

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Electric Distribution Rates.	)	Case No. 12-1682-EL-AIR
	)	

In the Matter of the Application of Duke Energy Ohio, Inc. for Tariff Approval.	)	Case No. 12-1683-EL-ATA
	)	

In the Matter of the Application of Duke Energy Ohio, Inc. for Approval to Change Accounting Methods.	)	Case No. 12-1684-EL-AAM
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**OBJECTIONS TO THE STAFF REPORT AND SUMMARY OF ISSUES  
BY  
PEOPLE WORKING COOPERATIVELY, INC.**

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Pursuant to Section 4909.19, Ohio Revised Code and Ohio Admin. Code (“O.A.C.”) Rule 4901-1-28, People Working Cooperatively, Inc. (“PWC”) respectfully submits its Objection to the Staff Report of Investigation issued in the above-named proceedings on January 4, 2013. PWC filed its Motion to Intervene in these proceedings on September 25, 2012.

PWC’s objections and its primary issues regarding the Staff Report are:

1. The proposed rate design of Duke Energy Ohio, Inc. (“Duke Energy Ohio” or “Company”) for residential customers in tariff RS, specifically the increase in the customer charge, appears to unfairly discriminate against low-income customers. Although Staff recommends a slightly lower increase in the Rate RS Customer Charge and corresponding increase in the Energy Charge, it nonetheless appears to unfairly discriminate against low-income customers.
2. The Staff Report is silent with respect to the Company’s omission of any funding proposal for low-income weatherization programs in its service territory. PWC notes that

under existing rates and rates proposed in this proceeding by the Company, and as adjusted in the Staff Report in Schedule A-1, Duke Energy Ohio has not earned in 2012, and will not earn in 2013 a return on equity exceeding ten percent. Hence the undertaking by Duke Energy Ohio (pursuant to the Stipulation adopted by the Commission in its November 22, 2011 Opinion and Order in Case No. 11-3549-EL-SSO as set forth in Paragraph 7(e) on p. 23) to provide shareholder funding of \$1,000,000 in both 2013 and 2014 for PWC-administered low-income weatherization programs would appear to be inoperative.

These programs are critically important to give low-income, especially elderly low-income PWC customers in the Company's electric service territory a significant opportunity to reduce their electricity consumption that is more effective than their efforts at conservation to reduce their electric bills.

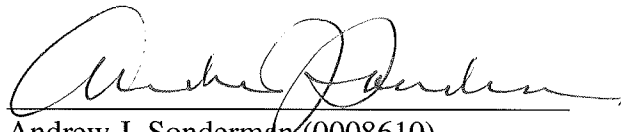
3. The Staff Report is silent with respect to the Company's omission of the continuation of any funding for PWC to maintain the joint pilot energy efficiency project approved by the Commission in Case no. Case No. 11-3549-EL-SSO using shareholder funds to enable PWC to leverage additional energy efficiency funds from nonutility public and private sources for electric and gas energy efficiency for low-income households. (See Opinion and Order, p. 23, Paragraph 7(f)).

These low-income weatherization services yield energy efficiency that is enhanced by additional improvements in the home and funded by such other sources. Hence the continuation of funding of this pilot is essential to the success of the pilot.

These omissions of funding as set forth in Objections (2) and (3), should be corrected, and cost-effective weatherization and conservation programs should be funded to ameliorate the impact of the propose rate increase on low-income, low use customers.

Should the Staff modify its position on any of the matters addressed in the Report of its investigation, or should there be any issues newly raised by Staff or any other party to the case as the case proceeds from the objections to the closing of the record, PWC reserves the right to file testimony, cross-examine witnesses and address such issues as if they were raised in this Report and to which PWC has objected.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Andrew J. Sonderman", written over a horizontal line.

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### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Objections To The Staff Report and Summary Of Issues By People Working Cooperatively, Inc., was served this 4<sup>th</sup> day of February, 2013, via electronic mail on the parties below:

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**This foregoing document was electronically filed with the Public Utilities**

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Summary: Objection Objections to Staff Report & Summary of Issues electronically filed by Mr. Andrew J Sonderman on behalf of People Working Cooperatively, Inc.