

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke)	
Energy Ohio, Inc., for Recovery of)	Case No. 12-1857-EL-RDR
Program Costs, Lost Distribution)	
Revenue, and Performance Incentives)	
Related to its Save-A-Watt Programs.)	

REPLY COMMENTS OF DUKE ENERGY OHIO, INC.

I. INTRODUCTION

As noted in the initial application, Duke Energy Ohio, Inc. (Duke Energy Ohio or Company) initiated this proceeding to end and true-up its Save-A-Watt Rider, (Rider DR-SAW). Rider DR-SAW was one element contained in a stipulation that resolved the Company's first electric security plan case, Case No. 08-920-EL-SSO, et al. (ESP I). In the stipulation in ESP I, the stipulation provided that Rider DR-SAW would begin January 1, 2009, and end with this proceeding in the second quarter of 2012. Relevant incentive thresholds were also agreed upon and included in the stipulation. Measurement and verification (M&V) of the energy efficiency and peak demand reduction achieved was spelled out in testimony in ESP I and the stipulation stated that M&V would be accomplished as set forth in the testimony of Duke Energy Ohio witness, Dr. Richard Stevie. The stipulation also provided that the Company would retain an independent M&V evaluator.

In early 2009, the Public Utilities Commission of Ohio, (Commission) enacted rules to guide its process with respect to implementing the energy efficiency and peak demand reduction mandates contained in Amended Substitute Senate Bill 221, (SB 221). Rule 4901:1-39-07, set

forth the criteria to be applied to recover costs for energy efficiency and peak demand reduction, including program costs, lost distribution revenues and shared savings. The application in this proceeding was submitted to comply with this rule and the terms of the stipulation in ESP I.

As directed by the Commission, the Staff of the Public Utilities Commission of Ohio, (Staff), the Office of the Ohio Consumers' Counsel (OCC) and Ohio Partners for Affordable Energy, (OPAE), have intervened and filed comments in this proceeding. Duke Energy Ohio submits this reply in response to the comments filed.

I. COMMENTS OF THE STAFF

The Staff's comments are expressed as areas of concern and there are three areas noted. First, Staff wishes to ensure that there are no lost generation revenues included in the costs that the Company seeks to recover. We agree. In Duke Energy Ohio witness James E. Ziolkowski's Direct Testimony filed with the Company's application in this proceeding, Mr. Ziolkowski explains that the lost margins shown for each program in Attachment JEZ-2 exclude generation lost margins for the period beginning December 10, 2009. Beginning on that date, the calculated lost margins include only distribution margins.

The purpose of Case No. 12-1857-EL-RDR is to true-up the revenues collected from January 2009 through December 2011 through Rider DR-SAW with the final, actual revenue requirement for the three years. The final revenue requirement appears in Attachment JEZ-2, page 1. The final revenue requirement of \$85,213,554 includes \$10,284,579 of lost revenues. The lost revenues were calculated by multiplying the lost sales for each month times the lost revenue rates for that month. The lost revenue rates for the period January through November 2009 included distribution and generation rates. The lost revenue rates subsequent to this period

included only distribution rates. Therefore, lost generation revenues were only included for those months during which their recovery was allowed.

In this true-up filing, the Company includes in its final revenue requirement, only those lost revenues that it is entitled to recover. The Company seeks to recover only lost distribution revenues for the months of December 2009 through December 2011. The Company credits back any lost generation revenue amounts included in its Rider DR-SAW rate because the true-up calculation matches revenue collected during the three-year period with the final, actual revenue requirement. This final revenue requirement excludes generation lost revenues for the months of December 2009 through December 2011.

Second, Staff mentions a concern with regard to \$32,302 included in costs for the Company's mercantile customer self-direct program and whether any of those costs are otherwise included in existing rates.

The costs for the self-direct program of \$32,302 include contractor costs, incentives, and labor costs that are not included in distribution rates. Most of the costs attributed to this program include start up costs (program management resources, analytics resources, training,) for a program that became active in 2011. Applications for the self-direct program had a significant increase in fourth quarter 2011 and early 2012 that did not get processed until 2012 therefore the impacts were not recognized within the Rider DR-SAW timeframe.

Finally, Staff notes a concern with the transition from the Rider DR-SAW revenue requirement of \$74,896,673 for the years 2009 through 2011 to the revenue requirement true-up decoupling mechanism for rate schedules applicable. Staff wishes to ensure that only lost distribution revenues are included in the true-up revenue requirement.

The Commission approved Duke Energy Ohio's Rider DDR, Distribution Decoupling Rider, on May 30, 2012 in Case No. 11-5905-EL-RDR. Rider DDR was established as a three-year pilot to run from January 1, 2012 through December 31, 2014. The Company will make its first Rider DDR update filing in early 2013 for the prior calendar year (2012). The Rider DR-SAW true-up (including lost distribution revenues) covers the years 2009 through 2011. The DR-SAW true-up is not affected by the decoupling rider because the decoupling rider did not begin until 2012.

COMMENTS OF OCC

A. The OCC has offered seven comments which will be addressed as presented. OCC's first comment was that the Company is not entitled to recover costs for lost generation revenue for customers who shopped from 2009 to December 9, 2009. In making the assumption that the underlying assertion is correct, OCC agrees that Duke Energy Ohio was entitled to recover lost generation revenue for that time period. However, OCC fails to cite any authority for the proposition that the Company is not entitled to lost generation revenue for shopping customers and that is likely because there is no such authority. In its order in Duke Energy Ohio's first portfolio proceeding, Case No. 09-1999-EL-POR, the Commission explicitly directed Duke Energy Ohio to remove lost generation revenue from its rider beginning December 10, 2009. The Order makes no reference to the need to adjust for the number of customers shopping.

Since the passage of SB 221, the obligation to provide energy efficiency programs to all residential and non-exempted mercantile customers has fallen on the electric distribution utility. Duke Energy Ohio has offered energy efficiency and demand response programs to all of its customers, regardless of generation provider. Those energy efficiency programs have allowed

customers to consume less and hence pay less for generation regardless of where they obtained their generation service.

B. OCC argues, in its second point, that Duke Energy Ohio should recalculate avoided costs to determine a new avoided cost number based upon results from the PJM Interconnection, Inc. (PJM) Reliability Pricing Model (RPM) resulting from its Base Residual Auction. The fact that OCC has recommended tying the Company's avoided cost to "lower market-based avoided capacity costs in PJM", a regional transmission organization to which Duke Energy Ohio did not belong during the period covered under Rider DR-SAW, illustrates that the OCC contention is irrational. Duke Energy Ohio was not a member of PJM until January 2012. Prior to that, Duke Energy Ohio was in the Midwest ISO. Additionally, in so arguing, OCC is explicitly reneging on its agreement in Duke Energy Ohio's ESP I. In the ESP I case, Dr. Richard Stevie provided testimony regarding the methodology for calculating whether or not a given energy efficiency program is cost effective. He explained the inputs to the DSMore[®] Model that is used to calculate cost effectiveness, including a description of avoided cost. It is this modeling that is applied to an energy efficiency program to determine whether or not it is advisable to include in the Company's portfolio. As a participant in Duke Energy Ohio's Community Partnership Energy Efficiency Collaborative, OCC is well aware of this application. It would be unjust and irrational to apply historic RPM pricing to energy efficiency work completed after the fact. Such a process unduly penalizes the utility for the work it has undertaken. It also places undue risk upon the Company and calls into question the prudence of reviewing programs with existing avoided cost models. The OCC's effort to re-trade on this issue at this stage in the process is disappointing.

C. The OCC's third point is that the Company's rider should be reduced to account for inclusion of transmission and distribution avoided costs. Again, this is a matter that was settled in ESP I and OCC is renegeing on its agreement to the Stipulation and Recommendation in that proceeding. Moreover, there is nothing in the Commission's rules that were enacted subsequent to ESP I, that would support OCC's argument here.

The Company included transmission and distribution (T&D) in its capacity avoided costs in all of the supporting documentation in ESP I. The use of the term capacity is always used for both generation and T&D in that they are both represented mathematically in the same manner as \$/kW-year. They are both capacity values. This representation is even demonstrated in the OCC's comments above. T&D is a capacity cost since it is computed on kW, not energy or kWh. A fact even more compelling is that in the Commission's own energy efficiency rules, in the definition of the Total Resource Cost Test, supply costs are defined as "those costs of supplying energy and/or capacity that are avoided by the investment, including generation, transmission, and distribution to customers."

It should be clear that the Company included T&D capacity value in its analysis as evident by the value it included in its cost-effectiveness analysis. The table below shows an excerpt from a DSMore file which included the avoided T&D value. This is from the DSMore file for the Smart Saver CFL measure in the section of the model for utility inputs. It was included in all of the analyses performed by the Company. In fact, the Company consistently included T&D avoided costs in the cost-effectiveness tests conducted in its 2006 energy efficiency application as well as the shared savings calculations used for computing the incentive to the Company.

Avoided Costs				
Electric				
	\$23.79	Avoided T&D (\$ / kW)		

It is worth noting that the OCC provides a quotation from Duke Energy Ohio witness Paul J. Smith's testimony referring to the estimate of the green-field cost of for peak plant capacity, but then adds the expression: "not T&D". This last expression was not in quotations in the OCC's comments, but was an OCC addition to the sentence. Nowhere in Company Witness Smith's testimony does he indicate that T&D avoided costs should be excluded. It should also be noted that Company witness Stevie's testimony referenced in Company Witness Smith's testimony also includes avoided T&D costs in discussing the concept of avoided cost. And nowhere in the Stipulation cited by the OCC is there mention of excluding T&D costs from the calculations.

Duke Energy Ohio has consistently included all avoided cost components, including T&D in the cost-effectiveness tests. Under the save-a-watt recovery mechanism, the Company's revenues are driven in part by the amount of avoided cost. The level of avoided cost has to equal or exceed the cost of the program; otherwise the revenues will leave the Company short. If T&D avoided costs are not included in the level of allowed revenue, this would inhibit the Company's ability to pursue all cost-effective energy efficiency. In fact, if T&D costs were excluded from the revenue allowance, then the Company should be excluding T&D avoided costs in establishing cost-effectiveness.

It is troubling that OCC seeks to apply its biased view of the cost recovery mechanism, a view that is contrary to the understanding of the parties and all of the supporting documents in the proceeding, to re-trade a deal completed in 2008. Either T&D avoided costs should be

included consistently in both the cost-effectiveness tests and the revenue computations or excluded consistently which would reduce the amount of cost-effective energy efficiency. The OCC would have the Company include avoided T&D costs for cost-effectiveness, but not for the revenue computation. The OCC cannot have it both ways. That makes no sense.

D. OCC's next effort to reduce the Company's fair return and incentive for all the energy efficiency it has undertaken focuses upon the independent evaluator the Commission has retained. OCC argues that the incentive should be reduced to account for lower program savings emanating from the independent evaluator's study that was filed with the Commission only recently. This is a specious and unfounded argument and constitutes retroactive ratemaking. The OCC well knows that the independent evaluation was retained by the Commission to develop independent review of mercantile customer (self-direct) and insurance for self-direct claims. An additional objective as stated by the Independent Evaluator is to support the Commission in developing a "best-of-class" evaluation infrastructure. It is the Company's understanding that the Independent Evaluator can assist with the review of a technical reference manual (TRM) for application to energy efficiency measures. The creation and application of the TRM was initiated in Case No. 09-512-GE-UNC. In initiating that docket, the Commission laid out its plan for implementing a TRM. The plan included the filing of a draft TRM, the filing of comments or objections, and if necessary, a full hearing on the objections. This proceeding is very much a work in progress. As no party has had an opportunity to offer objections to the draft, it will be some time before a definitive TRM may be applied to existing energy efficiency measures and portfolios. The policy with respect to exactly how and when it will be applied has also yet to be determined. However, the Commission itself recognized that the recommendations

in the TRM should be used prospectively.¹ The difficulty inherent in the process is manifest by the length of time it has taken the Commission to reach this stage of the proceeding. Seeking to apply the draft study to Duke Energy Ohio's portfolio so prematurely is obviously not a reasonable choice. In light of the fact that the independent evaluator's study is not yet fully vetted, it seems unnecessary to respond to OCC's comments with respect to comparing such a report with the Company's programs. However, we will address each of the comments to fully respond to OCC's concerns and to clarify the record.

OCC's issue: Duke Energy Ohio assumed install rates for CFLs at 100 percent. The draft TRM suggests an install rate of 81-86 percent.

Duke Energy Ohio response: Although Duke Energy Ohio does not agree with the independent evaluator's recommendation to apply an installation rate adjustment factor for CFLs in the report, the Company does agree that CFL savings should take into consideration an in-service rate adjustment in evaluations for future program years, just as recommended by the independent evaluator. In fact, consistent with the Independent Evaluator's recommendation, the Residential CFL M&V Report received from Duke Energy Ohio's independent third-party program evaluator, (TecMarket), addresses in-service rates in 2012.

OCC Issue: According to the report submitted by the independent evaluator, the savings estimates for kWh and therms are "higher than one would expect."

Duke Energy Ohio response: As noted in the response above, the Company is aware of the recommendations made by the independent evaluator in Duke Energy Ohio's Personalized Energy Report and where appropriate, will incorporate those recommendations into future M&V

¹ *In the Matter of Protocols for the Measurement and Verification of Energy Efficiency and Peak Demand Reduction Measures*, Case No. 09-512-GE-UNC, page 11, paragraph 32, October 15, 2009.

planning and operations. However, these recommendations are designed for future application and should not be applied historically.

OCC Issue: Again OCC points to the independent evaluator's comments and cites a statement that due to the lack of documentation, and the unsubstantiated adjustments for bias discussed in the report, there is not enough information to assess the credibility of reported savings. Therefore the independent evaluator did not recommend that the values be used to estimate future savings for program planning purposes.

Duke Energy Ohio Response: Where appropriate, the Company will incorporate the independent evaluator's recommendations. In some instances, certain recommendations for future evaluations have already been incorporated.

OCC Issue: Again citing to an irrelevant section of the independent evaluator's report, the OCC states that the savings value for a single thirteen watt CFL is incorrect.

Duke Energy Ohio Response: The OCC's reference in this instance is to a section addressing the National Energy Education Development (NEED) program. This is a Duke Energy Kentucky program that has no application in Ohio and has no impact on the Rider DR-SAW in Ohio. Information on the NEED program was presented for reference only. The savings values for thirteen watt CFLs used in the Rider DR-SAW application were very similar to those listed in the TRM with the exception of the installation rate adjustment discussed above.

OCC Issue: Again citing to the independent evaluator's report, OCC argues that the billing regression analysis estimates potential savings that are too high.

Duke Energy Ohio Response: The independent evaluator agrees that his recommendations, where appropriate, should be applied for future years. There is no reasonable method for applying these recommendations historically. To the extent the Company agrees

with the independent evaluator, the recommendations will be applied toward future planning and operations. The report referenced in the Independent Evaluator's report, originally provided in Appendix M, "Energy Efficiency Website Program Impact Evaluation, September 2008" in the status update filing in Case No. 10-317-EL-EEC, does not indicate an estimated savings of 11 to 22 percent. Duke Energy Ohio has never used an estimation of 11 to 22 percent as an *ex ante* estimate for the energy efficiency website.

E. The OCC's fifth claim is that Duke Energy Ohio should account for interest that OCC contends should be returned to customers on balances held by the Company from December 10, 2009 through December 31, 2011 regarding lost generation revenue. The contention is unreasonable and not supported by the record in this proceeding. While it is true that the Commission's Order in Case No. 09-1999-EL-POR did instruct the Company to "remove the recovery of lost generation revenues from its Rider DR-SAW beginning on December 10, 2009," it made no mention of applying any interest calculation. Finding 10, of the Commission Order instructed the Company to, "file revised tariffs with the Commission for review and approval, consistent with the modifications delineated in this order." In compliance with the Commission's order in Finding 10, the Company filed its compliance tariffs with the Commission on February 16, 2011. The Company never received an order from the Commission after its review of the new tariffs, so the rates never went into effect. Since the rates compliance tariffs were not approved and the associated rates did not become effective, the Company continued to collect lost generation revenues during the period the Rider DR- SAW was in effect. The Company has fully factored the need to return lost generation revenues collected after December 10, 2009, in the calculation of the true-up associated with DR-SAW, but does not believe that any calculation of interest needs to be performed, especially since in total, even

when factoring in the collection of lost generation revenues, the Company is under collected. The Company believes that if it were to calculate interest on the amount of lost generation revenues collected after December 10, 2009 that it is logical that the Company should calculate interest on the amount it under collected from customers during the three years Rider DR-SAW was in effect in order to maintain symmetry and fairness in the application.

F. The OCC next suggests that the Commission should require the Company to re-run all of its models and file a revised application in this proceeding.

As the Company fundamentally disagrees with OCC's recommendations, there is no need to re-run all of the filed models. Such an order would be enormously burdensome on the Company and is patently unnecessary. However, Duke Energy Ohio will work with the independent third-party program evaluator (TecMarket) and will consider the recommendations provided by the Commission's Independent Evaluator where appropriate in future evaluations, and M&V reports. These reports will be available for Commission review when the Company submits its 2012 status update filing.

G. Finally, the OCC asks the Commission to amend the procedural schedule. This application was submitted to the Commission on June 29, 2012. The OCC intervened in the proceeding on July 25, 2012. As of these comments, it has been pending for more than three months. OCC has had more than ample time to do discovery and to seek support for whatever position it seeks to support. It is not incumbent upon the Company to run variations on its application for the OCC to consider as alternatives. The OCC has substantial historic experience with the Company's programs and with the program that OCC agreed to in ESP I. There is no need to extend the procedural schedule to allow OCC to consider "what if" scenarios.

II. COMMENTS OF OP&E

OPAE has not done any due diligence on this application. It has not requested any discovery and therefore has neither facts nor support for its position. OPAE claims that Duke Energy Ohio should not be allowed to count the savings from pre-2009 programs for the purpose of determining compliance with the savings mandate contained in Ohio Revised Code Section 4929.66. According to OPAE, the language of the statute only permits a utility to count savings from previous mercantile efficiency improvements which are subsequently committed to the utility, R.C. 4928.66(A)(2)(c). OPAE contends that the counting of pre-2009 savings from pre-2009 non-mercantile energy efficiency programs is not permitted. Thus, the ‘preexisting banked savings’ cannot be included for the purposes of compliance with Ohio Revised Code Section 4929.66. OPAE states that it is appropriate to bank savings for the purpose of complying with future energy efficiency mandates and for the purpose of calculating incentives in future years under the Stipulation and Recommendation in Duke’s Case No. 11-4393-EL-RDR, but it is not correct to count pre-2009 savings. OPAE states that the Commission should only authorize the carryover of 282,180 MWh.

In January 2006, the Company filed an application with the Commission to implement a broad-based set of energy efficiency programs through the year 2010. Those programs were subsequently approved for implementation in July 2007. By taking such a proactive approach, the Company was the only utility in the State of Ohio implementing energy efficiency programs. This was well in advance of the passage of S.B. 221. However, S.B. 221 cut short the approved implementation period for the Commission approved energy efficiency programs of the Company.

At the time of the discussion and establishment of the Commission enactment of rules to implement the energy efficiency mandate, the Company inquired as to the potential for counting

the past impacts of the programs approved in 2007. It was the Company's understanding that the impacts from those programs would be accepted for compliance with the SB 221 mandates in recognition of the Company's proactive approach to energy efficiency. In Duke Energy Ohio witness Richard Stevie's Direct Testimony in the ESP I proceeding, recognition of the Company's pre-2009 energy efficiency program impacts were mentioned and incorporated into discussion concerning the satisfaction of the SB 221 energy efficiency mandates.² This inclusion was not questioned during the ESP proceeding. The Company included those impacts in its ESP filing in 2008, as well as in subsequent status reports filed in 2010, 2011 and 2012.³

OPAE next argues that the costs for low income services should not be recovered in Rider DR-SAW. OPAE misunderstands the commitments made in ESP I and claims that these services should not therefore be included. The Low Income Services Program was proposed and approved in ESP I,⁴ and was again explicitly proposed by the Company and approved by the Commission in the Company's energy efficiency portfolio plan filing in Case No. 09-1999-EL-POR.⁵ Given the fact that the Commission has twice approved the Low Income Services Program to be recovered as a component of the Company's Rider DR-SAW, OPAE's assertion that the \$582,137 of Low Income Services Program expenditures should not be eligible for recovery under Rider DR-SAW is perplexing.

OPAE's confusion regarding Duke Energy Ohio's commitment to increase home energy and weatherization contracts to \$1million per year during the ESP period is equally perplexing. The commitment increased annual funding for home energy weatherization contract funding was

² *In the Matter of the Application of Duke Energy Ohio for Approval of an Electric Security Plan, Case No. 08-920-EL-SSO, et al.*, Direct Testimony of Richard G. Stevie at page 10, lines 15 through 20.

³ See status reports submitted in Case Nos. 10-317-EL-EEC, 11-1311-EL-EEC and 12-1477-EL-EEC.

⁴ *In the Matter of the Application of Duke Energy Ohio for Approval of an Electric Security Plan, Case No. 08-920-EL-SSO, et al.*, Supplemental Direct Testimony of Theodore E. Schultz at supplemental attachment TES-1, September 16, 2008.

⁵ *In the Matter of the Report of Duke Energy Ohio, Inc., Concerning its Energy Efficiency and Peak Demand Reduction Programs and Portfolio Planning*, Case No. 09-1999-EL-POR, Opinion and Order at p. 5.

a separate and distinct commitment related to existing low income efforts and was never intended to be considered a component of its energy efficiency portfolio or recovered through Rider DR-SAW. The commitment to increase home energy and weatherization contracts to \$1 million per year during the ESP period was a separate and distinct commitment related to the ESP. As clearly illustrated in the Commission's Order approving the Stipulation, the Energy Efficiency programs and Rider DR-SAW is part (b) of the Section 3 which pertains to Distribution Riders and the commitment to increase funding efforts for its home energy and weatherization contracts to \$1 million per year is contained in part (e) of Section 4 pertaining to Other Matters. The funding for such programs was not intended to be included in Rider DR-SAW and therefore has not been included.

Beyond the fact that the \$582,137 of expenditures for Low Income Service Program are completely unrelated to the commitment to increasing its annual home energy and weatherization contracts to \$1 million per year, Duke Energy Ohio confirms here that it has fulfilled this commitment to increase the funding to Home Energy and Weatherization Contracts over the ESP period. From 2009 through 2011, the Company funded over \$3.1million for home energy weatherization contracts and not a single dollar of this expenditure is included in the \$582,137. Of costs associated with the Low Income Services Program included in the Company's true-up of Rider DR-SAW. OPAE's contention that Duke Energy somehow is required to spend an additional \$2.4 million on low income programs was calculated with no basis in fact is completely unsupported by the record and shows very little analysis of the Company's application in this proceeding.

Finally, OPAE argues that a Staff report is needed because OPAE is unable to verify the numbers and calculations included in Mr. Ziolkowski's attachments. This is an interesting turn

of events. Having made no effort to seek discovery from the Company on any matter associated with this application, OPAE argues that the Staff should provide a report and do this for OPAE. Such a report is unnecessary. OPAE and the Company agree that the Company may not collect lost generation revenue from December 10, 2009 through December 31, 2009, and that the Rider DR-SAW ended on December 31, 2011. The schedules and attachments provided by Duke Energy Ohio witness James E. Ziolkowski reflect this understanding. If OPAE had done its homework, this would have been obvious from the Company's application. There is no need for a Staff report.

Duke Energy Ohio appreciates the comments of the parties.


Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Amy B. Spiller', written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has been served upon the following parties via electronic mail, regular mail or hand delivery on this 16th day of October, 2012.


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Summary: Comments Reply Comments of Duke Energy Ohio, Inc. electronically filed by Carys Cochern on behalf of Watts, Elizabeth H. Ms.