BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke Energy Ohio, Inc. to Establish its Fuel and Economy Purchased Power Component of its Market-Based Standard Service Office for 2011.	)	Case No. 11-974-EL-FAC
In the Matter of the Application of Duke Energy Ohio, Inc. to Establish its System Reliability Tracker of its Market-Based Standard Service Offer for 2011.	)	Case No. 11-975-EL-RDR

DUKE ENERGY OHIO, INC'S MOTION TO EXTEND PROTECTIVE ORDER TO PROTECT THE CONFIDENTIALITY OF INFORMATION CONTAINED IN THE DOCUMENT TITLED "MANAGEMENT/PERFORMANCE AND FINANCIAL AUDIT OF THE FUEL AND PURCHASED POWER AND SYSTEM RELIABILITY TRACKER RIDERS OF DUKE ENERGY OHIO, INC."

Comes now Duke Energy Ohio, Inc., (Duke Energy Ohio or Company) and pursuant to O.A.C. 4901-1-24(F), hereby respectfully requests an order extending the confidential treatment afforded certain pages of information submitted to the Public Utilities Commission of Ohio (Commission) contained in the document entitled "Management/Performance and Financial Audit of the Fuel and Purchased Power as Well as the System Reliability Tracker Riders of Duke Energy Ohio, Inc." (Report). Said information was afforded confidential treatment by Entry in this case dated June 12, 2012.[1] The initial eighteen-month period for which confidential protection was afforded

[1] *In the Matter of the Application of Duke Energy Ohio for Authority to for Authority to Establish its Fuel and Economy Purchased Power Component of its Market-Based Standard Service Offer, et al.* Case No.11-974-EL-FAC, et al., (June 12, 2012).

expires on December 12, 2013.[2] As explained further in the accompanying memorandum in support, while some of the information that was subject to the protection afforded under the prior Entry can now be released, there remains some information which continues to warrant confidential protection. Duke Energy Ohio hereby moves to extend the protective orders issued on June 12, 2012 (Protective Order) to continue the confidential treatment of specific information included in the Report.

Duke Energy Ohio has now reviewed the Report and in the attached Memorandum in Support, sets forth its reasons why confidential treatment of certain information contained in this Report remains necessary.

[2] *Id.*

Respectfully submitted,

Elizabeth H. Watts (003192)
Assistant General Counsel
Rocco O. D'Ascenzo (0077651)
Assistant General Counsel
Amy B. Spiller (0047277)
Deputy General Counsel

DUKE ENERGY OHIO, INC
139 East Fourth Street, 1303 Main
Cincinnati, Ohio 45202

DUKE ENERGY OHIO'S MEMORANDUM IN SUPPORT OF ITS MOTION FOR PROTECTIVE ORDER TO PROTECT THE CONFIDENTIALITY OF INFORMATION CONTAINED IN THE DOCUMENT TITLED "MANAGEMENT/PERFORMANCE AND FINANCIAL AUDIT OF THE FUEL AND PURCHASED POWER AND SYSTEM RELIABILITY TRACKER RIDERS OF DUKE ENERGY OHIO, INC."

Duke Energy Ohio respectfully requests that the Public Utilities Commission of Ohio (Commission) grant its Motion for Protective Order to Protect the Confidentiality of Information Contained in the "Management/Performance and Financial Audit of the Fuel and Purchased Power and System Reliability Tracker Riders of Duke Energy Ohio, Inc." (Report) filed in this case.

Duke Energy Ohio is an Ohio corporation with its principal office in Cincinnati, Ohio. Duke Energy Ohio is engaged in the business of supplying electric distribution service to the public in the State of Ohio. Accordingly, Duke Energy Ohio is a public utility within the meaning of that term as used in R. C. 4905.02 And 4905.03. As such, Duke Energy Ohio is subject to the jurisdiction of the Commission in the manner and to the extent provided by the laws of the State of Ohio.

R.C. 1333.61(D) provides, in pertinent part:

> "Trade secret" means information, including . . . any *business information* or plans, financial information, or listing of names, addresses, or *telephone numbers*, that satisfies both of the following:
>
> (1) It derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.
>
> (2) It is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. [Emphasis added.]

Further, the Supreme Court of Ohio adopted six factors to be used in determining whether a trade secret claim meets the statutory definition:[3]

(1) The extent to which the information is known outside the business;

(2) The extent to which it is known to those inside the business, *i.e.*, by the employees;

(3) The precautions taken by the holder of the trade secret to guard the secrecy of the information;

(4) The savings affected and the value to the holder in having the information as against competitors;

(5) The amount of effort or money expended in obtaining and developing the information; and

(6) The amount of time and expense it would take for others to acquire and duplicate the information.

The redacted information contained in the Report constitutes trade secret information in accordance with Ohio's Uniform Trade Secret Act and relevant jurisprudence. While some of the information previously afforded confidential protection may now be released due to the passage of time easing the sensitivity of the information, some of the information must still remain confidential. The chart below summarizes the subject matter of the information and specific pages that should remain protected.

[3] *State ex rel. The Plain Dealer v. Ohio Dept. of Ins.* (1997), 80 Ohio St.3d 513, 524-25, 1997-Ohio-75.

Report Pages- Extend Confidential Treatment	Subject matter
pp. 22-24, 26, 28-32	Fuel Forecasting & Procurement
pp. 53-55, 66,67	Power Plant Performance
pp. 73-75	Fuel Handling & Inventory Mngmt.
pp. 96	Environmental Compliance
pp. 140,	Prior Audit Follow-up

The confidential material described above, if disclosed, would enable competitors in the wholesale power market to ascertain the manner in which Duke Energy Ohio plans, manages and operates their generating facilities, the fuel purchasing strategy, the purchase power strategy, the emission allowance strategy, the cost associated therewith, and would enable competitors to ascertain Duke Energy Ohio's positions (long and short) with respect to electric generation capabilities. Maintaining the confidentiality of this information is all the more important given that Duke Energy Ohio is obligated to transfer its ownership in legacy-owned generating assets to an unregulated affiliate by December 31, 2014.[4] Further, the competitively sensitive information will provide power marketing competitors with knowledge that will allow them to potentially manipulate the marketplace so as to unnecessarily cause consumers to pay more for electricity than they otherwise would.

If this information becomes public, Duke Energy Ohio will be placed at a competitive disadvantage, in among other things, reducing its ability to negotiate contracts for fuel. With the information contained in the Report, a competitor could take

[4] *In the Matter of Application of Duke Energy Ohio, Inc. for Authority to Establish a Standard Service Offer Pursuant to Sections 4928.143, Revised Code, in the Form of an Electric Security Plan, Accounting Modifications, and Tariffs for Generation Service,* Case No. 11-3549-EL-SSO, et al. (November 22, 2011)

actions that, in the absence of this information, it would not otherwise take. Such actions might include adjusting its prices, either to win contracts on which Duke Energy Ohio may also be bidding – business the competitors otherwise would not be in a position to win, or to set its prices artificially high to take advantage of an overall short market, the latter action obviously resulting in higher power prices and commodity.

The information for which Duke Energy Ohio is seeking confidential treatment is not known outside of Duke Energy Ohio, and it is not disseminated within Duke Energy Ohio except to those employees with a legitimate business need to know and act upon the information.

The public interest will be served by granting this motion. By protecting the confidentiality of the Report and its existing business plans regarding fuel purchases, purchased power, emission allowance information and contract information, the Commission will prevent undue harm to Duke Energy Ohio, consumers, as well as ensuring a sound competitive marketplace.

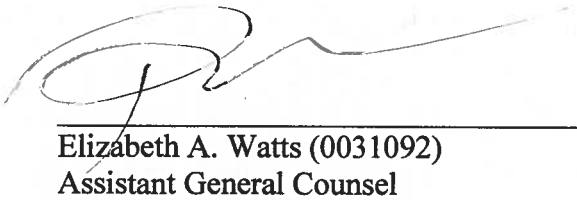
Duke Energy Ohio considers the Report's confidential material to be proprietary, confidential, and trade secrets, as that term is used in R. C. 1333.61. In addition, this information should be treated as confidential pursuant to R. C. 4901.16. The redacted version of the Report filed March 14, 2012 in Ohio proceedings includes the confidential material blacked out for the public.

For ease of reference, the information that the Company no longer considers confidential and that may now be made public is attached hereto and labeled as Public Document Attachment pp. 1-26 and Public Document Attachment WDW-2. This

information includes pages 56, 63, 64, 65, 72, 76-84, 90, 97, 101, 136, 142-149 of the Report and Attachment WDW-2 filed in these proceedings.

WHEREFORE, Duke Energy Ohio respectfully requests that the Commission, pursuant to Ohio Administrative Code Section 4901-1-24(D) continue the protection by its Entry of June 12, 2012 and that the following Confidential Material in the Report remain confidential, proprietary and a trade secret under R. C. 4901.16 and 1333.61:

Respectfully submitted,



Elizabeth A. Watts (0031092)
Assistant General Counsel
Rocco O. D'Ascenzo (0077651)
Assistant General Counsel
Amy B. Spiller (0047277)
Deputy General Counsel

DUKE ENERGY OHIO, INC
139 East Fourth Street, 1303 Main
Cincinnati, Ohio 45202

CERTIFICATE OF SERVICE

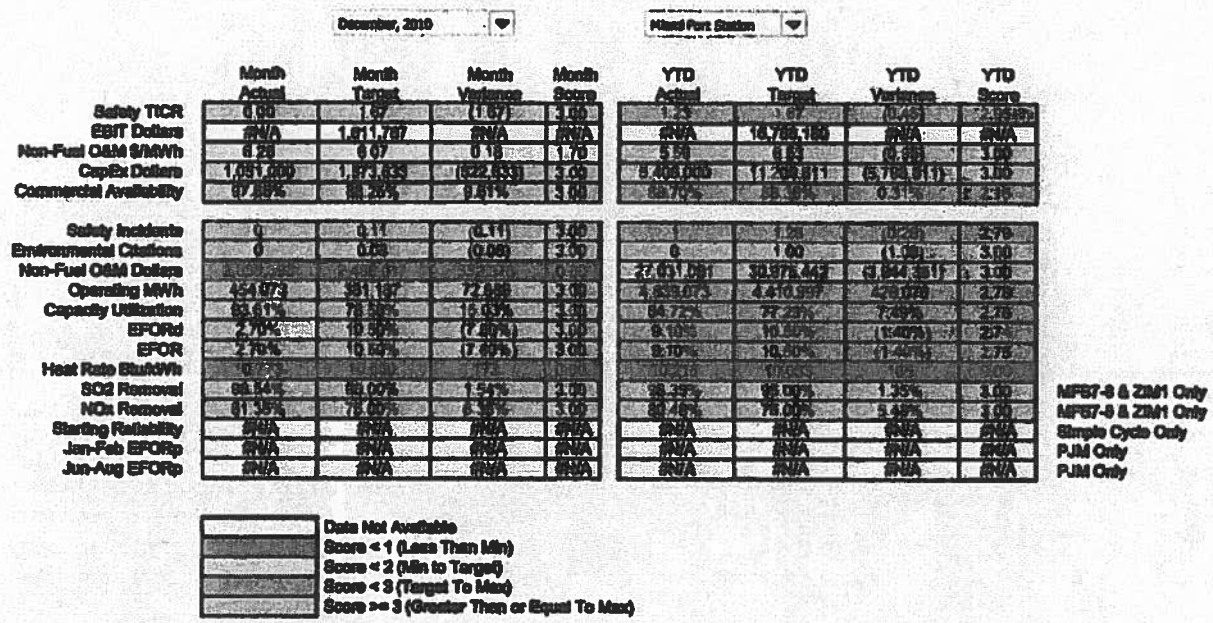
I certify that a copy of the foregoing Motion to Extend Protective Order was sent by electronic mail or first class US Mail to all parties of record and listed below this 28th day of October, 2013.

Rocco D'Ascenzo

Thomas McNamee
Attorney General Office
Public Utilities Commission of Ohio
180 East Broad Street, 9th Floor
Columbus, OH 43215

Ohio Consumers' Counsel
10 W. Broad Street
Columbus, OH 43215-3485

Exhibit IV-11
Sample KPI Format used at Generating Stations
December, 2010

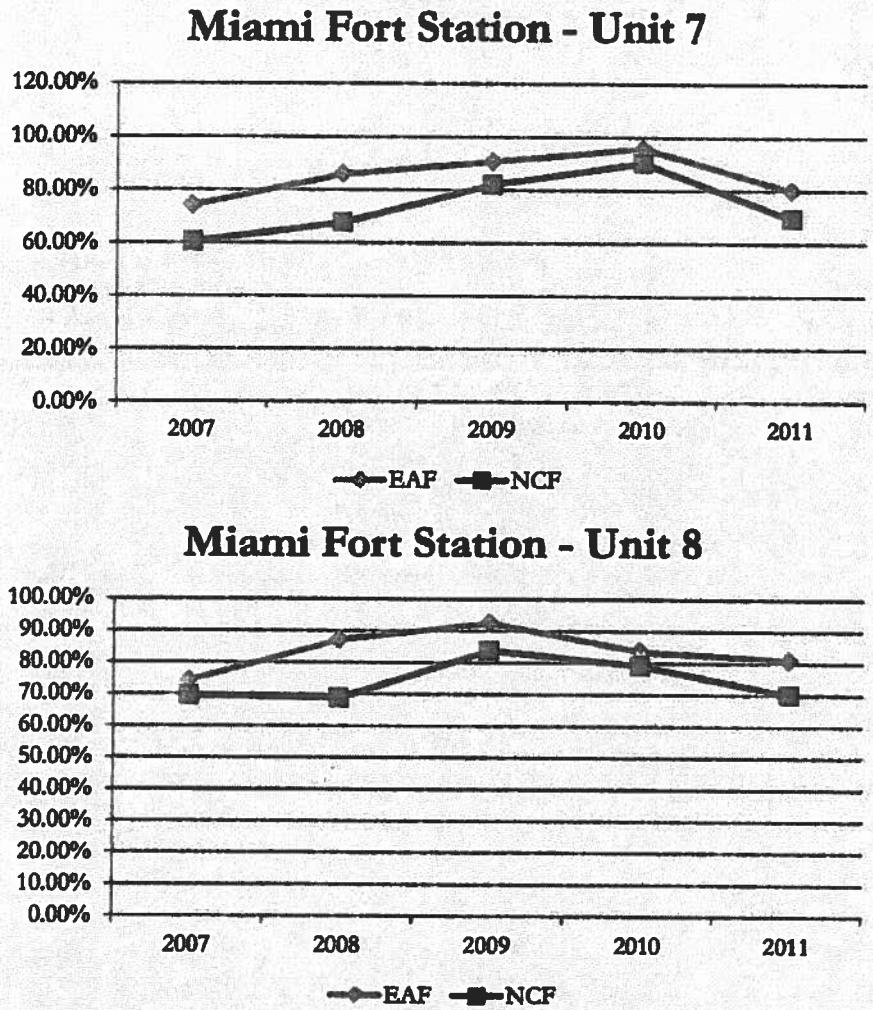


Source: Information Response 220

Finding IV-5 **Duke Energy Ohio continues to leverage the integration of the enterprise-wide eMax (Maximo) work management, PaSta work scheduling, and MyTime labor reporting systems to improve power plant performance during 2011.**

Schumaker and Company consultants viewed a demonstration of the use and integration of the work management, scheduling and labor reporting systems on March 8, 2011.[96] *Exhibit IV-12* provides the process integration diagram for Maximo v6.2, known internally to Duke Energy as eMax.[97] *Exhibit IV-13* shows an example PaSta screen that is used by work planners to schedule work orders to crews.[98] The interfaces between labor reporting and eMax and PaSta are shown in *Exhibit IV-14*.[99]

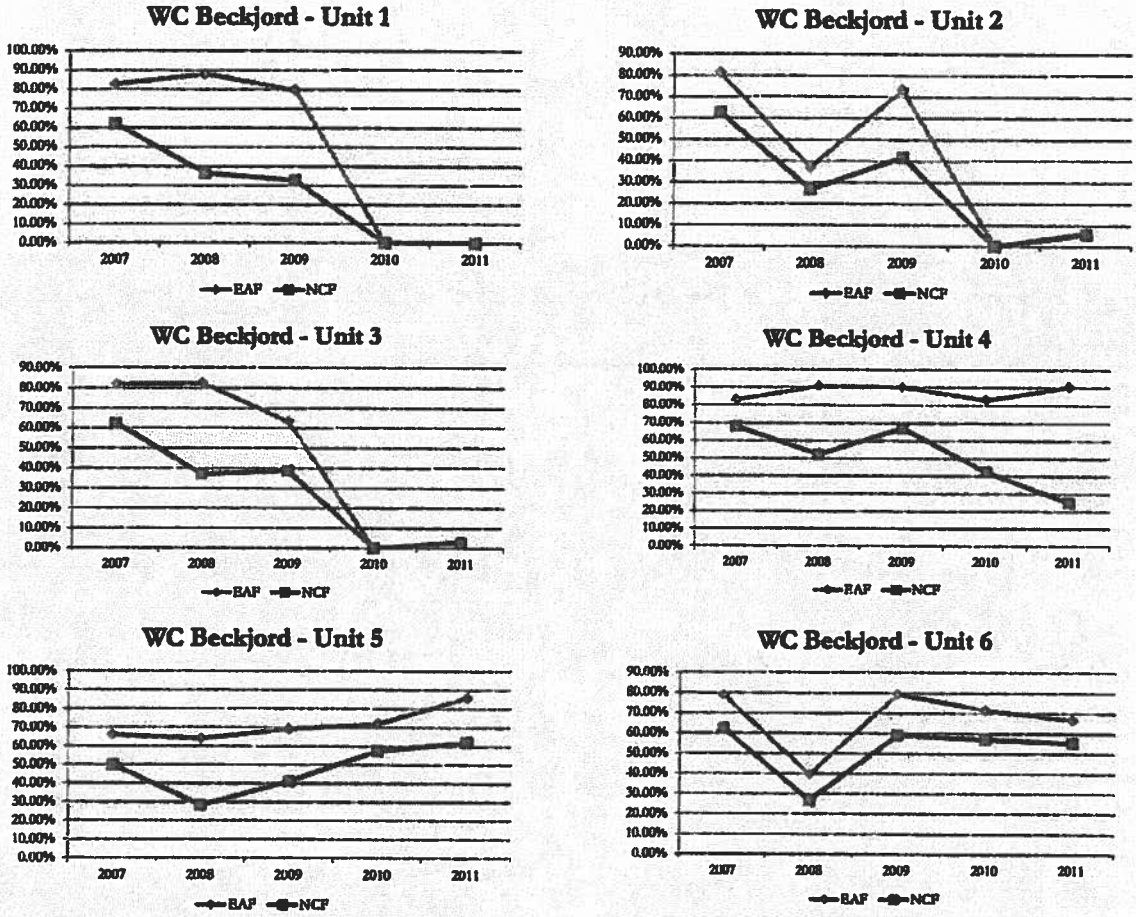
Exhibit IV-19
Miami Fort Plant Performance
2007 to 2011



Source: Information Response 48, 150, and 292

Exhibit IV-20 provides the performance of the Beckjord units.[108] Beckjord Units 1 through 3 are currently in an extended shutdown which began in 2010. Units 2 and 3 had to be operated for a very short period in 2011 to retain their operating licenses.[109] Units 4, 5 and 6 did not perform as well as Miami Fort, and the spread between the EAF and NCF would indicate that they are not "in the money" as frequently as Miami Fort. Beckjord 5 and 6 underwent planned outages during 2011.[110] Unit 5 and 6 Equivalent Availability Factors are near industry averages shown in *Exhibit IV-22*.

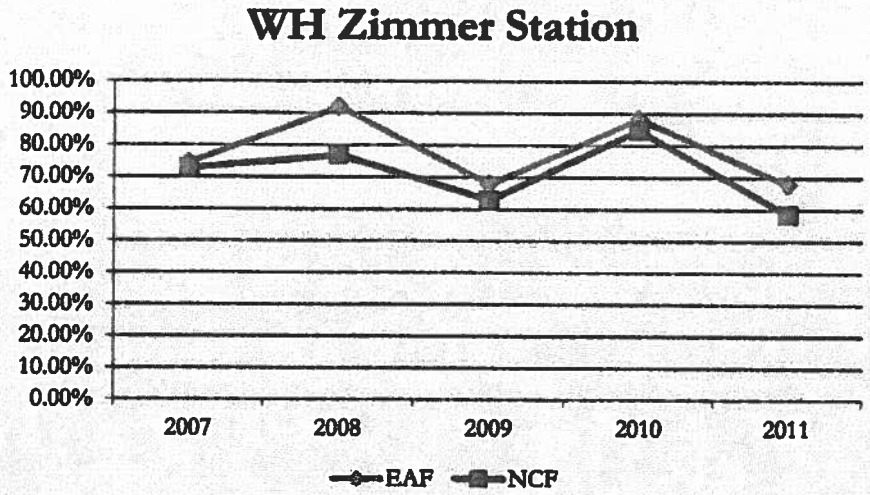
Exhibit IV-20
Beckjord Plant Performance
2007 to 2011



Source: Information Response 48, 150, and 292

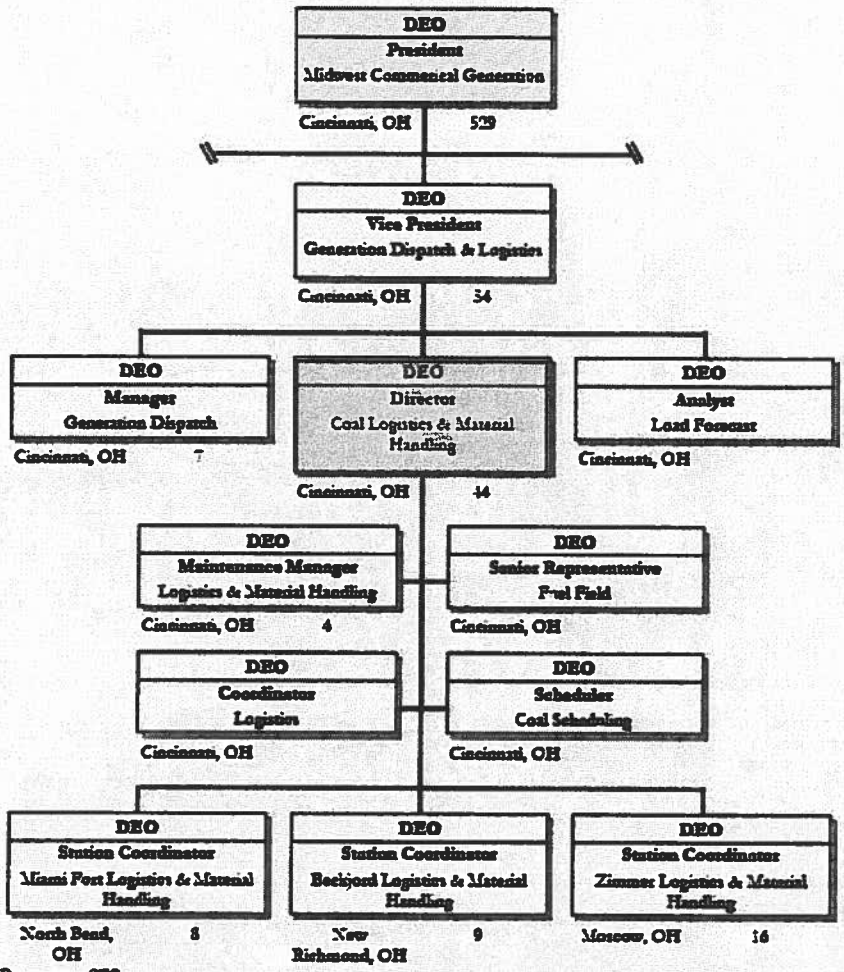
Zimmer's performance, shown in *Exhibit IV-21*, improved in 2010 to pre-2009 levels and achieved industry levels (1000+ MW) shown in *Exhibit IV-22*.[111] 2011 levels decreased to 2009 levels mainly due to unplanned outages caused by frozen coal early in the year and super heater tube leaks later in the year.[112]

Exhibit IV-21
Zimmer Station Plant Performance
2007 to 2011



Source: Information Response 48, 150, and 292

Exhibit V-4
Duke Energy Ohio Coal Logistics and Material Handling Organization
as of December 31, 2011



Source: Information Response 272

The Coal Logistics and Materials Handling (CLMH) organization, with 45 employees (down from 48 in 2010), including the director, is responsible for the delivery, including maintenance of equipment, of coal and limestone from the time the commodity is loaded on barges by the vendor until it is delivered to the coal-burn bunkers or limestone-staging facilities. Specific roles within the organization are:

- Station Logistics and Material Handling is responsible for managing the barge harbor, for unloading coal and limestone barges, for managing coal inventory piles, for managing demurrage charges, and for the operation and maintenance of the material handling equipment at the plants. 2011 staffing at the plants was:

CLMH uses a number of reports to manage and control barge traffic in order to minimize demurrage charges.[126]

Exhibit V-8 provides an example of the report that is used to monitor locations of coal barges supplying Duke Energy Ohio's generating stations.[127] *Exhibit V-9*, *Exhibit V-10*, and *Exhibit V-11* shows reports used to monitor the number of barges in the harbors at Beckjord, Zimmer, and Miami Fort.[128]

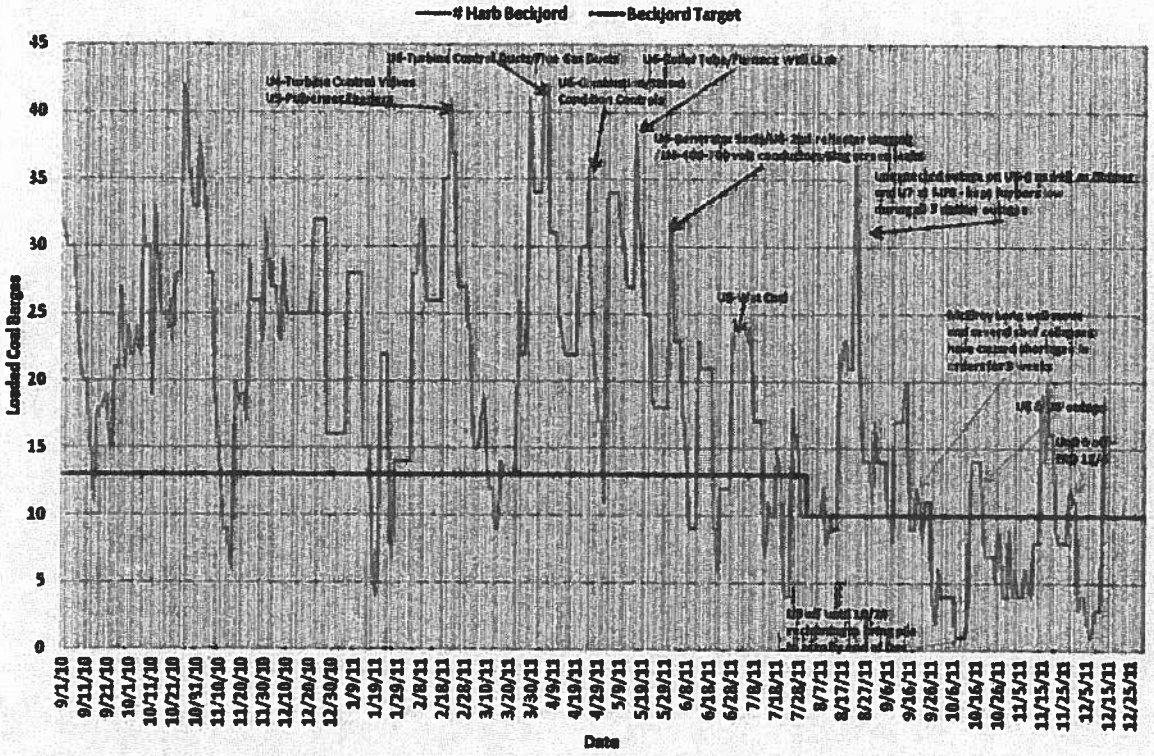
Exhibit V-8
Metric Used to Monitor Coal Barges Loaded/En Route
as of December 31, 2011

Coal Barges Loaded/En Route

		BECKJORD			
	Current Location	Origin	# Barges	ETA	Barge Line
12/13	Bellaire Harbor	1 Marietta, 4 McElroy	5	12/16 PM	Ingram
	KRT Marmet	KRT Marmet - LS coal	1	12/16 PM	Ingram
	Superior Fleet	Shrewsbury	1	12/17 AM	Ingram
	Lee Synnott	Highland/Uniontown	15	12/17 PM	Ingram
	Shawneetown	Arclar	3	12/18 AM	Ingram
		ZIMMER			
	Current Location	Origin	# Barges	ETA	Barge Line
12/13	Barbara	2 McElroy, 7 ACS	9	12/13 PM	Crounse
	Debi Sharp	ACS	15	12/14 PM	Crounse
	Jincy	ACS	1	12/14 PM	Crounse
	Laura Tamble	2 Somerville, 6 WB	8	12/15 AM	Crounse
	Big Bend	Big Bend - CBS&C	1	12/16 PM	Crounse
	Sara Page	2 Somerville, 5 WB	7	12/17 AM	Crounse
	Mt. Vernon	Elk Creek	6	12/17 PM	Crounse
	ACS	ACS	15	12/17 PM	Crounse
	Sandy Drake	Oxford	1	12/17 PM	Crounse
		MIAMI FORT 7 & 8			
	Current Location	Origin	# Barges	ETA	Barge Line
12/13	Robert C. Loedding	Shoemaker	1	12/13 PM	Ingram
	Laura Tamble	WB	7	12/14 PM	Ingram
	William E. Porter	ACS	15	12/15 PM	Ingram
	Harry R. Jacobson	Elk Creek	4	12/15 PM	Ingram
	Bellaire Harbor	Shoemaker	1	12/16 PM	Ingram
	Sara Page	Somerville	3	12/16 PM	Ingram
	Ytown	WB	1	12/16 PM	Ingram
	Mt. Vernon Fleet	Elk Creek	3	12/17 AM	Ingram

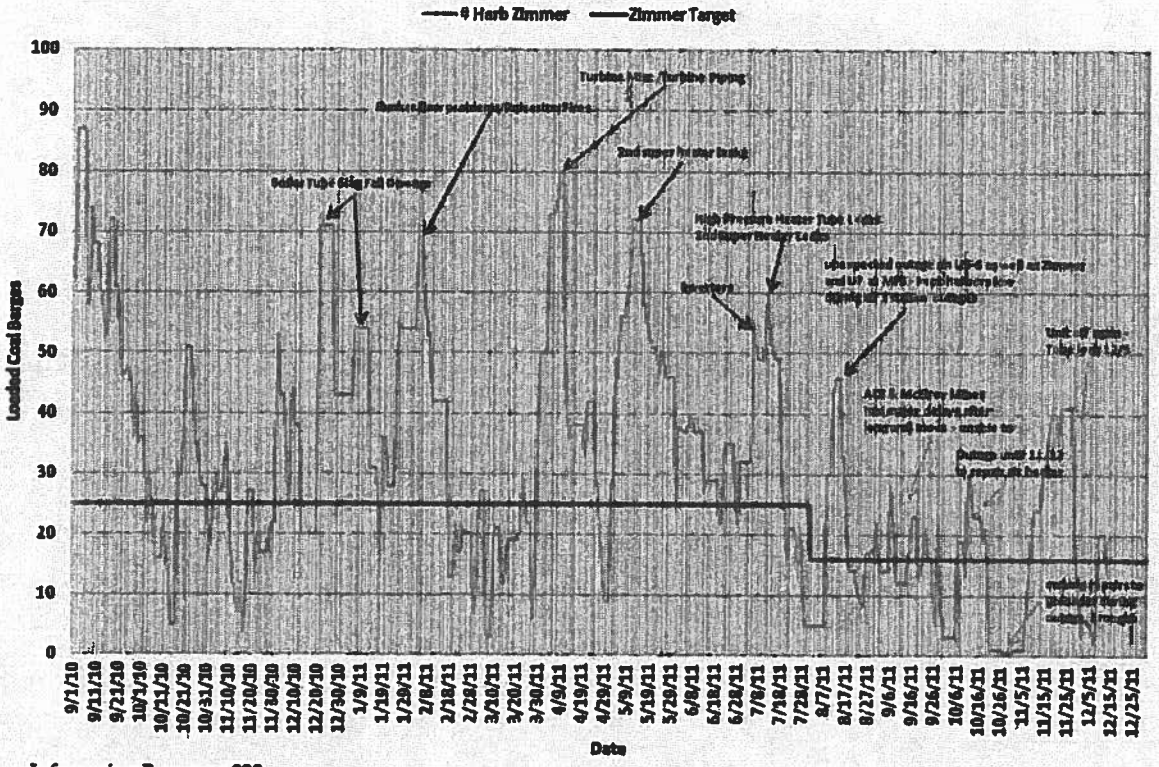
Source: Information Response 299

Exhibit V-9
Metric Used to Monitor Barge Count at the Beckjord Harbor
September - December, 2011



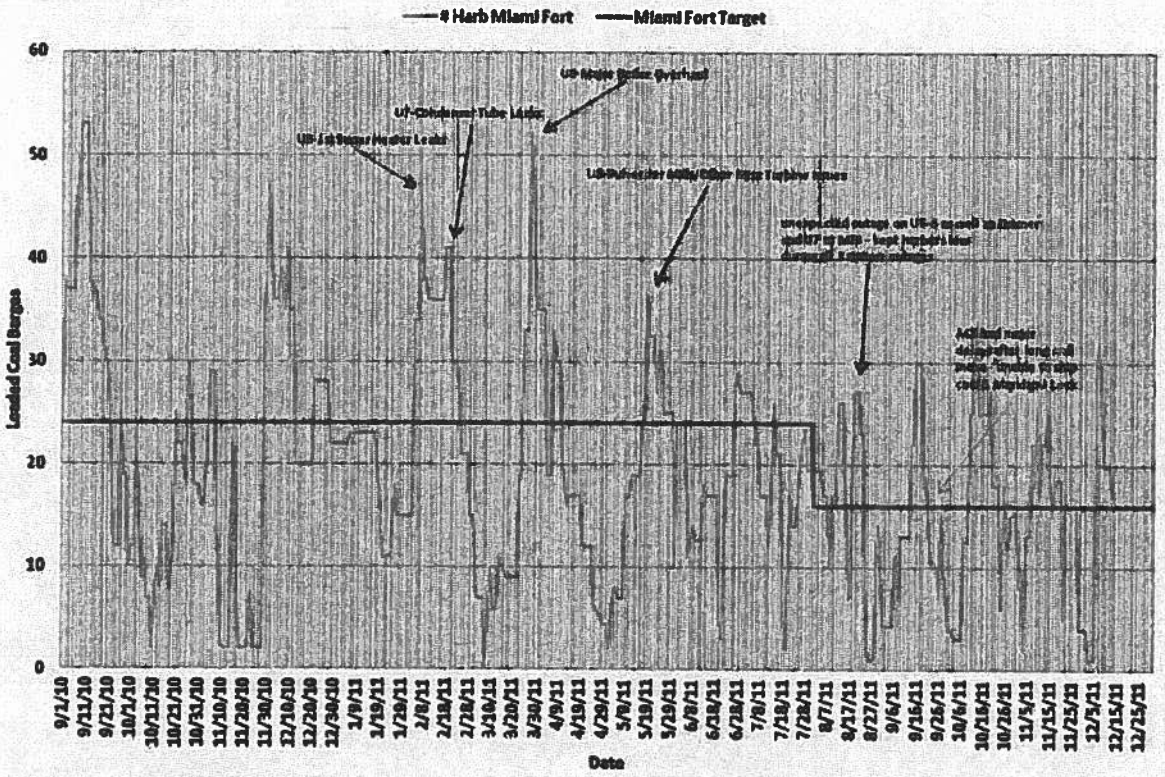
Source: Information Response 299

Exhibit V-10
Metric Used to Monitor Barge Count at the Zimmer Harbor
September - December, 2011



Source: Information Response 299

Exhibit V-11
Metric Used to Monitor Barge Count at the Miami Fort Harbor
September - December, 2011



Source: Information Response 299

Finding V-4 **The Fuel Handling and Inventory Management organization implemented comprehensive coal pile management processes during 2011.**

Generally, coal is off loaded from barges and transported via conveyor directly to the burn bunkers. Coal is added to inventory piles if units are down and barges cannot be diverted or inventory is built up in anticipation of river transportation problems (high water, ice, etc.). Coal is used from the piles when unloading equipment undergoes maintenance or other conditions, such as barge delays, occur.

CLMH implement a three (3) week coal pile planning process during 2011. *Exhibit V-12* provides a copy of the three (3) week plan ending December 31, 2011.[129]

Exhibit V-12
Three (3) Week Coal Pile Inventory Plans
as of December 31, 2011

	Beckjord											
	HS Burn (River)	HS Storn	HS Reclaim (Tons)	Delivery	HS Harbor Count	Proj HS Pile Inv	LS Burn (River)	LS Storn	LS Reclaim (Tons)	Delivery	LS Harbor Count	Proj LS Pile Inv
Tuesday, December 13, 2011	1.1		900.0		12.0	11,098	0.0		0.0		7.0	229,257
Wednesday, December 14, 2011	1.1		900.0		10.9	10,196	0.0		0.0		7.0	229,257
Thursday, December 15, 2011	2.0		1600.0		9.8	9,296	0.0		0.0		7.0	229,257
Friday, December 16, 2011	1.9		1600.0	5	7.8	6,896	0.0		0.0	1	7.0	229,257
Saturday, December 17, 2011	1.9		1600.0	16	10.9	5,396	0.0		0.0		8.0	229,257
Sunday, December 18, 2011	1.9		1600.0	3	25.0	3,798	0.0		0.0		8.0	229,257
Monday, December 19, 2011	2.2		1600.0		26.1	2,196	0.0		0.0		8.0	229,257
Tuesday, December 20, 2011	1.9		1600.0		23.9	596	0.0		0.0		8.0	229,257
Wednesday, December 21, 2011	2.5		596.0		22.0	0	0.0		0.0		8.0	229,257
Thursday, December 22, 2011	2.9				19.5	0	0.0		0.0		8.0	229,257
Friday, December 23, 2011	2.9				16.6	0	0.0		0.0		8.0	229,257
Saturday, December 24, 2011	2.5			7	13.7	0	0.0		0.0		8.0	229,257
Sunday, December 25, 2011	2.2				18.2	0	0.0		0.0		8.0	229,257
Monday, December 26, 2011	2.6				15.9	0	0.0		0.0		8.0	229,257
Tuesday, December 27, 2011	2.7				13.5	0	0.0		0.0		8.0	229,257
Wednesday, December 28, 2011	2.7				10.8	0	0.0		0.0		8.0	229,257
Thursday, December 29, 2011	2.7				8.1	0	0.0		0.0		8.0	229,257
Friday, December 30, 2011	2.5				5.4	0	0.0		0.0		8.0	229,257
Saturday, December 31, 2011	2.7					0	0.0		0.0		8.0	229,257

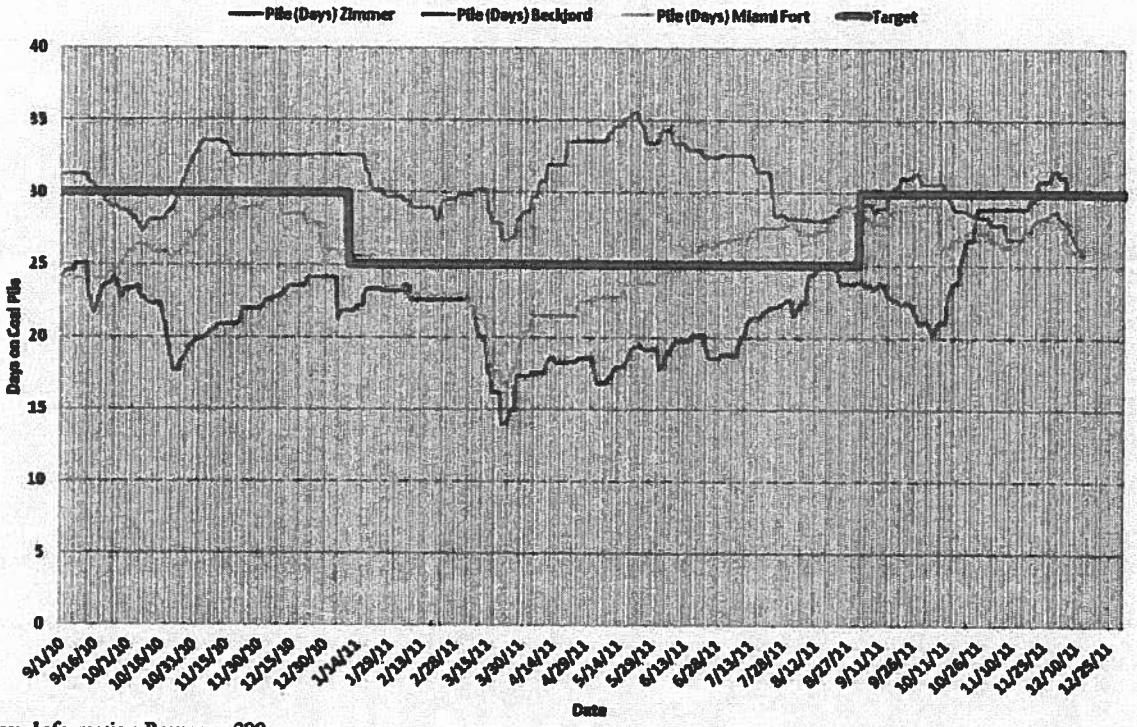
	Stuart					
	Burn (River)	Storn	Reclaim (Tons)	Delivery	Harbor Count	Proj Pile Inv
Tuesday, December 13, 2011	6.1	1.0		9	14.0	305,255
Wednesday, December 14, 2011	5.7	1.0		16	18.9	296,819
Thursday, December 15, 2011	5.9	1.0		6	23.2	288,419
Friday, December 16, 2011	5.9	1.0		1	28.0	279,911
Saturday, December 17, 2011	5.9	1.0		29	33.5	271,932
Sunday, December 18, 2011	6.0	1.0		20	43.6	259,715
Monday, December 19, 2011	6.5	1.0		20	46.5	254,077
Tuesday, December 20, 2011	6.0	1.0		20	47.0	248,419
Wednesday, December 21, 2011	5.9	1.0		3	50.9	242,819
Thursday, December 22, 2011	5.9	1.0			47.0	239,818
Friday, December 23, 2011	5.9	1.0			40.1	233,718
Saturday, December 24, 2011	5.3	1.0			31.2	227,819
Sunday, December 25, 2011	4.6	1.0			26.9	223,419
Monday, December 26, 2011	5.0				21.1	218,419
Tuesday, December 27, 2011	5.4				16.3	213,419
Wednesday, December 28, 2011	5.5					208,419
Thursday, December 29, 2011	5.5					203,419
Friday, December 30, 2011	5.0			12		198,419
Saturday, December 31, 2011	5.4			15		193,419

	Miami Fort					
	Burn (River)	Storn	Reclaim (Tons)	Delivery	Harbor Count	Proj Pile Inv
Tuesday, December 13, 2011	5.6	1.0		1	17.0	279,257
Wednesday, December 14, 2011	5.3	1.0		7		274,000
Thursday, December 15, 2011	5.3	1.0		29	12.1	279,457
Friday, December 16, 2011	5.3	1.9		5	14.0	280,899
Saturday, December 17, 2011	5.4			2	23.1	280,832
Sunday, December 18, 2011	5.3				20.7	280,839
Monday, December 19, 2011	5.7			10	15.4	280,899
Tuesday, December 20, 2011	5.0			10	13.6	280,899
Wednesday, December 21, 2011	5.1			10	14.6	280,899
Thursday, December 22, 2011	5.0			2	20.6	280,899
Friday, December 23, 2011	5.1				26.6	280,899
Saturday, December 24, 2011	4.8				21.4	280,899
Sunday, December 25, 2011	4.1			10	16.9	280,899
Monday, December 26, 2011	4.6			10	22.0	280,899
Tuesday, December 27, 2011	4.8				28.2	280,899
Wednesday, December 28, 2011	4.8				23.4	280,899
Thursday, December 29, 2011	4.8				18.6	280,899
Friday, December 30, 2011	4.5				13.8	280,899
Saturday, December 31, 2011	4.8					280,899

Source: Information Response 299

CLMH implemented daily tracking by quarter of actual coal pile inventories compared to target for each of the generating stations. *Exhibit V-13* shows the tracking report for the last quarter of 2011.[130]

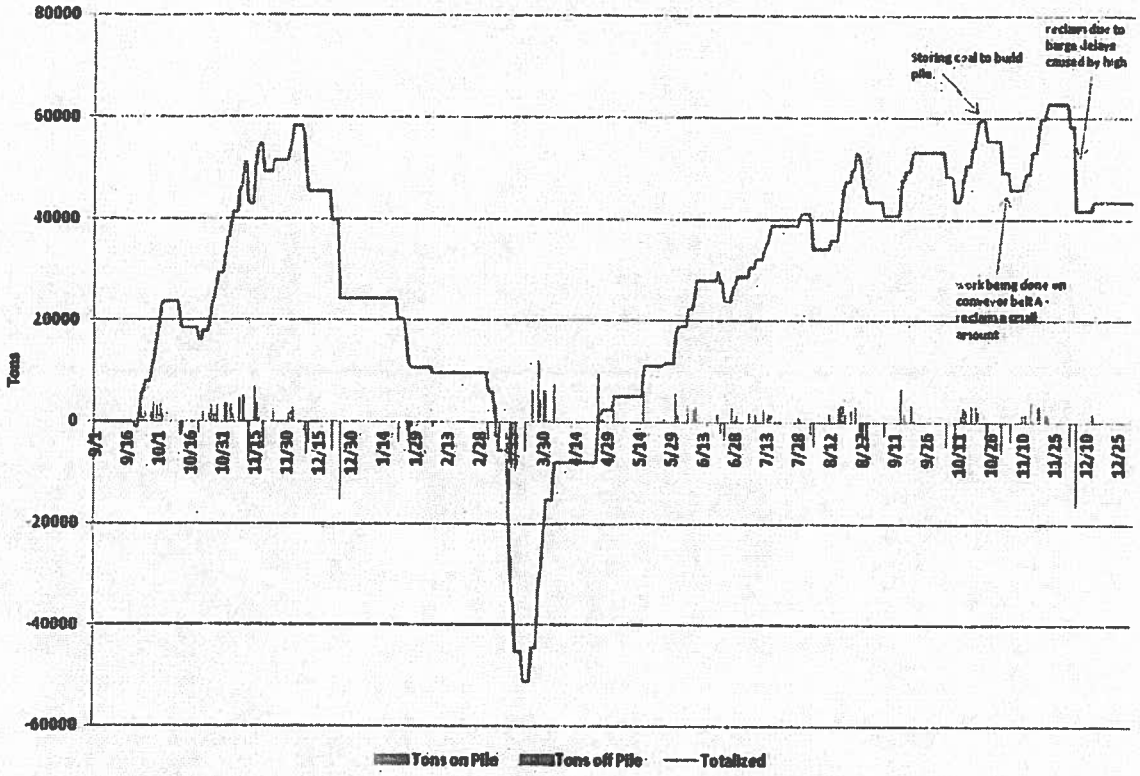
Exhibit V-13
Coal Pile Inventories
September -December, 2011



Source: Information Response 299

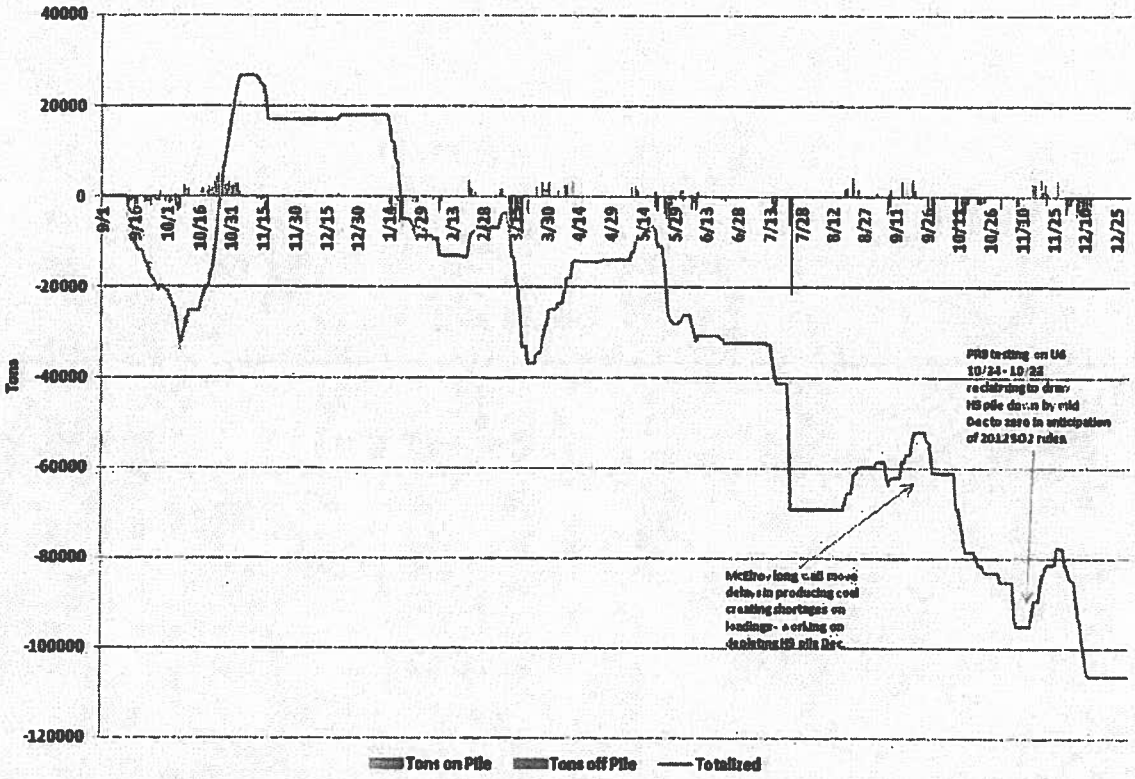
In addition, CLMH created reports of daily coal pile activity with notations of events affecting the size of the pile. *Exhibit V-14*, *Exhibit V-15*, and *Exhibit V-16* provide the 4th quarter 2011 reports for Miami Fort, Beckjord, and Zimmer stations respectively.

Exhibit V-14
Metric Used to Monitor Miami Fort 7 & 8 Station Coal Pile Activity
September - December, 2011



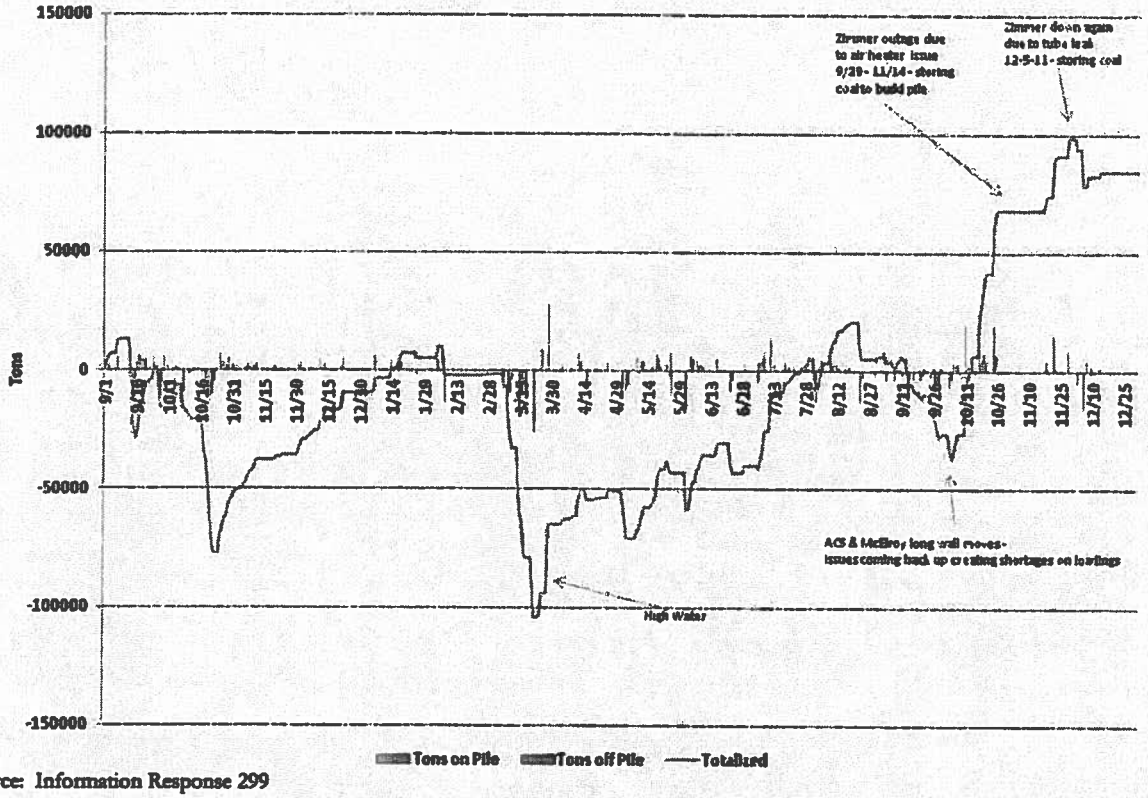
Source: Information Response 299

Exhibit V-15
Metric Used to Monitor Beckjord Station Coal Pile Activity
September - December, 2011



Source: Information Response 299

Exhibit V-16
Metric Used to Monitor Zimmer Station Coal Pile Activity
September - December, 2011



Source: Information Response 299

Finding V-5 **Duke Energy Ohio's total book inventory of coal was increased 2.18% (18,216 tons) in December 2011 as a result of an aerial physical coal inventory of Beckjord, Miami Fort, and Zimmer station coal piles performed during 2011.**

Schumaker & Company consultants requested and analyzed the documentation of any adjustments made to book inventory as a result of a physical coal inventory during 2011. Duke Energy Ohio has used the same aerial survey process for physical coal inventory checking for a number of years:[131]

- Coal piles are dressed prior to fly over
- Coal piles are defined, with lime if required, the day before flyover
- Core samples from piles are taken for density at time of flyover (have not seen wide variation in density from year-to-year)
- Aerial Survey vendor calculates volumes on piles and supplies a report for each pile that includes pictures showing coal pile outline and elevations of the piles
- Adjustments, regardless of size, are booked in December of the survey year

The results of the physical inventory survey are booked in December of the year of the aerial survey. *Exhibit V-22* shows the summary of the comparison between the aerial survey results and the book value.[134]

Exhibit V-22
Year-end Aerial Survey Summary of Coal Inventory
December 31, 2011

SURVEY INFORMATION		BECKJORD HS	BECKJORD LS	MIAMI FORT HS	ZIMMER	SYSTEM
DATE		7/28/2011	7/28/2011	7/28/2011	7/28/2011	7/28/2011
FLIGHT TIME		10:11 AM	10:11 AM	10:28 AM	10:03 AM	
COAL REPORT PREV DAY	TONS	48,987.21	227,087.58	278,243.58	278,395.30	833,723.65
COAL UNLOADED/NOT ADDED	TONS +	0	0	0	0	0.00
COAL RECLAIMED UP TO FLIGHT	TONS -	0	0	0	0	0.00
COAL RECEIVED UP TO FLIGHT	TONS +	0	0	0	0	0.00
CORRECTED BOOK AMOUNT	TONS	48,987	227,088	278,244	278,395	833,724
BUNKER CAPACITY	TONS -	0	0	0	0	0.00
AMOUNT BUNKER LOW	TONS +	0	0	0	0	0.00
COAL ON PILE (BOOK)	TONS	48,987	227,088	278,244	278,395	833,724
COAL PILE VOLUME (SURVEY)		BECKJORD HS	BECKJORD LS	MIAMI FORT HS	ZIMMER	SYSTEM
MAIN PILE	CU. FT.	1,115,790.00	5,884,387.00	7,220,883.00	7,923,486.00	21,944,806.00
DENSITY	LB/FT3	79.59	80.86	78.64	80.12	79.09
MAIN PILE TONS		44,397	228,799	278,337	301,407	851,940
AUXILIARY PILE	CU. FT.					
DENSITY	LB/FT3					
AUXILIARY PILE TONS		0	0	0	0	0.00
TONS BY SURVEY (VOL. * DENS./2000)	TONS	44,397	228,799	278,337	301,407	851,940
SURVEY VS PILE DIFFERENCE	TONS	-4,590	2,701	-2,907	23,012	18,216
PERCENT VARIANCE	PCNT %	-9.37%	1.19%	-1.04%	8.27%	2.18%
INVENTORY ADJUSTMENT	TONS +/-	-4,590	0	0	23,012	18,422.00
REMAINING DIFFERENCE	TONS +/-	0	2,701	-2,907	0	-206
ADJUSTED PERCENT VARIANCE	PCNT %	0.00%	1.19%	-1.04%	0.00%	-0.02%
LAST DENSITY TEST	DATE	8/2/2010	8/2/2010	8/3/2010	8/3/2010	
					Note: Kucera International Provided the Aerial Survey Services and Volume Report	
2011 Aerial Survey			Duke Energy Corporation Confidential			

Source: Information Responses 287 (b, c, and d)

The book adjustments (tons and percent) to station coal inventories that were applied in December 2011 are shown in *Exhibit V-23*.[135] The Beckjord high sulfur (HS) book inventory was reduced by 4,590 tons (8.37%) while the LS (low sulfur) inventory was increased by 2,701 tons (1.19%). The Miami Fort book inventory was decreased 2,907 tons (1.04%) and the Zimmer book was increased 23,012 tons (8.27%). Duke Energy Ohio's total book inventory was increased by 18,216 tons (2.18%).[136]

Exhibit VI-3
Zimmer Environmental Constraints
as of December 31, 2011

Station	Unit	Pollutant	Limit	Comments
Zimmer	Unit 1	Opacity	20%	
		Particulate	0.025 lbs/MMBtu	
		Particulate Removal	99.5%	Compliance with the 0.025 lbs/MMBtu PM emission limit constitutes compliance with the percent reduction requirements.
		Particulate	1,315 tons/year	
		Sulfur Dioxide	0.549 lbs/MMBtu	The limit is based on a 30-day rolling average using CEM data.
		SO2 Removal	91%	The limit is based on a 30-day rolling average using CEM data.
		Sulfur Dioxide	1.0 lbs/MMBtu	The limit is based on a 3-run average using Method 6 stack testing conducted during normal operating conditions.

Note: PM = parts per million

Source: Information Responses 28 and 149

Finding VI-2 **Duke Energy Ohio continues to manage its emission allowances positions based on the expected burn at each of its plants.**

During a tour of the Portfolio Risk Management trading floor on March 9, 2011, the emission allowances trader in the Portfolio Risk Management group provided Schumaker & Company consultants with an explanation of the process used to manage emission allowances positions.[143] Positions are managed based on forecasts from the Commercial Business Model (CBM) and on knowledge of current conditions. Duke Energy Ohio has been offering emission allowances to the market but the recent stability of the market has resulted in few counterparties.

Finding VI-3 **Duke Energy Ohio did not receive any citations for environmental violations during 2011 and all earlier citations have been settled and no further activities are ongoing on the earlier citations.**

Schumaker & Company requested and reviewed documentation of any citations or notices of violation (NOVs), including fines for environmental violations Duke Energy Ohio received during 2010. There were no additional citations in 2011. Fines paid for environmental citations are not included in the Fuel and Purchased Power (FPP).[144]

Finding VI-4 **Duke Energy Ohio continues to monitor potential regulations that could have an impact on future operations of the coal-fired plants.**

With the except of Beckjord, all of Duke Energy Ohio generating stations have under gone upgrades to the latest environmental controls in the last 10 years. The Beckjord generating stations contains some of the older, smaller generating units which have not been upgraded and in fact three of the units have been recently mothballed. At this time, the Beckjord units are currently scheduled to be retired instead of upgraded pending the final resolution of environmental regulations that are underway. Regulations for coal-burning plants continue to be a focus within the United States. The recent nuclear plant situation in Japan that resulted from an earthquake and subsequent tsunami, along with a continuing strengthening of the economy, will sharpen the discussion about sources of electric generation in the United States. Duke Energy Ohio and other utilities in the nation will ultimately be impacted.

Exhibit VII-1
2011 REC Positions
as of December 12, 2011

Ohio Solar	2011
Requirement	(2,381)
Supply	
Brought Forward	254
2011 Vintage	2,268
Position	141

Non-Ohio Solar	2011
Requirement	(2,381)
Supply	
Brought Forward	1,255
2011 Vintage	3,943
Position	2,817

Ohio NonSolar	2011
Requirement	(76,986)
Supply	
Brought Forward	135,357
2011 Vintage	63,334
Position	121,705

Non-Ohio NonSolar	2011
Requirement	(76,986)
Supply	
Brought Forward	153,706
2011 Vintage	-
Position	76,720

Notes: Brought Forward – RECs are bankable and any length after compliance can be used in subsequent years, therefore any length in the position after filling the 2011 Requirements will be carried forward to use toward the 2012 Requirements

Source: Information Response 296

Exhibit IX-16 below illustrates the summary totals for these items used in Duke Energy Ohio's supporting documentation to its SRT tariff filings.

Exhibit IX-16
2011 Summary Estimates for SRT Filings by Quarter

	Projected Capacity and Purchased Power Costs (Item #1)	Prior Period Costs Over/Under Collections (Item #2)	Total SRT Costs to be Recovered	Estimates of SRT Billing (Item #3)	Estimates of Net Power Costs	kWh	kW
1Q 2011	$750,813	$1,526,600	$2,277,413	$2,277,413	$0	12,141,600,298	12,148,988
2Q 2011	$16,985,910	$856,585	$17,842,495	$15,387,708	$2,454,787	7,927,074,341	6,540,646
3Q2011	$922,307	$2,454,786	$3,377,093	$1,777,588	$1,599,505	5,382,302,777	3,801,400
4Q 2011	$1,068,974	$2,454,786	$3,523,760	$701,615	$2,822,145	2,182,925,611	1,689,379

Source: Information Responses 197 and 249

With each quarterly filing, Duke Energy Ohio updates its estimated costs and billing based on actual results experienced on a year-to-date basis. For example, with its first quarter 2011 filing, its project data is based solely on estimated data. However, for its second quarter 2011 filing, Duke Energy Ohio has two months of actual data and 10 months of projected data. Then for its third quarter 2011 filing, Duke Energy Ohio has five months of actual data and seven months of project data.

Findings and Conclusions

Finding IX-4 **Schumaker & Company's review of the methodology, calculations, and accounting entries concerning the quarterly filing of the SRT rate disclosed no discrepancies that affected the FPP rate for 2011.**

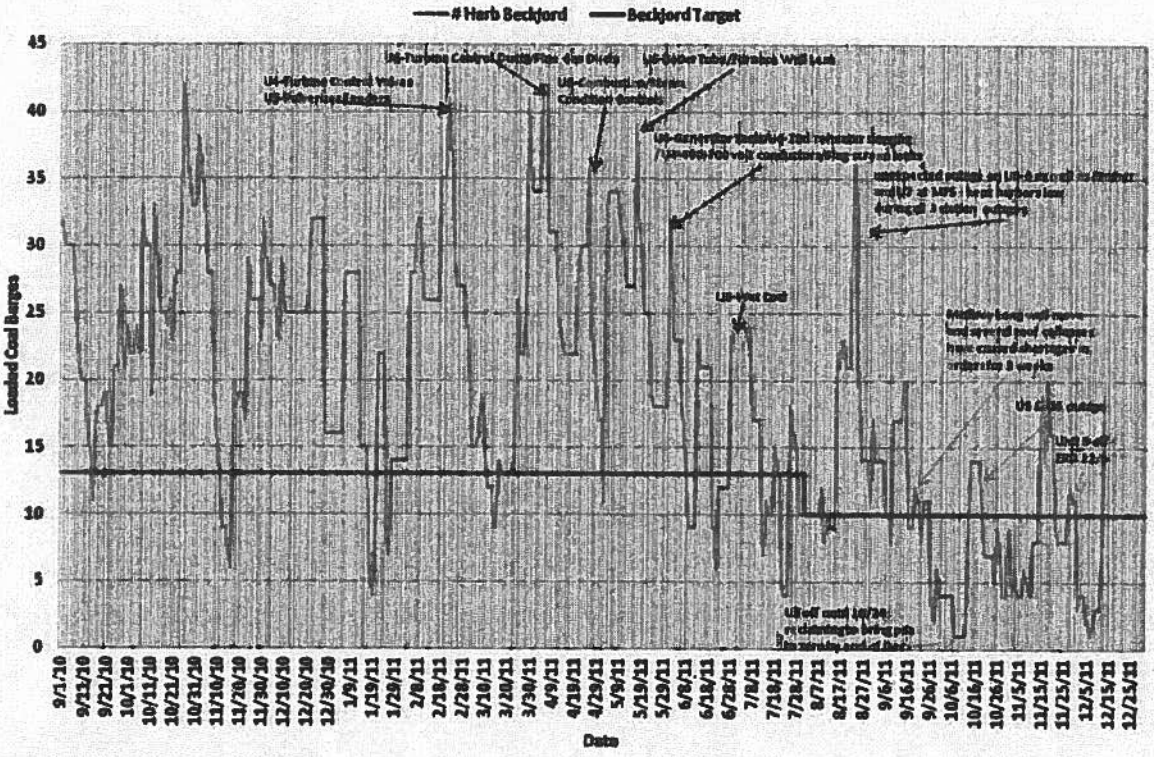
Schumaker & Company reviewed and recalculated, where appropriate, the work papers, supporting documentation, and accounting entries used to develop, report, and file the SRT rate included in PUCO filings. The mathematical accuracy of calculations was verified, entries were traced to supporting documentation, and rates were recomputed. Also, a random sample of customer bills, as shown previously in *Exhibit IX-14*, was examined to verify that the appropriate SRT rate was included on each invoice. Revenues and electricity usage were traced to monthly and annual financial reports used for external and internal purposes. A few minor formatting discrepancies were discovered, but they did not affect Duke Energy Ohio's accounting and reporting concerning the SRT rate for 2011.

Recommendations

None

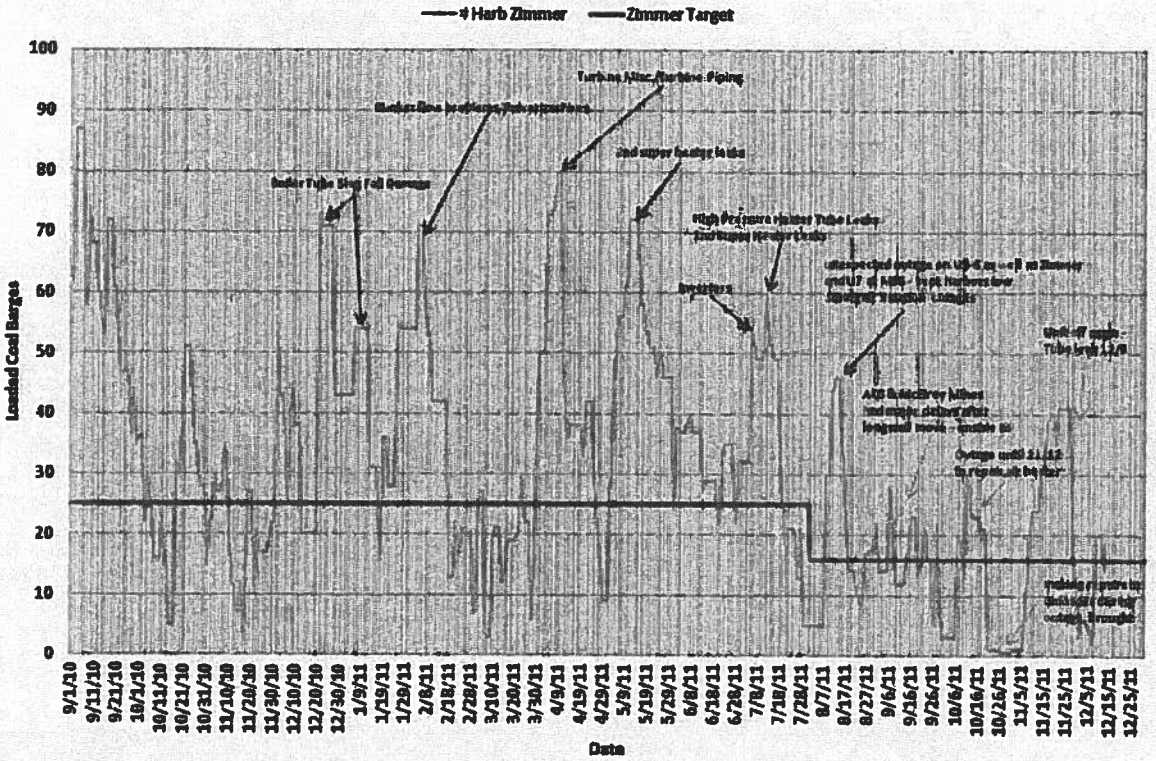
The number of barges in the harbors at Beckjord, Zimmer, and Miami Fort are monitored using the metrics shown in *Exhibit X-7*, *Exhibit X-8*, and *Exhibit X-9*.[221]

Exhibit X-7
Metric Used to Monitor Barge Count at the Beckjord Harbor
September - December, 2011



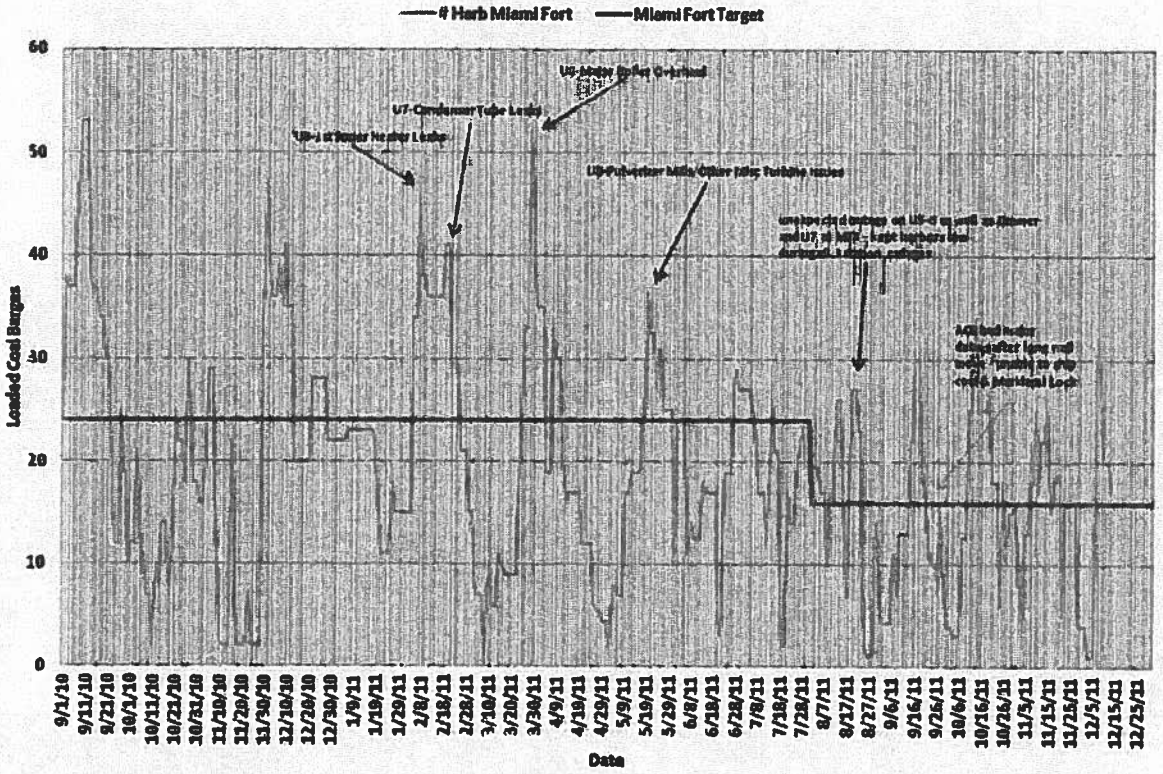
Source: Information Response 299

Exhibit X-8
Metric Used to Monitor Barge Count at the Zimmer Harbor
September - December, 2011



Source: Information Response 299

Exhibit X-9
Metric Used to Monitor Barge Count at the Miami Fort Harbor
September - December, 2011



Source: Information Response 299

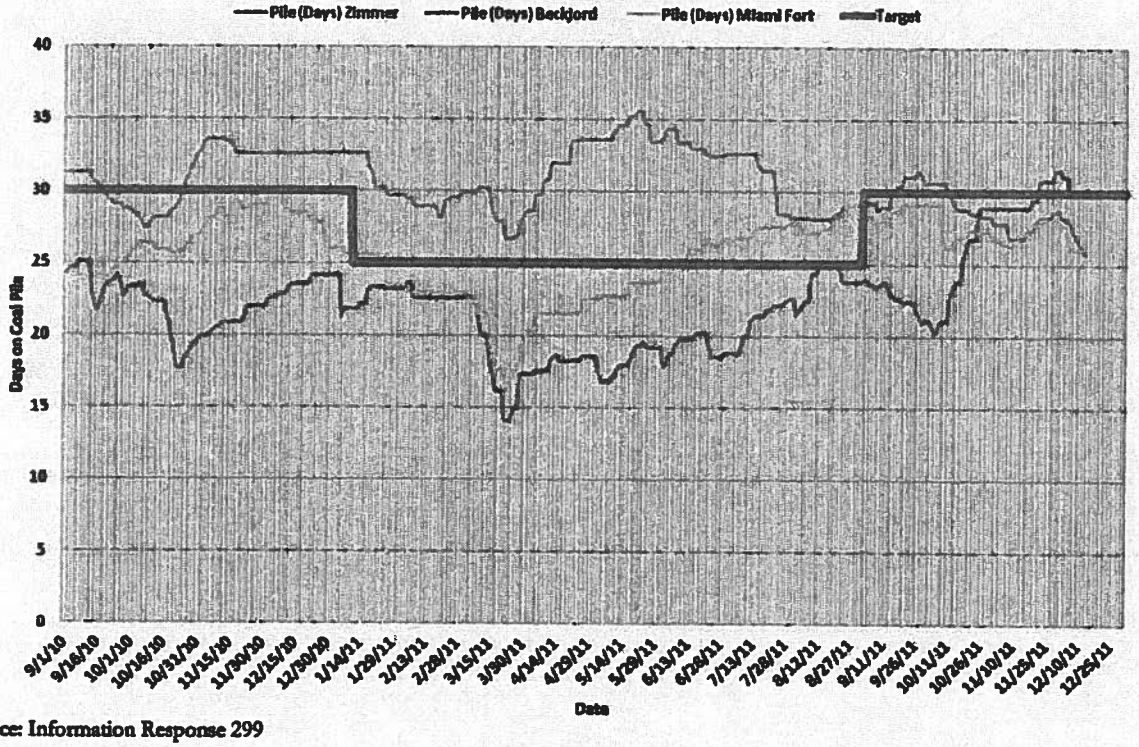
Stipulation (II) (b) (ii) – Refine process control of coal pile inventories

"Duke will continue to refine process control of coal pile inventories. The auditor for the 2011 audit report will review and report on the adequacy of Duke's implementation of this requirement. (Jt. Ex. 1 at 6.)"

Finding X-3 **Duke Energy Ohio has implemented practices and metrics to control coal pile inventories.**

Exhibit X-10 shows the metric that Duke Energy Ohio uses to monitor coal piles by following a three (3) week coal pile management plan shown in *Exhibit X-11*.[22]

Exhibit X-10
Coal Pile Inventories
September -December, 2011



Source: Information Response 299

Exhibit X-11
Three (3) Week Coal Pile Inventory Plans
as of December 31, 2011

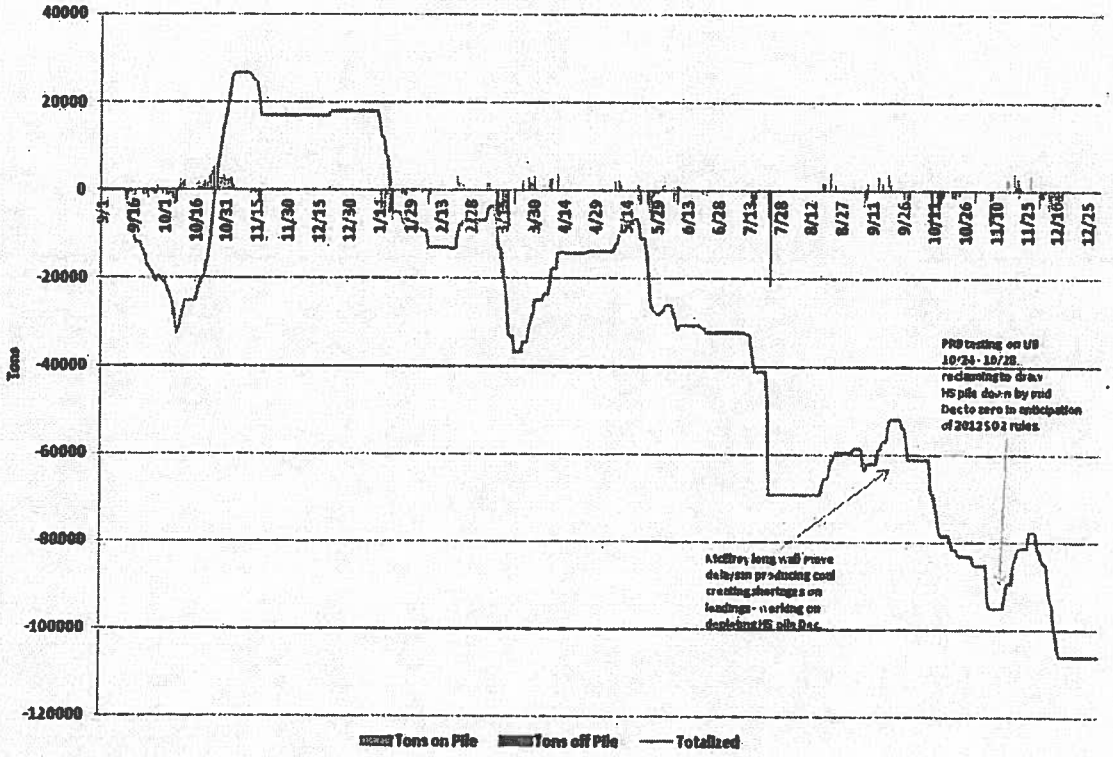
	Beckjord											
	HS Burn (River)	HS Store	HS Reclaim (Tons)	Delivery	HS Harbor Count	Proj HS Pile Inv	LS Burn (River)	LS Store	LS Reclaim (Tons)	Delivery	LS Harbor Count	Proj LS Pile Inv
Tuesday, December 13, 2011	1.1		900.0		12.0	11,096	0.0		0.0		7.0	229,257
Wednesday, December 14, 2011	1.1		900.0		10.9	10,196	0.0		0.0		7.0	229,257
Thursday, December 15, 2011	2.0		1600.0		9.8	8,596	0.0		0.0		7.0	229,257
Friday, December 16, 2011	1.9		1600.0	5	7.9	8,996	0.0		0.0	1	7.0	229,257
Saturday, December 17, 2011	1.9		1600.0	16	10.9	5,396	0.0		0.0		8.0	229,257
Sunday, December 18, 2011	1.9		1600.0	3	25.0	3,796	0.0		0.0		8.0	229,257
Monday, December 19, 2011	2.2		1600.0		26.1	2,196	0.0		0.0		8.0	229,257
Tuesday, December 20, 2011	1.9		1600.0		29.9	596	0.0		0.0		8.0	229,257
Wednesday, December 21, 2011	2.5		596.0		22.0	0	0.0		0.0		8.0	229,257
Thursday, December 22, 2011	2.9				18.5	0	0.0		0.0		8.0	229,257
Friday, December 23, 2011	2.9				16.6	0	0.0		0.0		8.0	229,257
Saturday, December 24, 2011	2.6			7	13.7	0	0.0		0.0		8.0	229,257
Sunday, December 25, 2011	2.2				14.7	0	0.0		0.0		8.0	229,257
Monday, December 26, 2011	2.5				15.9	0	0.0		0.0		8.0	229,257
Tuesday, December 27, 2011	2.7				13.5	0	0.0		0.0		8.0	229,257
Wednesday, December 28, 2011	2.7				10.8	0	0.0		0.0		8.0	229,257
Thursday, December 29, 2011	2.7				8.1	0	0.0		0.0		8.0	229,257
Friday, December 30, 2011	2.5				5.4	0	0.0		0.0		8.0	229,257
Saturday, December 31, 2011	2.7					0	0.0		0.0		8.0	229,257

	Zimmer						Miami Fort					
	Burn (River)	Store	Reclaim (Tons)	Delivery	Harbor Count	Proj Pile Inv	Burn (River)	Store	Reclaim (Tons)	Delivery	Harbor Count	Proj Pile Inv
Tuesday, December 13, 2011	6.1	1.0		9	14.0	405,213	5.6	1.0		1	17.0	275,230
Wednesday, December 14, 2011	5.7	1.0		10	15.9	385,813	5.9	1.0		7		274,630
Thursday, December 15, 2011	5.9	1.0		6	15.2	388,413	5.9	1.0		19	12.1	278,430
Friday, December 16, 2011	5.9	1.0		1	24.4	370,013	5.3	1.8		5	14.8	281,830
Saturday, December 17, 2011	5.9	1.0		28	23.3	377,013	5.4			3	23.1	280,630
Sunday, December 18, 2011	6.0	1.0		10	42.4	378,213	5.2				20.7	280,030
Monday, December 19, 2011	6.0	1.0		10	145.9	334,813	5.7			10	15.4	280,030
Tuesday, December 20, 2011	5.9	1.0		10	47.8	378,413	5.0			10	19.8	280,630
Wednesday, December 21, 2011	5.9	1.0		3	80.9	370,013	5.1			10	24.6	280,630
Thursday, December 22, 2011	5.9	1.0			47.0	379,613	5.0			7	28.6	280,630
Friday, December 23, 2011	5.9	1.0			40.1	380,213	5.1				26.8	280,630
Saturday, December 24, 2011	5.3	1.0			33.2	380,813	4.9				21.4	280,630
Sunday, December 25, 2011	4.6	1.0			26.9	384,413	4.1			10	18.9	280,630
Monday, December 26, 2011	5.0				21.3	386,413	4.6			10	22.8	280,630
Tuesday, December 27, 2011	5.4				16.1	384,413	4.8				28.2	280,630
Wednesday, December 28, 2011	5.5					384,413	4.6				23.4	280,630
Thursday, December 29, 2011	5.5					386,213	4.8				18.6	280,630
Friday, December 30, 2011	5.0			12		386,413	4.6				13.8	280,630
Saturday, December 31, 2011	5.4			15		386,413	4.8					280,630

Source: Information Response 299

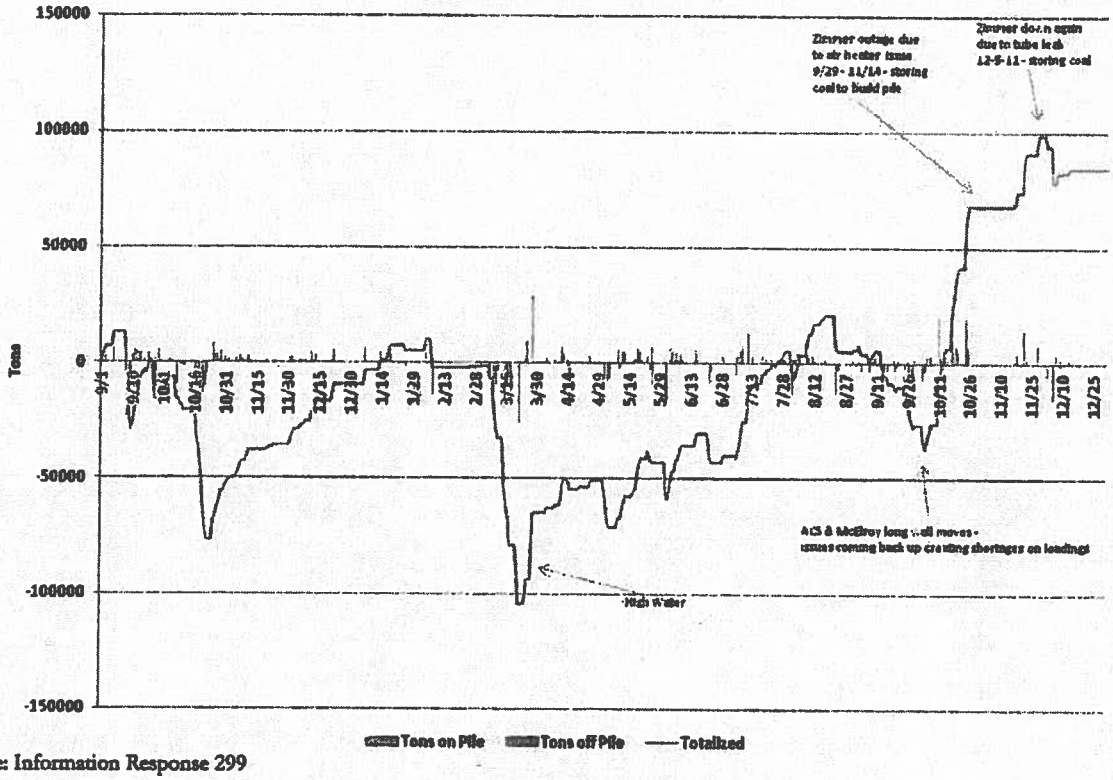
Exhibit X-12, *Exhibit X-13*, and *Exhibit X-14* provides the metrics that are used by Duke Energy Ohio to monitor coal pile activity at Beckjord, Zimmer, and Miami Fort stations respectively.[223]

Exhibit X-12
Metric Used to Monitor Beckjord Station Coal Pile Activity
September - December, 2011



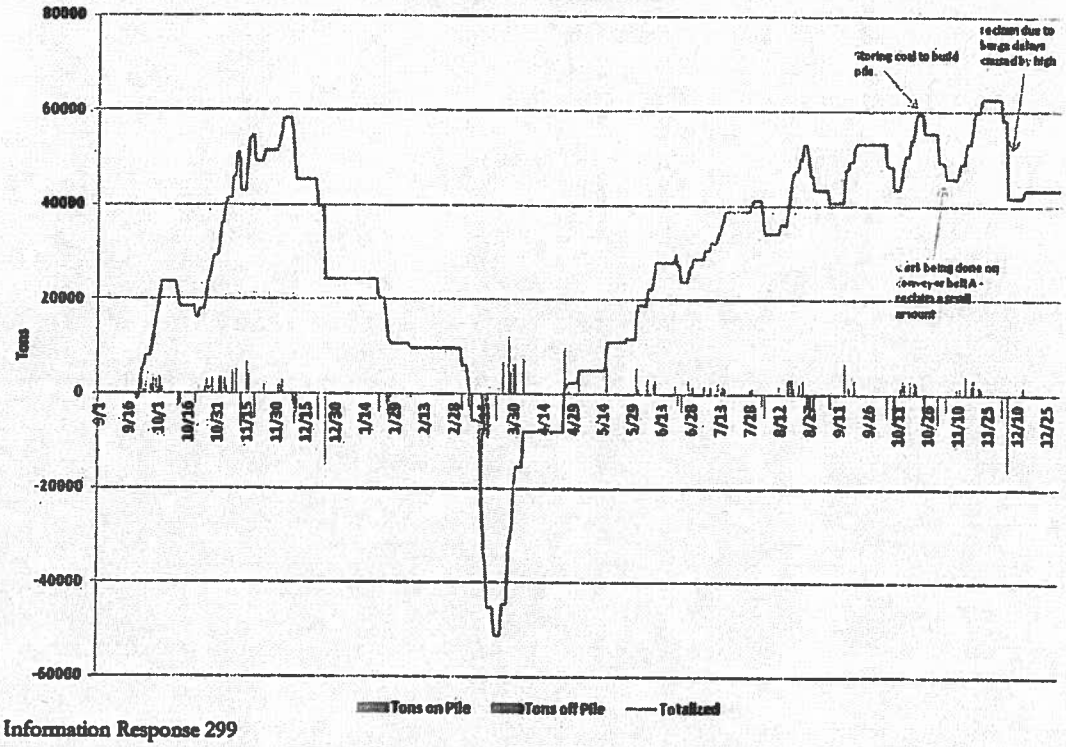
Source: Information Response 299

Exhibit X-13
Metric Used to Monitor Zimmer Station Coal Pile Activity
September - December, 2011



Source: Information Response 299

Exhibit X-14
Metric Used to Monitor Miami Fort 7 & 8 Station Coal Pile Activity
September - December, 2011



Source: Information Response 299

DUKE ENERGY OHIO

DETERMINATION OF SYSTEM RELIABILITY TRACKER - RIDER SRT - BY RETAIL RATE GROUP
REFLECTING RECOVERY OF ESTIMATED 2011 CAPACITY AND PURCHASED POWER COSTS (EXCLUDING ENERGY COSTS
FOR THE PERIOD JANUARY THROUGH DECEMBER 2011 TO BE APPLIED TO CUSTOMER BILLS OVER ATWELVE-MONTH PERIOD

Line No.	Description	Allocated Percentage Share of System Peak Demands for the Company's Retail Electric Customers 1/ (A)	Estimate of 2011 Capacity and Purchased Power Costs By Retail Rate Group to be Collected Through System Reliability Tracker - Rider SRT (B)	Estimated Rider SRT Billings for January thru December 2011 (C)	Prior Period Rider SRT Over/ Under-Collections to be Collected from Customers 2/ (D)	Estimate of 2011 Net Power Costs By Retail Rate Group to be Collected Through System Reliability Tracker - Rider SRT (E)	Allocated Capacity and Purchased Power Costs (F)	Estimated Kilowatt-Hour Sales For The Twelve Months Ended December 31, 2010 3/ (G)	Estimated Billing kW Demands (H)	SRT Adjustment Factor By Rate Group (SRV-$/kWh) (I)	Li N
	Retail Rate Group										
	RS Rate Group										
1	Rates RS, ORH, HEC, TD, CUR	42.382%	$318,210	$0	($261,415)	$56,795	$56,795	7,698,810,788		0.000007	1
2	Non-Residential (Detailed Below)	57.618%	432,603								
		100.000%	$750,813								
3	DS Rate Group										
4	Rate DS	65.250%	$282,274	$0	1,377,793	$1,660,067					
5	First 1,000 kW						1,029,881		9,466,341	0.108800	
6	Additional kW						17,047		198,498	0.085900	
7	First 300 kWh/kW						572,394	2,307,421,056		0.000248	7
8	Additional kWh						40,765	542,937,928		0.000075	8
9	Total Rate DS						1,660,067				9
10	Rate GS-FL	0.580%	2,509	-	20,488	22,997	22,997	30,394,523		0.000757	10
11	Rate EH	1.070%	4,629	-	43,837	48,466	48,466	87,720,187		0.000553	11
12	Total Rates DS, GS-FL, EH		289,412	-	1,442,118	1,731,530	1,731,530				12
13	Rate DM	9.430%	40,794	-	337,772	378,566	378,566	412,115,797		0.000919	13
14	Rate DP	10.750%	46,505	-	(137,805)	(91,300)					14
15	First 1,000 kW						(28,569)		579,769	-0.045800	15
16	Additional kW						(21,258)		568,039	-0.036200	16
17	First 300 kWh/kW						(36,248)	306,827,738		-0.000118	17
18	Additional kWh						(7,225)	162,449,387		-0.000044	18
19	Total Rate DP						(91,300)				19
20	Rate TS	10.790%	46,678	-	65,130	111,808					20
21	First 50,000 kVA						84,270		1,286,321	0.065000	21
22	Additional kVA						0		-	0.065000	22
23	First 300 kWh/kVA						19,480	280,334,911		0.000069	23
24	Additional kWh						8,058	191,274,376		0.000042	24
25	Total Rate TS						111,808				25
26	Lighting Rate Group										26
27	Rates SL, TL, OL, NSU, NSP,										27
28	SC, SE, UOLS	2.130%	9,214	-	80,800	90,014	90,014	120,313,610		0.000748	28
29	Total Retail	100.000%	$760,813	$0	$1,526,600	$2,277,413	$2,277,413	12,141,600,288			29

Rate Group RS based on applicable peak demands from the Company's cost of service study in Case No. 92-1464-EL-AIR. Non-residential based on 12 months actual KWH ending October 2010.
See Schedule A
Based on actual sales to SRT customers for the 12 months, October 31, 2010.

DUKE ENERGY OHIO

DETERMINATION OF SYSTEM RELIABILITY TRACKER - RIDER SRT - BY RETAIL RATE GROUP
REFLECTING RECOVERY OF ESTIMATED 2011 CAPACITY AND PURCHASED POWER COSTS (EXCLUDING ENERGY COSTS
FOR THE PERIOD JANUARY THROUGH DECEMBER 2011 TO BE APPLIED TO CUSTOMER BILLS OVER A NINE-MONTH PERIOD

Line No.	Description	Allocated Percentage Share of System Peak Demands for the Company's Retail Electric Customers 1/ (A)	Estimate of 2011 Capacity and Purchased Power Costs By Retail Rate Group to be Collected Through System Reliability Tracker - Rider SRT (B)	Estimated Rider SRT Billings for January thru March 2011 (C)	Prior Period Rider SRT Over/ Under-Collections to be Collected from Customers 2/ (D)	Estimate of 2011 Net Power Costs By Retail Rate Group to be Collected Through System Reliability Tracker - Rider SRT (E)	Allocated Capacity and Purchased Power Costs (F)	Estimated Kilowatt-Hour Sales For The Nine Months Ended December 31, 2011 3/ (G)	Estimated Billing kW Demands (H)	SRT Adjustment Factor By Rate Group ($/kW/ $/kWh) (I)	Line No.
	Retail Rate Group										
	RS Rate Group										
1	Rates RS, ORH, HEC, TD, CUR	42.382%	$327,778	$13,961	($169,071)	$124,748	$124,748	6,510,675,191		0.000023	1
2	Non-Residential (Detailed Below)	57.618%	445,611								2
3		100.000%	$773,389								3
4	DS Rate Group										4
5	Rate DS	64.540%	$287,698	$484,348	1,767,347	$1,580,597					5
6	First 1,000 kW						994,312		5,091,174	0.195300	6
7	Additional kW						12,181		58,665	0.206500	7
8	First 300 kWh/kW						545,685	1,219,093,125		0.000448	8
9	Additional kWh						38,419	282,520,699		0.000136	9
	Total Rate DS						1,590,597				
10	Rate GS-FL	0.550%	2,451	5,724	18,388	15,113	15,113	22,804,458		0.000663	10
11	Rate EH	1.070%	4,768	20,545	57,587	41,810	41,810	42,595,445		0.000982	11
12	Total Rates DS, GS-FL, EH		294,917	510,617	1,693,320	1,647,520	1,647,520				12
13	Rate DM	10.510%	46,834	113,784	453,976	386,726	386,726	264,698,606		0.001461	13
14	Rate DP	9.850%	43,001	(26,227)	(31,057)	37,171					14
15	First 1,000 kW						11,050		258,240	0.042800	15
16	Additional kW						8,585		278,187	0.030700	16
17	First 300 kWh/kW						14,656	140,139,120		0.000105	17
18	Additional kWh						2,900	71,633,388		0.000040	18
19	Total Rate DP						37,171				19
20	Rate TS	11.290%	50,755	28,120	248,461	269,116					20
21	First 50,000 kVA						208,487		852,060	0.241200	21
22	Additional kVA						0		-	0.241200	22
23	First 300 kWh/kVA						45,149	167,826,200		0.000269	23
24	Additional kWh						15,480	116,008,533		0.000161	24
25	Total Rate TS						269,116				25
26	Lighting Rate Group										26
27	Rates SL, TL, OL, NSU, NSP, SC, SE, UOLS	2.290%	10,204	19,751	111,437	101,890	101,890	90,079,364		0.001131	27
28	Total Retail	100.000%	$773,389	$881,006	$2,454,786	$2,567,169	$2,567,169	7,927,074,241			28
29											29

1/ Rate Group RS based on applicable peak demands from the Company's cost of service study in Case No. 92-1464-EL-AIR. Non-residential based on 12 months actual KWH ending December 2010.
2/ See Schedule A
3/ Based on actual sales to SRT customers for the 9 months, December 31, 2010.

DUKE ENERGY OHIO

DETERMINATION OF SYSTEM RELIABILITY TRACKER - RIDER SRT - BY RETAIL RATE GROUP
REFLECTING RECOVERY OF ESTIMATED 2011 CAPACITY AND PURCHASED POWER COSTS (EXCLUDING ENERGY COSTS
FOR THE PERIOD JANUARY THROUGH DECEMBER 2011 TO BE APPLIED TO CUSTOMER BILLS OVER A SIX-MONTH PERIOD

Line No.	Description	Allocated Percentage Share of System Peak Demands for the Company's Retail Electric Customers 1/ (A)	Estimate of 2011 Capacity and Purchased Power Costs By Retail Rate Group to be Collected Through System Reliability Tracker - Rider SRT (B)	Estimated Rider SRT Billings for January thru June 2011 (C)	Prior Period Rider SRT Over/ Under-Collections to be Collected from Customers 2/ (D)	Estimate of 2011 Net Power Costs By Retail Rate Group to be Collected Through System Reliability Tracker - Rider SRT (E)	Allocated Capacity and Purchased Power Costs (F)	Estimated Kilowatt-Hour Sales For The Six Months Ended December 31, 2011 3/ (G)	Estimated Billing kW Demands (H)	SRT Adjustment Factor By Rate Group ($/kW; $/kWh) (I)	Line No.
	Retail Rate Group										
	RS Rate Group										
1	Rates RS, ORH, HEC, TD, CUR	42.382%	$390,692	$49,807	($189,071)	$152,214	$152,214	3,976,508,780		0.000038	1
2	Non-Residential (Detailed Below)	57.618%	531,415								2
3		100.000%	$922,307								3
4	DS Rate Group										4
5	Rate DS	64.176%	$341,041	$1,118,764	1,787,347	$1,009,824					5
6	First 1,000 kW						631,135		3,006,742	0.209900	6
7	Additional kW						7,732		12,207	0.585400	7
8	First 300 kWh/kW						346,371	721,432,673		0.000480	8
9	Additional kWh						24,388	169,921,134		0.000144	9
10	Total Rate DS						1,009,824				10
11	Rate GS-FL	0.405%	2,152	10,676	18,388	9,862	9,862	15,210,993		0.000648	11
12	Rate EH	0.992%	4,953	18,256	57,587	44,282	44,282	27,330,394		0.001620	12
13	Total Rate DS, GS-FL, EH		348,146	1,147,696	1,863,320	1,063,768	1,063,768				13
14	Rate DM	12.686%	87,415	252,030	453,676	269,061	269,061	178,127,246		0.001510	14
15	Rate DP	6.262%	43,906	(4,977)	(31,057)	17,826					15
16	First 1,000 kW						5,899		134,342	0.039400	16
17	Additional kW						4,107		142,389	0.028800	17
18	First 300 kWh/kW						7,029	75,627,670		0.000093	18
19	Additional kWh						1,391	35,088,281		0.000040	19
20	Total Rate DP						17,826				20
21	Rate TS	10.926%	56,062	114,110	246,481	190,433					21
22	First 50,000 kVA						145,407		504,710	0.288100	22
23	Additional kVA						0		-	0.288100	23
24	First 300 kWh/kVA						31,949	92,301,733		0.000348	24
25	Additional kWh						13,077	58,782,291		0.000222	25
26	Total Rate TS						190,433				26
27	Lighting Rate Group										27
28	Rates SL, TL, OL, NSU, NSP, SC, SE, UOLS	2.613%	13,888	41,037	111,437	84,286	84,286	31,951,582		0.002638	28
29	Total Retail	100.000%	$922,307	$1,599,505	$2,454,788	$1,777,588	$1,777,588	5,382,302,777			29

1/ Rate Group RS based on applicable peak demands from the Company's cost of service study in Case No. 92-1464-EL-AIR. Non-residential based on 12 months actual KWH ending April 2011.
2/ See Schedule A
3/ Based on actual sales to SRT customers for the 6 months, December 31, 2010.

DUKE ENERGY OHIO

DETERMINATION OF SYSTEM RELIABILITY TRACKER - RIDER SRT - BY RETAIL RATE GROUP
REFLECTING RECOVERY OF ESTIMATED 2011 CAPACITY AND PURCHASED POWER COSTS (EXCLUDING ENERGY COSTS
FOR THE PERIOD JANUARY THROUGH DECEMBER 2011 TO BE APPLIED TO CUSTOMER BILLS OVER A THREE-MONTH PERIOD

Line No.	Description	Allocated Percentage Share of System Peak Demands for the Company's Retail Electric Customers 1/ (A)	Estimate of 2011 Capacity and Purchased Power Costs By Retail Rate Group to be Collected Through System Reliability Tracker - Rider SRT (B)	Estimated Rider SRT Billings for January thru September 2011 (C)	Prior Period Rider SRT Over/ Under-Collections to be Collected from Customers 2/ (D)	Estimate of 2011 Net Power Costs By Retail Rate Group to be Collected Through System Reliability Tracker - Rider SRT (E)	Allocated Capacity and Purchased Power Costs (F)	Estimated Kilowatt-Hour Sales For The Three Months Ended December 31, 2011 3/ (G)	Estimated Billing kW Demands (H)	SRT Adjustment Factor By Rate Group ($/kW-$/kWh) (I)	Line No.
	Retail Rate Group										
	RS Rate Group										
1	Rates RS, ORH, HEC, TD, CUR	42.382%	$463,053	$136,667	($189,071)	$127,425	$127,425	1,634,723,041		0.000078	1
2	Non-Residential (Detailed Below)	57.618%	615,921								2
3		100.000%	$1,088,974								3
4	DS Rate Group										4
5	Rate DS	65.086%	$400,879	$1,922,602	1,787,347	$265,624					5
6	First 1,000 kW						166,047		1,331,544	0.124700	6
7	Additional kW						2,034		5,704	0.356800	7
8	First 300 kWh/kW						91,127	299,657,589		0.000304	8
9	Additional kWh						6,416	55,445,741		0.000116	9
10	Total Rate DS						265,624				10
11	Rate GS-FL	0.160%	985	16,538	18,386	3,833	3,833	7,608,667		0.000504	11
12	Rate EH	1.093%	6,732	18,783	57,587	45,536	45,536	7,754,274		0.005872	12
13	Total Rates DS, GS-FL, EH		408,596	1,956,923	1,863,320	314,993	314,993				13
14	Rate DM	14.467%	89,105	453,499	453,676	89,282	89,282	75,146,743		0.001188	14
15	Rate DP	6.532%	40,648	8,814	(31,057)	977					15
16	First 1,000 kW						291		55,225	0.005300	16
17	Additional kW						225		56,695	0.004000	17
18	First 300 kWh/kW						385	30,294,820		0.000013	18
19	Additional kWh						76	8,402,493		0.000009	19
20	Total Rate DP						977				20
21	Rate TS	9.900%	60,976	164,253	246,481	123,204					21
22	First 50,000 kVA						94,073		240,211	0.391800	22
23	Additional kVA						0		-	0.391800	23
24	First 300 kWh/kVA						20,670	35,041,214		0.000590	24
25	Additional kWh						8,461	15,189,028		0.000557	25
26	Total Rate TS						123,204				26
27	Lighting Rate Group										27
28	Rates SL, TL, OL, NSU, NSP, SC, SE, UOLS	2.882%	18,396	82,099	111,437	45,734	45,734	12,662,091		0.003612	28
29	Total Retail	100.000%	$1,088,974	$2,822,145	$2,454,788	$701,615	$701,615	2,182,925,611			29

1/ Rate Group RS based on applicable peak demands from the Company's cost of service study in Case No. 92-1464-EL-AIR. Non-residential based on 12 months actual KWH ending July 2011.
2/ See Schedule A
3/ Based on actual sales to SRT customers for the 3 months, December 31, 2010.

Summary: Motion to Extend Protective Order to Protect the Confidentiality of Information Contained in the Document Titled "Management/Performance and Financial Audit of the Fuel and Purchased Power and System Reliability Tracker Riders of Duke Energy Ohio, Inc." electronically filed by Dianne Kuhnell on behalf of Duke Energy Ohio, Inc. and Spiller, Amy B. and Rocco D'Ascenzo