

CenterPoint Energy OHIO Choice Program Overview

July 2022

CenterPoint Energy Ohio Contacts



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- Supplier Application Questions:
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CenterPoint's Choice Supplier Approval Process

CenterPoint Energy Ohio's Choice Supplier Approval Process



1. Supplier submits:

- Choice Supplier Application Form (with requested financial information)
 - Suppliers must indicate on the application:
 - Customer list request
 - Customer Billing option selection (consolidated or dual)
 - Pooling intentions (mercantile, non-mercantile)
 - Requested contact information
- Partially executed Choice Supplier Pooling Agreement
- Copy of PUCO certification
- Connectivity Profile
- Pay a \$1,000 fee for Company to obtain and maintain a first priority perfected Uniform Commercial Code 1 (UCC-1) lien and related administrative procedures
- Remit a \$3,000 deposit for Electronic Data Interchange (EDI) testing and successfully completed EDI testing requirements. If Choice Supplier
 applicant is approved to participate in the Choice Program and begins serving Choice customers within ninety days of approval, the EDI
 testing deposit will be refunded without interest.
- Checks should be made out to CenterPoint Energy and send along with the Application form.
- 2. CenterPoint Energy Ohio performs financial evaluation
 - Consolidated Billing:
 - A first priority security interest in the customer receivables (in the case of Suppliers electing to utilize consolidated billing); or
 - An irrevocable standby letter of credit from a financial institution that meets CenterPoint Energy Ohio's approval in an amount equal to
 the expected customer receivables from the prospective Supplier's customers for the peak two consecutive months over the year (in the
 case of Suppliers electing to utilize consolidated or dual billing).
 - Dual Billing:
 - A letter of credit to fully collateralize any potential exposure deemed necessary by CenterPoint Energy Ohio.
- 3. Pass EDI certification testing with ESG

What's next?



Once approved by CenterPoint Energy Ohio, Choice Supplier may proceed with the following:

- 1. Solicit customers
 - Must attain and maintain no less than 100 customers or 10,000 Mcf annual load
 - CenterPoint Energy Ohio suggests attaining at least 150 customers to be enrolled in the first month as many will not be Choice eligible, or may rescind the enrollment
- 2. Receive eligible customer list
 - CenterPoint Energy Ohio will host an ftp for purposes of providing supplier with a Choice Eligible Customer List, and monthly reports
 - Files are encrypted, and PGP keys will need to be exchanged
- 1. Submit request for rates via CenterPoint Energy Ohio's Rate Submittal Form to SupplierRateGroup@CenterPointenergy.com
 - New Supplier rates must be received by CenterPoint Energy Ohio at least 30 days in advance of the 1st of the month start date
- 2. Inclusion in PUCO "Apples to Apples" Chart
 - Rates may be submitted to PUCO

CenterPoint Energy Ohio will provide one on one training via conference calls with new Choice Supplier's business units.

Choice Supplier Performance Obligations



- Must be listed on pipelines' approved bidders list and accept monthly mandatory capacity releases of CenterPoint Energy Ohio Capacity. Current capacity includes:
 - Panhandle
 - Columbia Gas Pipeline
 - TETCO
 - ANR (beginning April 1, 2016)
- Maintain comparable firm capacity/supplies
 - Proof must be submitted annually to CenterPoint Energy Ohio by October 31st
- Maintain no less than 100 eligible customers or 10,000 Mcf/year
- Adhere to CenterPoint Energy Ohio tariff terms and conditions, and CenterPoint Energy Ohio's executed Choice Supplier Pooling Agreement.



ELIGIBLE CUSTOMERS

Mercantile vs. Non-Mercantile



- Mercantile Customer" is a non-residential customer that uses > 5,000 Ccf/year at a single location or > 3 locations.
- Rules for competitive retail gas service (i.e. HB 9) are effective for Non-Mercantile customers and their Suppliers.
- CenterPoint Energy Ohio's Choice tariffs are available to Mercantile and Non-Mercantile customers using < 150,000 Ccf/year. Therefore, it implements the same (HB 9) requirements for both with the exception of:
 - PUCO Certification required to serve Non-Mercantile
 - PUCO approval required to terminate Non-Mercantile Supplier
- Mercantile and Non-Mercantile customers may be combined in the same pool (and thereby one DDQ and pool bill) provided that:
 - Supplier is certified with PUCO
 - Mercantile default process is followed
- CenterPoint Energy Ohio strongly suggests one combined pool to reduce Supplier administration.

Choice Eligible Customers



- Uses < 150,000 Ccf/year
- Is not 35 days past due and owe more than \$100 at time of enrollment
- Is <u>not</u> past due on a payment arrangement
- Is <u>not</u> a PIPP customer

Breakdown of Choice Eligible Customers



Customers with annual usage <
 150,000 Ccf as of July 2019

	July-19
Total Customer Count	319,440
Choice Eligible	306,839
Total Choice	132,546
Pipp	9,459



CUSTOMER ENROLLMENT

High Level Customer Enrollment Process



- 1. Customer enters into a contract with a Choice Supplier.
- 2. Choice Supplier sends EDI enrollment request transaction to CenterPoint Energy Ohio.
- 3. CenterPoint Energy Ohio validates the enrollment request and sends an acceptance or rejection EDI transaction to the

Choice Supplier within 3 business days.

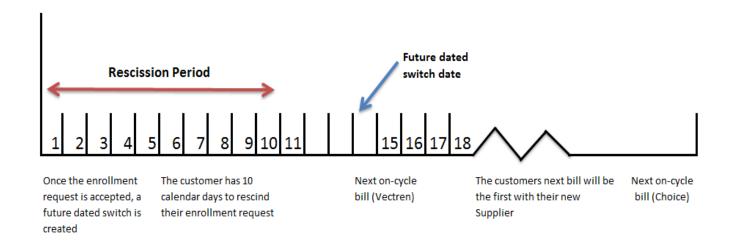
- Response target is 1 business day
- File contains customer's anticipated enrollment date
- 4. Customer joins the Choice Supplier's pool with their next on-cycle read date after a 10-calendar day rescission period (from the date CenterPoint Energy Ohio sends letter to customer).

Timing



- Projected Enrollment Date is set at the next meter read date 10 calendar days (typically 7 business days) after the customer notice is created.
- CenterPoint Energy Ohio must receive enrollment request from Suppliers 10 calendar days prior to scheduled read date.

Meter	Customer	Rescission	Next On-	Enroll
Read	Notice	Period End	Cycle Bill	Date
Cycle	Created		Date	
1	15-Apr	25-Apr	1-May	1-May
14	15-Apr	25-Apr	24-Apr	24-May
18	15-Apr	25-Apr	29-Apr	29-Apr



Reasons for Rejection of an Enrollment



- Main Reasons an Enrollment is rejected:
 - Account is delinquent
 - Inaccurate Account Number
 - Customer is on PIPP
 - Account is Inactive
 - Customer is already pending with a new Supplier for that period
 - Customer usage > 150,000 Ccf/year
- Customers remain with their Supplier until:
 - The Supplier sends a drop request
 - The customer is DNP for delinquency
 - The customer joins the PIPP program
 - Another Supplier enrolls the customer
 - The customer asks CenterPoint Energy Ohio to drop them
 - The customer moves out of their current residence



TRANSACTION PROCESSING

Energy Services Group (ESG)



- CenterPoint Energy Ohio has partnered with ESG to provide transaction management services between CenterPoint Energy Ohio Banner CIS and Suppliers. All Choice file transfers will come through ESG.
- All Choice Suppliers must pass EDI testing with ESG before initiating enrollments.
- ESG will contact Supplier once Supplier meets CenterPoint Energy Ohio participation requirements.
- ESG and Supplier will implement a test plan that tests connectivity and data transmission. This test plan is tailored to the Supplier's billing election (dual or consolidated).
- Testing takes approximately 4 weeks for dual billing and 6 weeks for consolidated.

Batch Processing



- Communication via FTP using PGP encryption
- Suppliers may send files 24 hours a day
- Inbound files are processed by ESG Hourly
- Supplier transactions will be processed by CenterPoint Energy Ohio's Banner CIS once a day as part of the nightly batch process.
- Outbound files are processed by ESG immediately

Transaction Types



- General Account Administration (GAA)
 - Enrollments
 - Changes
 - Drops
 - Reinstatement
- Usage (USG)
 - Monthly (original, cancelled)
 - Historical Usage (on request)
- Invoice (INV)
- CenterPoint Energy Ohio does not send payment files
- All transactions must be sent through ESG using the defined standards.

High Level Customer Drop Process



- It is not necessary for the current Supplier to submit a file to drop a customer before the customer can be served by another Supplier.
- If two Suppliers send a request to enroll a customer in the same processing period, the customer will be assigned to the Supplier whose request was received first.
- Customers may rescind via phone, mail, or through CenterPoint Energy Ohio's Call Center. Only the Customer (not the current Supplier) may rescind an enrollment during the recession period.
- If a customer rescinds their enrollment, a drop notification is sent to the recent Supplier and a reinstatement transaction is sent to the previous Supplier.

Enrollments for New Accounts



- Customers are able to enroll their new, inactive account with a Choice Supplier
- Suppliers must submit the enrollment before the read date + the rescind period.
- If the enrollment is received within that date, the enrollment will be rejected and the customer will be billed on the SCO Rate.
- CenterPoint Energy Ohio will advise the customer of the new account number when the service order is created.
- CenterPoint Energy Ohio will also advise current Choice customers that they may call their Supplier to advise them of the move and the new account number so that any existing contracts can be transferred.



CUSTOMER RATES & BILLING

Bills to Customers



Supplier must select one option for all of its Choice customers:

- CenterPoint Energy Ohio-generated Consolidated bill
- Dual Billing
- This option can be changed annually with 90 days prior written notice. All of the Supplier's existing customers will be migrated to the new billing option.
- On the onset of the program, there is no charge for billing services.
- CenterPoint Energy Ohio will not bill Supplier's penalties or termination fees.
- CenterPoint Energy Ohio does not bill for Suppliers' non-commodity products and services.
- CenterPoint Energy Ohio is not able to include Supplier's logo on its bills.

Consolidated Billing



Sales tax on Supplier charges:

- Supplier charges are subject to sales tax.
- Supplier will provide the taxing county on the enrollment request.
- Supplier will provide any customer tax exemption information on the enrollment request or a subsequent change request.
- Supplier rates submitted to CenterPoint Energy Ohio should be exclusive of sales tax.
- Suppliers will be responsible for remitting sales tax to the relevant state and county authorities (Information needed by Supplier is contained in EDI customer invoice files).
- CenterPoint Energy Ohio does not refund billed taxes. Customer must request the refund from the State.

Consolidated Billing, Cont'd.



- CenterPoint Energy Ohio performs all meter reading, charge calculation, bill preparation and collections responsibilities.
- Supplier may use any rate structure automatically billed by CenterPoint Energy Ohio's standard billing system. Charges may be negotiated for adapting billing system to bill alternate rate structures.
- Supplier's charges are subject to the same billing proration rules as CenterPoint Energy Ohio's sales service which is currently based on days of service and heating degree days.
- Prices for each Supplier rate may only be changed once per month effective with the first day of the month.
- Suppliers are limited to 25 new rates per year, and there is no charge for rate submittals.
- CenterPoint Energy Ohio currently purchases 100% of the receivables

Submittal of Supplier Rates



Timeline:

- Suppliers will notify CenterPoint Energy Ohio of changes to existing rates no later than Noon CST on the 2nd business day prior to the end of the month using CenterPoint Energy Ohio's Rate Request Form. All rate requests should be e-mailed to SupplierRateGroup@CenterPointenergy.com.
- CenterPoint Energy Ohio will send out changes for confirmation by 10 AM CST on the last business day prior to the end of the month.
- Suppliers must confirm the proposed changes no later than Noon CST the last business day of the month in order for the rate to become effective.
- If confirmation is not received by noon the last business day of the month, the current rate will remain in affect and the proposed change will not go into effect until the next business month.
- CenterPoint Energy Ohio will need 30 days notice for new rates. The new rate form must be submitted 30 days in advance. The actual rate to be billed to customers can be updated based on the changes to the existing rate timeline outlined above.
- CenterPoint Energy Ohio is not responsible for any customers being billed the rate submitted on the original new rate form if Supplier does not submit the actual rate change within the timeline outlined above. In such case, the customers' bills will not be corrected.
- *Note If an EDI rate change request is made within 7 days of the last read date, the new rate will take effect as of that read date.

Dual Billing



- CenterPoint Energy Ohio performs all meter reading.
- Meter reading information will be provided to the Supplier to enable them to bill the customer for the supply charges.
- CenterPoint Energy Ohio will bill for its own charges only.
- The CenterPoint Energy Ohio bill indicates the Supplier's name and a statement that Supplier charges will be invoiced separately by their Choice Supplier.

Budget Billing



- Choice customers may participate in budget billing upon program implementation.
- A budget customer who enrolls in Choice will automatically remain on the budget program.
 - No settle up or change in budget amount at Choice enrollment.
 - A non-budget Choice customer may join the budget billing program at any time.
 - The budget bill amount will be adjusted for Customers enrolling in Choice with a Supplier electing Dual Billing.
- Suppliers electing Consolidated Billing will be paid the value of the gas consumed (utility receives budget payment amount).



CUSTOMER DELINQUENCY

Customer Delinquency



- When on Choice, a customer will be disconnected for non-payment of charges contained on its CenterPoint Energy Ohio bill.
- Customers are dropped from Choice for non-payment when the physical disconnection of gas takes place.
 - Customers with past due charges on their CenterPoint Energy Ohio bill will be warned via a bill message that they will be dropped from Choice if they are disconnected for non-payment.
 - If the customer is disconnected, the customer will be dropped from Choice. The customer will be informed by a bill message & the Supplier will be informed by an EDI file.
 - If service is reconnected within 10 days, a reinstatement transaction will be created with the reactivation date.
 - If service is not reconnected within 10 days, an eligibility check will be done. If eligible, they will be enrolled with the SCO Provider for the premise. If not eligible, they will default to DSS Service.

Customer Delinquency, Cont'd.



- Dual Billing Delinquency:
 - CenterPoint Energy Ohio can drop the customer for past due CenterPoint Energy Ohio charges.
 - The Supplier has collection responsibilities for its own charges.
 - The Supplier cannot request CenterPoint Energy Ohio to disconnect the customer.
 - The Supplier can drop the customer from Choice after the Supplier has issued mandated notices to the customer.
- Re-enrollment after Delinquency Drop:
 - When a customer has been dropped from Choice for non-payment, any past due balance with CenterPoint Energy Ohio must be paid before the customer may re-enroll in Choice.
 - A new enrollment is required for the customer to re-enroll in the Choice program, unless the customer reconnects within a 10 day period.



GOVERNMENTAL AGGREGATION

Government Aggregation



- What is Government Aggregation?
 - Ohio's laws allow for communities such as cities and counties to form aggregated buying groups on behalf of their citizens. The governmental aggregator chooses a Supplier for all of the customer-members in its group.
- What Certifications are Required?
 - Supplier and Government Aggregator must be PUCO certified.
 - The Supplier must meet CenterPoint Energy Ohio requirements.
- Which customers are <u>not</u> eligible?
 - PIPP customers,
 - Customers already under contract with a Supplier as part of Choice (unless they terminate their current Supplier agreement), and
 - Customers using > 5,000 Ccf/year (Mercantile customers)

Government Aggregation, Cont'd.



Opt-in Aggregation

 A program that permits each customer to sign up individually to participate in the program. If the local government chooses Opt-in aggregation, it can proceed to develop a plan and start signing up customers.

Opt-out Aggregation

A program that automatically enrolls all local residents, unless they individually opt-out of the program. If a community chooses this form of aggregation, a number of steps are required:

Government Aggregation, Cont'd.



Formation of an Opt-out Aggregation

- A majority of voters must authorize opt-out aggregation in an election.
- If authorized by a majority of the vote, the local government must form a plan of operation and management. They must also hold at least two public hearings to allow customers to voice any concerns over the proposed plan.
- Each customer to be aggregated must be notified that they will be automatically enrolled in the program unless they specifically elect not to participate.

CenterPoint Energy Ohio's Responsibilities



- CenterPoint Energy Ohio will work with approved aggregators to provide a list of eligible customers within the specified boundaries.
 - A minimum of two weeks lead time is required.
- CenterPoint Energy Ohio can support identification of the boundaries through Zip codes (not Zip+4).



GAS MANAGEMENT

CenterPoint Energy Ohio's System Balancing



- CenterPoint Energy Ohio's Columbia Pipeline Group (TCO) Firm Storage Service (FSS) agreement provides most of CenterPoint Energy Ohio's system balancing capability – hourly, daily and monthly.
- SCO/Choice Suppliers collectively balance CenterPoint Energy Ohio's system
 - CenterPoint Energy Ohio does not retain a portion of TCO storage to perform the system balancing function.
 - CenterPoint Energy Ohio mandates release of its TCO storage capacity to these Suppliers. The Suppliers are responsible for filling and emptying the storage account.
 - Choice/SCO holders of CenterPoint Energy Ohio's released TCO storage capacity collectively provide system balancing via an auto-balancing feature on TCO that has been specifically designed for CenterPoint Energy Ohio
- The Suppliers must agree to allow their TCO storage (individually and in aggregate) to be used to balance the CenterPoint Energy Ohio system.
- Suppliers must agree to follow CenterPoint Energy Ohio-established:
 - Min/Max boundaries for daily storage injection/withdrawal
 - Minimum storage inventory balances to ensure sufficient storage inventory injection/withdrawal capability to balance the system each day

CenterPoint Energy Ohio's System Balancing, Cont'd.



- All SCO and Choice Suppliers will be required to enter into a TCO Agency Agreement on a monthly basis giving CenterPoint Energy Ohio the rights to view all of the Suppliers' nominations and storage information on their CenterPoint Energy Ohio released contracts.
 - TCO Agency Agreements will be submitted to TransCanada/Columbia Pipeline Group at navigates@transcanada.com by Suppliers.
 - The expiration date is populated to allow access to the multiple FSS contracts during the entire
 phase in the event there is a prior period adjustment that would need to be updated in
 CenterPoint Energy Ohio's system.
- SCO/Choice Suppliers will receive the cash-outs and premiums charged to Large Transporters/Pool
 Operators on a monthly basis based on their CRP's for providing balancing services.

CenterPoint Energy Ohio's System Balancing Cont'd.



- Suppliers must agree to allow CenterPoint Energy Ohio to shift some TCO storage capacity among the Suppliers at the start of each month due to Customer migrations or intra-month if a large migration occurs. Capacity follows the Customer; storage inventory does not.
 - CenterPoint Energy Ohio reserves the right to adjust PDA's intra-month if a large Choice migrations occur or to resolve any other imbalance issues between SCO and Choice Suppliers.
 - TCO will bill the individual Suppliers that overrun their individual storage limitations.
 - Nominated storage injections, withdrawals and off-system storage withdrawals must be nominated on CenterPoint Energy Ohio's EBB.
- Minimum Storage Levels
 - Suppliers must have at least the minimum storage level designated by CenterPoint Energy Ohio in their storage account at all times.
 - Volumes below the minimum storage level are subject to Storage Non-Compliance Charges.

CenterPoint Energy Ohio System Balancing Cont'd.



- Daily minimum and maximum injection and withdrawal limits will be established for each SCO and Choice Supplier in order to balance the system and adhere to TCO's tariff limits.
- Daily limits can vary depending on HDD. TCO will bill the individual Suppliers that overrun their individual storage limitations.
- Suppliers must have at least the minimum storage level designated by CenterPoint Energy Ohio in their storage account at all times.
- Suppliers must set their PDA's accordingly at the shipper level.

CenterPoint Energy Ohio's TCO Storage Min/Max Injection/Withdrawal



Requirements

							m MMBTL					ual					
		HHDO	HDD6	HDD11	HDD16	HDD21	HD026	HDD31	HDD36	HDD41	HDD46	HDD51	HDD56	HDD61	HDD66	HDD71	HDD76
		HDD6 15,549	HDD10	HDD15	HDD20 21,388	HDD25 34,632	HDD30 50.247	HDD35 48,427	HDD40 54,543	HDD45	HDD50	HDD55	HDD60	HDD65	HDD70	HDD75	HDD80
January February		12,998	20,314 7,866	37,526 22,629	21,388 37,851	36,589	38,736	31,955	45,335	39,674 38,113	34,357 43,550	44,309 31,069	50,801 19,650	43,161	26,793	44,000	
March		15,578	19,116	30,249	42,761	45,586	29,476	32,057	38,485	18,574	29,792	22,710	12,000				
April		33.062	30,550	19,136	39,362	39,966	8,544	25,749	30,403	10,574	23,132	22,710					
May		23,468	24,875	27,124	26,267	42,275	4011	2.001 4.0									
June		10,845	13,414														
July		12,353															
August		13,460	732														
September		13,850	12,466	24,095	16,210												-
October		15,087	33,879	30,749	37,147	38,006	19,040										-
November		6,581	39,943	46,722	47,889	40,869	30,795	34,528	14,070	8,780							-
December		17,659	7,778	37,216	32,269	31,841	42,130	37,511	45,632	24,537	34,676	14,896					-
-									F	OR GAS DA	YS ON AND	AFTER 09/0	1/2014				
	TCO	HHDO	HDD6	HDD11	HDD16	njection T	ADIO HDD26	HDD31	HDD36	HDD41	HDD46	HDD51	HDD56	HD061	HDD66	HDD71	HDD76
Month	Max Inj.	HDD5	HDD10	HDD15	HDD20	HDD25	HDD30	HDD35	HDD40	HDD45	HDD50	HDD55	HDD60	HDD65	HDD70	HDD75	HDD80
January	30,592	15,043	10,278	(6,934)	9,204	(4,040)	(19,655)	(17,835)	(23,951)	(9,082)	(3,765)	(13,717)	(20,209)	-	-	-	-
February	30,592	17,594	22,726	7,963	(7,259)	(5,997)	(8,144)	(1,353)	(14,744)	(7,521)	(12,958)	(477)	10,942	-	-	-	-
March	30,592	15,014	11,476	343	(12,169)	(15,994)	1,116	(1,465)	(7,893)	12,018	800	7,882	-	-	-	-	
April	45,888	see below	15,338	26,752	6,526	5,922	37,244	19,139	45,888	-	-	-	-	-	-	-	
May	61,184	37,716	36,309	34,060	34,917	18,909	-		-	-	-	-	-	-	-	-	-
June	61,184	50,338	47,770	-	-	-	-		-	-	-	-	-	-	-	-	-
July	61,184	48,831	-	-	-	-	-		-	-	-	-	-	-	-	-	-
August	61,184	47,724	60,452	-	-	-	-		-	-	-	-	-	-	-	-	-
September	39,770	25,920	27,304	15,675	23,560	-	-		-	-	-	-	-	-	-	-	-
October	21,414	6,327 6,166	-	750 MTM	100 4 400	- -	(18,048)	704 9041	14 5555	5.00	-	-	-	-	-	-	-
November December	25,493	7,834	(27,196) 17,715	(33,975)	(35,142)	(28,122) (5,348)	(16,637)	(21,781) (12,018)	(1,323) (20,139)	3,967 956	(9,183)	10,597				- 1	
				Apri	l Max Inje	ction Det	ail										
		HDD 0	HDD 1	HDD 2	HDD 3	HDD 4	HDD 5										
April		25000	40000	40000	25000	20000	20000		F	OR GAS DA	YS ON AND	AFTER 09/0	1/2014				
					Max With												
Month	TCO Max W/D	HHDO HDO5	HDD6	HDD11 HDD15	HDD16 HDD20	HDD21 HDD25	HDD26 HDD30	HDD31 HDD35	HDD36	HDD41 HDD45	HDD46 HDD50	HDD51 HDD55	HDD56 HDD60	HDD61 HDD65	HDD66 HDD70	HDD71 HDD75	HDD76
January	200,000	184,451	179,686	162,474	178,612	165,368	149,753	151,573	145,457	160,326	165,643	155,691	149,199	156,839	173,207	156,000	200,000
Early Feb	200,000	187,002	192,134	177,371	162,149	163,411	161,264	168,045	154,664	161,887	156,450	168,931	180,350	190,000	190,000	200,000	200,000
Late Feb	130,000	117,002	122,134	107, 371	92,149	93,411	91,264	98,045	84,664	91,887	86,450	98,931	130,000	130,000	130,000	130,000	-
March	130,000	114,422	110,884	99,751	87,239	83,414	100,524	97,943	91,515	111,425	100,208	107,290	130,000	130,000	130,000		
April	100,000	66,938	69,450	80,854	60,638	60,034	91,356	73,251									
May	100,000	76,532	75,125	72,876	73,733	57,725											
June	100,000	89,154	86,586														
July	100,000	87,647	100,000														
August	100,000	86,540	99,268														
September	100,000	86,150	87,534	75,905	83,790	454.007	400.000										
October	200,000	184,913	166,121	169,251	162,853	161,994	180,960	455.475	405.005	404 000	200 000	000.000					
November December	200,000 200,000	193,419 182,341	160,057 192,222	153,278 162,784	152,111	159,131 168,159	169,205 157,870	165,472 162,489	185,930 154,368	191,220 175,463	200,000 165,324	200,000 185,104	190,000	190,000	190,000	190,000	200,000
									F		YS ON AND	AFTER 04/0	1/2012				
						thdrawal											
Month	TCO Max W/D	HHDO HDO5	HDD6	HDD11 HDD15	HDD16	HDD21 HDD25	HDD26 HDD30	HDD31 HDD35	HDD36	HDD41	HDD46	HDD51	HDD56	HDD61	HDD66	HDD71	HDD76
		MUU5	HDD10		HDD20				HDD40	HDD45	HDD50	HDD55	HDD60	HDD65	HDD70	HDD75	HDD80
November	200,000	-	-	15,000	20,000	20,000	25,000	20,000	20,000								

Minimum Daily TCO Storage Inventory Requirements



ATTACHMENT 17B

Centerpoint Energy Ohio MONTHLY TCO STORAGE REQUIREMENTS

Month	Daily Minimum Required % of SCQ in TCO Storage	Daily Minimum Recommended % of SCQ in TCO Storage	Maximum Required % of SCQ in TCO Storage
April	0.00%	*2.5%	TCO Tariff
May	0.00%	*2.5%	TCO Tariff
June	0.00%	*2.5%	TCO Tariff
July	0.00%	*2.5%	TCO Tariff
August	0.00%	*2.5%	TCO Tariff
September	0.00%	*2.5%	TCO Tariff
October	0.00%	*2.5%	TCO Tariff
November	30%	^30%	TCO Tariff
December	30%	^30%	TCO Tariff
January	30%	^30%	TCO Tariff
February 1 -15	30%	^30%	TCO Tariff
February 16 - 28	0.00%	*2.5%	TCO Tariff
March	0.00%	*2.5%	TCO Tariff

Note: Centerpoint Energy Ohio will require all the released capacity holders of the CEOH TCO

FSS storage service to maintain a minimum balance of 30% of the released

TCO SCQ capacity in inventory until February 15th of each year. This is needed in order for CEOH to be assured that the first TCO storage ratchet is not reached

prior to February 15th each year.

CEOH will not require a minimum balance in inventory from February 16th through the end of October.

CEOH RECOMMENDS a minimum of 2.5% at all times to ensure that a three day historic maximum forecast miss will not result in a negative storage balance and excessive penalties.

Recommended TCO Storage Inventory



Columbia Gas Transn	nission - Recommended Oper	rating Parameters per Co	enterPoint Energy Ohio	
Storage Contract Quantity	7,64	8,483		
Date	Max SCQ %	Min SCQ %	Max Dth	Min Dth
December 15th	100%	75%	7,648,483	5,736,362
January 15th	80%	55%	6,118,786	4,206,666
February 15th	55%	30%	4,206,666	2,294,545
March 15th	30%	10%	2,294,545	764,848

The CenterPoint Energy Ohio recommended TCO Storage Inventory levels are those previously used by CenterPoint Energy Ohio prior to its merchant exit.

Capacity Release



- CenterPoint Energy Ohio's holding of capacity equals approximately 75% of its total SCO/DSS and Choice load.
- CenterPoint Energy Ohio's pipeline firm transportation capacity will be temporarily released on a monthly basis, with recall rights, to SCO and Choice Suppliers on a pro-rata basis (Capacity Release Percentage –CRP).
- CRP's are available to SCO and Choice Suppliers in GTS when Capacity is released, typically by the 20th of each month.
- The volumes and costs associated with the capacity may be provided upon request.
- Transportation capacity follows the Customer.
- Supplier will not be permitted to change any primary points of receipt or delivery associated with assigned pipeline transportation contracts.
- For specific parcels of capacity identified by CenterPoint Energy Ohio, Supplier may not utilize any
 delivery point other than those primary and secondary points identified by CenterPoint Energy Ohio
 unless the capacity is released at the pipeline's full tariff rate or unless an alternate capacity billing
 arrangement is agreed to by Supplier and CenterPoint Energy Ohio.
- CenterPoint Energy Ohio will continue to retain prospectively a combination of interstate pipeline transportation and storage capacity along with alternate peaking supplies to serve approximately 75% of total system requirements (not including Large Transporter loads) for releasing to SCO and Choice Suppliers.

Capacity Release, Cont'd.



- Suppliers must execute capacity release documents in the timeframe specified by CenterPoint Energy Ohio.
- CenterPoint Energy Ohio reserves the right to adjust capacity release quantities intra-month if needed.
- CenterPoint Energy Ohio will release capacity to those Suppliers participating as both an SCO Supplier and a Choice Supplier collectively; however, the Supplier will have a Choice Pool and a separate SCO Pool with its own DDQ, nominations, usage, etc. for billing purposes.
- Capacity contract numbers will change monthly by the pipelines as capacity is recalled and re-released.
 - *Note A new Choice Supplier must have 100 enrollments or enrollments with 10,000 CCF of annual load collectively submitted before the release date in order to be awarded capacity. Once the capacity is awarded, the new Choice Supplier will be responsible for fulfilling the Minimum Storage amount by the first of the month.
 - Suppliers will be notified of the released pipeline contracts, volumes and offer numbers typically by the 20th of each month.
 - Suppliers must accept capacity within 48 hours of the release.
 - CenterPoint Energy Ohio's Tri-Party Capacity Agreement must be fully executed if capacity is not to be released directly to the SCO Supplier.

Capacity Release of Storage



- Suppliers that have an SCO and a Choice pool will receive capacity released jointly for the combined CRP of both pools.
- Capacity follows the customer:
 - Monthly reassignment of capacity to Suppliers based on design peak day market share.
- The TCO storage capacity (FSS & SST) released to Suppliers cannot be re-released.
- The costs of the released storage and related transportation capacity must be paid directly to the pipelines pursuant to pipeline capacity release payment procedures.
- The released capacity is subject to recall at any time if:
 - Supplier does not perform in accordance with the SCO or Choice Supplier Agreements or;
 - Fails to comply with other relevant provisions set forth in CenterPoint Energy Ohio's Tariff
- Storage is recalled and re-released on a monthly basis which changes the contract numbers each month
- Suppliers must transfer their end of the month storage balance to their new contract the beginning of each month

CenterPoint Energy Ohio's Capacity Portfolio effective April 1, 2016



							С	enterpoir	nt Energy	Ohio							
								(Volu	mes in Dth)								
						Apr '16	May '16	Jun '16	Jul '16	Aug '16	Sep '16	Oct '16	Nov '16	Dec '16	Jan '16	Feb '16	Mar '16
						30	31	30	31	31	30	31	30	31	31	28	31
Pipeline	Svc Type	Contract Number	Primary Receipt	Primary Delivery		MDQ	MDQ	MDQ	MDQ	MDQ	MDQ	MDQ	MDQ	MDQ	MDQ	MDQ	MDQ
TCO	SST	99599	33/Stow	Stoi/33		100,000	100,000	100,000	100,000	100,000	100,000	200,000	200,000	200,000	200,000	200,000	200,000
ANR	NNS	126278	742252	1400988		30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000
ANR	NNS	126279	742252	1400988		30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000
Panhandle	EFT	20349		02603/New Paris		1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
TETCO	LLFT	870172	74902	73970		31,225	10,500	10,500	10,500	10,500	10,500	10,500	10,500	31,225	31,225	31,225	31,225
TETCO	LLFT	870173	74902	73970		_	_	_	_	_	_	_	23,580	23,580	23,580	23,580	23,580
TETCO	FT-1	910555	79951	73105		4,200	4,200	4,200	4,200	4,200	4,200	4,200	4,200	4,200	4,200	4,200	4,200
Total City	Gate Delivera	ability				196,425	175,700	175,700	175,700	175,700	175,700	275,700	299,280	320,005	320,005	320,005	320,005
		_	_			Apr '16	May '16	Jun '16	Jul '16	Aug '16	Sep '16	Oct '16	Nov '16	Dec '16	Jan '16	Feb '16	Mar '16
Pipeline	Svc Type	Contract Number	Primary Receipt	Primary Delivery	scq	MDQ	MDQ	MDQ	MDQ	MDQ	MDQ	MDQ	MDQ	MDQ	MDQ	MDQ	MDQ
TCO	FSS (SCQ)	99600	Stoi 33/Stow	Stow Stoi/33	7,648,483	200.000	200.000	200,000	200.000	200.000	200,000	200.000	200,000	200,000	200,000	200.000	200,000

Capacity Portfolio Changes



CenterPoint Energy Ohio has made some changes to its portfolio, and delivery requirements effective April 1, 2016. They are:

- CenterPoint Energy Ohio has entered into Rate Schedule ETS capacity contracts with ANR
 Pipeline for the replacement of its Panhandle capacity.
 - Both contracts are for a ten year term starting April 1, 2016 with a primary delivery point of CenterPoint Energy Ohio GRP-1:
 - Contract #126278 has an MDQ of 30,000 dths per day with a primary receipt point of REX Shelbyville
 - Contract # 126279 has an MDQ of 30,000 dths per day with a primary receipt point of REX Shelbyville
- CenterPoint Energy Ohio has retained 1,000 dths per day EFT Panhandle capacity for delivery to New Paris
- CenterPoint Energy Ohio will no longer hold storage capacity on Panhandle

Allocation of CenterPoint Energy Ohio Purchased Peaking Supplies



- Each Choice/SCO Supplier agrees to retain sufficient firm interstate pipeline transportation and storage capacity with primary delivery points to the CenterPoint Energy Ohio city-gates and/or city-gate firm gas supply arrangements to meet 100% of their monthly design peak day demand.
 - CenterPoint Energy Ohio provides approximately 75% of the capacity peak day needs
- CenterPoint Energy Ohio will allow a physical call for 10 peaking days at the CenterPoint Energy Ohio city-gate to cover an SCO and/or Choice Supplier's firm capacity obligation.
- Plans and proof of comparable firm capacity should be submitted directly to TJ Noland at <u>jerry.noland@CenterPointenergy.com</u> no later than October 31st of each year.
 - Actual proof of capacity may be submitted during the month of October or on a monthly basis. If submitted on a monthly basis, the proof must be submitted by the 25th of the preceding winter month for the months of December, January and February.
- CenterPoint Energy Ohio may verify the Suppliers' compliance with this requirement at any time.

Pipeline Delivery Point Imbalances



- Differences between the actual deliveries through the Delivery Point meters and the nominations to those meters will be managed by CenterPoint Energy Ohio as shown below.
 - Texas Gas Lebanon Point
 - No OBA in place.
 - Imbalance volumes are allocated pro-rata to shippers on a daily basis.
 - Texas Eastern Derby, Red Lion and Gano Road Points
 - OBA in place.
 - Imbalances are managed to minimal levels through TETCO Gas Control adjusting flow.
 - Month-end imbalance carries month to month.
 - Imbalance is not cashed out.

Pipeline Delivery Point Imbalances, Cont'd.

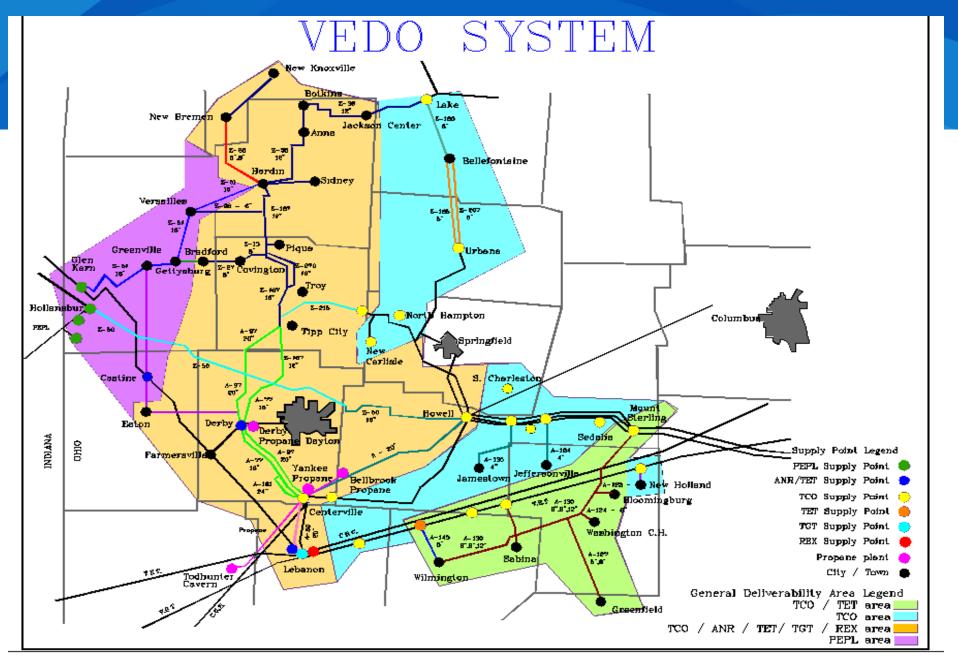


- ANR Derby, Red Lion, & effective April 1, 2016 CenterPoint Energy Ohio GRP-1 140098
 - OBA in place.
 - Imbalances are managed to minimal levels through ANR Gas Control adjusting flow.
 - Month-end imbalance carries month to month.
 - Imbalance is not cashed out.
- Panhandle Rural Point
 - OBA in place.
- Rockies Express Clear Creek
 - POA in place.
 - Imbalances are managed to minimal levels through REX Gas Control adjusting flow.
 - Imbalance < 20,000 Dths carries month to month.
 - Imbalance > 20,000 Dths is cashed out.

Comparable Firm Capacity



- Each SCO Supplier agrees to retain sufficient firm interstate pipeline transportation and storage capacity with primary delivery points to the CenterPoint Energy Ohio city-gates and/or city-gate firm gas supply arrangements to meet 100% of the monthly design peak day demands for its tranches.
 - CenterPoint Energy Ohio provides approximately 75% of the capacity peak day needs.
- CenterPoint Energy Ohio may verify the Suppliers' compliance with this requirement at any time.
- CenterPoint Energy Ohio will allow a physical call for 10 peaking days at the CenterPoint Energy Ohio city-gate to cover an SCO and/or Choice Supplier's firm capacity obligation.
- Choice and SCO Suppliers must provide capacity supply plans in October to demonstrate their supply plans for the upcoming season.
- Actual proof of capacity may be submitted at that time or on a monthly basis. If submitted on a monthly basis, the
 proof must be submitted by the 25th of the preceding winter month for the months of December, January and
 February.
- Plans and proof of comparable firm capacity should be submitted directly to TJ Noland at jerry.noland@CenterPointenergy.com



Note: Does not include the ANR Mikesell or GRP -1 interconnects

City-gate Delivery Requirements



- The allowable minimum and maximum delivery percentages are recalculated and communicated to Suppliers periodically.
 - Typically a four month minimum notification will be provided on changes to the city-gate allocation tables.
- Required minimum/maximum delivery requirements vary by Heating Degree Day.
- Deliveries to a grouped city-gate delivery point in CenterPoint Energy Ohio's city-gate allocation table allow delivery by various pipelines.
- A City-Gate Allocation Non-Compliance Charge will be assessed on the quantity difference if the SCO Supplier's confirmed daily pipeline nomination is less than the minimum or greater than the maximum city-gate allocation requirements.
- Due to the changes to CenterPoint Energy Ohio's portfolio, city-gate delivery requirements have also changed:
 - No deliveries will be accepted at Panhandle Glen Karn or Hollansburg as of April 1, 2016.
 - Panhandle Rural deliveries are still required
 - Deliveries will be required at ANR CenterPoint Energy Ohio GRP-1 1400988 April 1, 2016.
- CenterPoint Energy Ohio's city-gate allocation delivery requirement table can be found on Vectren.com.

City-Gate Information



	Centerpoint En	ergy Ohio's Non LGT Pipe	line & City-Gates
Pipeline	Pipeline Meter Point	Pipeline City-Gate Name	CEOH City-Gate Delivery Groupings
ANR	295956	Lebanon/Derby	Derby Hub
TETCO	73970	Farmersville-Derby Delivery	Derby Hub
TETCO	73105	Clinton, OH (Gano Rd)	Gano Rd
PEPI	2603	New Paris	New Paris
ANR	108796	Lebanon/Red Lion	Lebanon Hub
тетсо	72909	Red Lion, OH(Lebanon- Lateral)-72909	Lebanon Hub
тст	Zone 4-1720	Lebanon-Dayton-Zone 4	Lebanon Hub
Rex	44472	Clear Creek (Lebanon Lateral)	Lebanon Hub
ANR	VEDO GRP-1	Loc ID: 1400988	VEDO GRP-1
Columbia	33-3	Dayton-3	33-3
Columbia	33-6	Dayton-6	33-6
ANR	Mikesell	Loc ID: 1401911	Mikesell

Operational Flow Orders (OFO's)



CenterPoint Energy Ohio may issue an OFO, in its reasonable discretion upon determination that an action is required in order to:

- Alleviate conditions which threaten the integrity or reliability of Company's gas system.
- To maintain the system in balance
- To maintain adequate storage levels
- To assure deliveries of gas supplies by Suppliers to the customers
- Protect the reliability of Company's gas system
- Assure deliveries of gas supplies by Suppliers to the customers
- Adhere to the various interstate pipeline companies' balancing requirements, as stated in their FERC approved gas tariffs under which Company is served
- Direct Suppliers to different city-gates or institute different city-gate delivery allocations due to system maintenance or system constraints
- Any other condition warranting a change to delivery requirements

Operational Flow Orders (OFO's), Cont'd.



- An OFO may be issued to all Suppliers delivering gas to CenterPoint Energy Ohio's city-gates, individual transport programs, or an individual Supplier when necessary in Company's sole judgment.
 - Violations of OFO requirements will be subject to a \$35.00 charge per Dth for any volumes over or under the specified restriction.
 - An e-mail notification of OFO's or critical periods will be posted to GTS and received by all registered Suppliers.



Operational Flow Orders Guidelines

CenterPoint Energy Ohio will issue an OFO in the following situations:

- Columbia Pipeline Group (i.e. TCO) issues a Transport Critical Day or OFO, and the TCO Storage inventory levels are above 30%.
- TCO issues a Storage Critical Day or OFO regardless of the collective storage inventory level.
 - Off-system withdrawals are forbidden by CenterPoint Energy Ohio when TCO issues a Storage Critical Day, and any other time as deemed necessary by CenterPoint Energy Ohio.
- Certain circumstances may result in exceptions to CenterPoint Energy Ohio's practice of issuing OFO's. Such exceptions will be communicated to internal stakeholders as part of the normal OFO process.
- Off-System storage withdrawals are not allowed during a Cold OFO



CHOICE SUPPLIER RECONCILIATION BILLING

Choice Supplier Billing



Supplier Charges

- Choice Supplier Monthly Statements (bills) will be rendered each month by the 25th day of the month, for the prior month's activity.
- CenterPoint Energy Ohio will pay the Choice Suppliers for the dollars billed to their Choice customers for the revenue month.
- Payment to Supplier from CenterPoint Energy Ohio typically is made within three days of issuance of the monthly invoice statement via wire.
- Payment from Supplier to CenterPoint Energy Ohio is due within five days of receipt of the electronic monthly invoice statement.

Choice Supplier Billing, Cont'd.



Receivables

- CenterPoint Energy Ohio will purchase 100% of the Choice Supplier receivables without discount so long as CenterPoint Energy Ohio has continuing authority pursuant to Commission Entry to seek recovery for unpaid customer receivables.
- Customer Billed Supply Charges and Customer Billed Supply Tax Charges (i.e. Receivables) are credited to the Supplier's bill monthly.
 - The dollars reflect the dollars billed to customers the previous revenue month.
 - CenterPoint Energy Ohio bills on a 21 cycle basis. Receivables for April will be paid in May.

Choice Supplier Billing, Cont'd.



Bill Detail Report

- Sent via e-mail and reflects the charges billed to their customers for the preceding revenue month (i.e. breakdown of receivables by customer).
 - Suppliers will need Excel 2007 in order to receive this file. The file will consist of the following information:
 - Customer's account number
 - Rate (Supplier's rate code)
 - Charge
 - Tax Rate
 - County Code
 - Tax Charge
 - Ccf Amount
- Please note that the usage associated to the receivables is based on a revenue month, and the usage used in the monthly reconciliation of deliveries is calendarized usage.

Choice Supplier Billing, Cont'd



Choice Supplier Monthly Charges include the following:

- Choice Eligible Customer Account List Fee
 - Annual Option \$.08 charge for each account included on the initial list, with updated lists provided the three subsequent quarters at no additional cost.
 - Quarterly Option \$.05 charge for each account included on the list. Such lists shall be available quarterly.
 - Nomination Error Charge A \$0.50 per Dth charge based upon the quantity difference between the Choice Supplier's daily pipeline nomination and the pipeline daily confirmed volume delivered to CenterPoint Energy Ohio, for each day of difference.
 - This fee is not charged if the difference is due to pipeline allocations or cut volumes.
- DDQ Non-Compliance Charge A \$15.00 charge per Dth fee for the daily difference between the Supplier's DDQ and the aggregate deliveries which includes scheduled storage withdrawals.
 - This fee is not charged if the difference is due to pipeline allocations.
- City-Gate Allocation Non-Compliance Charge A \$5.00 charge per Dth for any daily city-gate scheduled nomination less than the minimum or greater than the maximum city-gate allocation requirement stated on the DDQ.
 - This fee will not be charged if CenterPoint Energy Ohio cuts scheduled deliveries greater than the maximum allowed at the city-gate.
- OFO Non-Compliance Charge A \$35.00 per Dth charge for any volumes over or under the specified restriction.

Choice Supplier Billing, Cont'd.



- Non-Compliance charges will apply as normal to volumes outside of the daily delivery, city-gate, and storage requirements that are not affected by the Operational Flow Order.
- Storage Non-Compliance Charge
 - A \$35.00 per Dth charge for each occurrence during the term of the contract.
 - Supplier is considered in default upon the fifth occurrence.
 - Charges apply to any volumes greater than the CenterPoint Energy Ohio-established maximums or less than the CenterPoint Energy Ohio-established minimums for the daily injection and/or withdrawal requirements.
 - Charges will apply daily for any volumes less than the daily minimum storage inventory requirements.
- In the event that TCO allows daily over-injection or over-withdrawal rights, Company shall not impose the Storage Non-Compliance Charge on any volumes injected or withdrawn less than the minimum or greater than the maximum daily injection limits set by Company. However, over-injection and over-withdrawal rights do not preclude the TCO Storage Holders from maintaining their daily storage levels within the minimum limitations set by the Company.

Choice Supplier Billing, Cont'd.



- Related Charges Supplier shall reimburse CenterPoint Energy Ohio for all charges CenterPoint
 Energy Ohio incurs in connection with interstate pipeline transportation of Choice Supplier-Delivered
 Gas including any gas costs, penalty charges, or cash-outs.
- System Balancing Charge Because the Suppliers' TCO storage accounts are used to balance the system including the Large Transporters, the imbalance gas costs and premiums payable by/to the Transporters will be allocated among the Suppliers based on their portion of TCO storage (monthly CRP) in addition to other non-compliance charges.
- Monthly Reconciliation Charge The price utilized will be the IFERC Gas Market Report First-of-themonth price for Columbia Gas Transmission Corp, Appalachia with retention and firm commodity rate included.
- Alternate Peaking Supplies Charge The cost of alternate supplies provided by Company for SCO/Choice Supplier as set out in the Allocation of Alternate Supplies section of the SCO Supplier Service Terms and Conditions.
- The actual costs of the alternate supply provided by Company hereunder shall be allocated to Choice and SCO Suppliers.
- POLR Charge Any charges associated with providing provider of last resort services due to the default of Supplier.

Reconciliation



- SCO and Choice Suppliers' deliveries will be reconciled to their supply requirements and cashed-out on a monthly basis.
- On a monthly basis, Company will compare each Supplier's Deliveries to the Supplier's Pool and Allocated Requirements to determine the Supplier's Monthly Reconciliation Volumes.
 - The Supplier's Deliveries will be the sum of the Supplier's confirmed deliveries to the citygate, its no-notice storage activity, and its allocated share of alternate peaking supply.
 - The Supplier's Pool Requirements will be determined by adjusting the Supplier's Pool's actual billed usage for annual Standard Btu Value and the UAFG % identified in CenterPoint Energy Ohio's Tariff.
- The Supplier's Allocated Requirements will include the Supplier's portion of Large Transporter Imbalance volumes (sum of their deliveries minus CenterPoint Energy Ohio tariff unaccounted for gas percentage minus usage converted to Dth using CenterPoint Energy Ohio's monthly average BTU), CenterPoint Energy Ohio Line Pack changes, and CenterPoint Energy Ohio Operational Balancing Agreement (OBA) volume changes.
- The reconciliation cash-out price for each month will be the IFERC Gas Market Report First-ofthe-month price for Columbia Gas Transmission Corp, Appalachia plus applicable variable costs including fuel retention and pipeline variable charges.

Reconciliation, Cont'd.



- The sum of the monthly reconciliation cash-out amounts, plus any applicable taxes, will be the monthly cash-out credit or charge.
 - The monthly cash-out charge or credit will be recovered/passed back in the Exit Transition Cost (ETC) Rider charged to the customers.
- Such reconciliations will be performed the second month following the end of the last month of flow in each SCO Phase in order to have sufficient time to obtain all billed usage for the applicable period and prior usage adjustments.
- Monthly Volume Reconciliation statements remain subject to revision based on any corrections to underlying data and any issues identified in the annual ETC Audits.

Reconciliation Calculation Example



15	Reconciliation Amount (lines 13*-14)
14	Commodity)
	Columbia Appalachia plus TCO fuel and
	Reconciliation Price (first of the month
13	Reconciliation Volumes (line 4-12)
12	Total Requirements (lines 8-9-10-11)
11	Allocated Line Pack Change
10	Allocated Pipeline OBA Change
9	minus shrink minus usage)
	Allocated LGT Imbalance (Deliveries
8	Pool Requirements (line 7/-UAFG%)
7	Pool Usage (Dth) (lines 5*6)
6	Standard BTU
5	Pool Usage (MCF)
4	Total Supplied (lines 1+2+3)
3	Auto Balancing Activity
2	Allocated Peaking Supply
1	Confirmed Deliveries

Pool usage shall be the Pool's billed usage using the monthly Energy Conversion Factor.

Reconciliation Timeline Example



- Supplier bill issued in May
 - Non-Compliance charges for Supplier's April deliveries
 - Billed receivables April usage billed in April
- Supplier bill issued in June
 - Non-Compliance Charges for Supplier's May deliveries
 - Billed receivables April and May usage billed in May
 - Reconciliation volumes for April
 - Allocation of credits/charges for non-compliance charges from all SCO/Choice Suppliers, and cash-outs and premiums from Large Transporters for April activity.

Reconciliation Timeline Example, Cont'd.



Annual Phase - April 1 thru March 31			
Month customer receivables billed	Gas Flow	Bill Month (by the 25th)	Reconciliation Month
January	January	February	December reconciliation Allocation of cash-outs, premiums, and non- compliance penalties charged in December
February	February	March	January reconciliation Allocation of cash-outs, premiums, and non- compliance penalties charged in January
March	March	April	February reconciliation Allocation of cash-outs, premiums, and non- compliance penalties charged in February
Remaining March bills that bill in April		May	March reconciliation Allocation of cash-outs, premiums, and non- compliance penalties charged in March
Start of Annual Phase			
April	April	May	

Note: Allocation of cash-outs, premiums, and non-compliance penalties includes those billed to SCO Suppliers, Choice Suppliers and Large Transporters

Provider of Last Resort (POLR)



- In the SCO Phase, the POLR responsibility will include temporarily providing supply to cover SCO tranche loads in the event of an SCO Supplier default. The SCO Supplier Agreement and relevant tariff sheets will hold the defaulting SCO Supplier financially responsible.
- Defaulting Suppliers will be required to reimburse for any incremental POLR costs incurred.
- CenterPoint Energy Ohio, SCO Suppliers, Choice Suppliers, and Large Transporters/ Pool Operators would all be involved.
- CenterPoint Energy Ohio will act as POLR Coordinator, identifying the need for POLR supply and notifying the non-defaulting SCO and Choice Suppliers.

POLR, Cont'd.



In the event of Supplier default, CenterPoint Energy Ohio will take the following short-term action with regard to obtaining POLR supply:

- SCO/Choice Suppliers collectively will provide supply to meet POLR needs, using their individual TCO storage inventories. The withdrawn storage inventory will be subsequently replaced with the cost assessed to the defaulting Supplier.
- If CenterPoint Energy Ohio determines that the daily quantity of gas needed due to Supplier default(s) may affect the reliability of the system, an OFO will be issued, to ensure that Large Transporters/Pool Operators are delivering enough supply for their Transport Customer load during the POLR period.
- Next, as soon as possible, all transportation and storage capacity released to the defaulting Supplier will be recalled by CenterPoint Energy Ohio who will use it to meet some portion of the immediate needs of the defaulting Supplier's customers. CenterPoint Energy Ohio will claim the defaulting Supplier's storage inventory, as needed, to meet the defaulting Supplier's customer loads.
- CenterPoint Energy Ohio will fill any remaining shortfall through acquiring additional temporary capacity and supply or city-gate delivered gas.
- CenterPoint Energy Ohio will coordinate the provision of POLR service for the remainder of the billing month in which the default occurs, and the subsequent month, or until an alternate solution is effectuated.

POLR, Cont'd.



- In the event of Supplier removal, CenterPoint Energy Ohio will take the following action with regard to an alternate solution:
 - If a Choice Supplier defaults, per the Choice Tariff, CenterPoint Energy Ohio will offer non-defaulting
 Choice Suppliers the option of assuming the customers of the defaulting Supplier. If there are no takers, the
 customers will revert to SCO service.
 - If an SCO Supplier defaults or Choice Suppliers do not assume the customers of a removed Choice Supplier:
 - a) The remaining SCO Suppliers loads will be increased to cover the defaulted load on a pro rata basis. Such incremental load will be limited to 50% of initial Tranches awarded.
 - b) For the portion of increased load quantity greater than 50% of initial Load Tranches awarded to remaining SCO Suppliers, Company shall solicit non-defaulting SCO Suppliers to serve the defaulted load through the end of the current SCO Phase at the SCO price established in the auction governing the current SCO Phase.
 - c) If assignment to SCO Suppliers under part (a) and voluntary solicitation under part (b) does not accommodate assignments of the entire load of the removed SCO Supplier, Company shall solicit non-defaulting Choice Suppliers to serve the defaulted load through the end of the current SCO Phase unless Customer enters into a contract with a Choice Supplier.
 - d) If after taking the above actions unserved SCO load remains, the remaining unserved load will be assigned to a new SCO Supplier based on an accelerated auction process.
 - e) The removed SCO Supplier will be responsible for all costs associated with (a) through (d) as described herein.

Directed Delivery Quantity (DDQ)

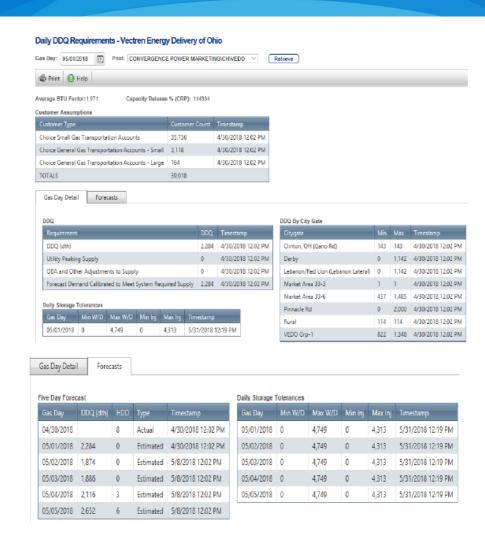


- DDQ's will typically be posted no later than 9:00 a.m. Central Clock Time (CCT) for the gas day beginning 9:00 a.m. CCT the following day.
- The DDQ's will be the sum of:
 - The Expected Demand of the Suppliers' tranches or customer load for that gas day, plus;
 - System UAFG quantities based on CenterPoint Energy Ohio's UAFG Percentage, plus;
 - Any necessary adjustments for interstate pipeline and/or CenterPoint Energy Ohio operating constraints.
- CenterPoint Energy Ohio will post the Suppliers' Expected Demands for the subsequent four days as well as the Heating Degree Days (HDD's) used to calculate the Expected Demands.
 - Expected Demands are subject to change, and may or may not result as the actual DDQ for that date
- At the time of posting the DDQ, CenterPoint Energy Ohio will indicate:
 - The minimum and maximum (or exact) Dth quantity required to be delivered by Supplier to each CenterPoint Energy Ohio city gate to achieve the DDQ
 - The minimum and maximum TCO storage injection and withdrawal quantities

Viewing DDQ's



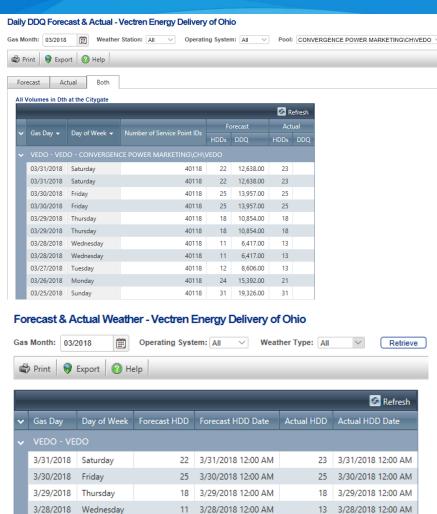
- View the total Directed Delivery Quantity (DDQ) and the DDQ by City Gate.
- –Enter Gas Day
- –Enter Pool
- Click Retrieve
- Choice/SCO Suppliers will deliver according to their pipeline/city gate minimum and maximum volumes and total volume specified on their pool's DDQ.
- Ohio DDQ's will display the pool's Capacity Release Percentage (CRP) and the Average BTU factor.
- Click on the Forecast Tab to view the "Five Day Forecast" and the "Daily Storage Tolerances" (Ohio Only).
- –Min/Max Storage Withdrawals and Storage Injections volumes
- All Choice/SCO Suppliers must nominate TRANSPORTATION nominations to the pipeline/city-gate combinations within their min and max delivery requirement totaling to their DDQ:



Heating degree days (hdd)



- Forecasted and Actual HDD and DDQ information by Gas Day.
- –View Forecast, Actual, or Both
- Go to Forecasting & Actuals>Daily DDQ Forecast & Actual
- Enter Gas Month
- –Enter Pool
- Click Retrieve
- HDD information can also be found on the Forecast & Actual Weather page.
- Go to Forecasting & Actuals >Forecast & Actual Weather
- –Enter Gas Month
- Click Retrieve



Nomination Status and Timelines



Nomination Cycles Effective April 1, 2016		
	Time Shifts All times CCT	Nomination
		Deadline
Timely	Timely (Day-Ahead) Nomination Deadline	1:00 PM
Timely 2	Evening (Day-Ahead) Nomination Deadline	6:00 PM
Intraday 1	ID1 (Current Day) Nomination Deadline	10:00 AM
Intraday 2	ID2 (Current Day) Nomination Deadline	2:30 PM
Intraday 3	ID3 (Current Day) Nomination Deadline	7:00 PM
	No-Notice (Previous Day) Nomination	
TCO No-Notice	Deadline	12:00 PM CST

- All noms EXCEPT Storage Withdrawal and Storage Injection, can be edited until the end of the Intraday3 status.
- Storage Injection and Storage Withdrawals can be entered/edited until the end of the TCO No-Notice status.

Nomination & Balancing Provisions



- Nominations must be submitted daily by 1:00 p.m. CST, one day prior to gas flow via GTS.
 - Large General Transportation nominations are due on Friday for Saturday, Sunday and Monday's flows, and on the last business day prior to Company observed holidays.
 - Company may accept nominations submitted after the deadlines within its reasonable discretion.
 - All Suppliers should be utilizing the variance reports on GTS to ensure all deliveries are within Company's city-gate requirements.
 - Gas Transportation Operations will typically notify Suppliers of variances as a courtesy; however, notification is not guaranteed and all city-gate non-compliant deliveries are subject to penalty.
 - Company will not waive city-gate non-compliance charges due to the lack of due diligence by the Supplier in identifying and addressing nomination and city-gate variances.
 - Gas Transportation Operations will typically notify Suppliers of scheduling errors as a courtesy; however, notification is not guaranteed. It is the Supplier's responsibility to ensure the correct volumes are scheduled correctly, and in a timely manner. This includes any third-party deliveries to your pool(s).

Pipeline/GTS Nom Variances



- Company's confirmation process:
 - By 3:30 p.m. CT Suppliers may view their confirmed timely nominations via GTS delivery reports.
 - Scheduled volumes will be updated to match the pipe if a discrepancy between GTS and the pipe occurs.
 - Once all nominations are confirmed, GTS will send automated emails to advise of any known discrepancies at that time.
 - To correct nominations submitted on GTS, Supplier must edit the nominated volume to match what is on the pipe, if correct, or advise GT Operations that the nominated volume is correct.
 - A nomination error charge of \$0.50 per Dth will be assessed on the delivery difference between the nomination made to Company and the pipeline nomination.

Intraday Nominations / Retro Nominations



- Intraday changes are acceptable for rescheduling due to pipeline cuts. Intraday
 nomination changes on the day of flow are subject to Company's approval, and for
 just cause. Suppliers are advised to keep intraday changes to a minimum.
- Retro Nominations are subject to Company's approval. Suppliers must submit a
 Retro Nomination in GTS and are required to enter an adequate note explaining
 why the Retro Request is being made. Lack of sufficient details will result in denial
 of the Retro Request.

Nomination Types



- TRANSPORTATION
 - Requires selection of a pipeline
 - Requires selection of a city-gate
 - Nomination status will default based on the time submitted
 - Contract number is required
- STORAGE INJECTION AND STORAGE WITHDRAWAL
 - Requires selection of Columbia pipeline.
 - Requires selection of city-gate
 - Columbia restricted to Market Area 33-6
 - Contract Number is required.
 - No-Notice Nominations can only be made for Columbia Storage Injections and Withdrawals.
 - No-Notice nominations may be made to Supplier's scheduled storage withdrawal nominations by CenterPoint Energy Ohio via TCO's EBB by noon for the prior day's flow if such SCO/Choice Supplier has not delivered adequate supplies to meet its DDQ or has not met its TCO minimum city-gate allocation delivery volume. These no-notice nominations are necessary to lessen the impact to other SCO and Choice Suppliers' system imbalance allocations.

Nomination Types, Cont'd.

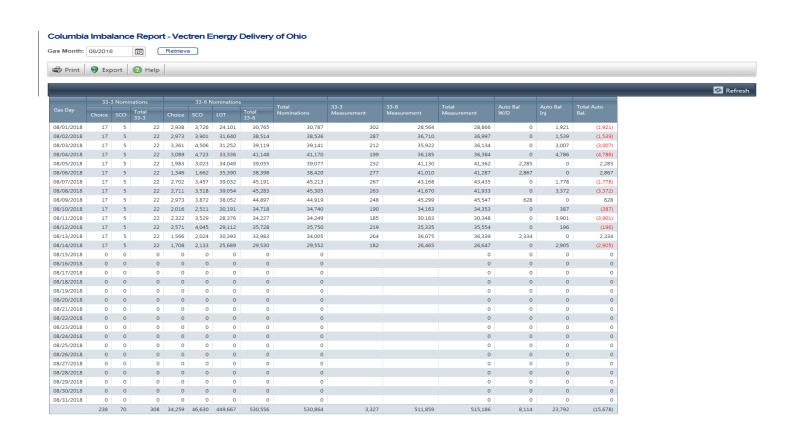


- OFF-SYSTEM STORAGE WITHDRAWAL
 - Does not require a city-gate or contract number.
 - No-Notice nominations cannot be made on Off-System Storage Withdrawals.
 - All off-system storage withdrawals must be nominated to CenterPoint Energy Ohio via the Marketer Extranet.
 - Must be entered into GTS
 - Lack of entry will result in a Nomination Error Charge on the off-system withdrawal volume
 - Off-System storage withdrawal volumes entered in GTS should be the TCO storage volume minus TCO's withdrawal loss.

Columbia imbalance Report



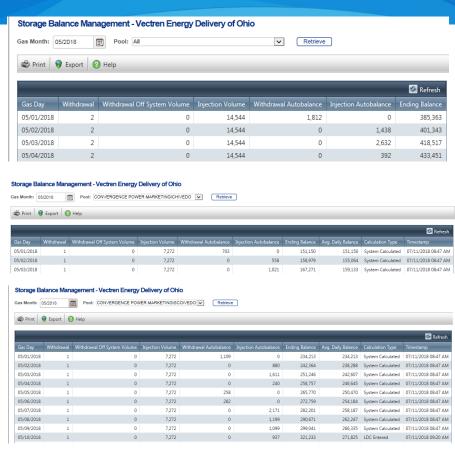
The Columbia Imbalance Report details out on a daily basis what the no-notice storage activity is



Storage Balance Management



- Each day you can view:
 - Injections
 - Withdrawals
 - Off-System Storage Withdrawals
 - Withdrawal Autobalance
 - Injection Autobalance
 - Ending Balance
- Totals are displayed at the bottom
- Report has Download to Excel capability

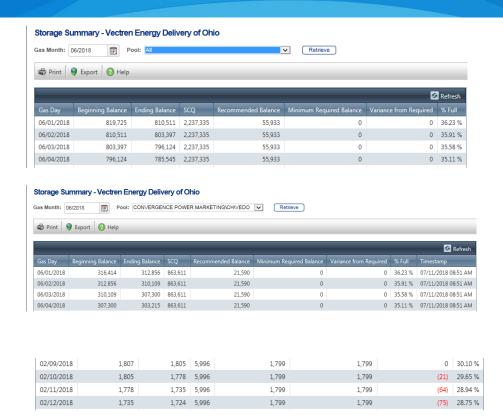


Storage Summary



-Each day you can view:

- Beginning Balance
- Ending Balance
- SCQ
- Recommended Balance
- Minimum Required Balance
- Variance from Required
- % Full



Events



The Events screen allows you to search for:

- Cold OFO's
- Cold OFO's with Storage Restrictions
- Warm OFO's
- Warm OFO's with Storage Restrictions
- Curtailments



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