commission of Ohio (the "PUCO") with respect to the PUCO's evaluation of the Company's compliance with PUCO Case Nos. 88-1115-GE-PIP, 90-705-GE-PIP, and 90-879-GE-ORD, as amended in PUCO Case Nos. 08-723-AU-ORD and 13-274-AU-ORD, in conjunction with the calculation of the Percentage of Income Payment Plan Rider ("PIPP Rider") for the period April 1, 2022 to March 31, 2023, as described in the entry dated March 08, 2023 in PUCO Case No. 23-419-GA-PIP. The Company's management is responsible for the Company's compliance with these requirements.

DEO has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of the engagement, as described above. In addition, the PUCO has agreed to and acknowledged that the procedures performed are appropriate for their purposes.

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

The procedures that we performed, and related findings are as follows:

### **Percentage of Income Payment Plan Procedures**

- A. We obtained from Company management the Calculation of Recommended PIPP Rider Rate for the 2023 PIPP filing, and compared the balance of accumulated deferrals as of March 31, 2023 to the sum of (1) the beginning balance of accumulated deferred PIPP on April 1, 2022 and (2) the activity obtained in B below for the periods April 1, 2022 to December 31, 2022, and January 1, 2023 to March 31, 2023, and found them to be in agreement.
- B. We obtained from Company management, and recalculated the mathematical accuracy of, the accounting schedules summarizing the deferred PIPP balances for the following items for each month within the period April 1, 2022 to March 31, 2023:
  - 1. Deferred PIPP arrearages
  - 2. PIPP Recoveries

- i. Sales customers
  - ii. Energy Choice customers
  - iii. Transport customers
3. Firm receipt point and commodity exchange revenue sharing
4. Re-verification charges
5. Carrying charges

No exceptions were found as a result of recalculating the above accounting schedules.

C. We haphazardly selected the months of April, June, August, December of 2022 and February of 2023 and performed the following procedures:

1. We compared the deferred PIPP arrearages for each selected month, as detailed in B.1, to the sum of (1) the monthly net activity of the PIPP arrearages over 12 months old and pre-PIPP arrearages, and (2) PIPP arrearage and repayment credits, credit balance transfers, and charge-offs, for such selected month, each as shown in a schedule obtained from Company management detailing the monthly account balance activity for the PIPP regulatory assets and found them to be in agreement.
  - i. For each of the five selected months, we compared the beginning and ending month balances for the PIPP arrearages over 12 months old and pre-PIPP arrearages, each shown in the monthly schedule supporting the general ledger entry to record arrearages to the regulatory asset account ("HOPP File Entry schedule"), to the corresponding balances in Customer Care System ("CCS") HOPP file reports provided by Company management, and found them to be in agreement except for the ending balances for the PIPP arrearages over 12 months old shown below.

<b>Month</b>	<b>Over 12-Month-Old Ending Balance of CCS</b>	<b>Over 12-Month-Old Ending Balance of HOPP File Entry Schedule</b>
April 2022	\$2,942,400.82	\$2,943,920.39
August 2022	\$3,008,914.63	\$3,010,614.25
December 2022	\$2,319,688.69	\$2,321,431.42
February 2023	(\$1,966,910.08)	(\$1,965,168.94)

- ii. We compared (1) the PIPP arrearage and repayment credits, (2) the credit balance transfer amounts, and (3) the charge-offs to the corresponding activity reported in CCS, as shown in screen prints provided by Company management for each of the five selected months, and found them to be in agreement.
2. For each of the five selected months, we compared (1) the PIPP recoveries as shown in the schedules referenced in B.2.i, B.2.ii, and B.2.iii above to (2) supporting schedules that calculate rider recoveries based on applicable customer consumption volumes and approved rates, provided by the Company management, finding them to be in agreement, and we recalculated the mathematical accuracy of such schedules, and identified no exceptions.

3. For each month selected in C above:
  - i. We compared the PIPP recovery volumes for B.2.i in C.2 above to the respective volumes on Schedule 23 – Requirements and Supply and the PIPP recovery volumes for B.2.ii and B.2.iii, in C.2 above to reports from the applicable billing system for each selected month, obtained from Company management, and found them to be in agreement with the exception of August 2022 wherein the volume shown on Schedule 23 was 2,000 MCF greater than the volume in the applicable billing system, SBS. Management explained that this was a typographical error within the historical volume data and did not impact the calculation of the PIPP rate.
  - ii. We compared the PIPP Rider rate used to derive the recoveries shown in the schedules obtained in C.2 above to the applicable rate filing approved by the PUCO and found them to be in agreement.
4. We compared the firm receipt point and commodity exchange revenue sharing amounts for each selected month, as detailed in the schedules obtained in B.3 above, to supporting schedules provided by Company management, and found them to be in agreement.
5. For each of the five selected months in C. above, we compared the re-verification charges, incurred within each of the selected months, included in schedules obtained in B.4 above to the corresponding invoices provided by Company management, and found them to be in agreement.
6. We obtained from Company management the Company's monthly annualized money pool interest rates for each selected month, and compared such interest rates to the interest rates utilized by the Company to calculate the monthly carrying charges as detailed in the schedules obtained in B.5 above and found them to be in agreement.
7. For each of the five selected month, using (1) the rates obtained in C.6 above, net of the impact of the statutory federal income tax rate of 21 percent when the regulatory asset balance shows an under-recovery, and (2) the average of the previous month and current month net PIPP deferral balance before interest reported in the Company's schedule of deferred balances used to calculate the PIPP Rider obtained in B.5 above, we recalculated the carrying charges for such selected months shown on the applicable schedules obtained in B.5 and found them to be in agreement except for April 2022, June 2022, and August 2022 which had differences noted below. Management explained that the differences resulted from an incorrect interest rate that had been used for the first 7 months of 2022, that was corrected and trued up in August.

<b>Month</b>	<b>Recalculated Carrying Charges</b>	<b>Carrying Charges per Schedule</b>	<b>Difference</b>
April 2022	(\$2,666.83)	(\$2,418.11)	(\$248.72)
June 2022	(\$1,754.07)	(\$1,495.83)	(\$258.24)
August 2022	(\$1,943.63)	(\$3,581.06)	\$1,637.43

We performed the following procedure related to the application of the PIPP Riders in effect during the period April 1, 2022 through March 31, 2023:

- D. We haphazardly selected five individual customer billings from each month selected in C. above (25 selections in total, including 20 selections from the CCS billing system and 5 selections from the SBS billing system) and compared the PIPP Rider rate used in each customer's bill calculation to the applicable rate filing approved by the PUCO, and found them to be in agreement.

We performed the following procedures related to the application of credits to customer balances in accordance with Chapter 4901:1-18-14 of the Ohio Administrative Code for the period April 1, 2022 through March 31, 2023:

- E. We haphazardly selected four individual PIPP Plus customer payments and one individual Graduate PIPP customer payment, as defined by the Ohio Administrative Code, made within each of the months selected in C. above (25 selected payments in total, all from the CCS billing system) from a detail of such payments reported by CCS. For each payment selected, we obtained the customer's bill for which the payment was made, and noted whether the required PIPP payment was made in full and by the due date stated on the bill based on inspection of the customer's account detail in CCS.

Note: for the purposes of the procedures below, the term "Anniversary Date" as applied to each customer is defined as the calendar date each year corresponding with the date on which the customer became a PIPP customer.

1. For each PIPP Plus customer payment selected above, if the required payment was made in full and on time, we found that the customer's account balance was reduced by (1) the difference between (a) the amount of the required payment as shown on the bill for which the payment was made, obtained from Company management, and (b) the current monthly bill amount, also as shown on the bill for which the payment was made, plus (2) one twenty-fourth of the customer's accumulated arrearages, as shown on the customer's account detail in CCS, obtained from Company management, calculated as of the customer's enrollment in the PIPP program or, if late or missed payments occurred, at the time of the PIPP customer's last Anniversary Date.
2. For each Graduate PIPP customer payment selected above, if the required payment was made in full and on time, we found that the customer's account balance was reduced by (1) the difference between (a) the amount of the required payment as shown on the bill for which the payment was made, obtained from Company management, and (b) the current monthly bill amount, also as shown on the bill for which the payment was made, plus (2) one twelfth of the customer's accumulated arrearages, as shown on the customer's account detail in CCS, obtained from Company management, calculated as at the time of the customer's enrollment in the Graduate PIPP Plus program.
3. For each customer payment selected above, if the required payment was not made both in full and on time, we found that the credits described in E.1 or E.2 were not applied to the associated customer arrearage balance as a result of that customer payment.

We performed the following procedure related to the planned billed volumes used to calculate

the PIPP Rider rate:

- F. We compared the planned billed volumes subject to the PIPP Rider used in the Calculation of Recommended PIPP Rider Rate obtained in A. above to the schedule of total planned volumes for the 12-months ending June 30, 2024 provided by Company management, and found them to be in agreement.

We performed the following procedure related to the balance of accumulated deferrals for the PIPP rider (SAP account numbers 1171162/2171137) as of March 31, 2023:

- G. We obtained from Company management a reconciliation of the balance of accumulated deferrals for the PIPP Rider at March 31, 2023 to SAP account numbers 1171162/2171137 and found that the Company has identified reconciling items for activity during period ended March 31, 2023. The Company has informed us that these reconciling differences relate to timing differences that result from the estimated amounts recorded to the SAP general ledger each month, in accordance with the Company's policies, which are updated with the actual balances in the subsequent month.

We were engaged by the Company to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not, conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the Company's compliance with PUCO Case Nos. 88-1115-GE-PIP, 90-705-GE-PIP, and 90-879-GE-ORD, as amended in PUCO Case Nos. 08-723-AU-ORD and 13-274-AU-ORD, in conjunction with the calculation of the Percentage of Income Payment Plan Rider for the period April 1, 2022 through March 31, 2023. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures other matters might have come to our attention that would have been reported to you.

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

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

*Deloitte & Touche LLP*

August 30, 2023

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

**9/5/2023 4:39:40 PM**

**in**

**Case No(s). 23-0419-GA-PIP**

Summary: Report Report electronically filed by Mr. Christopher T. Kennedy on  
behalf of The East Ohio Gas Company d/b/a Dominion Energy Ohio.