

**STATE OF INDIANA**

**INDIANA UTILITY REGULATORY COMMISSION**

**VERIFIED JOINT PETITION OF DUKE ENERGY INDIANA, )  
LLC, INDIANA GAS COMPANY D/B/A VECTREN ENERGY )  
DELIVERY OF INDIANA, INC., INDIANA MICHIGAN POWER )  
COMPANY, INDIANA NATURAL GAS CORPORATION, )  
INDIANAPOLIS POWER & LIGHT COMPANY, MIDWEST )  
NATURAL GAS CORPORATION, NORTHERN INDIANA )  
PUBLIC SERVICE COMPANY, LLC, OHIO VALLEY GAS )  
CORP. AND OHIO VALLEY GAS, INC., SOUTHERN INDIANA )  
GAS & ELECTRIC COMPANY D/B/A VECTREN ENERGY )  
DELIVERY OF INDIANA, INC., AND SYCAMORE GAS ) **CAUSE NO. 45377**  
COMPANY FOR (1) AUTHORITY FOR ALL JOINT ) **(Consolidated under**  
PETITIONERS TO DEFER AS A REGULATORY ASSET ) **Cause No. 45380)**  
CERTAIN INCREMENTAL EXPENSE INCREASES AND )  
REVENUE REDUCTIONS OF THE UTILITY ATTRIBUTABLE )  
TO COVID-19; AND (2) THE ESTABLISHMENT OF )  
SUBDOCKETS FOR EACH JOINT PETITIONER IN WHICH )  
EACH JOINT PETITIONER MAY ADDRESS REPAYMENT )  
PROGRAMS FOR PAST DUE CUSTOMER ACCOUNTS, )  
APPROVAL OF NEW BAD DEBT TRACKERS, AND/OR )  
DETAILS CONCERNING THE FUTURE RECOVERY OF THE )  
COVID-19 REGULATORY ASSET )**

**PETITION OF INDIANA OFFICE OF UTILITY CONSUMER )  
COUNSELOR FOR GENERIC INVESTIGATION INTO COVID- )  
19 IMPACTS TO BE CONDUCTED OVER TWO PHASES; )  
EMERGENCY RELIEF PURSUANT TO IND. CODE § 8-1-2-113 ) **CAUSE NO. 45380**  
TO RELIEVE INDIANA RATEPAYERS OF THE THREAT OF )  
UTILITY SERVICE DISCONNECTION AND PAYMENT )  
ARREARAGES DURING GLOBAL HEALTH AND ECONOMIC )  
CRISIS )**

**SUBMISSION OF RESPONSES TO COMMISSION QUESTIONS TO MIDWEST**  
**NATURAL GAS CORPORATION**

In accordance with the Commission’s May 27, 2020 Order in this matter, and the questions posed in such Order to the Joint Utility Petitioners, Midwest Natural Gas Corporation (the “Company”) respectfully submits the following responses.

1. A description of any federal or state legislation as well as any government, government-funded, or community programs that are intended to assist utility customers in the payment of utility bills. Include the classes of customers affected and an analysis of any impact on utility bill payments.
  - A. The Company is unaware of any specific federal or state legislation intended to assist utility customers specifically with utility bills. The Company believes that certain parts of the federal legislation known as the CARES Act may provide funds which ultimately are available for both rent of housing and utility payments. The Company also believes that such legislation provides funds available to the various commercial enterprises which could assist those commercial customers in the payment of utility bills. Because of the extraordinary circumstances created by COVID-19 and the resulting economic downturn, the Company consulted outside accountants and counsel to gain advice on federal legislation, such as the CARES Act.

With respect to community programs, the Company believes that community action programs within the service area of the Company are available to provide assistance with utility bills for low income customers. The Company has reached out to such CAP entities in order discuss their eligibility criteria in place during the COVID-19 pandemic, and has in turn referred customers to such local CAP agencies indicating to the Company's customer that the CAP agency may be able to help with a variety of needs for low income customers.

2. A description of any federal legislation and government, government-funded, or community programs that are designed to assist utilities in their ongoing operations and obligations under the current COVID-19 pandemic.
  - A. Beyond the Paycheck Protection Program, the Company is unaware of any federal legislation; or government or community program funds; that are designed specifically to assist utilities in the utility's ongoing operations and obligations under the current COVID-19 pandemic.
3. Actual and/or potential cost savings associated with impacts due to COVID-19.
  - A. Because of the need to maintain essential utility services, and in recognition that the Company has incurred various unexpected costs associated with advice from consultants, personal protective equipment, changes in its office and transportation in order to maintain social distancing, the Company has incurred costs, but has not determined the existence of any actual or potential cost savings associated with the impacts of COVID-19 on its ongoing operations and obligations.
4. Actual and/or potential external sources of revenue that may provide reimbursement for COVID-19-related expenses.
  - A. The Company is unaware of any current actual or potential sources of revenue that may provide reimbursement for COVID-19 related expenses.

5. Beginning with March 6, 2020, the date of the Governor's Executive Order 20-02 declaring a public health emergency, accrued through June 30, 2020, provide a detailed list of all COVID-19 related expenses and revenues that each utility has incurred on or before July 15, 2020.
- A. The Company is pulling information together to respond to this question. The Company recognizes that it has recovered no revenues related to COVID-19, but has incurred various expenses related to COVID-19 which include the following:
- Krieg DeVault, legal advice on CARES Act.
  - Office sanitation supplies
  - Lobby sanitation supplies
  - Masks
  - Shoe covers
  - Gloves
  - Safety glasses
  - Barnes & Thornburg counsel on COVID-19 issues related to Cause No. 45377, Cause No. 45380, and various Executive Orders issued by the Indiana Governor's Office.

Due to the small size of its staff, and the need to deal with ongoing customer issues related to COVID-19, the Company has not totaled these costs. However, the Company does not anticipate seeking recovery of these costs during Phase 2 of this proceeding.

Respectfully submitted,



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## **CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing was served this 15<sup>th</sup> day of July, 2020, via email transmission to:

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A handwritten signature in black ink, appearing to be 'L. Parvin Price', written in a cursive style.

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