

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Adoption of a Portfolio)	
Plan Template for Electric Utility Energy)	Case No. 09-714-EL-UNC
Efficiency and Peak Demand Reduction)	
Programs)	

COMMENTS OF DUKE ENERGY OHIO, INC.

1. General Comments

On April 23, 2008, the Ohio legislature adopted Amended Substitute Senate Bill No. 221 (SB 221), which became effective on July 31, 2008. Among the provisions of SB 221 was the requirement in Section 4928.66, Revised Code, for the Public Utilities Commission of Ohio (Commission) to take certain actions related to the implementation of energy efficiency and peak-demand reduction programs by the electric utilities. In furtherance of that policy, the Commission will now require each electric utility to create and file an energy efficiency and peak demand reduction program portfolio. In its August 28, 2009 Entry the Commission issued a draft portfolio plan template for stakeholder comment. Duke Energy Ohio submits these brief Reply Comments in Response to those filed by the Ohio Consumer and Environmental Advocates (OCEA).

Section 3, "Program Descriptions"

With respect to the OCEA's comments relevant to Section 2 of the proposed Portfolio Plan Template, Duke Energy Ohio again notes that the

segmentation proposed, using arbitrary customer classifications, does not follow standard methods by which programs are designed, implemented and promoted across the United States. Because of this, the OCEA's suggestion to add yet another arbitrary category to these classifications is not helpful and simply compounds the problem. In order to avoid unnecessary costs and complicating factors, the Company proposes the Commission allow Companies the flexibility to provide reports based upon a segmentation most applicable to its view of the energy efficiency market.

Section 5, "Portfolio Management and Implementation Strategies"

OCEA requested in its comments that the Commission require utilities to quantify the cost of administrative budgets as a percentage of a total program cost for each program, and as a percentage of incentive cost. If the OCEA believes these calculations are important, it can perform these calculations on its own with the information provided by Duke Energy Ohio as a matter of course. This requirement would mandate additional administrative cost and not provide any useful data. The information does not render any useful information and merely adds to the regulatory burden. Duke Energy Ohio respectfully submits that there is nothing to be gained by a requirement to provide this additional information.

Section 7, "Cost Recovery Mechanism"

The OCEA members requested an addition to the section in the template that addresses the utilities' cost recovery mechanisms. Specifically, the OCEA asked that the utilities provide information concerning the receipt and use of

stimulus money, grants, donations, bartering or other types of miscellaneous funding used for the programs.

This request by the OCEA would layer on additional administrative burden and yield no useful information. At present, there are no stimulus funds available to utilities for energy efficiency. Such funds are being administered by state governments. Typically, there are no grants, donations or bartering funds available either. Adding in this requirement would create detail that is burdensome and of no value.

Conclusion

Duke Energy Ohio is proud of its tradition of delivering energy efficiency that is effective and verifiable and Duke Energy Ohio is committed to continuing that tradition pursuant to the save a watt program as approved in its Electric Security Plan.

Respectfully submitted,

/s/Elizabeth H. Watts

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Summary: Comments In the Matter of the Adoption of a Portfolio Plan Template for Electric
Utility Energy Efficiency and Peak Demand Reduction Programs
electronically filed by Carys Cochern on behalf of Watts, Elizabeth H