

FILE

DUKE ENERGY OHIO EXHIBIT _____

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke)
Energy Ohio for Authority to Establish a)
Standard Service Offer Pursuant to Section)
4928.143, Revised Code, in the Form of) Case No. 14-841-EL-SSO
an Electric Security Plan, Accounting)
Modifications and Tariffs for Generation)
Service.)

In the Matter of the Application of Duke)
Energy Ohio for Authority to Amend its) Case No. 14-842-EL-ATA
Certified Supplier Tariff, P.U.C.O. No. 20.)

PUBLIC VERSION

DIRECT TESTIMONY OF

MARC W. ARNOLD

ON BEHALF OF

DUKE ENERGY OHIO, INC.

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Attachments:

MWA-1:	Graphic Depiction of the Age of Duke Energy Ohio's Distribution Facilities
MWA-2:	Excerpt from the 2014 J.D. Power Study Showing the Power Quality and Reliability Performance Rankings
MWA-3:	Excerpt from J.D. Power 2013 Residential Electric Study
MWA-4:	Customer Satisfaction Results for Ohio/Kentucky for Calendar Year 2013
MWA-5:	Commission-Required Residential Survey for the First Quarter of 2014 and Calendar Year 2013
MWA-6:	Commission-Required Non-Residential Survey for the First Quarter of 2014 and Calendar Year 2013
MWA-7:	Distribution Program Details

I. INTRODUCTION

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Marc W. Arnold, and my business address is 139 East Fourth Street,
3 Cincinnati, Ohio 45202.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am employed by Duke Energy Business Services LLC (DEBS) as the Director
6 of Engineering and Construction Planning for Ohio and Kentucky. DEBS
7 provides various administrative and other services to Duke Energy Ohio, Inc.,
8 (Duke Energy Ohio or the Company) and other affiliated companies of Duke
9 Energy Corporation (Duke Energy).

10 **Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATION AND**
11 **PROFESSIONAL EXPERIENCE.**

12 A. I received a Bachelor of Science in Business from St. Leo University and a
13 Master's Degree in Business from Indiana Wesleyan University. I began my
14 career at Cinergy Corp., as a Distribution Designer in 2001, and have held a
15 variety of positions of increasing responsibility across Duke Energy in the areas
16 of electric system distribution engineering.

17 **Q. PLEASE DESCRIBE YOUR DUTIES AS DIRECTOR OF ENGINEERING**
18 **AND CONSTRUCTION PLANNING.**

19 A. As the Director of Engineering and Construction Planning, I am responsible for
20 the distribution integrity programs for Duke Energy's regulated utility operations
21 in Ohio and Kentucky. I am also responsible for engineering and design for line

1 extensions for new businesses in the Duke Energy Ohio and Duke Energy
2 Kentucky, Inc., (Duke Energy Kentucky) service territories.

3 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PUBLIC**
4 **UTILITIES COMMISSION OF OHIO?**

5 A. No.

6 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THESE**
7 **PROCEEDINGS?**

8 A. The purpose of my testimony is to provide an overview of how Duke Energy
9 Ohio maintains the reliability of its distribution system and the investments
10 necessary to continue to provide safe, reliable, and reasonably priced service to its
11 approximately 700,000 distribution customers located in southwestern Ohio. I
12 also will discuss the challenges the Company faces in maintaining its distribution
13 system; including, but not limited to, efforts necessary to continue to meet its
14 customers' power quality expectations. I then support Duke Energy Ohio's plan
15 to implement its Distribution Capital Investment Rider (Rider DCI) and discuss
16 the initiatives the Company will undertake to enhance and improve the safety and
17 reliability of its infrastructure to better meet its customers' growing reliability
18 needs.

19 **Q. PLEASE DESCRIBE THE ATTACHMENTS FOR WHICH YOU ARE**
20 **RESPONSIBLE.**

21 A. I am sponsoring the following attachments:

- 22 • Attachment MWA-1 – Graphic depiction of the age of Duke Energy
23 Ohio's distribution facilities.

- 1 • Attachment MWA-2 – Excerpt from the J.D. Power and Associates (J.D.
2 Power) 2014 study, showing the power quality and reliability performance
3 rankings.
- 4 • Attachment MWA-3 – Excerpt from J.D. Power 2013 Residential Electric
5 Study.
- 6 • Attachment MWA-4 – Customer satisfaction results for Ohio/Kentucky
7 for calendar year 2013.
- 8 • Attachment MWA-5 – Residential survey required by the Public Utilities
9 Commission of Ohio (Commission) for calendar year 2013 and the first
10 quarter 2014.
- 11 • Attachment MWA-6 – Non-residential survey required by the
12 Commission for calendar year 2013 and the first quarter 2014.
- 13 • Attachment MWA-7 – Distribution Program Details.

II. DUKE ENERGY OHIO'S ELECTRIC DISTRIBUTION SYSTEM

14 **Q. PLEASE BRIEFLY DESCRIBE DUKE ENERGY OHIO'S EXISTING**
15 **ELECTRIC DISTRIBUTION INFRASTRUCTURE.**

16 A. The Duke Energy Ohio electric delivery system is used, among other things, to
17 provide electric service to approximately 700,000 customers located throughout
18 southwestern Ohio. Duke Energy Ohio owns and operates all of its electric
19 distribution and local transmission facilities.

20 Duke Energy Ohio's electric delivery system includes approximately 238
21 substations, 15 transmission substations (locations with 69 kilovolt (kV) or higher
22 operating voltages) having a combined capacity of approximately 8,923,438
23 kilovolt-amperes (kVA), 194 distribution substations (locations that supply one or
24 more circuits at 35 kV or lower voltage) having a combined capacity of
25 approximately 6,795,371 kVA, and 29 joint transmission and distribution

1 substations (locations with 69 kV or higher operating voltages that also have 35
2 kV or lower voltage) having a combined capacity of approximately 7,297,320
3 kVA. The Duke Energy Ohio electric delivery system includes various other
4 equipment and facilities, such as control rooms, computers, capacitors, street
5 lights, meters and protective relays, and telecommunications equipment and
6 facilities.

7 **Q. PLEASE GENERALLY DESCRIBE HOW THE ELECTRIC**
8 **DISTRIBUTION INFRASTRUCTURE IS DESIGNED, CONSTRUCTED,**
9 **MANAGED AND OPERATED.**

10 A. The electric distribution infrastructure is designed to receive bulk power at
11 transmission voltages, reduce the voltage to 34.5 kV, 12.5 kV, or 4 kV, and deliver
12 power to customers' premises. The distribution infrastructure generally consists of
13 substation power transformers, switches, circuit breakers, wood pole lines,
14 underground cables, distribution transformers, and associated equipment. The
15 physical design of the distribution system is also generally governed by the National
16 Electrical Safety Code, which I understand has been adopted by the state of Ohio in
17 Ohio Administrative Code (O.A.C.) 4901:1-10-06.

18 Duke Energy Ohio operates the distribution facilities it owns in accordance
19 with good utility practice. Duke Energy Ohio continuously runs the system with a
20 workforce that provides customer service 24 hours per day, 7 days per week, 365
21 days per year, and includes trouble response crews. The Company monitors outages

1 with various systems, such as Supervisory Control and Data Acquisition,
2 Distribution Outage Management System (DOMS), Electric Trouble Data Mart, and
3 Outage Information System.

4 **Q. HOW DOES DUKE ENERGY OHIO DISCOVER AND ADDRESS SYSTEM**
5 **OUTAGES TODAY?**

6 A. Customers typically report outages by telephone through Duke Energy's call center.
7 The call center creates an outage report through a telephone software application that
8 interfaces with DOMS, a state-of-the-art outage management software application
9 that Duke Energy Ohio implemented in 2011 to improve its ability to monitor and
10 respond to outages. DOMS analyzes the calls and identifies for Duke Energy Ohio's
11 dispatchers the piece of equipment (*e.g.*, circuit breaker, recloser, fuse, transformer)
12 that is the probable location of the outage. The dispatcher contacts the field trouble
13 response person through the radio system to direct them to the probable equipment
14 location to make repairs and restore electric service. Generally, the field trouble
15 response person inspects the circuit or segment of line in question to identify and
16 report the cause of the outage. The dispatcher records the date, time, duration, and
17 cause of the outage in DOMS.

18 Dispatchers continuously monitor weather conditions, both in anticipation of
19 and during weather events. When lightning, wind, or ice storms hit Duke Energy
20 Ohio's service territory, line crews are paged, called, or held over to respond. Duke
21 Energy Ohio will call in several hundred employees, as necessary, to respond to
22 severe storms, including Duke Energy's utility employees stationed in Kentucky,
23 Indiana, North Carolina, South Carolina, and Florida. If necessary, Duke Energy

1 Ohio will contact other utilities for additional line crews, through a mutual assistance
2 program.

3 **Q. PLEASE GENERALLY DESCRIBE HOW DUKE ENERGY OHIO**
4 **CURRENTLY MONITORS AND MAINTAINS ITS DISTRIBUTION**
5 **INFRASTRUCTURE AND ITS PERFORMANCE.**

6 A. Duke Energy Ohio maintains its distribution infrastructure in accordance with good
7 utility practice by adhering to inspections, monitoring, testing, and periodic
8 maintenance programs. Examples of these existing programs include, but are not
9 limited to, the following: (1) substation inspection program; (2) line inspection
10 program; (3) ground-line inspection and treatment program; (4) vegetation
11 management program; (5) underground cable replacement program; (6) capacitor
12 maintenance program; and (7) dissolved gas analysis.

13 Duke Energy Ohio also uses various reliability indices to measure the
14 effectiveness of its maintenance programs and system reliability. Duke Energy Ohio
15 follows the Commission's Electric Service and Safety Standards (ESSS), as set forth
16 in O.A.C. Chapter 4901:1-10. The Company also uses various indices to measure
17 the effectiveness of its maintenance programs and system reliability.

18 **Q. YOU STATED THAT DUKE ENERGY OHIO USES VARIOUS INDICES**
19 **TO MEASURE THE EFFECTIVENESS OF ITS MAINTENANCE**
20 **PROGRAMS AND SYSTEM RELIABILITY. PLEASE EXPLAIN THESE**
21 **RELIABILITY INDICES.**

22 A. Reliability indices are generally recognized standards for measuring the number,
23 scope, and duration of outages. Ohio requires electric distribution utilities to report

1 annually on these reliability indices. These indices are defined as follows:

- 2 • Customer Average Interruption Duration Index (CAIDI) is the average
3 *interruption duration or average time to restore service per interrupted*
4 customer and is expressed by the sum of the customer interruption durations
5 divided by the total number of customer interruptions.
- 6 • System Average Interruption Duration Index (SAIDI) is the average time
7 each customer is interrupted and is expressed by the sum of customer
8 interruption durations divided by the total number of customers served.
- 9 • System Average Interruption Frequency Index (SAIFI) is the system average
10 frequency index and represents the average number of interruptions per
11 customer. SAIFI is expressed by the total number of customer interruptions
12 divided by the total number of customers served.

13 **Q. HOW HAS DUKE ENERGY OHIO'S DISTRIBUTION INFRASTRUCTURE**
14 **PERFORMED, AS MEASURED BY THESE RELIABILITY INDICES?**

15 A. Duke Energy Ohio has performed well. Its reliability scores have always exceeded
16 Duke Energy Ohio's standards for CAIDI and SAIFI established in consultation
17 with Commission Staff pursuant to O.A.C. 4901:1-10-10(B)(2). As referenced in
18 Case No. 14-0493-EL-ESS, the Company's latest reliability index scores available
19 for calendar year 2013 are: CAIDI = 117.8 excluding storms, 121.56 with no
20 exclusions; SAIDI = 115.44 excluding storms, 160.46 with no exclusions; and
21 SAIFI = 0.98 excluding storms, 1.32 with no exclusions. The performance

1 standards for the above reliability index scores are CAIDI 118.14 and SAIFI 1.24
2 respectively.¹

3 **Q. PLEASE DESCRIBE SOME OF THE FACTORS THAT THE COMPANY**
4 **MUST CONSIDER IN PROVIDING CUSTOMERS WITH SAFE,**
5 **RELIABLE, AND REASONABLY PRICED ELECTRIC SERVICE.**

6 A. Duke Energy Ohio weighs various factors in selecting the electric delivery
7 infrastructure improvement projects in which to invest. By way of example, the
8 Company will give consideration to customer expectations, its planning criteria,
9 any requirements mandated by either regulatory authorities or reliability councils,
10 and government-mandated projects.

11 **Q. HOW DOES DUKE ENERGY OHIO BALANCE ALL OF THESE**
12 **FACTORS?**

13 A. From a planning perspective, electric system studies are performed annually to
14 determine where and when system modifications are needed to ensure load is
15 adequately served. When these needs are identified, multiple solutions are
16 developed, addressing not only the capacity need, but potential opportunities to
17 maintain or improve reliability and operating flexibility. Recommendations are
18 made and discussed with the operations staff to ensure that a balanced, workable
19 plan has been developed.

20 In the course of maintaining and operating the electric distribution system,
21 Duke Energy Ohio identifies equipment and hardware that requires repair or
22 replacement. Blanket budgets have been established to cover small items, but

¹ There is no target established for SAIDI.

1 specific projects are developed for larger expenditure items. These items are
2 triggered as a result of operating issues, new load growth, or the various
3 inspections, monitoring, and testing programs I described above.

III. CHALLENGES FACING DUKE ENERGY OHIO'S
DISTRIBUTION FACILITIES

4 **Q. WHAT ARE THE MAJOR CHALLENGES FACING DUKE ENERGY**
5 **OHIO'S DISTRIBUTION SYSTEM?**

6 A. There are several challenges to managing Duke Energy Ohio's electric
7 distribution system. Perhaps the biggest challenges relate to aging infrastructure,
8 obsolescence of equipment, and the need to regularly review the system and its
9 operation for appropriate upgrades or replacements. Satisfying changing
10 customer expectations also presents a challenge for Duke Energy Ohio.

11 **Q. PLEASE EXPLAIN HOW THE AGE OF THE ELECTRIC**
12 **DISTRIBUTION SYSTEM AND OBSOLESCENCE OF EQUIPMENT**
13 **PRESENT A CHALLENGE TO THE COMPANY.**

14 A. Aging distribution systems are a major challenge for all utilities. Indeed the
15 majority of the outages experienced by customers are due, at least in part, to the
16 aging of the distribution system. Much of Duke Energy Ohio's electric
17 distribution equipment is over 30 years old. Such equipment typically lasts from
18 30 to 50 years if preventative maintenance is performed on a regular schedule. By
19 way of example, there are some portions of the Company's underground network
20 in downtown Cincinnati with equipment dating back to the 1920s that is in need
21 of replacement in order to maintain and improve customer reliability. Attachment

1 MWA-1 shows a graphic depiction of the age of Duke Energy Ohio's distribution
2 facilities.

3 Another challenge Duke Energy Ohio and other utilities are seeing is that
4 replacement parts are becoming harder to find and, when they are located, can be
5 quite expensive. For example, this very issue surfaced during Hurricane Sandy
6 with Consolidated Edison, Inc., (a/k/a ConEd) reaching out to mutual assistance
7 partners attempting to locate rare fuses.

8 **Q. PLEASE EXPLAIN FURTHER HOW CUSTOMERS' EXPECTATIONS**
9 **PRESENT A CHALLENGE.**

10 A. Customers are now using equipment that is highly sensitive to voltage
11 fluctuations; therefore, customers are more sensitive to power quality than they
12 have been in the past. Customers are demanding highly reliable service that
13 minimizes the number of voltage fluctuations. These changing expectations can
14 present a challenge for Duke Energy Ohio as it attempts to prudently and
15 reasonably balance reliable service with cost.

16 **Q. ARE THE PRACTICES AND PROGRAMS YOU DESCRIBED ABOVE**
17 **COUPLED WITH THE CURRENT LEVEL OF SPENDING SUFFICIENT**
18 **FOR THE COMPANY TO MAINTAIN ITS PRESENT LEVEL OF**
19 **SERVICE RELIABILITY AND MEET CUSTOMER EXPECTATIONS?**

20 A. I do not believe so. Customer expectations are evolving as technology changes.
21 Customers are requiring a higher degree of reliability, performance, and response.
22 They are expecting service restorations to be made more quickly, as so much of their
23 daily life depends upon the availability of electricity. This ranges from the ability to

1 power and charge cellular phones, computers, and other mobile devices, in order to
2 maintain communication access, to heating and cooling homes. Although Duke
3 Energy Ohio's current practices have served it well in the past, the Company must
4 continue to evolve to meet these growing customer expectations. Duke Energy Ohio
5 cannot be stagnant and simply rely upon the premise that past practices will continue
6 to be sufficient to maintain future performance. Rather, it must adapt its practices
7 and implement new programs to respond to industry demands, changes in
8 technology, and continually evolving customer needs and expectations.

9 **Q. DOES THE COMPANY MEASURE OR ATTEMPT TO QUANTIFY**
10 **CUSTOMER EXPECTATIONS?**

11 A. Yes.

12 **Q. PLEASE EXPLAIN.**

13 A. Duke Energy and Duke Energy Ohio continuously evaluate customer satisfaction
14 and expectations as well as the Company's performance, through third-party
15 national benchmarking and regional surveys generated by Duke Energy.
16 Specifically, Duke Energy subscribes to and participates in the J.D. Power annual
17 electric utility residential customer and business customer satisfaction studies.
18 Duke Energy also conducts its own surveys of residential, small/medium
19 business, and large business customers, including community leaders, on a
20 corporate and regional level for Ohio and Kentucky.

21 Duke Energy Ohio also performs a quarterly survey at the direction of the
22 Commission, using a study that includes questions authored by the Commission.
23 The Duke Energy surveys are generally done electronically and are emailed to a

1 random sample of customers throughout the year on a quarterly basis. Based
2 upon the results of all these surveys, the Company gauges its performance in
3 relation to customer expectations.

4 **Q. PLEASE DESCRIBE THE MOST RECENT J.D. POWER SURVEYS AND**
5 **WHAT THEY INDICATE WITH RESPECT TO CUSTOMER**
6 **EXPECTATIONS, SATISFACTION, AND PERFORMANCE.**

7 A. J.D. Power is well known for setting the standard for measurement of consumer
8 opinion and customer satisfaction in many key industries. J.D. Power annually
9 surveys electric utilities' residential and business customer satisfaction. Duke
10 Energy's Midwest utilities (Ohio, Kentucky, and Indiana) participate in these
11 annual studies.

12 The J.D. Power electric utility business customer satisfaction study,
13 established in 2000, calculates overall customer satisfaction based on six
14 performance areas: (1) corporate citizenship, (2) communications, (3) price, (4)
15 billing and payment, (5) power quality and reliability, and (6) customer service.
16 For 2014, the most recent study for which results are available, J.D. Power
17 measured business customer satisfaction for the country's Midwest large electric
18 utilities, serving over 25,000 business customers. Duke Energy Midwest scored
19 666 points in the Overall Customer Satisfaction Index, which is above the
20 national average. Attachment MWA-2 is a true and accurate copy of an excerpt
21 from the 2014 J.D. Power study, showing the power quality and reliability
22 performance rankings.

1 Attachment MWA-3 is an excerpt from the J.D. Power 2013 Residential
2 Electric study that supports the conclusion that customer outage tolerances are
3 [REDACTED] The [REDACTED] indicates that, on a
4 national average, overall satisfaction is [REDACTED] even among
5 customers who are experiencing "perfect power" or no outages. This means that
6 customer expectations are high with respect to the power quality and reliability of
7 their electric utility service.

8 **Q. PLEASE DESCRIBE THE DUKE ENERGY CUSTOMER SURVEYS AND**
9 **WHAT THEY INDICATE IN TERMS OF CUSTOMER EXPECTATIONS**
10 **REGARDING POWER QUALITY AND THE COMPANY'S**
11 **PERFORMANCE.**

12 A. Duke Energy's Customer Satisfaction Team conducts continuous customer
13 satisfaction studies of the residential, small/medium business, and large business
14 customer segments for each of Duke Energy's utility operating companies.
15 Attachment MWA-4 is a true and accurate copy of the Ohio and Kentucky
16 excerpt of the Midwest Summary Presentation for fourth quarter of 2013. This
17 presentation shows the customer satisfaction results for Ohio/Kentucky for
18 calendar year 2013. The results are expressed on the basis of the percentage of
19 respondents who are highly satisfied and the percentage who are least satisfied.
20 Using a ranking system of one to ten, customers who rated the Company an eight
21 or higher are considered to be highly satisfied and those who rated the Company a
22 four or below are considered least satisfied. Page 11 of this excerpt directly
23 addresses the performance of Duke Energy Ohio and Duke Energy Kentucky

1 relative to customer power quality and reliability expectations across the
2 Ohio/Kentucky region.

3 **Q. PLEASE DESCRIBE THE COMMISSION RELIABILITY SURVEYS**
4 **AND WHAT THEY INDICATE IN TERMS OF CUSTOMER**
5 **EXPECTATIONS REGARDING POWER QUALITY AND THE**
6 **COMPANY'S PERFORMANCE.**

7 A. Attachments MWA-5 and MWA-6 are excerpts from summaries of the
8 Company's most recent Commission-required residential and non-residential
9 surveys, respectively. The surveys, showing data for calendar year 2013 through
10 the first quarter of 2014, were performed online to random samples of customers.
11 While the Company does not use these surveys for planning purposes, they are
12 useful as tools to indicate what our customers expect in terms of power quality
13 and service. These surveys, among other things, tested customer tolerances for
14 service interruptions and how the Company has performed in relation to those
15 expectations.

16 For example, the non-residential customer surveys provide information
17 regarding customer tolerances for, among other things, service interruptions of
18 less than five minutes and greater than five minutes, as well as storm-related
19 outages. There are also follow-up questions related to the number and duration of
20 outages actually experienced by these same customers. As can be seen from these
21 surveys, business customers have very high expectations related to the number
22 and duration of outages. On page 5, the customers were asked how many
23 momentary outages they would find acceptable over a 12-month period. Over 80

1 percent of the customers expect two or fewer momentary outages over a 12-month
2 period. These expectations, while varying somewhat during these surveys, do
3 show that customers' expectations are increasing regarding power quality. Duke
4 Energy Ohio has performed relatively well in meeting these expectations.

5 Similar surveys were performed for residential customers. Again, these
6 results indicate that Duke Energy Ohio's residential customer have increasing
7 expectations of reliability and power quality.

8 **Q. WHAT DO THESE SURVEYS INDICATE IN TERMS OF DUKE**
9 **ENERGY OHIO'S STRATEGY TO MEET CUSTOMER POWER**
10 **QUALITY AND RELIABILITY EXPECTATIONS?**

11 A. Even though the majority of Duke Energy Ohio's customers appear to be satisfied
12 with the Company's reliability and power quality, there is room for improvement.
13 And failure to be proactive to resolve issues before they manifest will result in a
14 decline in system performance and customer satisfaction. In order to meet these
15 high expectations, Duke Energy Ohio must be proactive and take corrective
16 actions before a problem manifests itself. Identifying these issues and employing
17 the necessary resources presents challenges from a budgeting perspective when
18 the sole source of operating and maintenance capital is limited to base rates
19 established through base rate proceedings.

20 **Q. WHAT IS THE COMPANY PROPOSING IN THESE PROCEEDINGS TO**
21 **ADDRESS THESE CHALLENGES?**

22 A. Duke Energy Ohio is proposing an infrastructure modernization plan and recovery
23 mechanism consistent with Ohio Revised Code 4928.143(B)(2)(a) and O.A.C.

1 4901:1-35(g) as part of this electric security plan (ESP). The distribution
2 infrastructure plans and the associated recovery mechanism, Rider DCI, are
3 designed to balance the needs of the Company to maintain its financial stability
4 with its commitment to customers to minimize costs and continue to provide safe,
5 reliable, and reasonably priced service.

6 **Q. PLEASE DESCRIBE RIDER DCI.**

7 A. The objective of Rider DCI is to allow the Company to implement new initiatives
8 to enhance the safety and reliability of its delivery system, recover a return of and
9 on incremental capital investment in electric distribution plant, and recover the
10 associated property tax and depreciation expenses from the date certain of Duke
11 Energy Ohio's last electric distribution rate case. Duke Energy Ohio witness
12 Peggy A. Laub fully explains how Rider DCI will work and be adjusted. In
13 summary, the rider will recover the Company's incremental distribution capital
14 investment, including, but not limited to ongoing maintenance capital, as well as
15 the cost to implement various specific programs or initiatives designed to
16 maintain and/or enhance the safety and reliability of the Company's distribution
17 system. The programs to be implemented under the infrastructure modernization
18 plan are designed to meet customer expectations, manage costs, and proactively
19 address the aging infrastructure issues through a targeted and coordinated
20 approach. Attachment MWA-7 is a detailed analysis of the forecasted costs under
21 the Company's infrastructure modernization plan, including estimated customer
22 rate impacts.

1 **Q. WHAT IS THE ANTICIPATED IMPACT TO THE COMPANY'S**
2 **CURRENT RELIABILITY AND PERFORMANCE THROUGH THE**
3 **PLANS PROPOSED FOR INCLUSION UNDER RIDER DCI?**

4 A. Although Duke Energy Ohio cannot guarantee that system reliability or customer
5 satisfaction will improve in terms of specific reliability index scores or a
6 particular level of performance from implementing its infrastructure improvement
7 plans, doing nothing is sure to erode both. There are factors that impact the
8 Company's reliability that are simply beyond its control, such as the frequency
9 and severity of major storms. Nonetheless, the programs selected by the
10 Company are designed to address those issues that are predictable and
11 controllable, such as replacement of obsolete and aging infrastructure that
12 becomes less reliable as it approaches the end of its useful life. Proactively
13 addressing vulnerable spots on the distribution system is the most effective way to
14 attempt to improve reliability and will provide benefits to customers.

15 **Q. PLEASE SUMMARIZE THESE CUSTOMER BENEFITS.**

16 A. By implementing these programs together, the Company is better able to manage
17 and control its costs and its workforce resources. That should allow for a more
18 efficient process. The new equipment that replaces and updates the Company's
19 aging distribution equipment will likely be more resilient to loading due to
20 extreme weather conditions. Because many of these programs will be
21 implemented throughout the Company's service territory, ultimately every
22 customer will benefit from these efficiencies and system hardening. Rider DCI
23 and the infrastructure modernization programs proposed therein will allow Duke

1 Energy Ohio to take a holistic, coordinated approach to addressing these
2 identified areas of concern, in contrast to the current, reactive strategy inherent in
3 a pure base rate recovery model.

4 **Q. PLEASE IDENTIFY THE PROGRAMS INCLUDED IN DUKE ENERGY**
5 **OHIO'S INFRASTRUCTURE MODERNIZATION PLAN, THE COSTS**
6 **OF WHICH WOULD BE RECOVERABLE UNDER RIDER DCI.**

7 A. Duke Energy Ohio is currently proposing a total of nineteen programs (both new
8 programs and enhancements to existing programs) as part of its overall
9 infrastructure modernization plan, with recovery through Rider DCI. Attachment
10 MWA-7 provides a list and the estimated cost of the infrastructure maintenance
11 programs to be included under Rider DCI through the term of this ESP.
12 Consistent with the intent of Rider DCI, which is to allow the Company to
13 proactively address reliability issues through a coordinated and targeted strategy,
14 the Company anticipates that Rider DCI will continue to evolve, with
15 technological advances or changes in field conditions, to include additional
16 programs or revisions and modifications to the initial programs over time. The
17 current programs in the infrastructure modernization plan are as follows:

- 18 • Transformer Retrofit Program
- 19 • Vegetation Clearing/Right-of-Way Acquisition/Facility Modification
- 20 • Underground Cable Injection
- 21 • Underground Cable Replacement
- 22 • DTUG-Online Dissolved Gas Analysis (DGA), Sump Pump, Oil
- 23 Monitoring (Network)

- 1 • Manhole Lid Retrofit Program
- 2 • Manhole/Vault Capital Rebuild (Network)
- 3 • Network Secondary Main Replacement
- 4 • Vault Network Protector/Transformer Change Out
- 5 • Redesign of Worst Congested Underground Structures
- 6 • URD Submersible Transformer Upgrades
- 7 • Distribution Substation Protection (Physical Security)
- 8 • Upgrade Live Front Transformers
- 9 • Upgrade Distribution Transformer Substations (Unique Customer
- 10 Locations)
- 11 • PILC Replacement (Feeder Exits)
- 12 • Distribution Operations Center and Mobile Logistics Modernization
- 13 • Ownership of Underground Residential Services
- 14 • Conversion of Old 4kV Feeders
- 15 • Recloser Replacement
- 16 • Circuit Sectionalization

17 **Q. PLEASE DESCRIBE THE TRANSFORMER RETROFIT PROGRAM, ITS**
18 **PURPOSE, AND THE ANTICIPATED BENEFITS.**

19 A. The Transformer Retrofit Program proactively replaces aging Completely Self
20 Protected (CSP) transformers throughout the Company's distribution system and
21 is intended to result in fewer transformer-related customer outages. The
22 installation of CSPs was prevalent from approximately 1965 through the 1990s.
23 CSP transformers are internally fused on the secondary side of the transformer

1 and when overloaded have and continue to cause outages. In addition to CSP
2 transformer replacements, the program will include adding external lightning
3 arresters, squirrel guards, and covered lead wires for additional protection from
4 outages. By installing high-voltage fuses and lightning arresters on the line side
5 of this device, the Company will significantly reduce the line exposure. This
6 program will encompass the entire overhead distribution system in Duke Energy
7 Ohio's service area. The program is intended to enhance the overall customer
8 experience, reliability, and the Company's operational integrity and will
9 eventually reduce operating and maintenance (O&M) costs by reducing outages
10 attributed to the older equipment.

11 **Q. PLEASE DESCRIBE THE VEGETATION CLEARING/RIGHT-OF-WAY**
12 **ACQUISITION/FACILITY MODIFICATION PROGRAM, ITS PURPOSE,**
13 **AND THE ANTICIPATED BENEFITS.**

14 A. The Vegetation Clearing/Right-of-Way Acquisition/Facility Modification
15 Program identifies dead or high risk trees or vegetation, within or along the right-
16 of-way, that pose a hazard or danger for the Company's overhead lines. Dead or
17 at-risk trees outside of the Company's easements cause numerous outages
18 annually. Proactively addressing these potential threats would potentially avert a
19 future outage. This capital program allows the acquisition of additional
20 easements for vegetation management clearing purposes to remove additional
21 trees and vegetation and reduce tree-related outages. This program will
22 encompass the entire overhead service area, but with a primary focus on wooded
23 areas and along rights-of-way. The Company will make contact with the

1 customer prior to removing the trees or vegetation. The benefits anticipated will
2 positively impact customer experience, reliability, and the overall integrity of the
3 distribution system through fewer outages. However, the benefits of this program
4 extend beyond the Company's distribution service and its customers, as dead or
5 dying trees also threaten the general public. This is an integrity-related program
6 anticipated to assist in maintaining and even improving the Company's CAIDI
7 and SAIDI.

8 **Q. PLEASE DESCRIBE THE UNDERGROUND CABLE INJECTION**
9 **PROGRAM, ITS PURPOSE, AND THE ANTICIPATED BENEFITS.**

10 A. The Underground Cable Injection Program is designed to extend the life of
11 existing underground cable. Cable injection is a process that infuses a di-electric
12 gel into the cable refurbishing it for approximately fifty percent of the cost of
13 replacing it. This program will reduce future repairs with a cable warranty
14 program and should reduce future O&M costs associated with current cable
15 repairs. Cable injection can be accomplished for about one-third of the cost of
16 replacement. In addition, the technique the Company is using comes with a 25-
17 year warranty that will further mitigate future costs. Anytime upgrades are
18 needed that necessitate cable replacements, outages are required. These outages
19 can be lengthy. The injection process requires less time in terms of outage
20 duration. This program will encompass the existing underground service area and
21 there will be a primary focus on underground runs of cable that have failed and
22 that have been identified by Duke Energy Ohio's engineers as candidates for
23 injection treatment. The benefits anticipated from this program will positively

1 impact customer experience, reliability, and the overall integrity of the
2 distribution system through fewer outages.

3 **Q. PLEASE DESCRIBE THE UNDERGROUND CABLE REPLACEMENT**
4 **PROGRAM, ITS PURPOSE, AND THE ANTICIPATED BENEFITS.**

5 A. The Underground Cable Replacement Program consists of replacement of
6 existing underground cable that the Company determines to be at the end of its
7 useful life and that cannot be treated properly under the Underground Cable
8 Injection Program. The Company has discovered that soil conditions in southwest
9 Ohio can cause the neutral in non-jacketed cable to deteriorate over time. This
10 program, like the associated Underground Cable Injection Program, will
11 encompass Duke Energy Ohio's entire underground service area, where injection
12 was not feasible. The benefits anticipated from this program will positively
13 impact customer experience, reliability, and the overall integrity of the
14 distribution system through fewer outages. Fewer outages should, in the future,
15 result in O&M savings.

16 **Q. PLEASE DESCRIBE THE DTUG-ONLINE DGA, SUMP PUMP, OIL**
17 **MONITORING (NETWORK) PROGRAM, ITS PURPOSE, AND THE**
18 **ANTICIPATED BENEFITS.**

19 A. The DTUG-Online DGA, Sump Pump, and Oil Monitoring Program will allow
20 the installation of dissolved gas analysis and oil monitoring using a
21 communication network. Downtown Cincinnati is primarily commercial in
22 nature. And, as a result, reliability is one of the key attractions for commercial
23 tenants in the downtown Cincinnati area. The type of distribution equipment in

1 the downtown Cincinnati underground network is significantly more expensive to
2 own, maintain, and operate than that equipment used in the suburbs. The vaults,
3 manholes, and conduit system in downtown Cincinnati date back to the early
4 1900s, with some equipment still in service dating as far back as the 1920s. The
5 advantage to this program is that it provides data back to the Company that could
6 potentially diagnose or forecast a future equipment failure. While DGA
7 monitoring is completed today and tested at our facility, this program will allow
8 for real-time monitoring. The program will encompass the entire downtown
9 Cincinnati underground network. The benefits anticipated from this program will
10 positively impact customer experience, reliability, and the overall integrity of the
11 downtown Cincinnati underground network distribution system through fewer
12 outages.

13 **Q. PLEASE DESCRIBE THE MANHOLE LID RETROFIT PROGRAM, ITS**
14 **PURPOSE, AND THE ANTICIPATED BENEFITS.**

15 A. The Manhole Lid Retrofit Program involves the installation of Swiveloc Manhole
16 Covers along pedestrian areas in proximity to Duke Energy Ohio's downtown
17 Cincinnati underground network. The primary focus of this program is safety –
18 that of the general public and the Company's employees and contractors. When
19 gases build up in the underground system and a source of ignition is added, a
20 volatile explosion could occur with sufficient force to launch even a 200-pound
21 cast-iron manhole lid into the air. This program focuses on securing these lids
22 along the Duke Energy Ohio underground network in downtown Cincinnati so
23 that, if such an event occurs, the lid will merely lift slightly to release the pressure

1 of gases but continue to rest on the manhole. The benefits anticipated from this
2 program will positively impact customer experience through maintaining and
3 enhancing safety, reliability, and the overall integrity of the downtown Cincinnati
4 underground network distribution system.

5 **Q. PLEASE DESCRIBE THE MANHOLE/VAULT CAPITAL REBUILD**
6 **PROGRAM, ITS PURPOSE, AND THE ANTICIPATED BENEFITS.**

7 A. The Manhole/Vault Capital Rebuild Program is designed to enhance the safety of
8 Duke Energy Ohio's delivery system and involves complete restoration of
9 concrete structures, including all racking of cables in manholes along Duke
10 Energy Ohio's underground network. This program constitutes a structural
11 rebuilding of the infrastructure that has deteriorated due to age, road traffic, and
12 the presence of other underground facilities and utilities. The issues addressed by
13 the program include, but are not limited to, water damage due to leaky vault and
14 manhole roofs, salt contamination, and structural deterioration due to the public
15 roadway vibrations. If the Company does not proactively and aggressively
16 address this issue, the damaged vaults could pose a safety issue for the general
17 public due to the potential risk of collapse. The program will encompass the
18 entire downtown Cincinnati underground network. The benefits anticipated from
19 this program will positively impact customer experience through enhancing
20 safety, reliability, and the overall integrity of the downtown Cincinnati
21 underground network distribution system through fewer outages.

1 **Q. PLEASE DESCRIBE THE NETWORK SECONDARY MAIN**
2 **REPLACEMENT PROGRAM, ITS PURPOSE, AND THE ANTICIPATED**
3 **BENEFITS.**

4 A. The Network Secondary Main Replacement Program is designed to maintain and
5 enhance reliability through the replacement of 600 volt PILC cable that provides a
6 necessary safety net for the secondary system through a network redundancy for
7 the downtown Cincinnati distribution system. The existing cable is, in most
8 cases, more than 40 years old and thus, because of age, has an increased
9 likelihood of failure. The redundant network in downtown Cincinnati is vital to
10 attracting new business, not to mention retaining existing businesses, especially
11 those that require a high degree of reliability, such as data centers and financial
12 institutions. An advantage that developers and current businesses have in the
13 downtown network is that its redundancy eliminates the need for these businesses
14 to have separate back-up generation in most cases. For example, in new
15 downtown buildings, as well as some current downtown buildings, the redundant
16 downtown system alleviates the need to own and maintain back-up generation to
17 power emergency equipment such as fire systems. The benefits anticipated from
18 this program will positively impact customer experience through enhancing
19 safety, reliability, and the overall integrity of the downtown Cincinnati
20 underground network distribution system through decreasing the likelihood of
21 outages. It would also continue to allow these buildings and business to not have
22 to secure separate back-up generation resources.

1 **Q. PLEASE DESCRIBE THE VAULT NETWORK**
2 **PROTECTOR/TRANSFORMER CHANGE OUT PROGRAM, ITS**
3 **PURPOSE, AND THE ANTICIPATED BENEFITS.**

4 A. The Vault Network Protector/Transformer Change Out Program is designed to
5 both proactively and reactively replace older vault protectors and transformers.
6 This program would include a transition from wall-mounted protectors to
7 transformer-mounted protectors, where possible. Although Duke Energy Ohio
8 currently has a rigorous preventative maintenance program in place for this
9 equipment, there are circumstances where replacing the equipment is more cost
10 effective and yields greater reliability. This is primarily due to the age of some of
11 the infrastructure, resulting in a greater risk for failure. In addition, because much
12 of this equipment is unique in nature, there is a potential risk of longer outage
13 durations in the event of a failure, due to long lead times to acquire replacement
14 equipment. The benefits anticipated from this program will positively impact
15 customer experience through maintaining and enhancing reliability and the
16 overall integrity of the downtown Cincinnati underground network distribution
17 system through decreasing the likelihood of outages.

18 **Q. PLEASE DESCRIBE THE REDESIGN OF WORST CONGESTED**
19 **UNDERGROUND STRUCTURES PROGRAM, ITS PURPOSE, AND THE**
20 **ANTICIPATED BENEFITS.**

21 A. The Redesign of Worst Congested Underground Structures Program will allow
22 the redesign and rebuilding of congested and overcrowded manholes and vaults.
23 There are several underground structures that were built and installed in place due

1 to the congestion of other utilities located in the street. Over time and as a result
2 of previous equipment failure and replacement, as well as general load growth,
3 these structures have become congested and pose a reliability risk due to the close
4 proximity of other conductors. The benefits anticipated from this program will be
5 seen by decreasing the likelihood of outages due to congestion in an underground
6 structure. Although this program will not eliminate all outages, this program
7 allows for Duke Energy to keep the impact isolated to one circuit

8 **Q. PLEASE DESCRIBE THE URD SUBMERSIBLE TRANSFORMER**
9 **UPGRADE PROGRAM, ITS PURPOSE, AND THE ANTICIPATED**
10 **BENEFITS.**

11 A. The URD Submersible Transformer Upgrade Program will allow for the removal
12 of overhead transformers that were installed in underground vaults and will
13 further include installing pad mounted equipment and relocating all connections
14 above ground. A submersible transformer is an overhead transformer that has
15 been retrofitted with underground bushings so that it can be installed below grade.
16 These installations were prevalent and customary prior to the time that pad
17 mounted transformers became the standard. These submersible transformers
18 present a safety and reliability concern, as a utility employee must lie on the
19 ground to work on this equipment. Outages relating to submersible transformers
20 can be lengthy. When these devices fail today, the Company replaces them with a
21 ground mounted transformer. The replacement of submersible transformers will
22 be performed in conjunction with the Cable Injection/Replacement Programs I
23 previously described. These facilities exist in areas where services were installed

1 during the mid-1970s and 1980s throughout the Duke Energy Ohio service
2 territory. The benefits anticipated from this program will positively impact
3 customer experience through maintaining and enhancing reliability and the
4 overall integrity of the Company's service area through decreasing the likelihood
5 and the length of outages.

6 **Q. PLEASE DESCRIBE THE DISTRIBUTION SUBSTATION PROTECTION**
7 **PROGRAM, ITS PURPOSE, AND THE ANTICIPATED BENEFITS.**

8 A. The Distribution Substation Protection Program will facilitate the upgrade of
9 security measures, including but not limited to installation of cameras, higher
10 fences, and other theft deterrents at Company substations in locations of high risk
11 of theft. The Company is experiencing more frequent attempts at vandalism and
12 theft at its substations. To the untrained person, accessing these areas, especially
13 through an act of vandalism, presents a serious risk of injury or death. Equipment
14 in these substations is used to provide service to customers. If equipment that is
15 in service is stolen, an outage may occur. The equipment must be replaced,
16 which, in turn, increases costs to all customers. Duke Energy Ohio intends to
17 implement the described measures throughout its service territory with a priority
18 focus in those areas at the highest risk of theft or vandalism. The benefits
19 anticipated from this program will positively impact customer experience through
20 maintaining and enhancing reliability, reducing O&M expense in the future, and
21 improving safety.

22 **Q. PLEASE DESCRIBE THE UPGRADE LIVE FRONT TRANSFORMERS**
23 **PROGRAM, ITS PURPOSE, AND THE ANTICIPATED BENEFITS.**

1 A. The Upgrade Live Front Transformers Program is designed to enable replacement
2 of 40- to 50-year-old equipment, including but not limited to transformers without
3 insulated HV bushings. Live front transformers were installed during the 1970s
4 and they limit the Company's ability to expand its underground system. These
5 devices are also difficult to maintain in that they must be fully de-energized
6 before they can be worked on. This program would identify these devices and
7 replace them. This program will encompass the entire Duke Energy Ohio service
8 territory with a primary focus on three-phase transformers. The benefits
9 anticipated from this program will positively impact customer experience by
10 maintaining and enhancing reliability and the overall integrity of the Company's
11 service area through decreasing the likelihood of outages and the length of
12 outages.

13 **Q. PLEASE DESCRIBE THE UPGRADE DISTRIBUTION TRANSFORMER**
14 **SUBSTATION PROGRAM, ITS PURPOSE, AND THE ANTICIPATED**
15 **BENEFITS.**

16 A. The Upgrade Distribution Transformer Substations Program is intended to
17 address unique and non-standard customer locations and installations. Duke
18 Energy Ohio has several unique transformer installations that do not have a
19 replacement alternative readily available. This current situation creates the
20 potential for reliability issues, not to mention an extended down time for the
21 customer, if the facilities need to be repaired. Non-standard transformers are not
22 only a risk to the customer in relation to the longer duration of an outage, but also
23 a concern to the Company. As a result of the evolution of the electric industry

1 and aesthetic attempts to keep transformers out of the public view, several
2 installations in the Company's territory are non-standard and required special-
3 order equipment at the time they were installed. This unique equipment is
4 considered obsolete in many cases and, in order to continue serving customers
5 with these types of installations, such equipment must be upgraded before a
6 failure occurs. The program would identify and facilitate updating of these
7 stations before an equipment failure occurs. This program will encompass the
8 entire Duke Energy Ohio service territory. The benefits anticipated from this
9 program will positively impact customer experience through maintaining and
10 enhancing reliability and the overall integrity of the Company's service area
11 through decreasing the likelihood of outages and the length of outages.

12 **Q. PLEASE DESCRIBE THE PILC REPLACEMENT PROGRAM, ITS**
13 **PURPOSE, AND THE ANTICIPATED BENEFITS.**

14 A. The PILC Replacement program includes replacement of old paper and lead
15 substation exit cables from the substation to the overhead/underground lines. The
16 PILC cables are approaching the end of their useful life and this program would
17 accelerate replacement. These cables are the first section of a feeder and, in most
18 cases, their failure could cause an outage to thousands of customers. The PILC
19 cable was a standard installation for many years. However, the oil and papers
20 have been breaking down over time. Infrared scanning has determined that
21 replacement of the PILC cables must be accelerated. This program will
22 encompass the entire Duke Energy Ohio service territory with a primary focus on
23 13kv substations. The benefits anticipated from this program will positively

1 impact customer experience through maintaining and enhancing reliability and the
2 overall integrity of the Company's service area through decreasing the likelihood
3 of outages and the length of outages.

4 **Q. PLEASE DESCRIBE THE DISTRIBUTION OPERATIONS CENTER AND**
5 **MOBILE LOGISTICS MODERNIZATION PROGRAM, ITS PURPOSE,**
6 **AND THE ANTICIPATED BENEFITS.**

7 A. The Distribution Operations Center and Mobile Logistics Modernization Program
8 focuses on optimizing and upgrading the Company's facilities to a more mobile
9 workforce. The program includes modernizing distribution office data equipment
10 and mobile technology and exploring opportunities for consolidating activities.
11 Utility trucks are carrying Mobile Data Terminals that need to be docked nightly,
12 as well as tablets and other handheld equipment. Each district will have an
13 Information Technology room where these devices will be kept and docked for
14 upgrades. Duke Energy Ohio is investing in its operation centers to provide more
15 timely response and to increase customer satisfaction. Once implemented, the
16 program will provide for real-time updates from the field during construction and
17 outage events. This program will encompass Duke Energy Ohio's Service
18 Distribution Operation Centers. The benefits anticipated from this program will
19 positively impact customer experience through improved communications and
20 information for customers, thereby enhancing reliability and the overall integrity
21 of the Company's distribution system.

1 **Q. PLEASE DESCRIBE THE OWNERSHIP OF UNDERGROUND**
2 **RESIDENTIAL SERVICES PROGRAM, ITS PURPOSE, AND THE**
3 **ANTICIPATED BENEFITS.**

4 **A.** Upon implementation, the Ownership of Underground Residential Services
5 Program would allow Duke Energy Ohio to take ownership and control of
6 customer underground services that must be repaired or replaced. Currently,
7 Duke Energy Ohio owns and maintains all overhead electric service drops to the
8 customers' premises. However, the underground services remain the sole
9 responsibility of the customers. Consequently, if a repair is needed on these
10 underground services, it is the customer's responsibility. The Company is
11 proposing to change this going forward such that if an underground service needs
12 repair or replacement, the Company would make such a repair, take ownership of
13 the service, and then become responsible for future maintenance. Duke Energy
14 Ohio's proposal to take over ownership of these services will allow for faster
15 restoration for the customer and will decrease customer confusion relating to
16 ownership of and responsibility for these services. Many other utilities in the
17 United States, including five of Duke Energy's seven regulated companies,
18 install, own, and maintain the underground residential services. This program
19 will encompass the entire Duke Energy Ohio service territory where these
20 underground services exist. The benefits anticipated from this program will
21 positively impact customer experience through maintaining and enhancing
22 reliability and the overall integrity of the Company's service area through
23 decreasing the likelihood of outages and the length of outages.

1 **Q. PLEASE DESCRIBE THE CONVERSION OF OLD 4KV FEEDERS**
2 **PROGRAM, ITS PURPOSE, AND THE ANTICIPATED BENEFITS.**

3 A. The Conversion of Old 4kV Feeders Program facilitates the continuing upgrade of
4 primary distribution voltage along 4kV Feeders. These feeders were installed
5 more than 50 years ago. The current 4kv stations are expensive to maintain due to
6 age and provide a significant limit on future expansion. The additional funding
7 through this program will accelerate the upgrades and allow for more load
8 capability. This program would accelerate the schedule into a 5-year plan from
9 the current 10-year plan so as to allow for greater availability for capacity and
10 improved reliability through replacement of old equipment. This program will
11 encompass the entire Duke Energy Ohio service territory, with a focus on the
12 older suburbs. The benefits anticipated from this program will positively impact
13 customer experience through maintaining and enhancing reliability and the
14 overall integrity of the Company's service area through decreasing the likelihood
15 of outages and the length of outages.

16 **Q. PLEASE DESCRIBE THE RECLOSER REPLACEMENT PROGRAM,**
17 **ITS PURPOSE, AND THE ANTICIPATED BENEFITS.**

18 A. The Recloser Replacement Program accelerates the replacement and upgrade of
19 reclosers to electronic controls. The recloser plays a key role in protecting the
20 main line of the circuit and isolating outages to a smaller group of customers.
21 Annually, this replacement encompasses approximately 100 locations or 300 units
22 on the system. This program will encompass the entire Duke Energy Ohio service
23 territory. The benefits anticipated from this program will positively impact

1 customer experience through maintaining and enhancing reliability and the
2 overall integrity of the electric distribution system.

3 **Q. PLEASE DESCRIBE THE CIRCUIT SECTIONALIZATION PROGRAM,**
4 **ITS PURPOSE, AND THE ANTICIPATED BENEFITS.**

5 A. The Circuit Sectionalization Program, as the name implies, sectionalizes Duke
6 Energy Ohio's distribution feeders to be broken down into smaller isolated
7 segments rather than all relaying back to a large device. This program works in
8 conjunction with the Company's Transformer Retrofit and Recloser Replacement
9 Program, to break down the distribution feeders into smaller circuits with relays
10 and protection schemes. This helps isolate outages, when they occur, to smaller
11 groups and keeps the main lines energized. This program will encompass the
12 entire Duke Energy Ohio service territory. The benefits anticipated from this
13 program will positively impact customer experience through maintaining and
14 enhancing reliability by reducing the number of customers impacted by outages
15 and the enhancing overall integrity of the electric distribution system.

16 **Q. ARE THE PROGRAMS YOU DESCRIBED ABOVE THE ONLY**
17 **PROGRAMS TO BE INCLUDED IN THE INFRASTRUCTURE**
18 **MODERNIZATION PLAN?**

19 A. As I previously stated, the Company anticipates that infrastructure modernization
20 plan will continue to evolve with technological advances or changes in field
21 conditions to include additional programs or revisions and modifications to the
22 initial programs over time. The Company needs to be able to modify the list of
23 programs and to shift dollars to similar or new programs as technology evolves.

1 An example of such a shift would be through our URD cable replacement
2 program where there may be a future introduction of new injection technologies.

3 The Company continually strives to find new and better ways to employ
4 technology, proactively address system infrastructure issues in a cost-effective
5 way, and improve reliability.

6 **Q. ARE THE FORECASTED COSTS LISTED IN MWA-7, THE**
7 **INFRASTRUCTURE MODERNIZATION PLAN, REASONABLE FOR**
8 **THE WORK AND SERVICES TO BE PERFORMED?**

9 A. Yes. The costs forecasted for Rider DCI are consistent with other costs incurred
10 through the normal operation of the Company. Rider DCI will allow timely
11 recovery of the Company's costs for the programs included therein, to ensure the
12 Company can continue these programs. The rider will be trued-up for actual costs
13 and audited by the Commission to ensure that the Company is not over-
14 recovering.

15 **Q. HOW WILL THE COMPANY'S PERFORMANCE UNDER THE**
16 **INFRASTRUCTURE MODERNIZATION PLAN BE MEASURED?**

17 A. Performance will be measured primarily through the reporting indices I described
18 previously. It is anticipated that these programs will allow the Company to maintain
19 and improve CAIDI, SAIFI, and SAIDI.

IV. CONCLUSION

20 **Q. WERE ATTACHMENTS MWA-1 THROUGH MWA-7 COMPILED BY**
21 **YOU OR UNDER YOUR SUPERVISION?**

22 A. Yes.

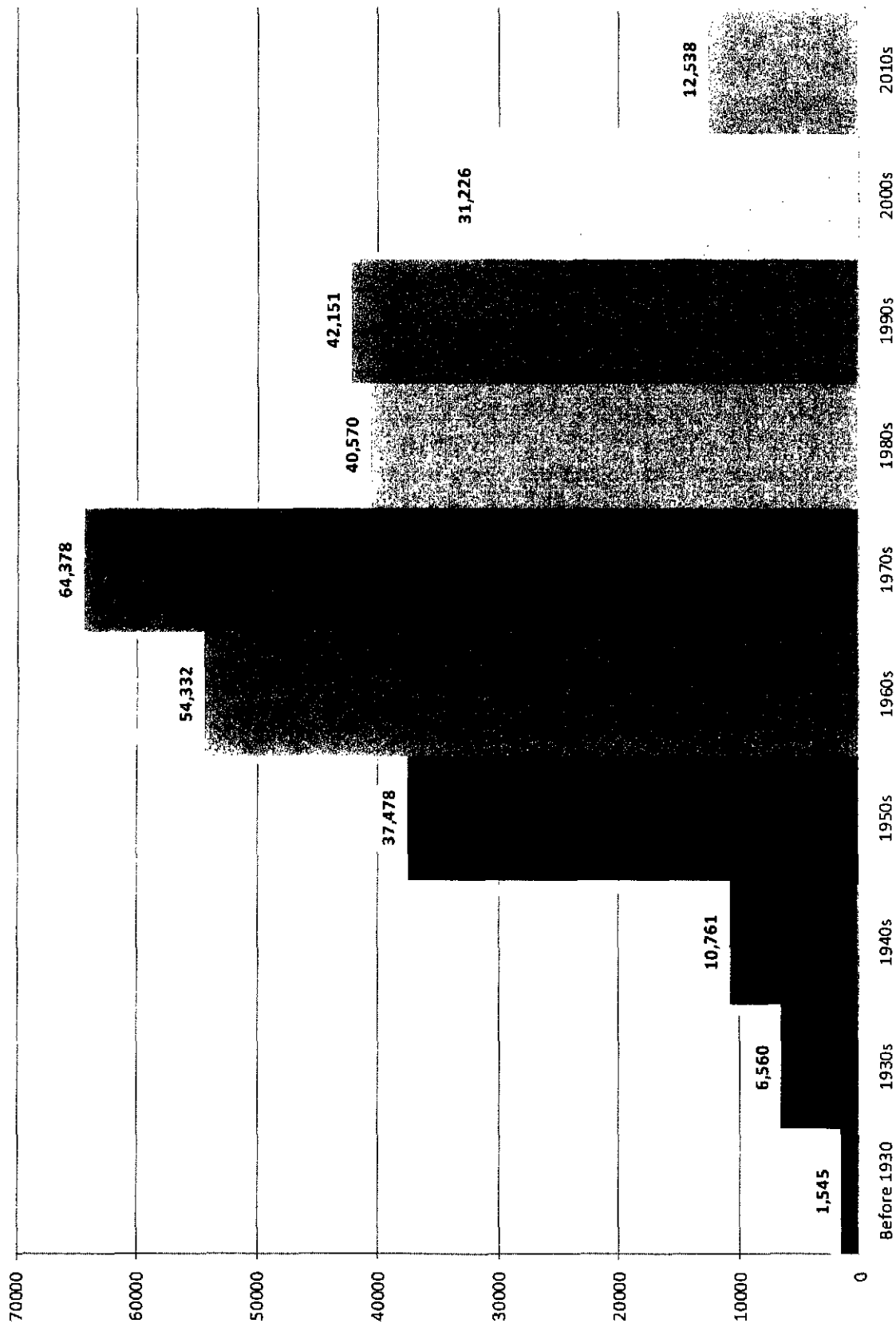
1 **Q. IS THE INFORMATION CONTAINED IN ATTACHMENTS MWA-1**
2 **THROUGH MWA-7 TRUE AND ACCURATE TO THE BEST OF YOUR**
3 **KNOWLEDGE AND BELIEF?**

4 **A. Yes.**

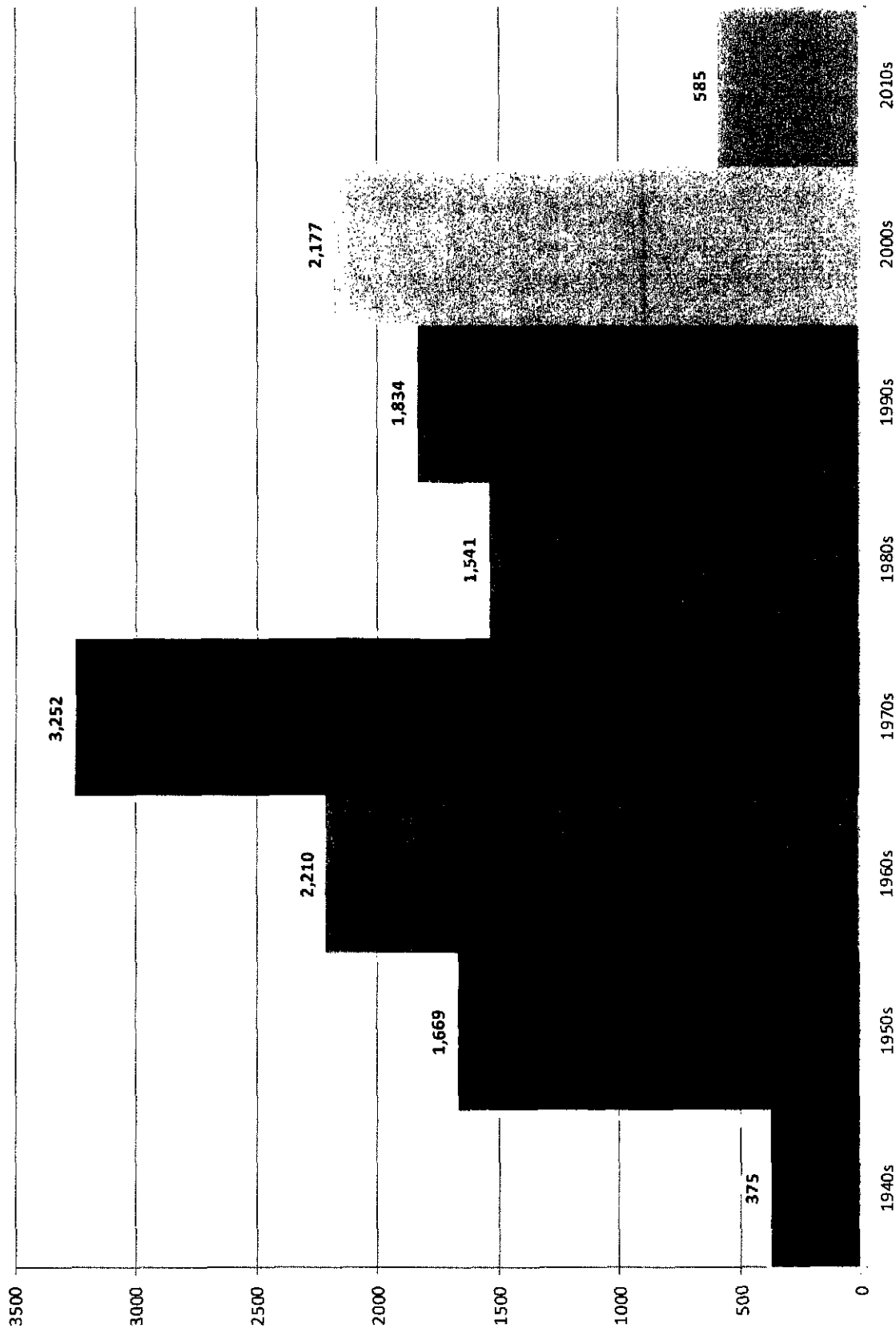
5 **Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

6 **A. Yes.**

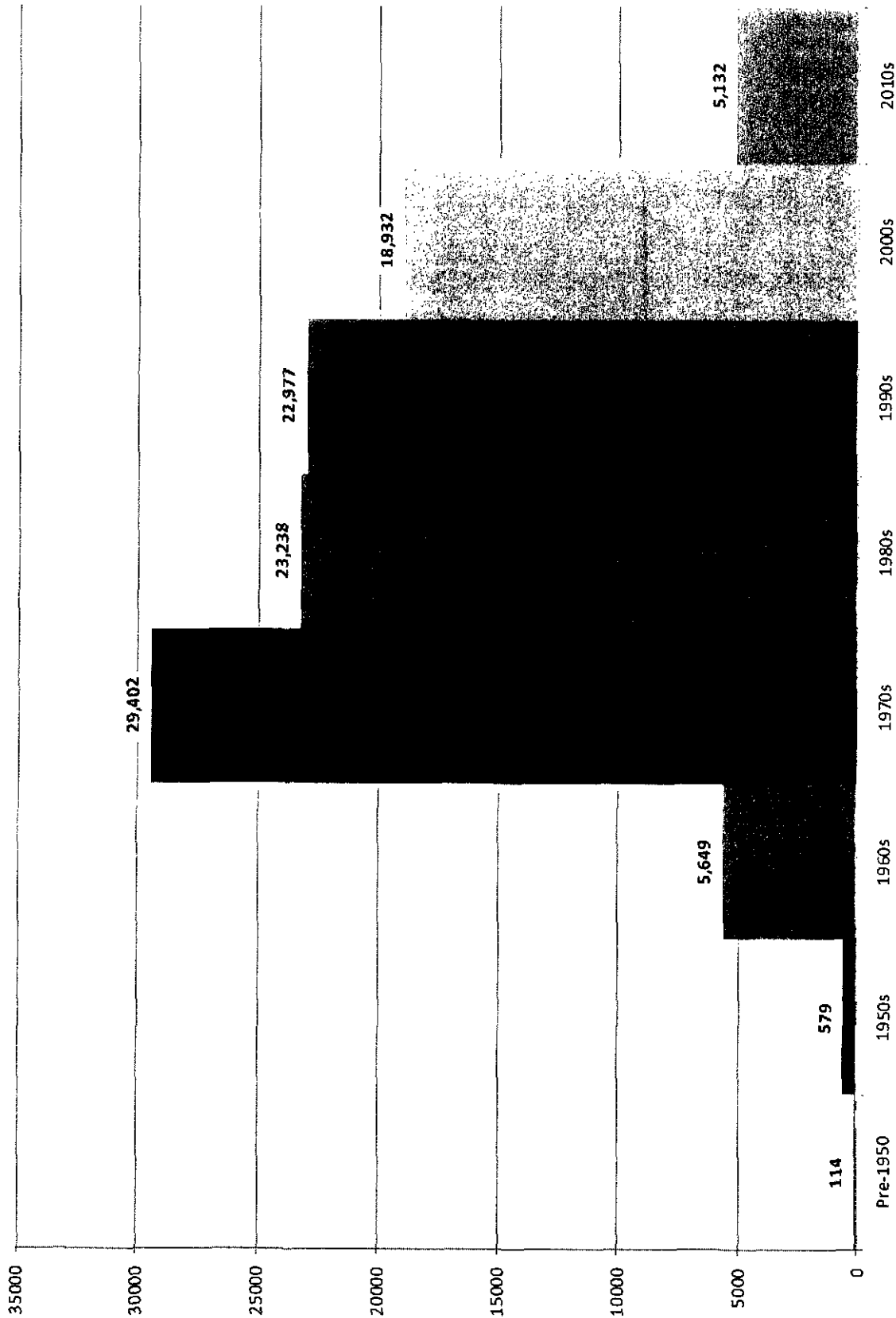
Number of Distribution Wood Poles by Decade - Ohio



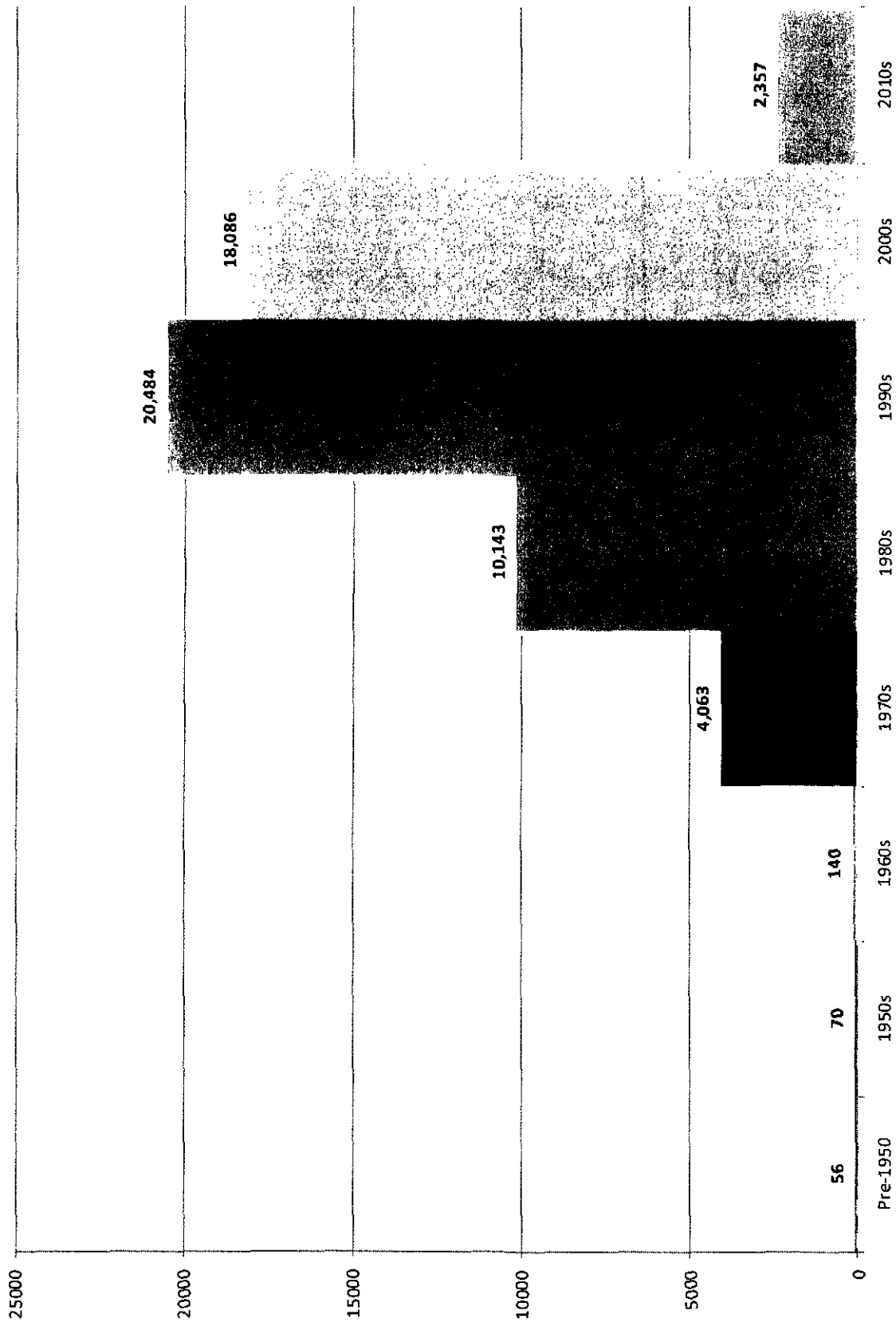
Number of Transmission Wood Poles by Decade - Ohio



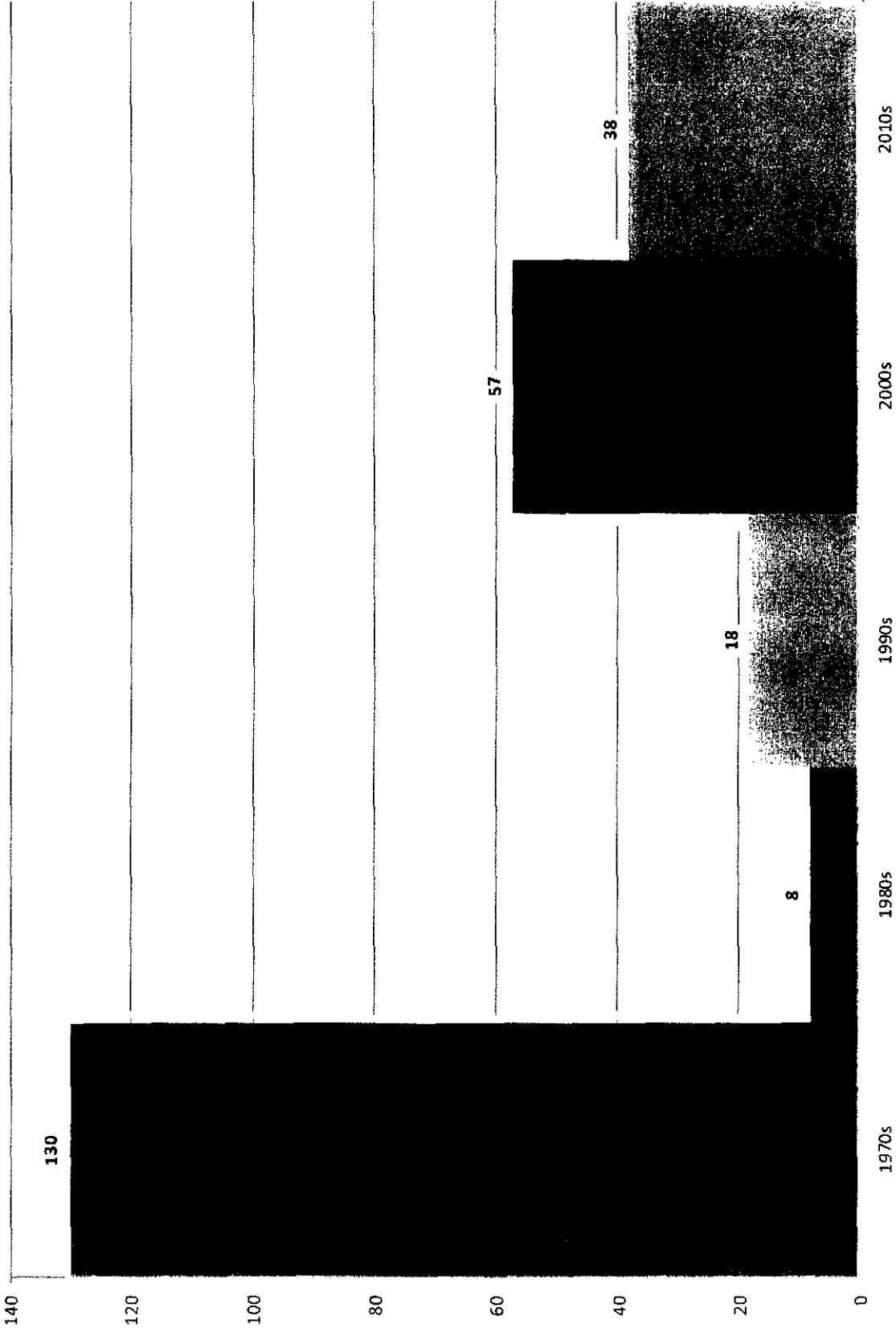
Number of OH Transformers by decade - Ohio



Age of UG Transformers by Decade - Ohio



Number of Switchgear by Decade - Ohio



ATTACHMENT MWA- 2

**CONFIDENTIAL
PROPRIETARY TRADE
SECRET**

ATTACHMENT MWA- 3

**CONFIDENTIAL
PROPRIETARY TRADE
SECRET**

ATTACHMENT MWA- 4

**CONFIDENTIAL
PROPRIETARY TRADE
SECRET**

Ohio PUC Reliability Residential Survey Results Q1-14 Update

Prepared By
Duke Energy Market Research & Customer Insights



Completed Survey Counts

- Online survey emailed to a random sample of residential OH customers
- Email invitations mailed in Waves

Residential Regulated

	Q1-13	Q2-13	Q3-13	Q4-13	YE-13	Q1-14
Sample Size	1350	1350	1050	1350	5100	1250
Completed Surveys	100	88	56	81	325	80
Response Rate	7%	7%	5%	6%	6%	6%

Residential Non-Regulated

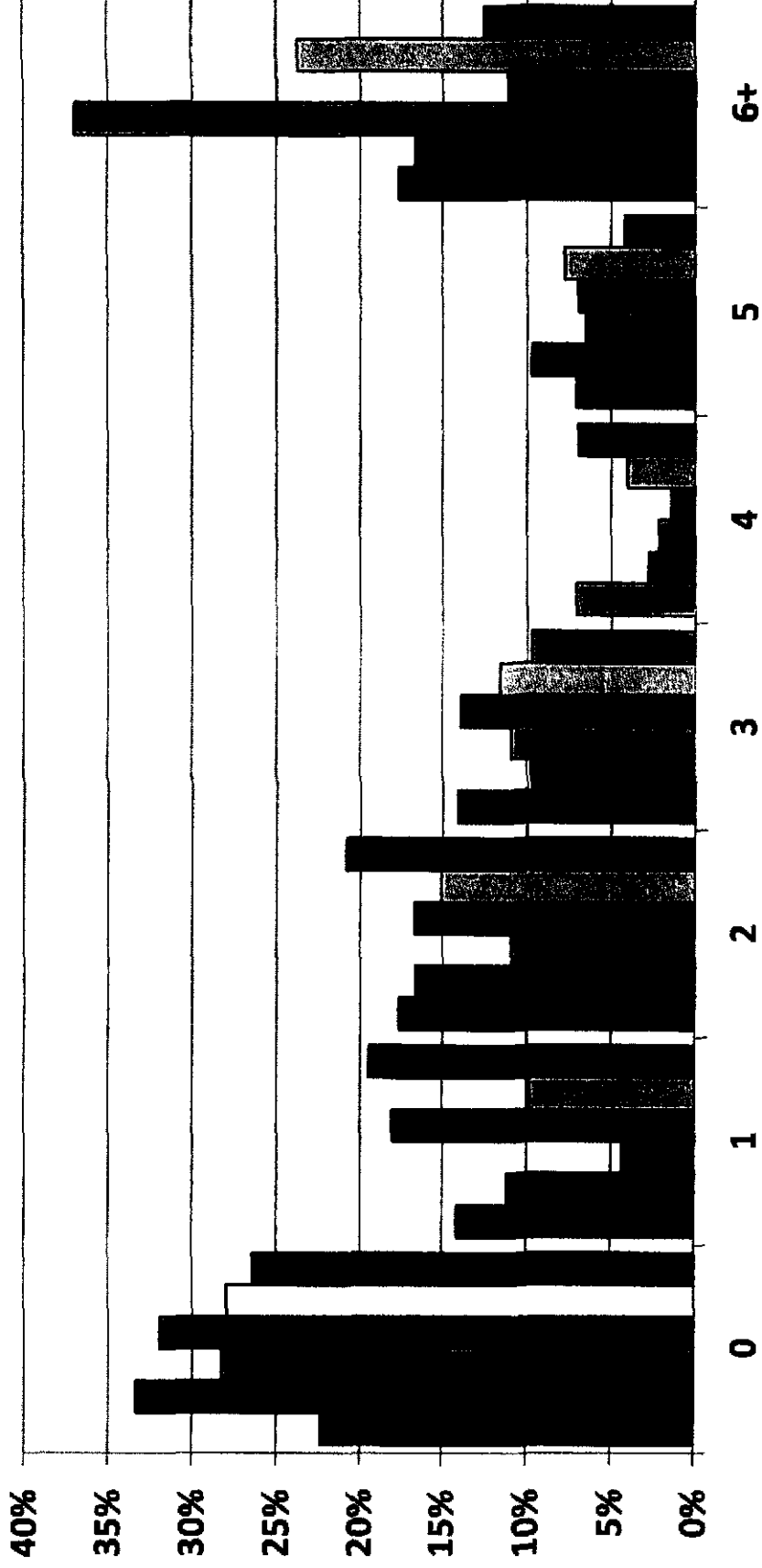
	Q1-13	Q2-13	Q3-13	Q4-13	YE-13	Q1-14
Sample Size	575	190	450	570	1785	555
Completed Surveys	39*	63	48	52	202	43
Response Rate	7%	33%	11%	9%	11%	8%

*Use caution when interpreting results; low sample sizes

How many brief interruptions of 5 minutes or less you experienced at your home in the past 12 months?

Regulated Customers

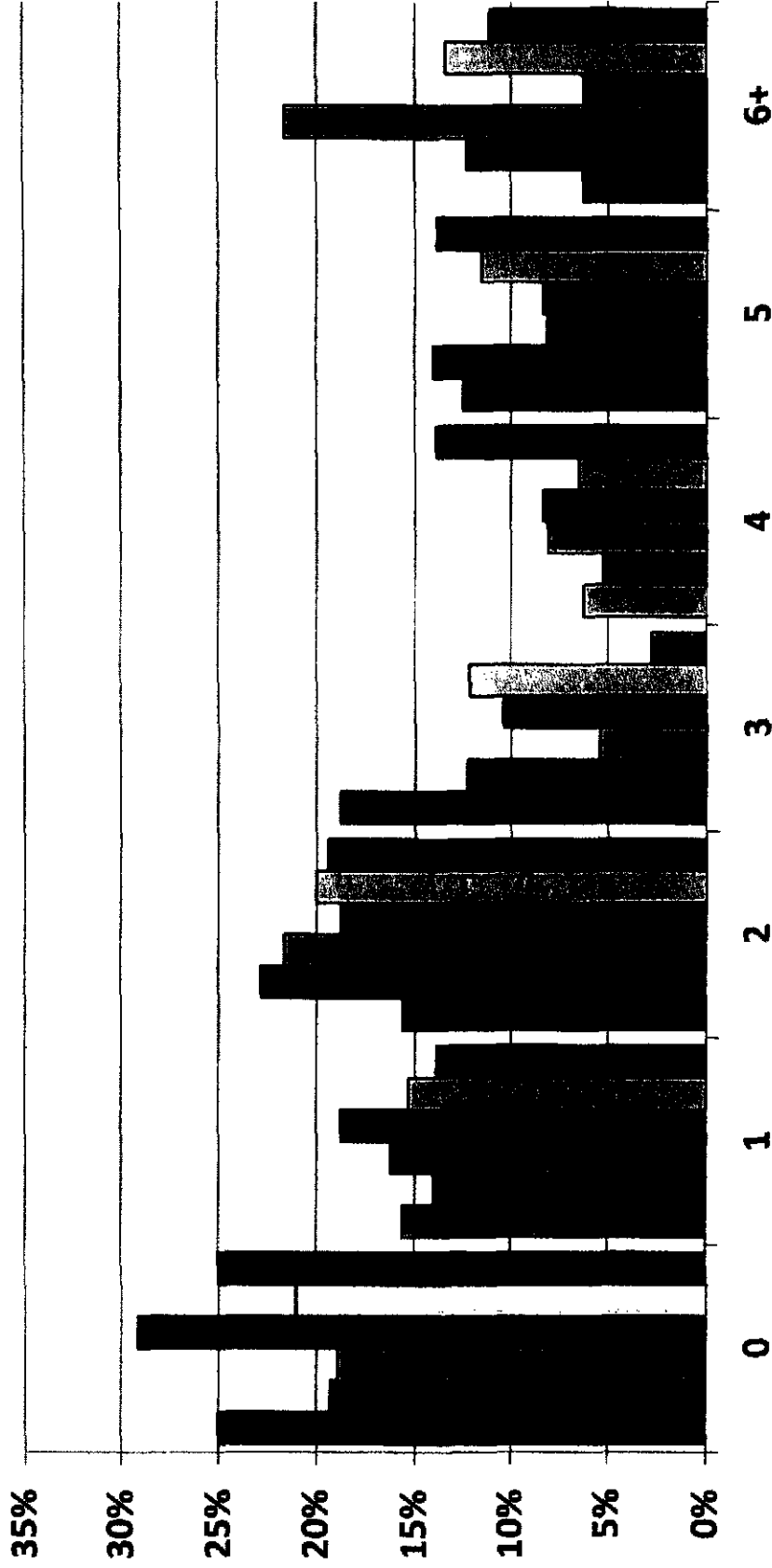
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How many brief interruptions of 5 minutes or less you experienced at your home in the past 12 months?

Non-Regulated Customers

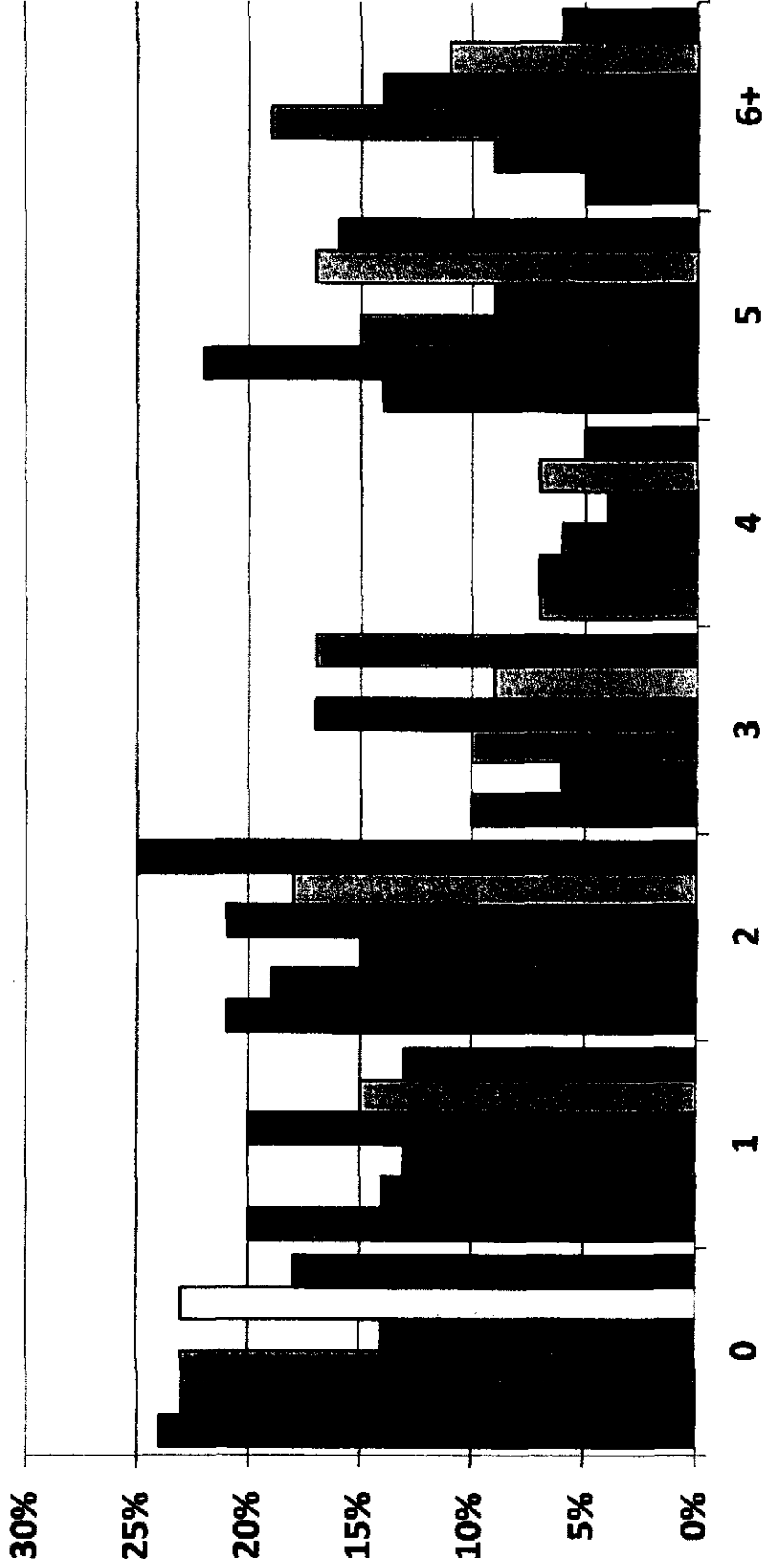
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How many brief interruptions of 5 minutes or less you consider acceptable during a 12 month period?

Regulated Customers

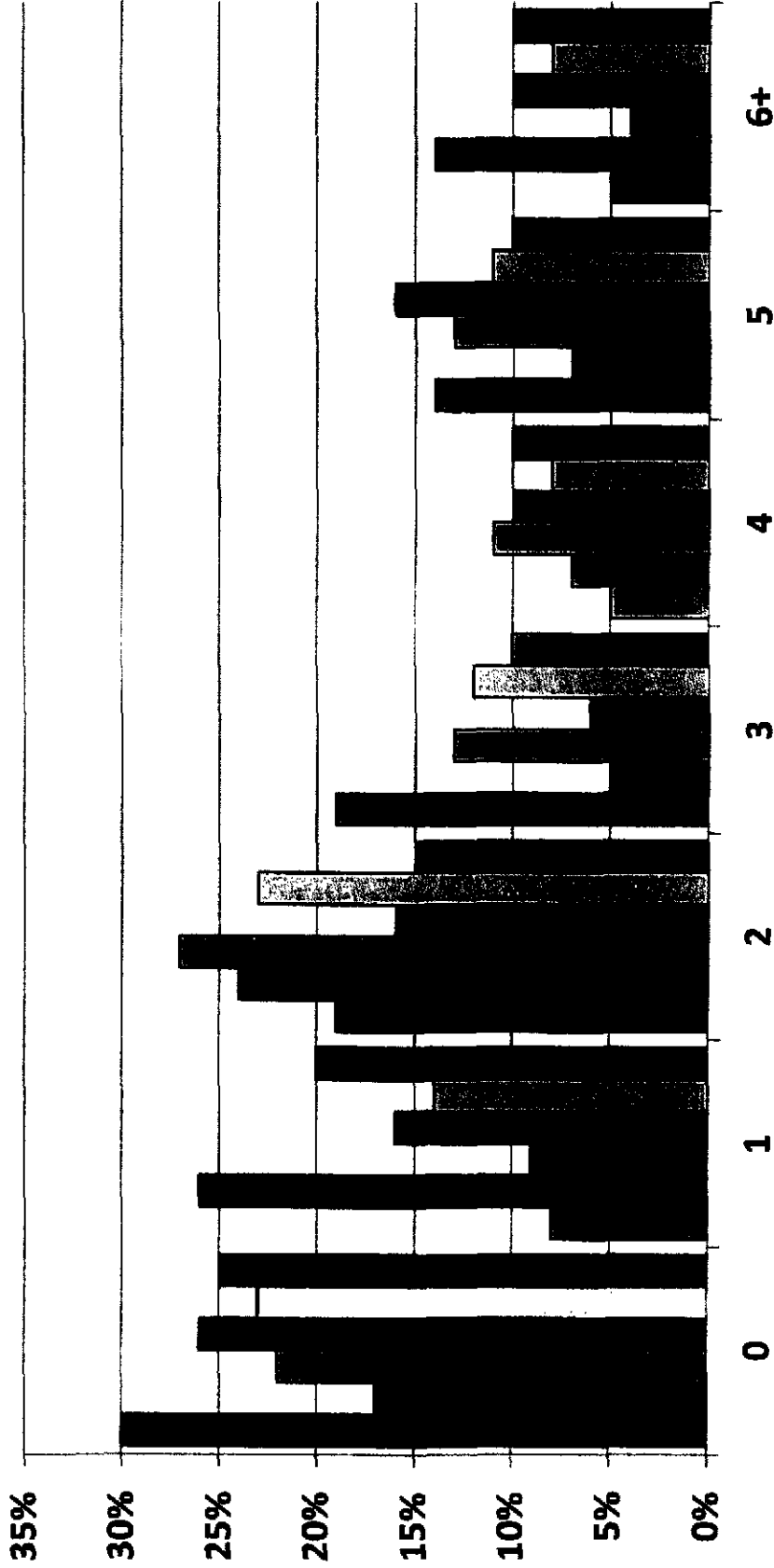
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How many brief interruptions of 5 minutes or less you consider acceptable during a 12 month period?

Non-Regulated Customers

■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How many lengthy interruptions of more than 5 minutes have you experienced at your home in the past 12 months?

Regulated Customers

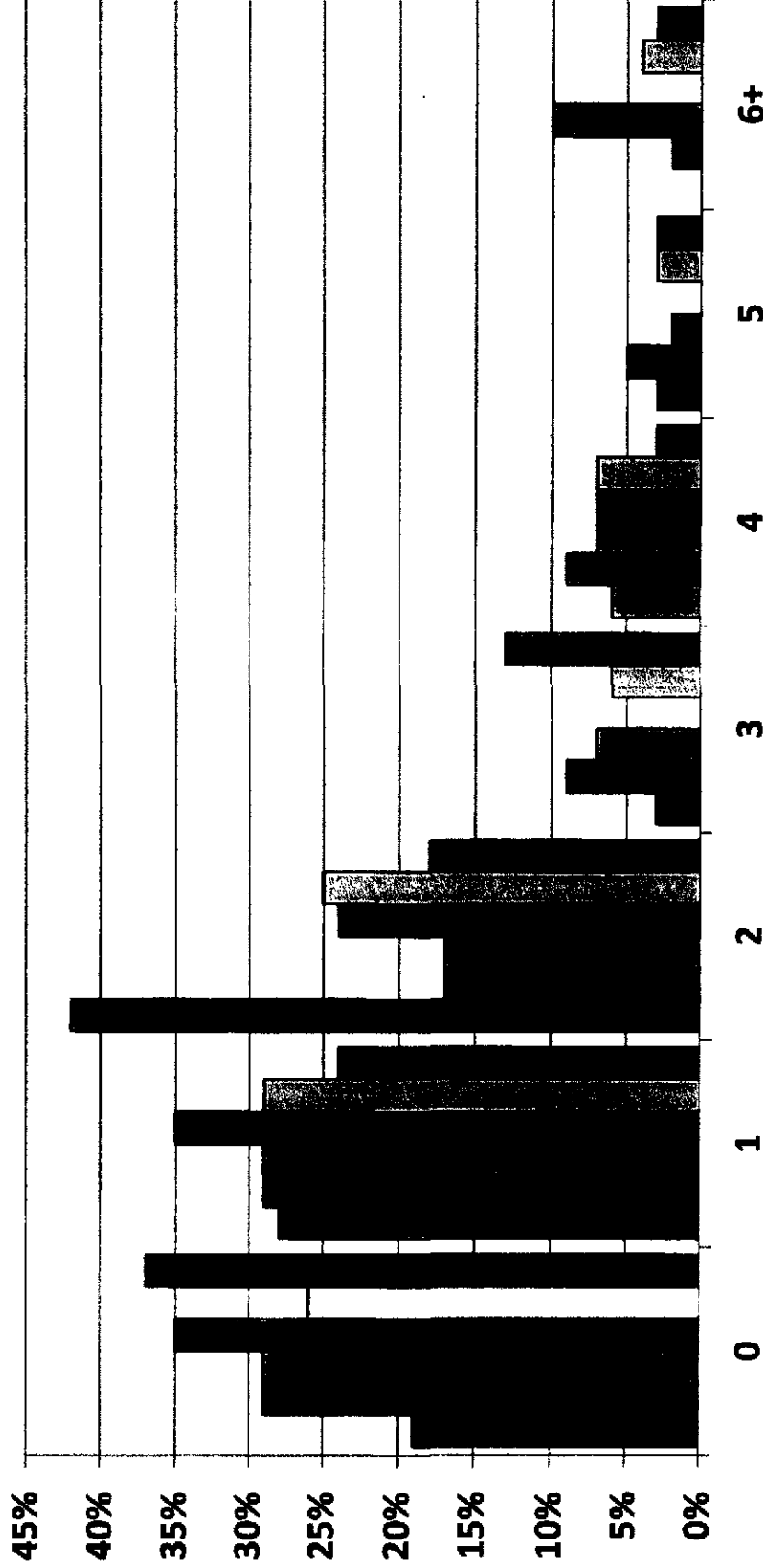
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How many lengthy interruptions of more than 5 minutes have you experienced at your home in the past 12 months?

Non-Regulated Customers

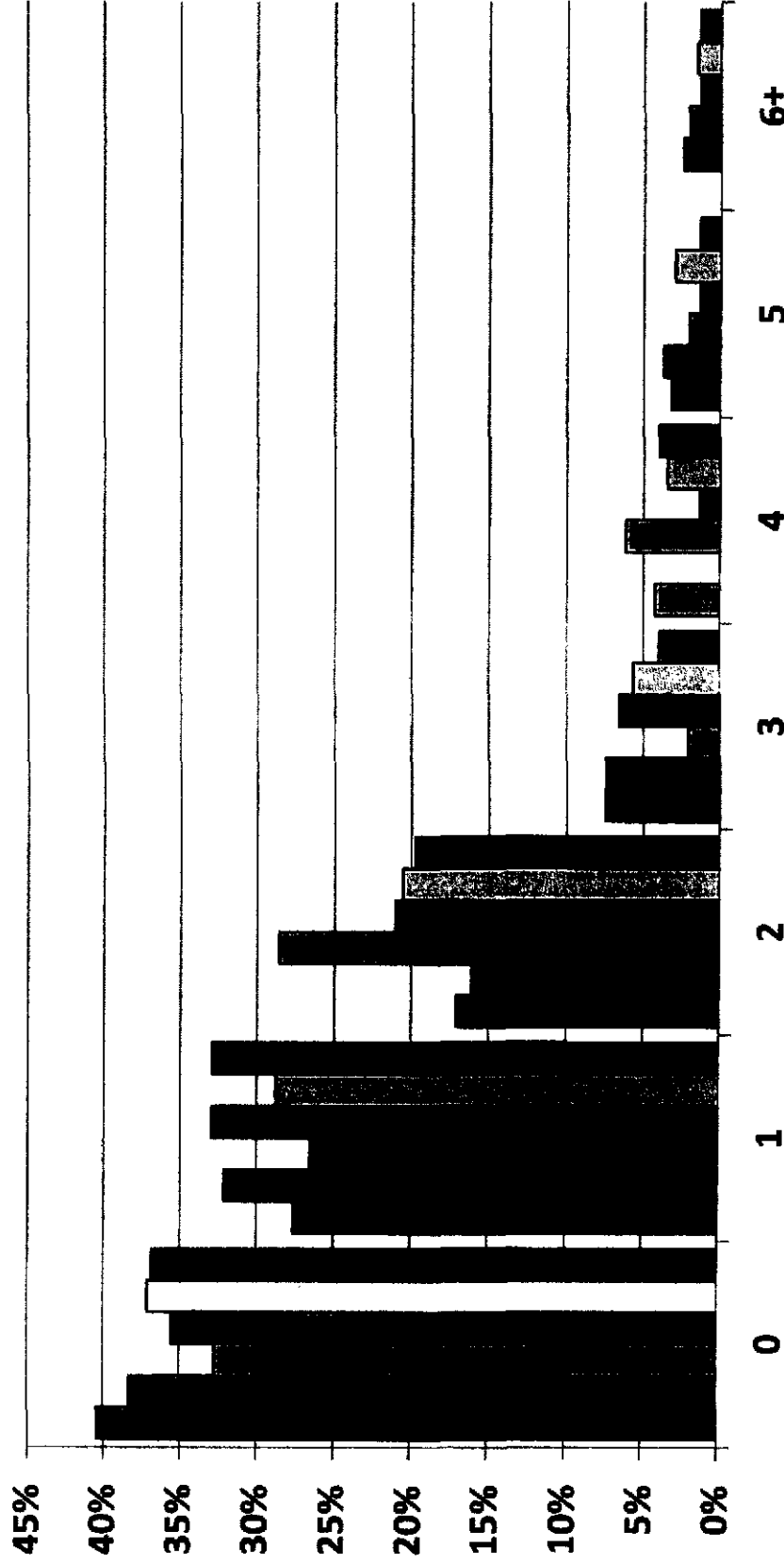
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How many lengthy interruptions of more than 5 minutes would you consider acceptable during a 12 month period?

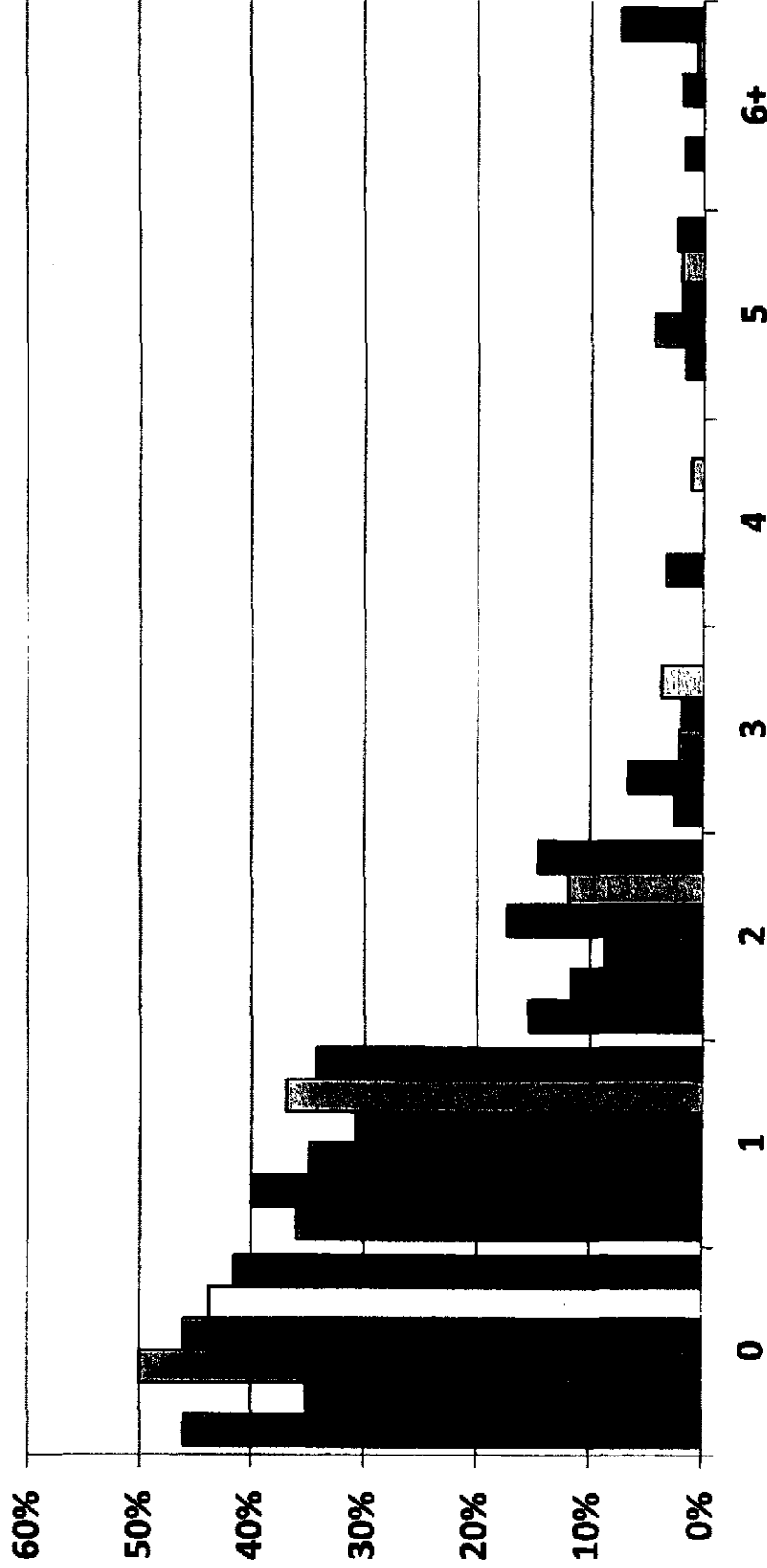
Regulated Customers

■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How many lengthy interruptions of more than 5 minutes would you consider acceptable during a 12 month period?

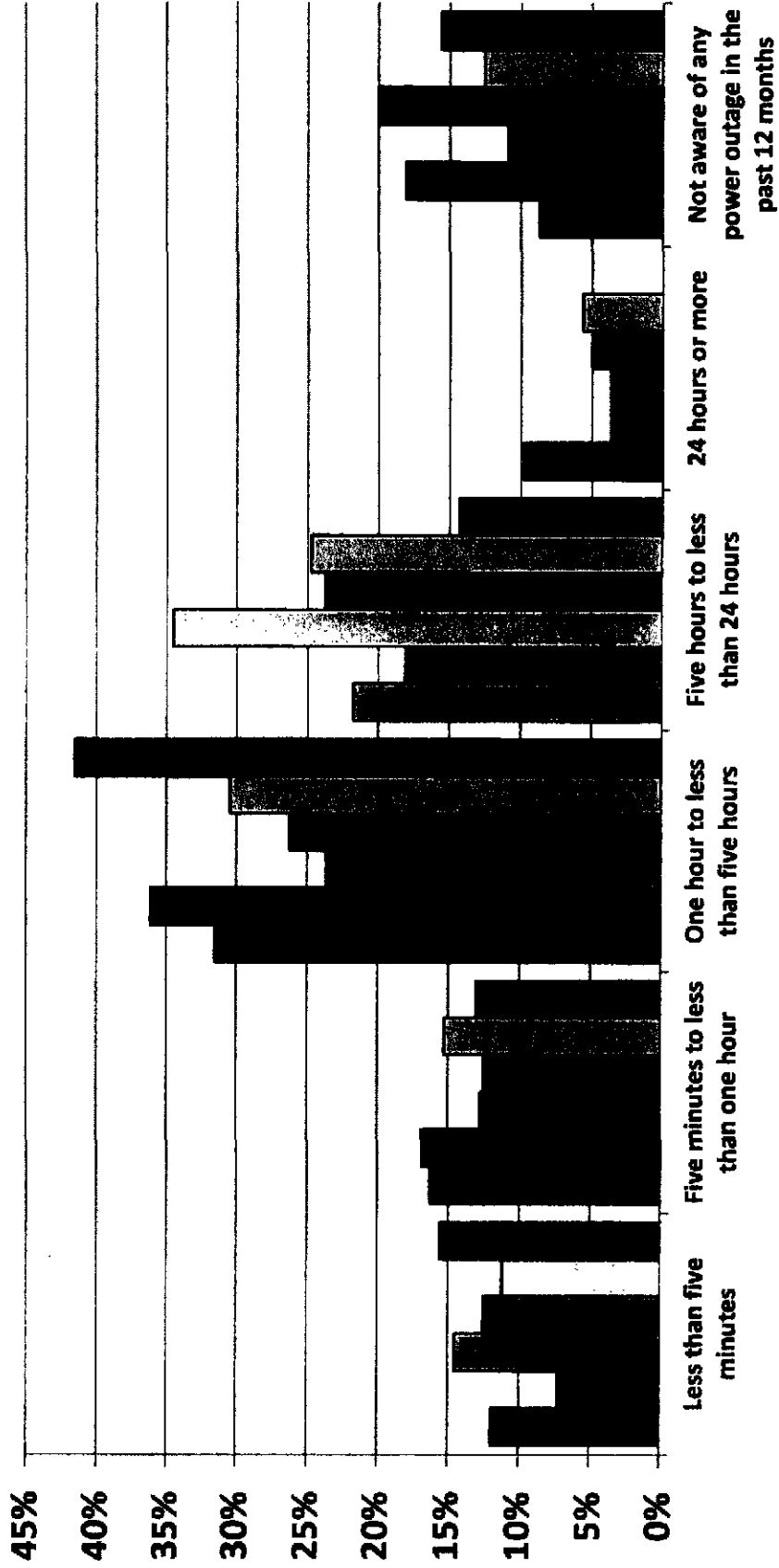
Non-Regulated Customers
 ■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



**Would you estimate your longest power outage
in the past 12 months to be:**

Regulated Customers

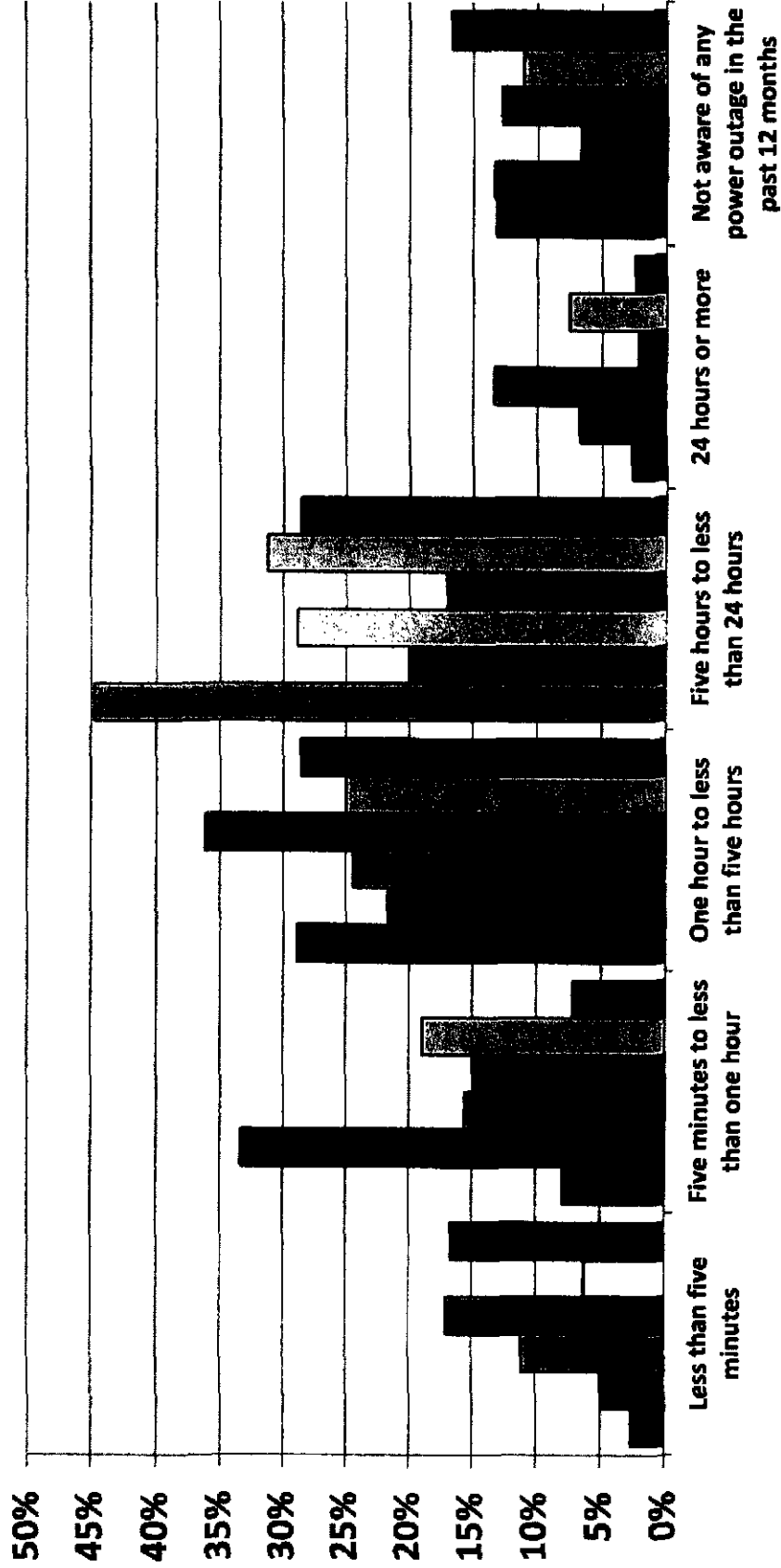
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



**Would you estimate your longest power outage
in the past 12 months to be:**

Non-Regulated Customers

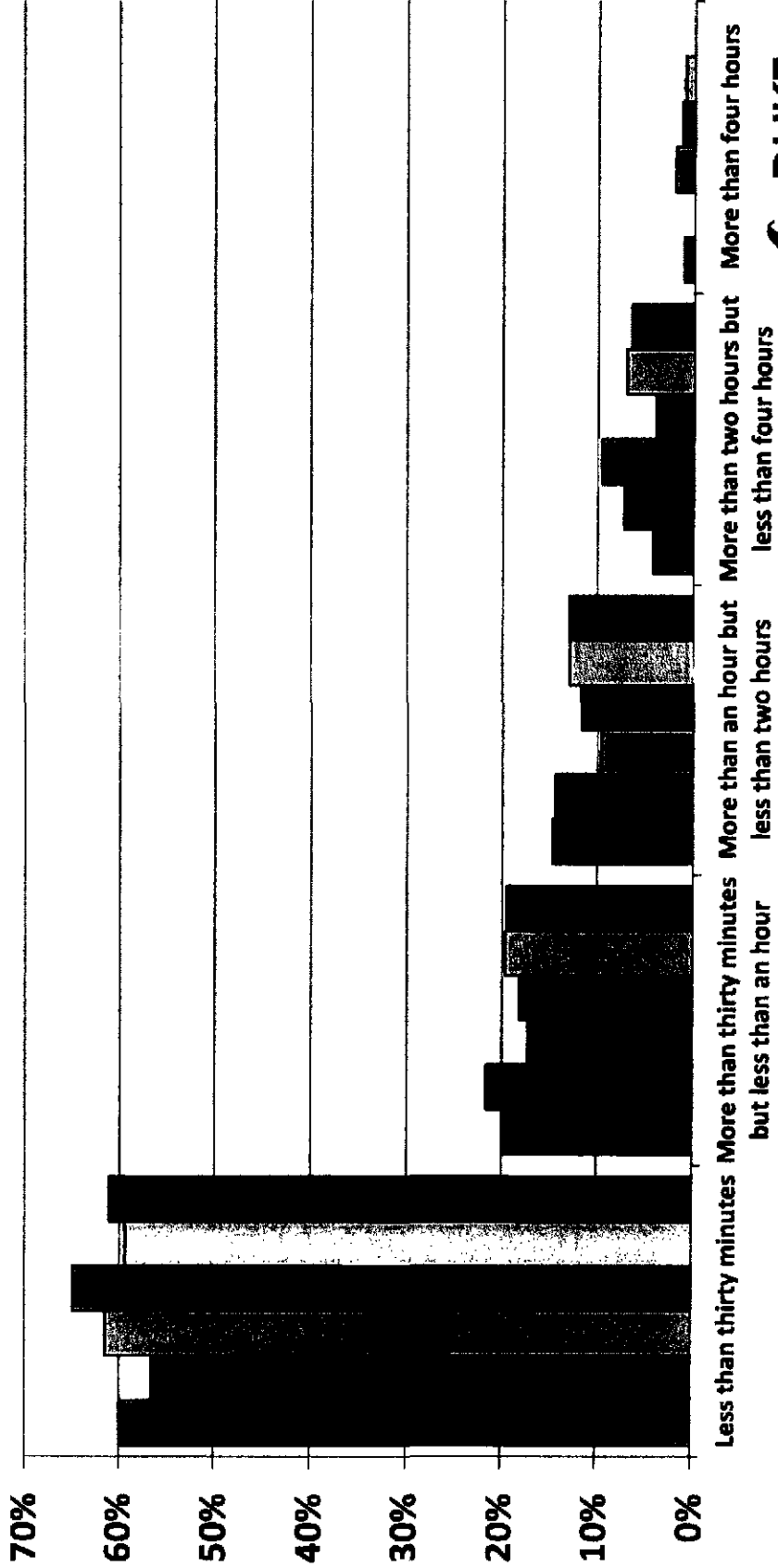
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



What do you consider to be an acceptable length of a prolonged outage that was not storm related?

Regulated Customers

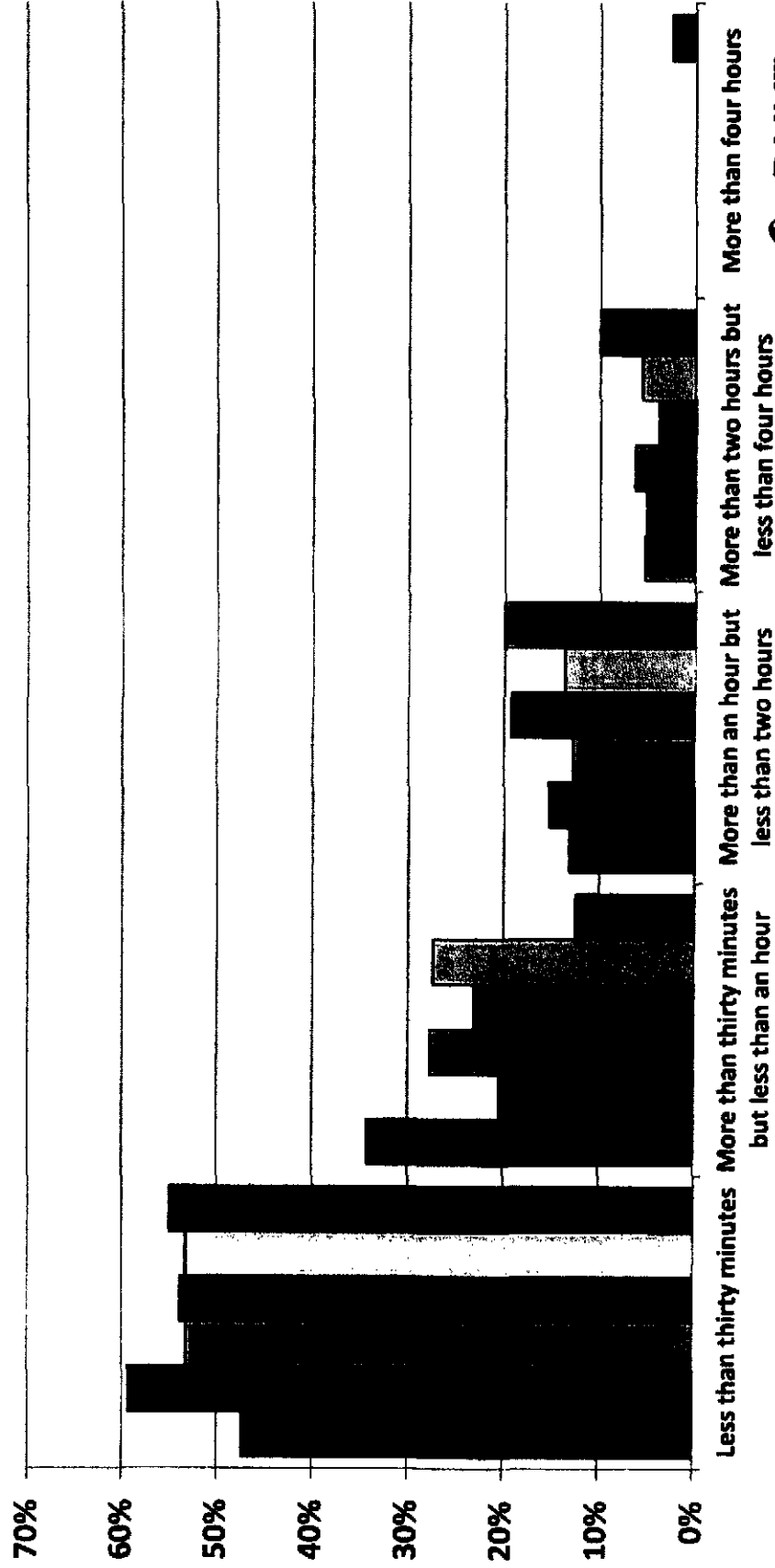
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



What do you consider to be an acceptable length of a prolonged outage that was not storm related?

Non-Regulated Customers

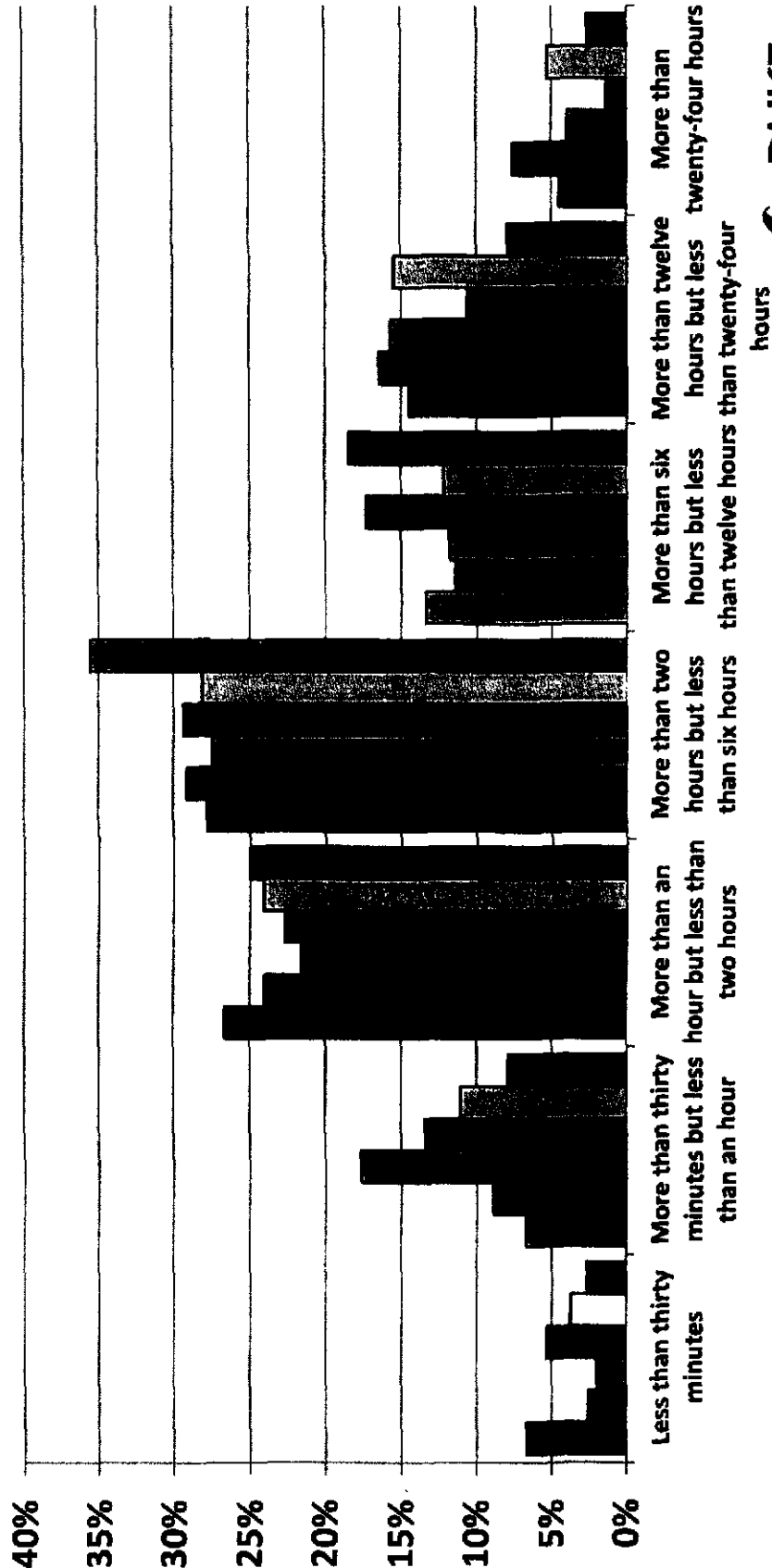
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



What do you consider to be an acceptable length of a prolonged outage that was storm related?

Regulated Customers

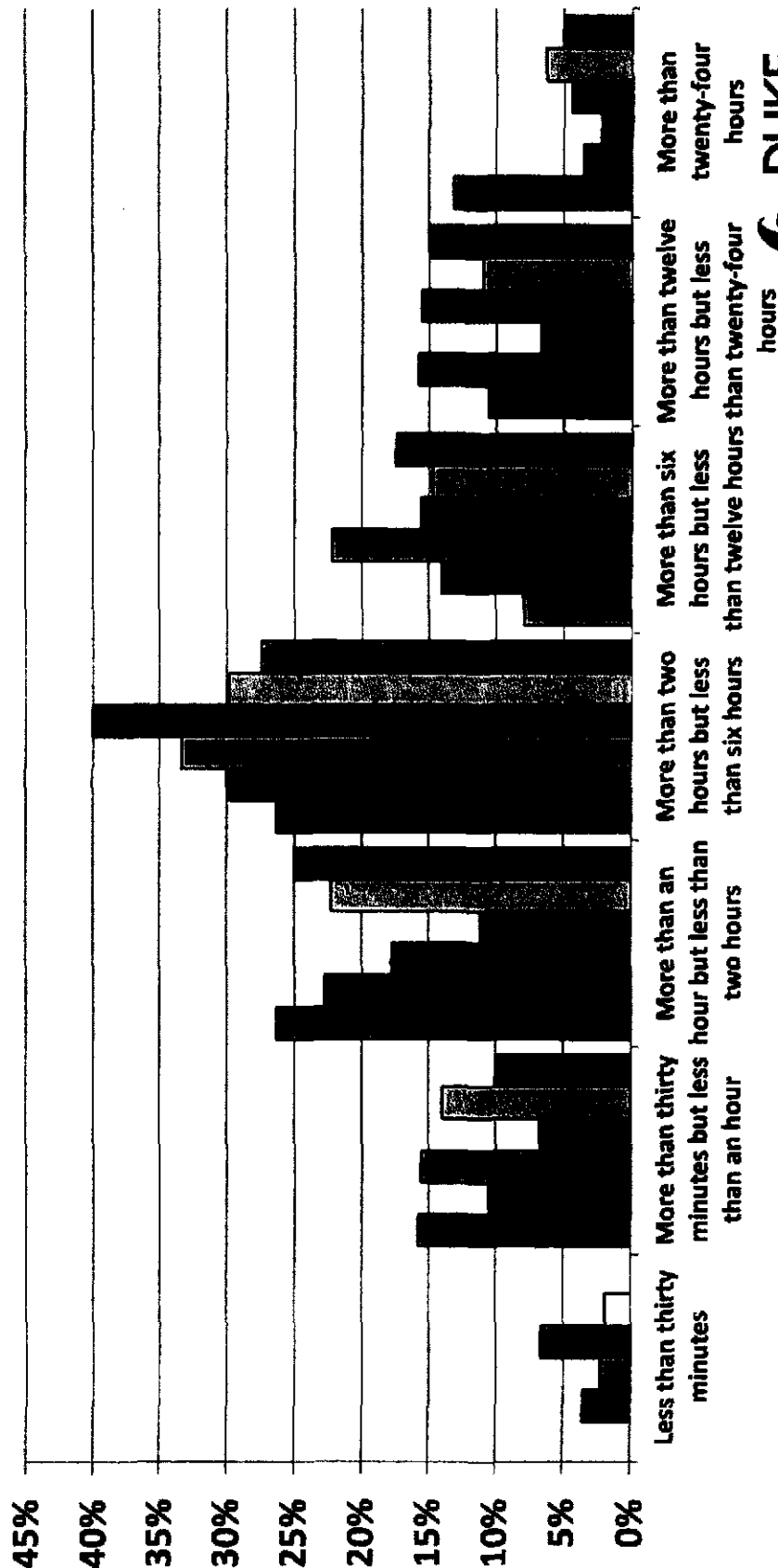
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



What do you consider to be an acceptable length of a prolonged outage that was storm related?

Non-Regulated Customers

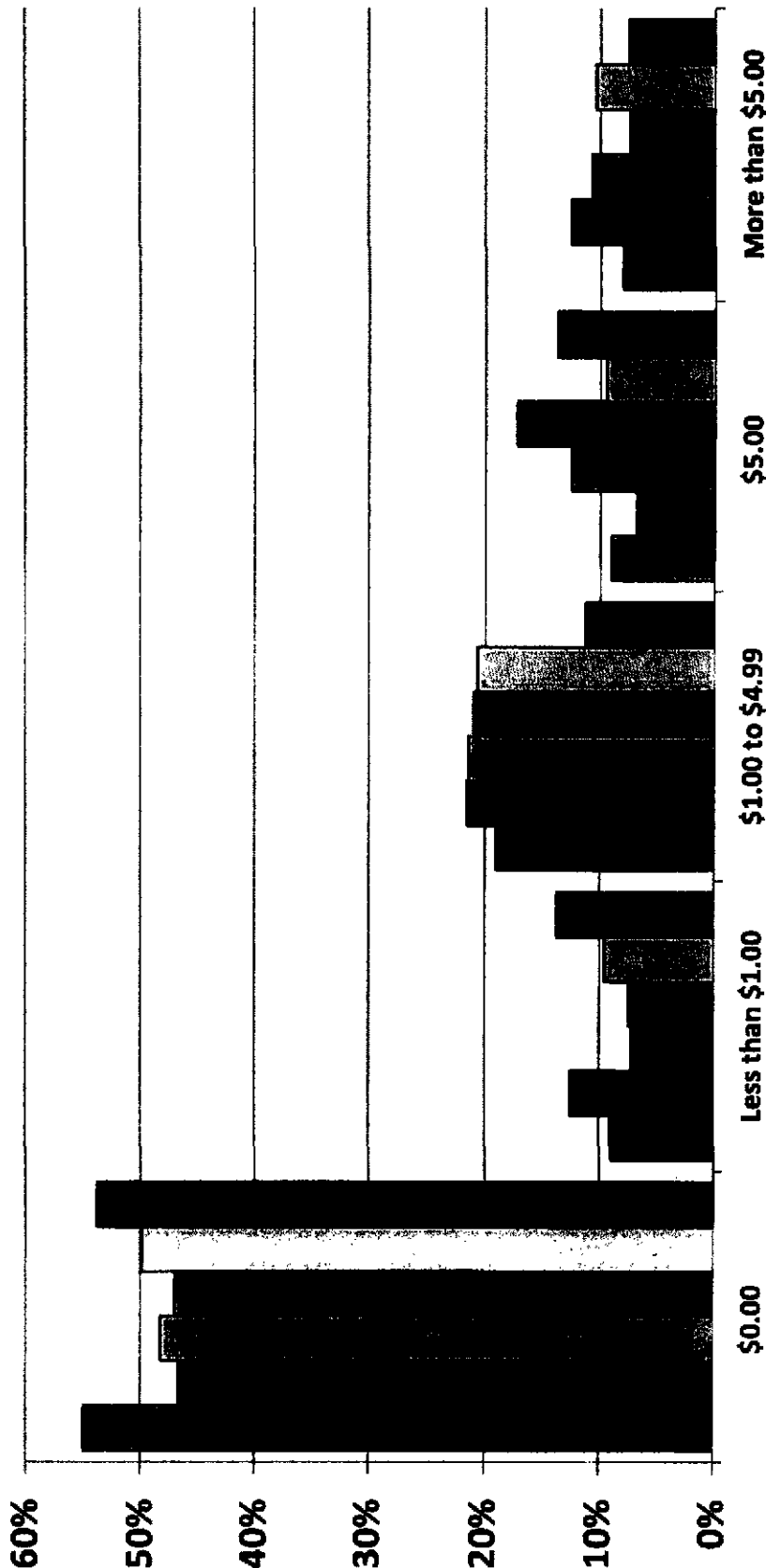
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



During a specified period of system stress, such as a hot summer day, what is the maximum amount that you would be willing to pay and have included in your electric bill in order to avoid a 1 hour electric service outage to your residence?

Regulated Customers

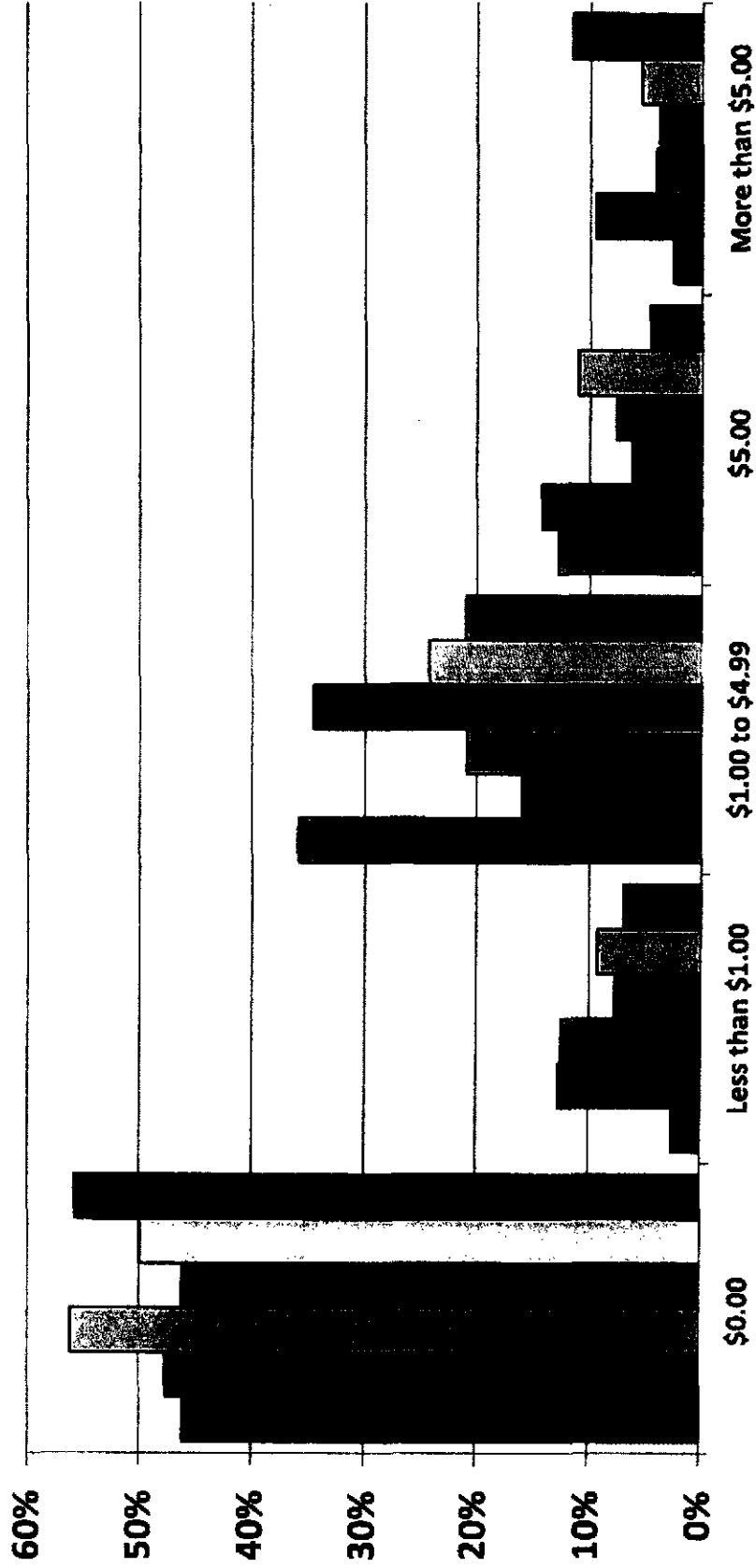
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



During a specified period of system stress, such as a hot summer day, what is the maximum amount that you would be willing to pay and have included in your electric bill in order to avoid a 1 hour electric service outage to your residence?

Non-Regulated Customers

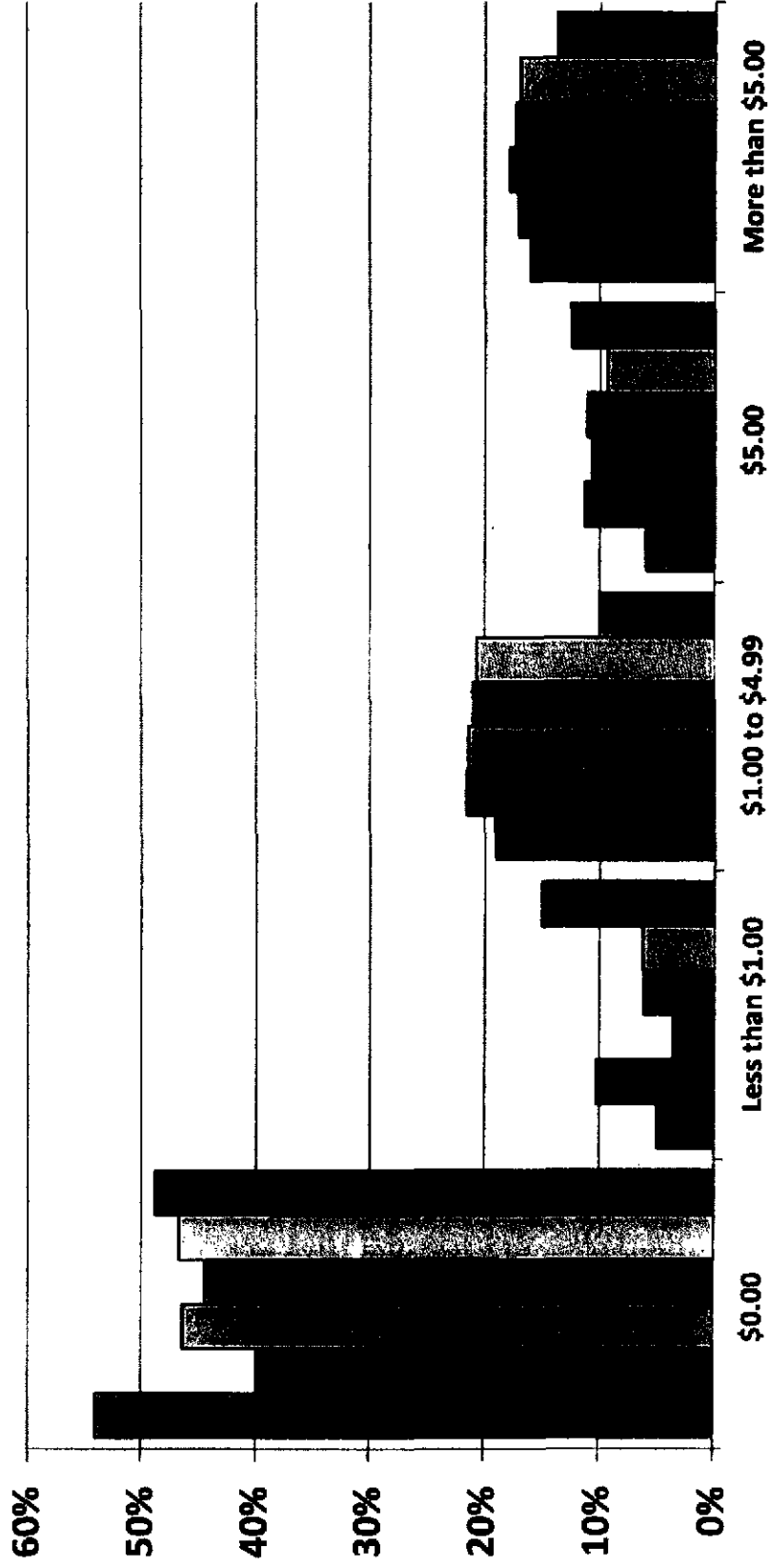
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



During a specified period of system stress, such as a hot summer day, what is the maximum amount that you would be willing to pay and have included in your electric bill in order to avoid a 2 hour electric service outage to your residence?

Regulated Customers

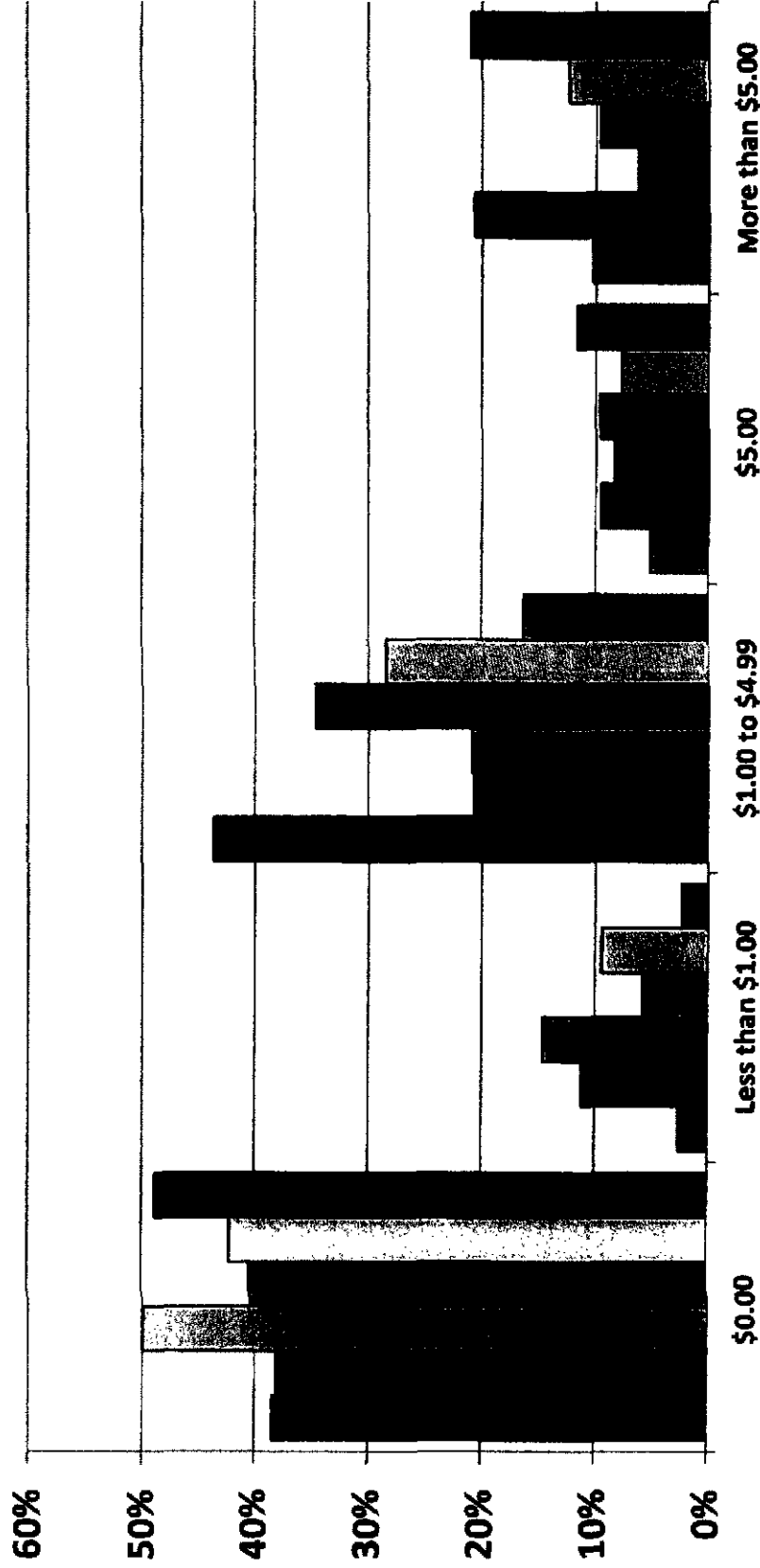
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



During a specified period of system stress, such as a hot summer day, what is the maximum amount that you would be willing to pay and have included in your electric bill in order to avoid a 2 hour electric service outage to your residence?

Non-Regulated Customers

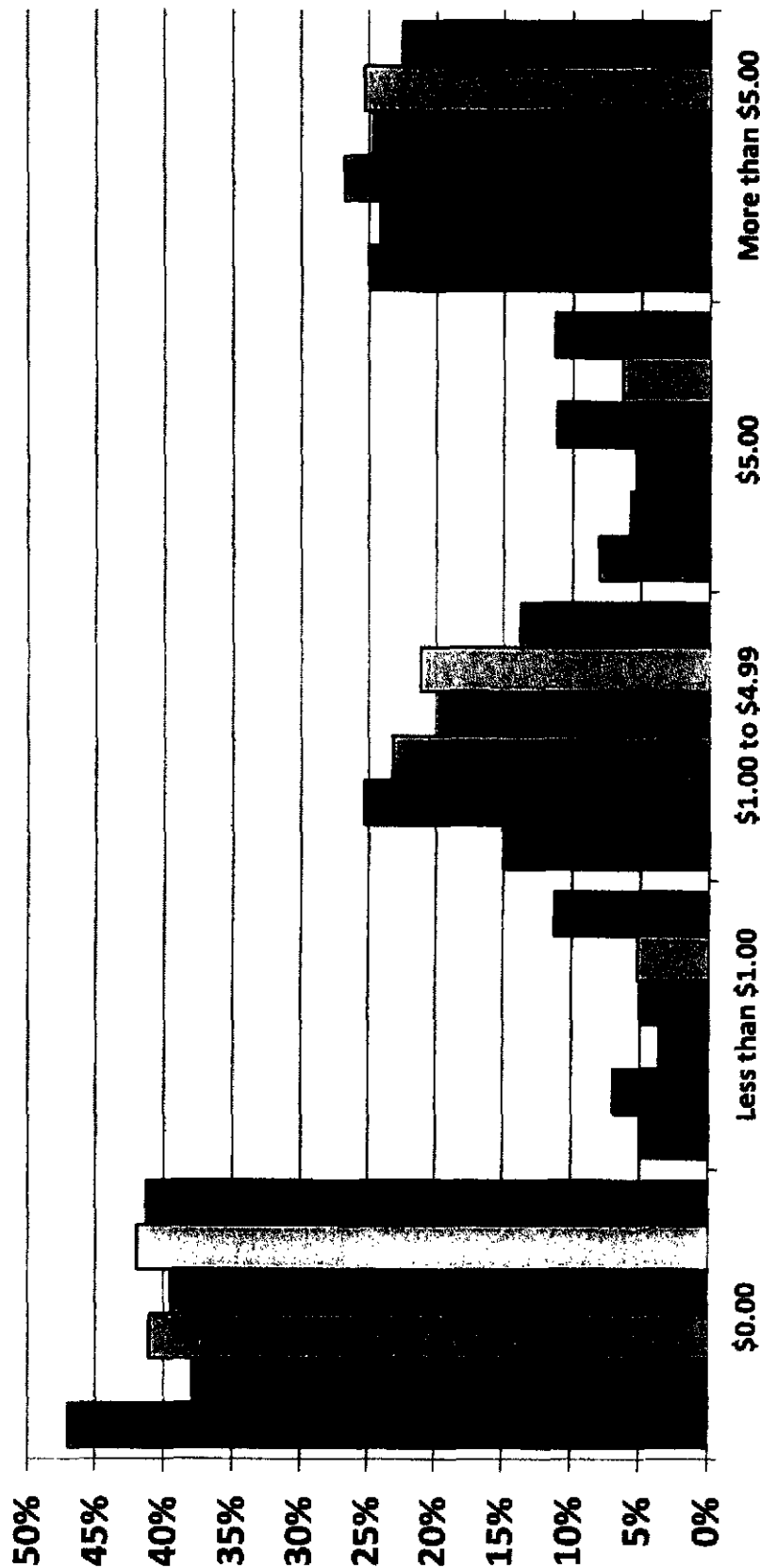
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



During a specified period of system stress, such as a hot summer day, what is the maximum amount that you would be willing to pay and have included in your electric bill in order to avoid a 4 hour electric service outage to your residence?

Regulated Customers

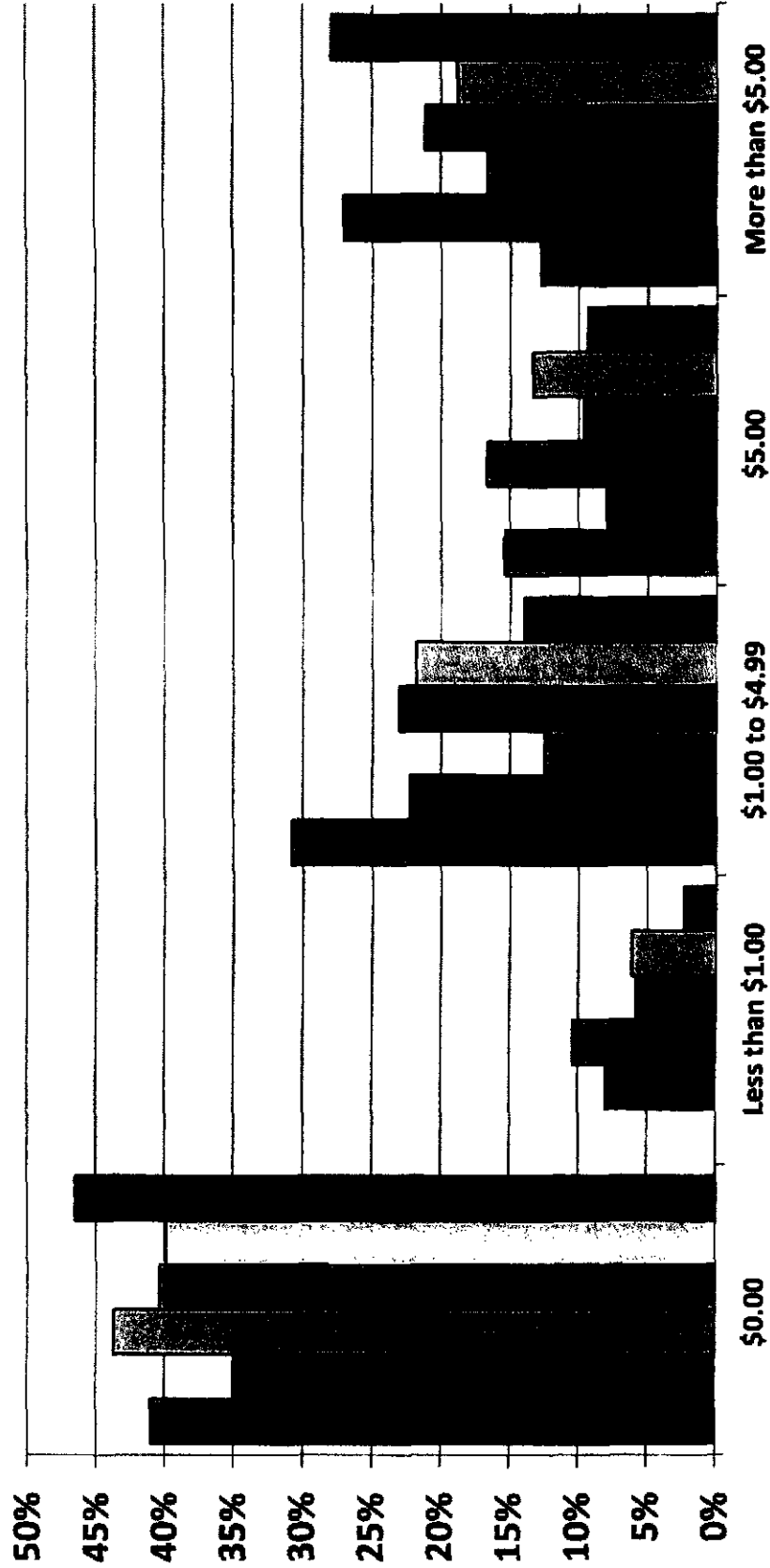
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



During a specified period of system stress, such as a hot summer day, what is the maximum amount that you would be willing to pay and have included in your electric bill in order to avoid a 4 hour electric service outage to your residence?

Non-Regulated Customers

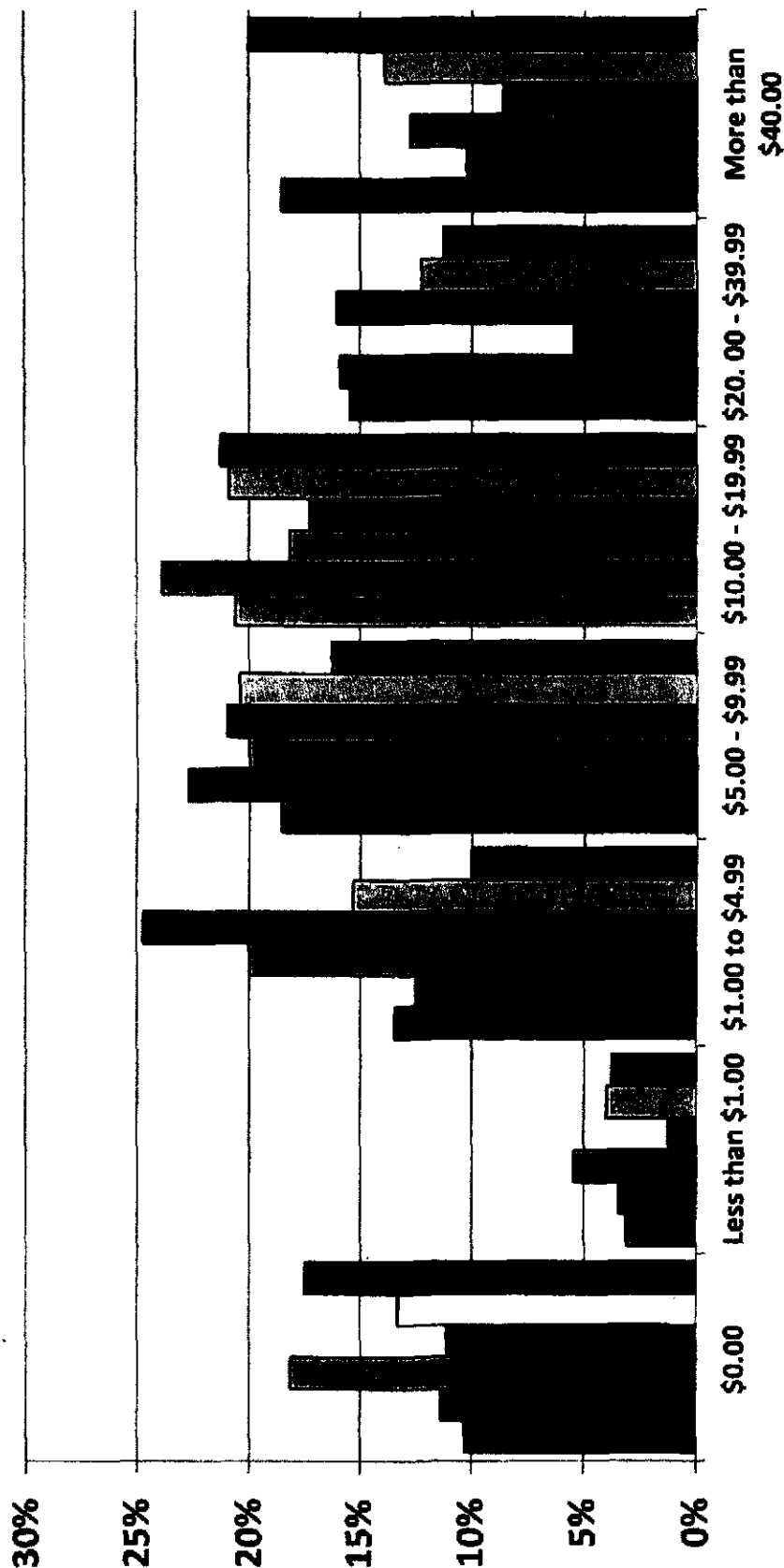
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How much of a credit to your electric bill would you require from the utility to allow the electric company to interrupt service to your residence for 1 hour?

Regulated Customers

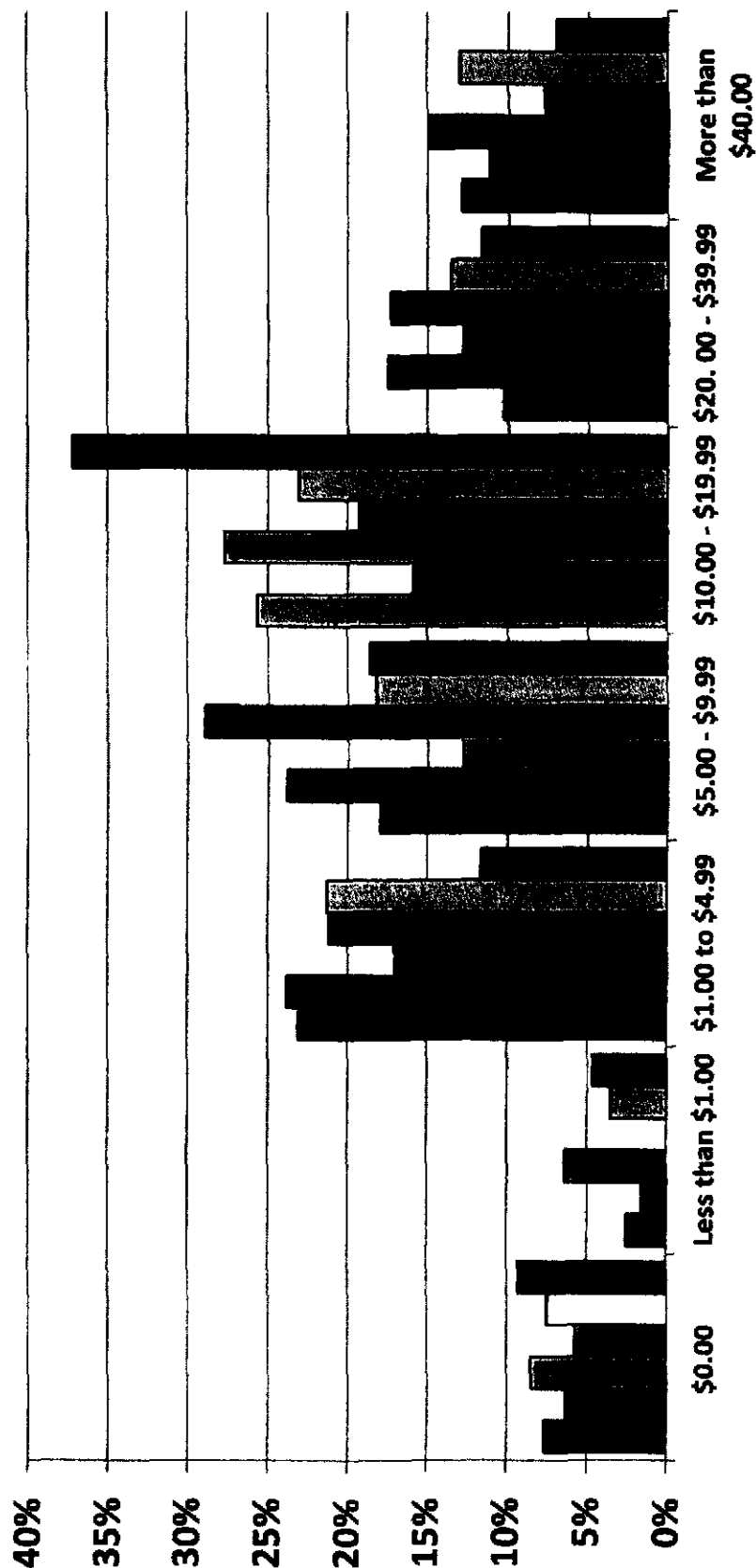
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How much of a credit to your electric bill would you require from the utility to allow the electric company to interrupt service to your residence for 1 hour?

Non-Regulated Customers

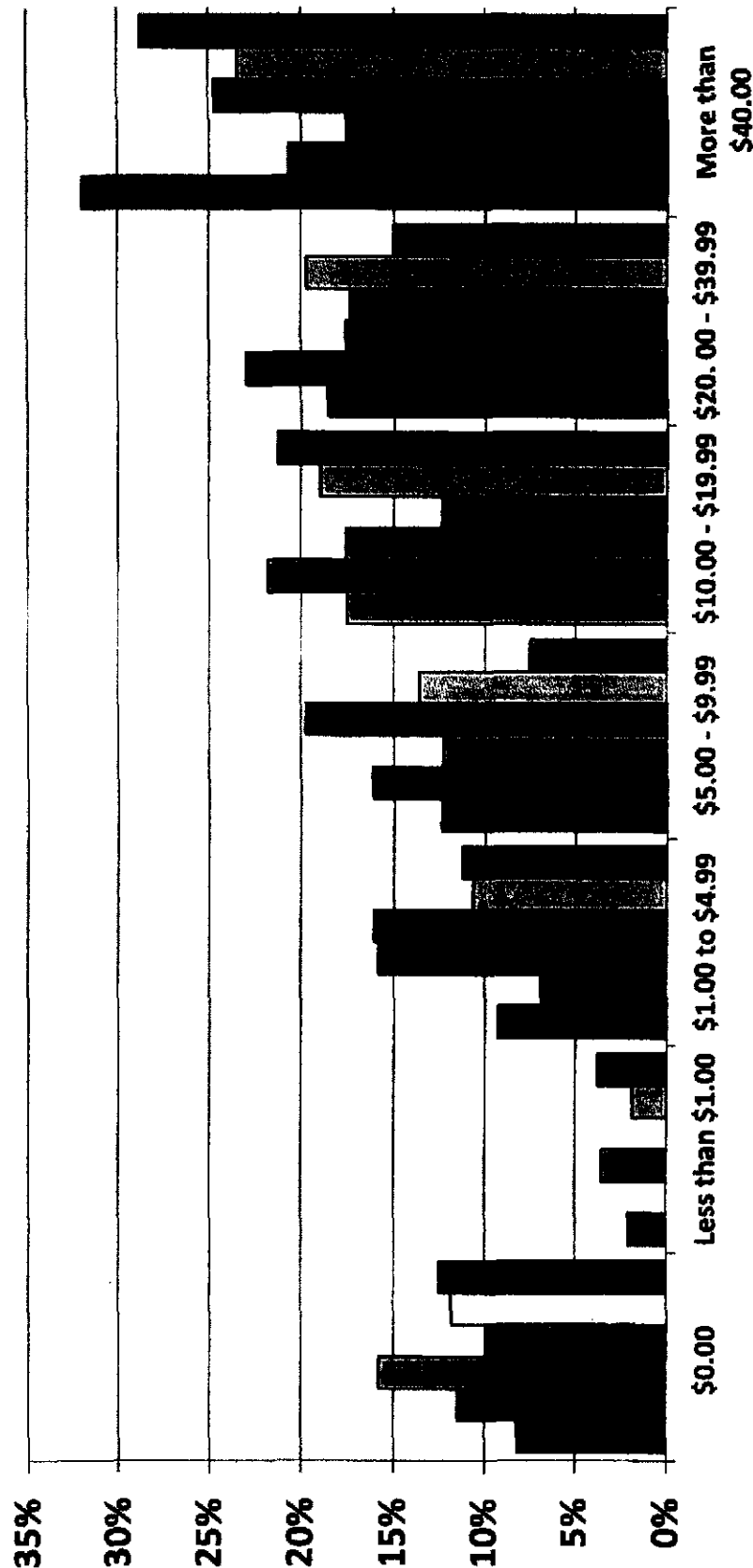
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How much of a credit to your electric bill would you require from the utility to allow the electric company to interrupt service to your residence for 2 hours?

Regulated Customers

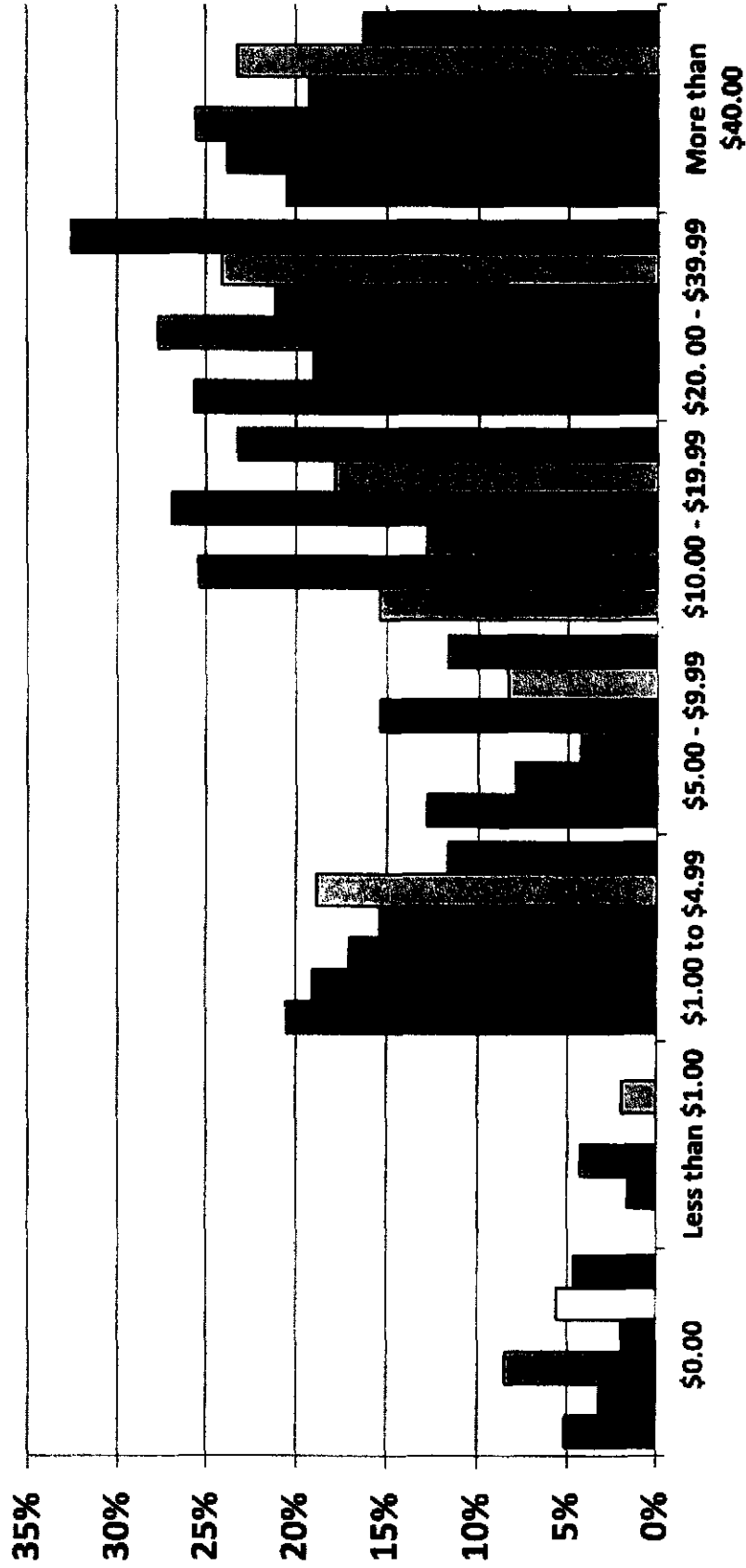
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How much of a credit to your electric bill would you require from the utility to allow the electric company to interrupt service to your residence for 2 hours?

Non-Regulated Customers

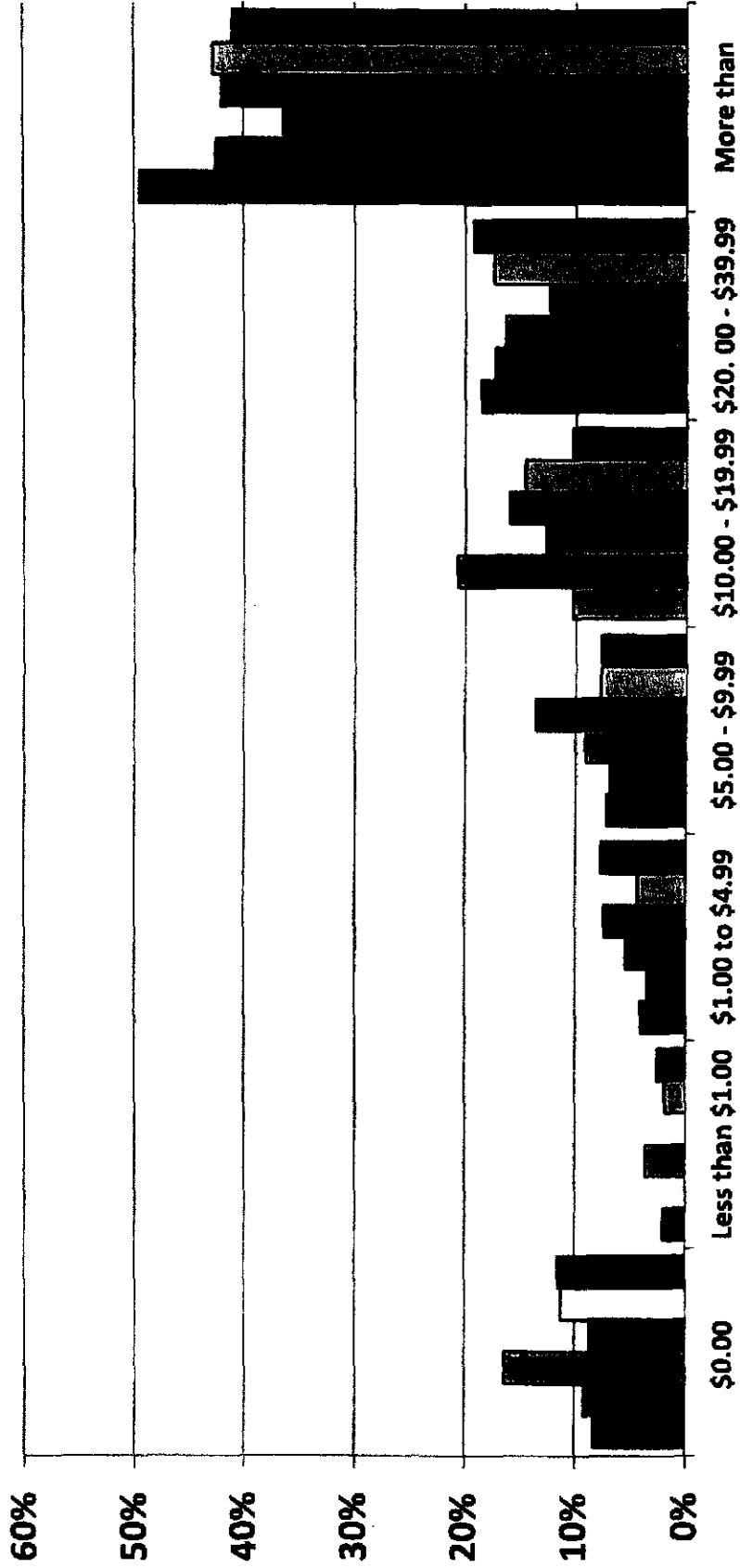
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How much of a credit to your electric bill would you require from the utility to allow the electric company to interrupt service to your residence for 4 hours?

Regulated Customers

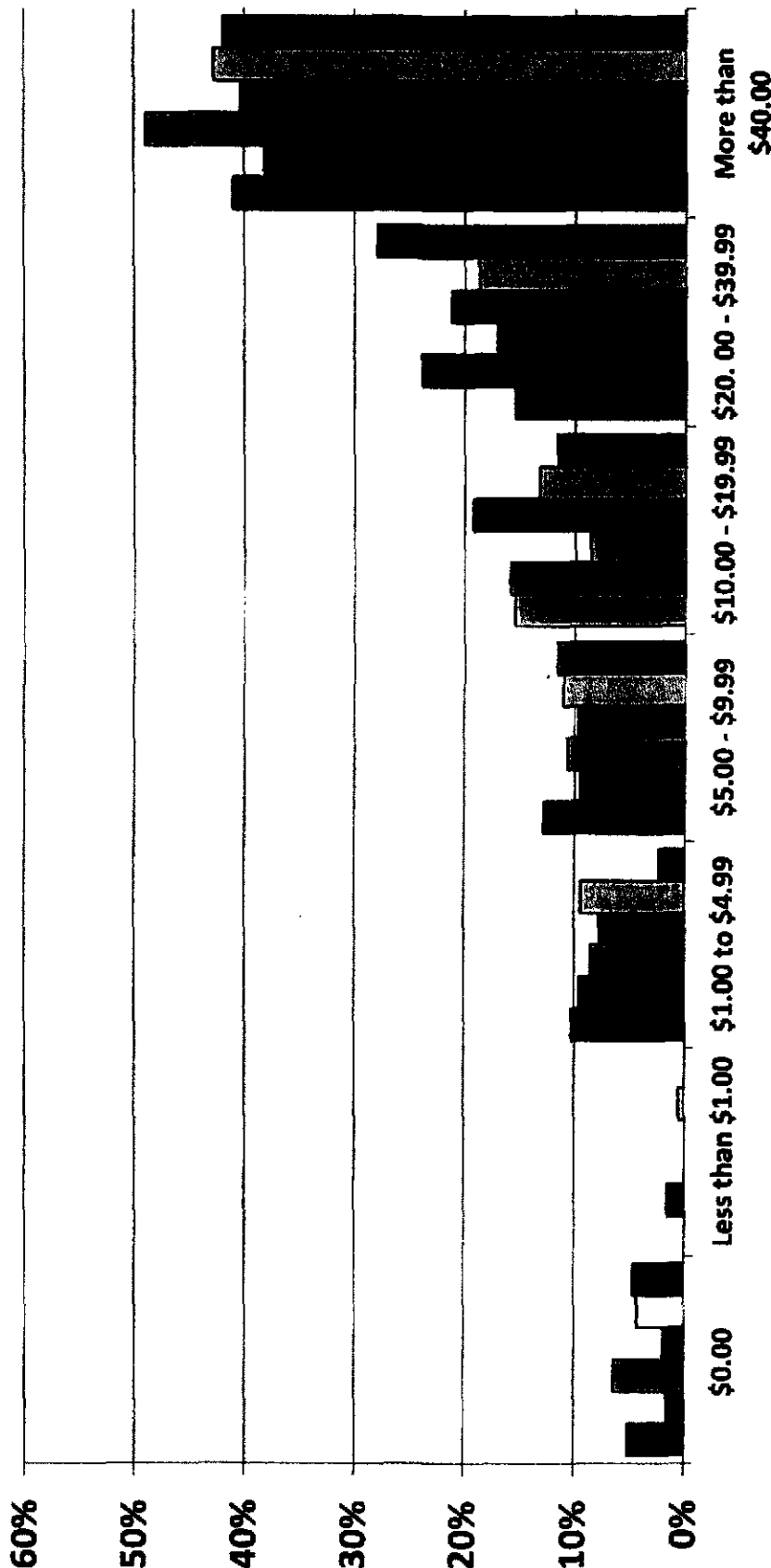
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How much of a credit to your electric bill would you require from the utility to allow the electric company to interrupt service to your residence for 4 hours?

Non-Regulated Customers

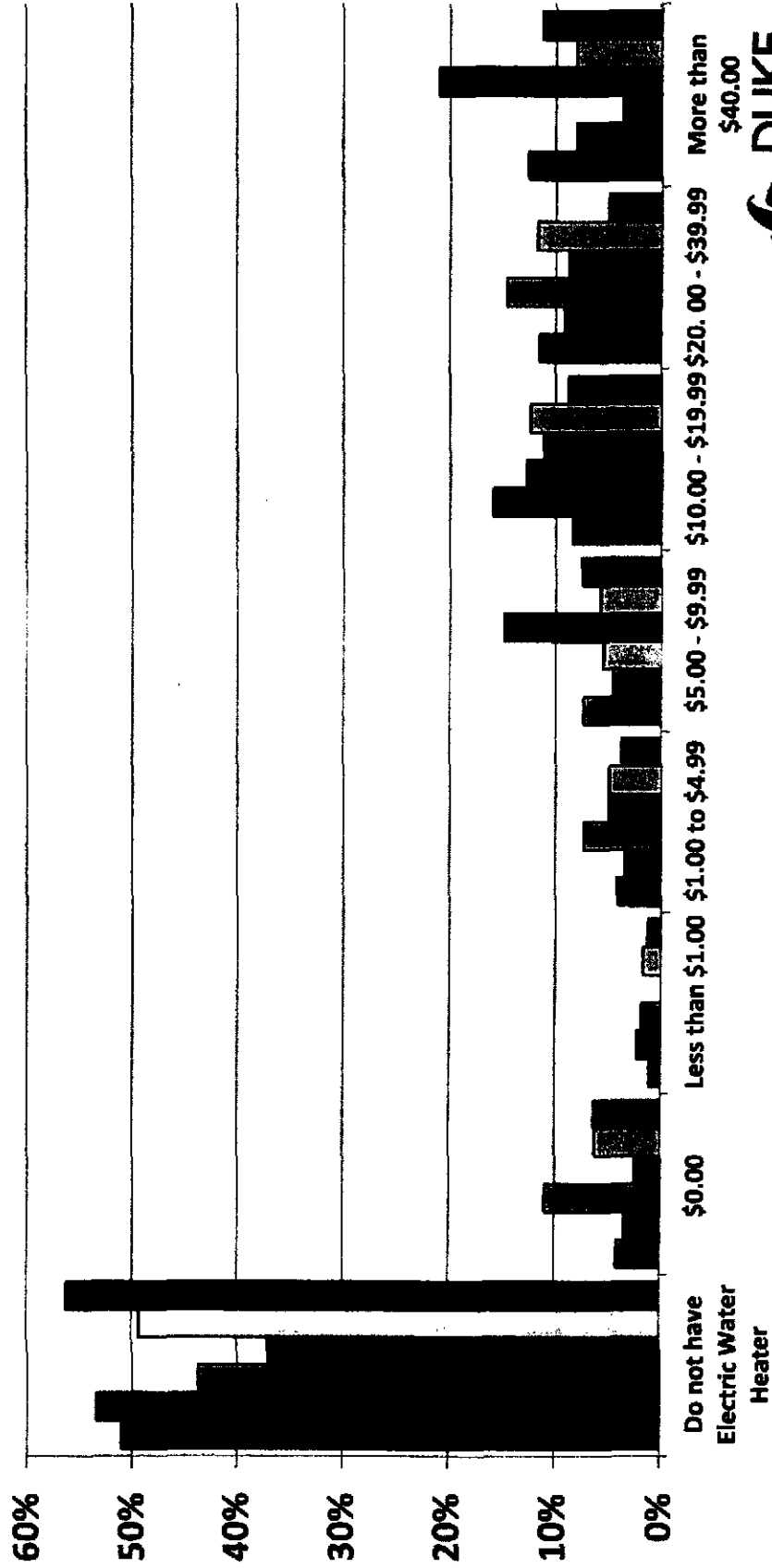
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How much of a credit to your electric bill would you require from the utility to allow the electric company to control the operation of the hot water heater within your residence during a time when its system is under stress?

Regulated Customers

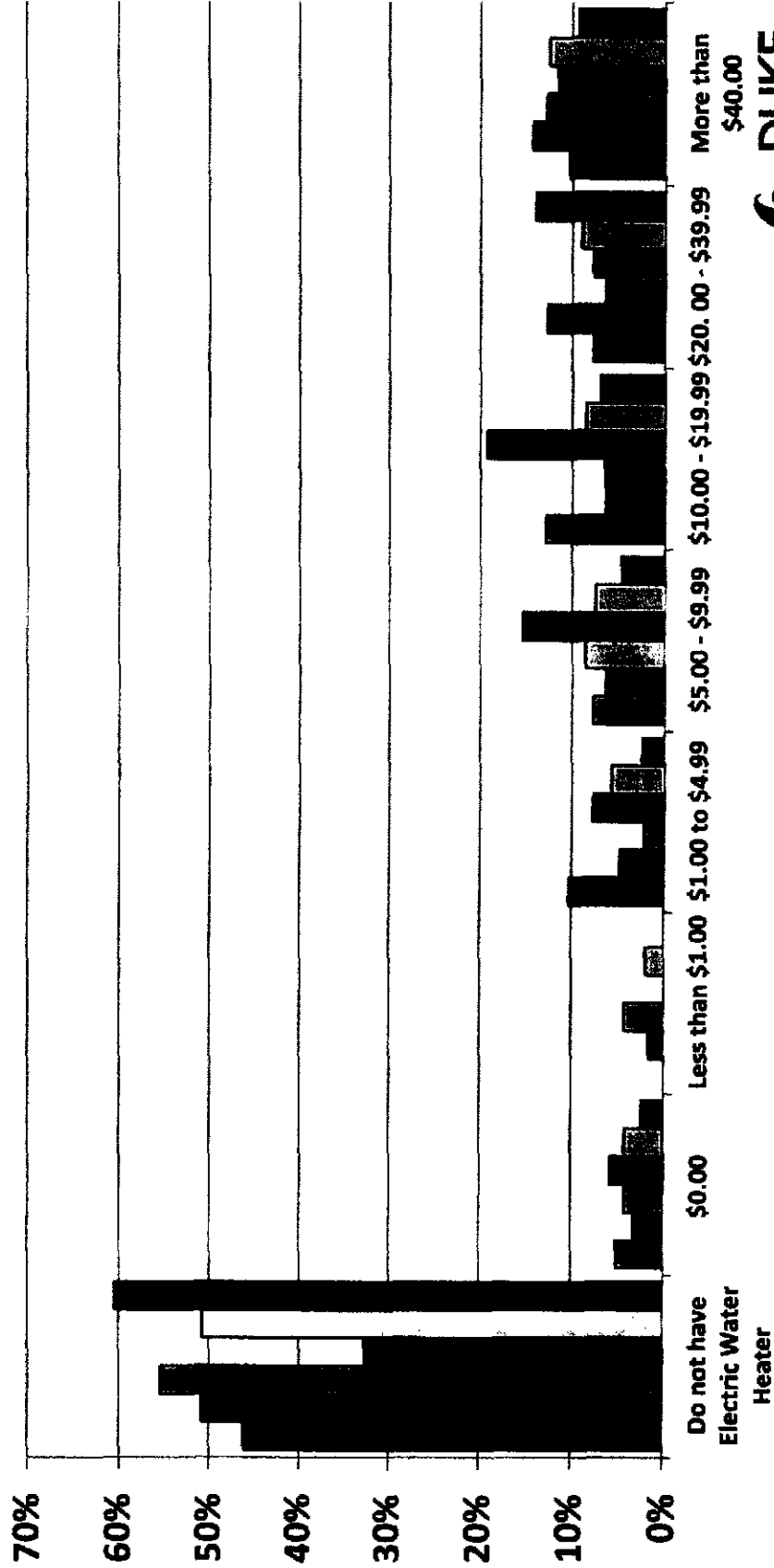
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How much of a credit to your electric bill would you require from the utility to allow the electric company to control the operation of the hot water heater within your residence during a time when its system is under stress?

Non-Regulated Customers

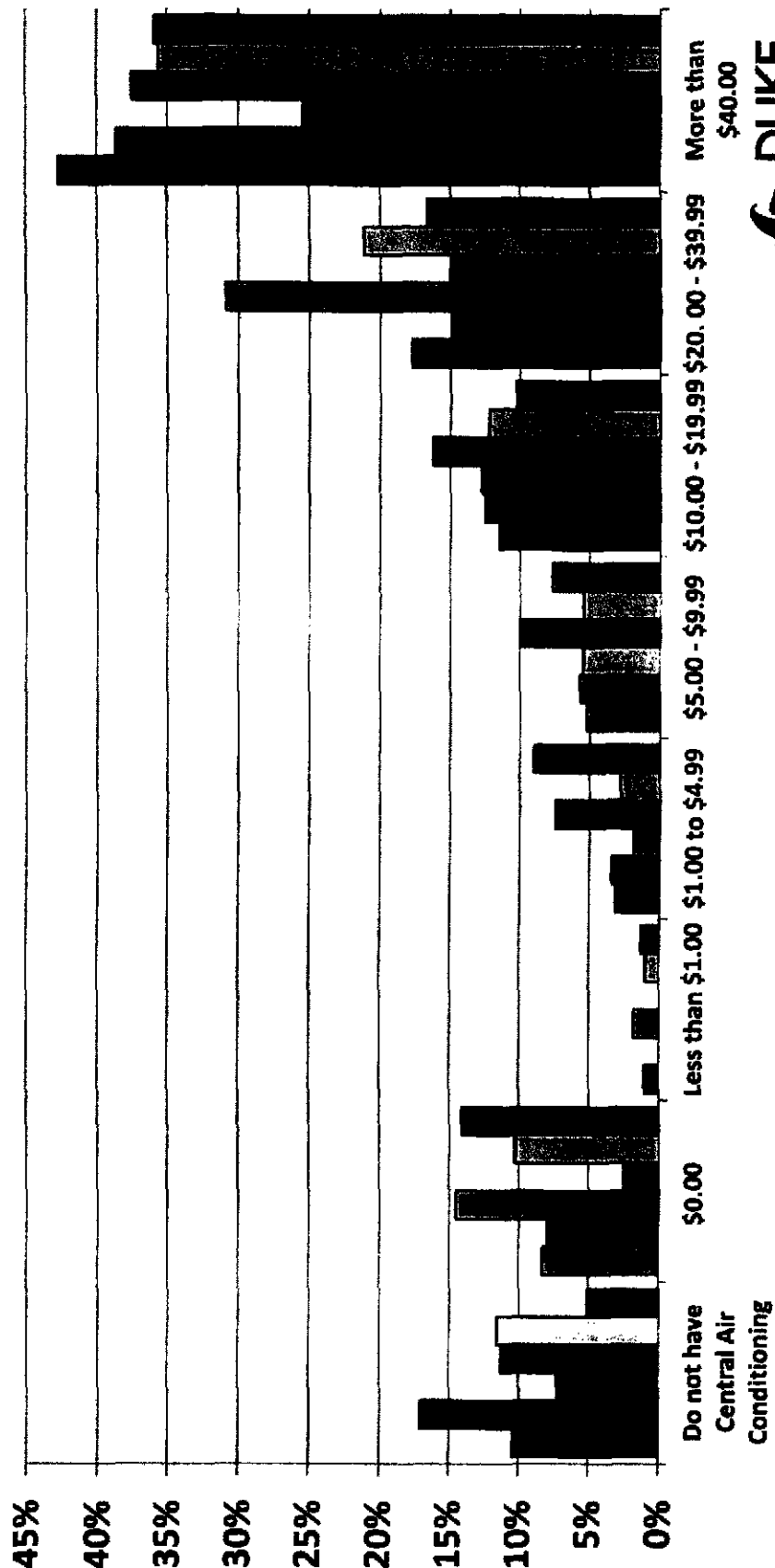
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How much of a credit to your electric bill would you require from the utility to allow the electric company to control the operation of the central air conditioning within your residence during a time when its system is under stress?

Regulated Customers

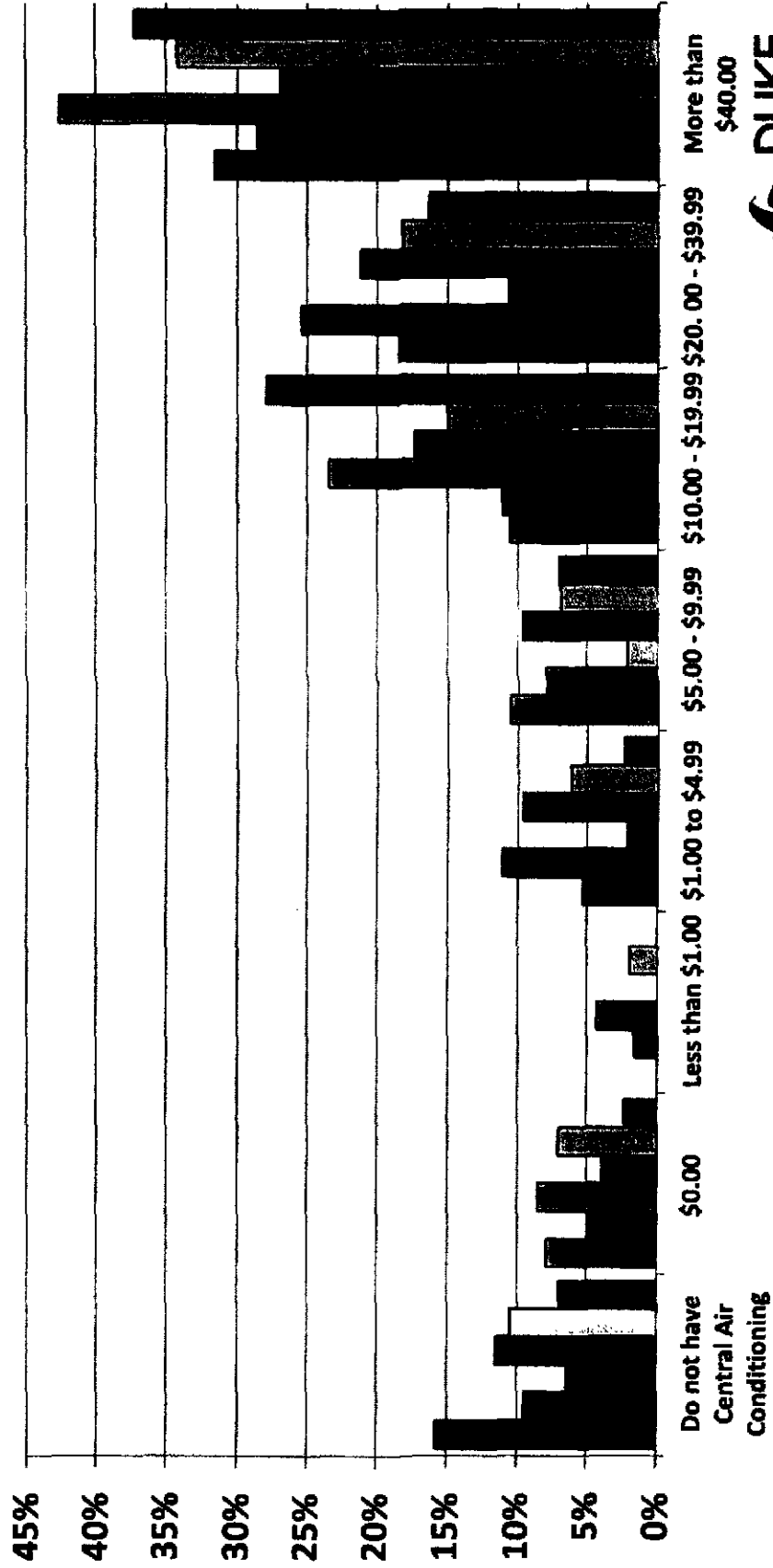
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How much of a credit to your electric bill would you require from the utility to allow the electric company to control the operation of the central air conditioning within your residence during a time when its system is under stress?

Non-Regulated Customers

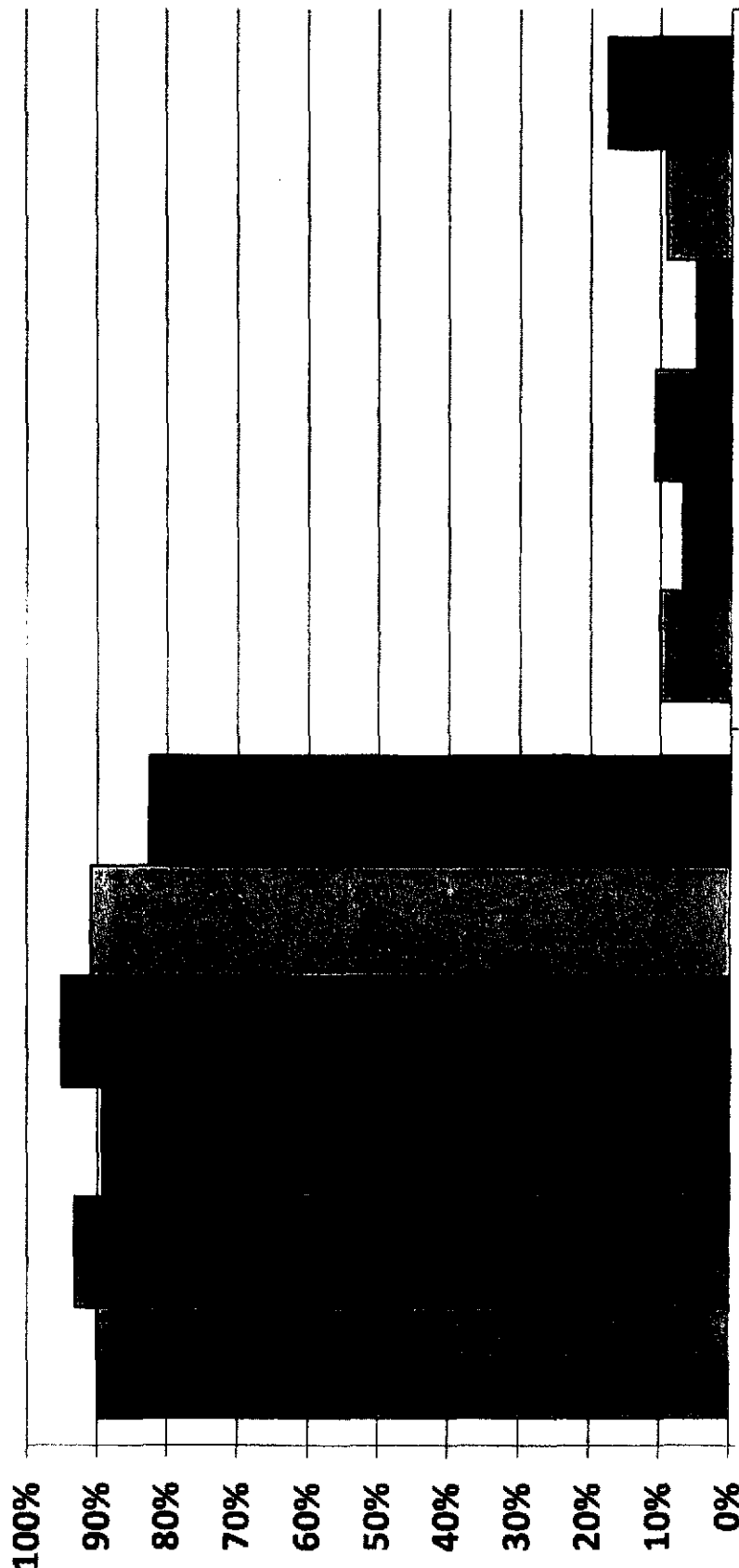
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



During a time when your electric company's system is under stress and the company calls on its customers to conserve electricity, would you be willing to take measures to conserve your household electric usage?

Regulated Customers

■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



Yes

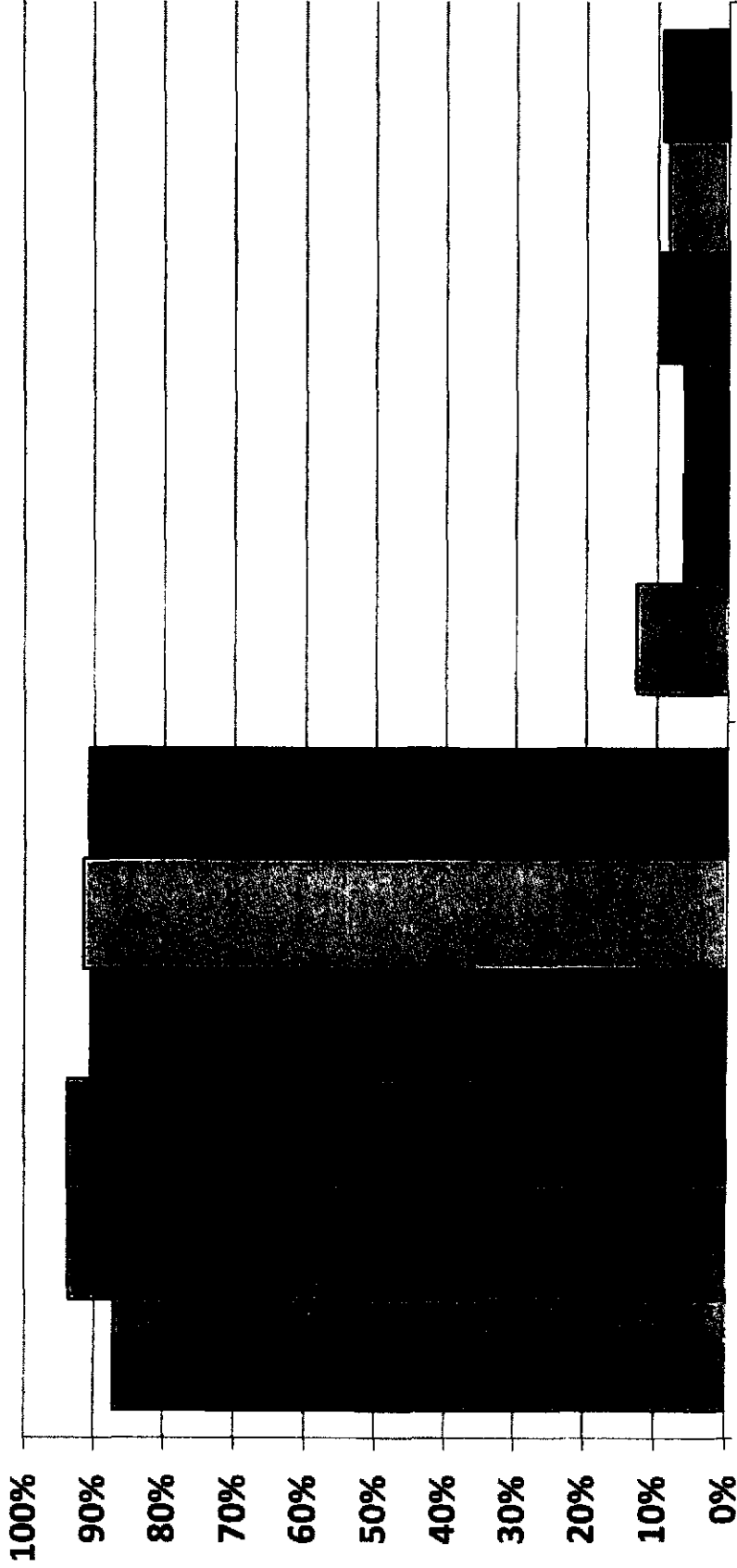
No



During a time when your electric company's system is under stress and the company calls on its customers to conserve electricity, would you be willing to take measures to conserve your household electric usage?

Non-Regulated Customers

■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



Yes

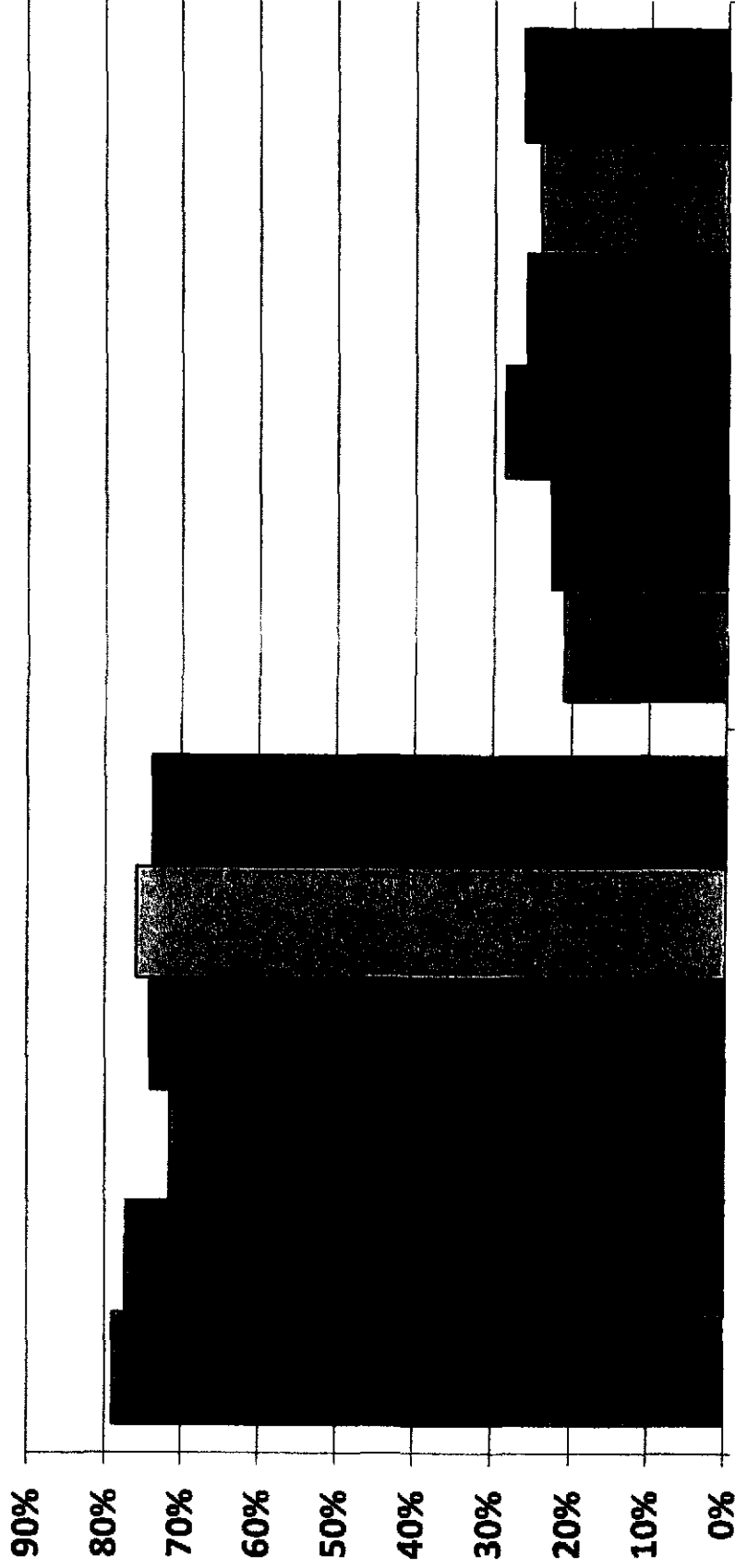
No



In helping with your energy conservation, would you be interested in new technology that lets you automate the settings for air conditioning or different appliances to reduce electricity use when the cost to produce and deliver electricity is high?

Regulated Customers

■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



Yes

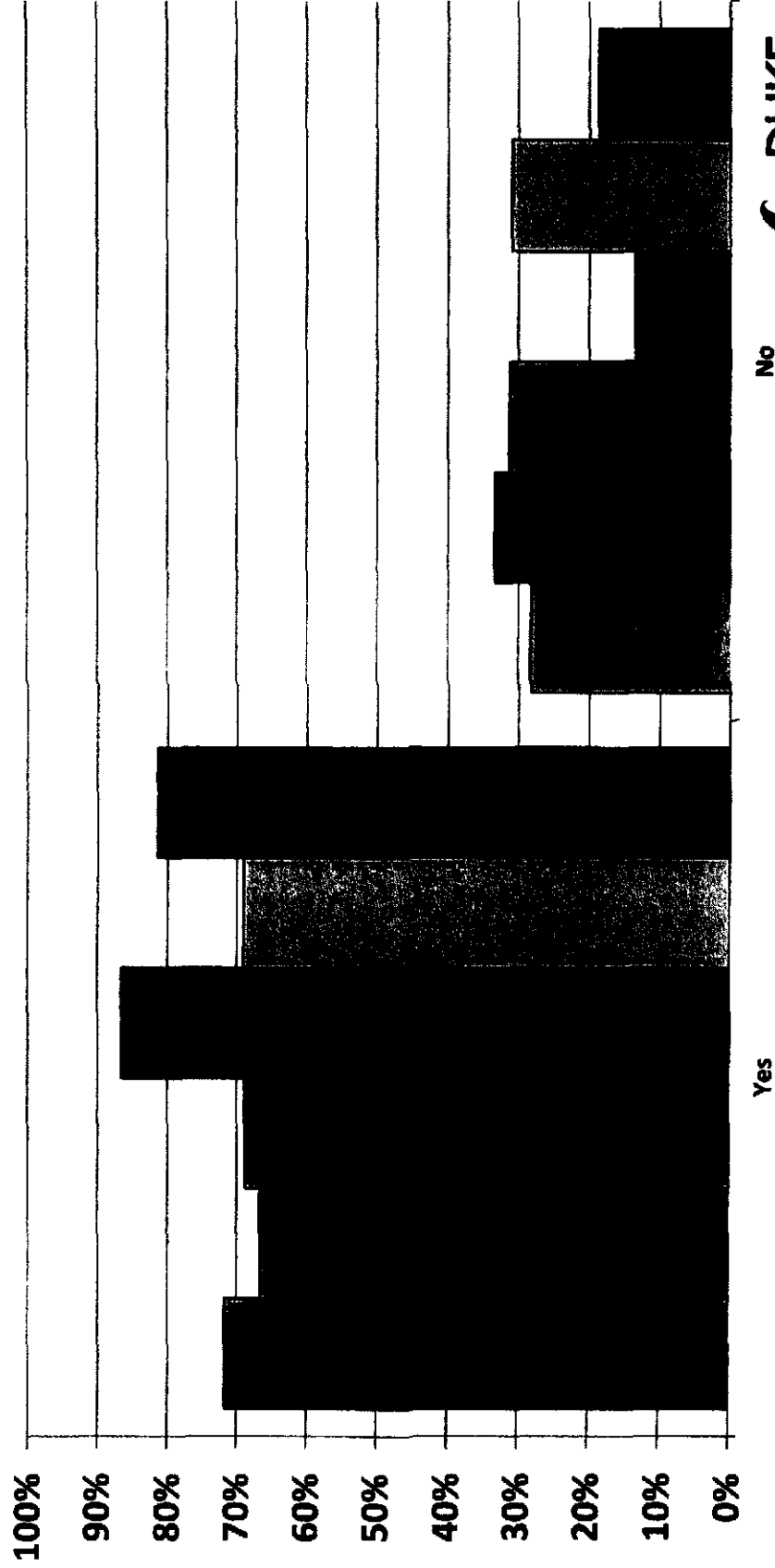
No



In helping with your energy conservation, would you be interested in new technology that lets you automate the settings for air conditioning or different appliances to reduce electricity use when the cost to produce and deliver electricity is high?

Non-Regulated Customers

■ Q-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



Ohio PUC Reliability Business Survey Results Q1-14 Update

Prepared By
Duke Energy Market Research & Customer Insights



Completed Survey Counts

- Online survey emailed to a random sample of business customers
- Email invitations mailed in Waves

Business Regulated

	Q1-13	Q2-13	Q3-13	Q4-13	YE-13	Q1-14
Sample Size	1257	686	789	1000	3732	1080
Completed Surveys	48	21*	32	36	137	48
Response Rate	4%	3%	4%	4%	4%	4%

Business Non-Regulated

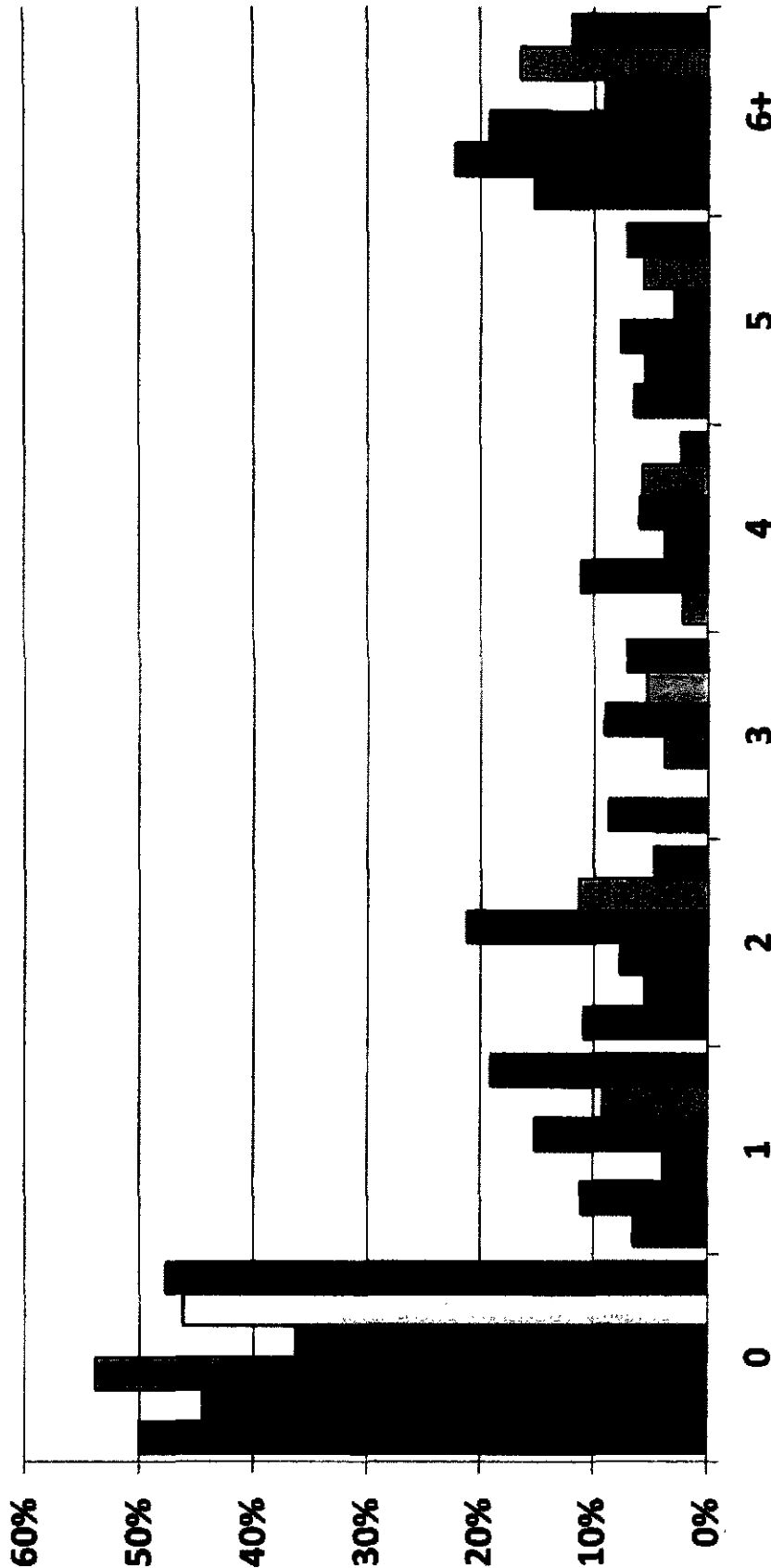
	Q1-13	Q2-13	Q3-13	Q4-13	YE-13	Q1-14
Sample Size	976	1141	1017	1000	4134	920
Completed Surveys	47	60	60	32	199	54
Response Rate	5%	5%	6%	3%	5%	6%

*Use caution when interpreting results; low sample sizes

How many brief interruptions of 5 minutes or less you experienced at your business in the past 12 months?

Regulated Customers

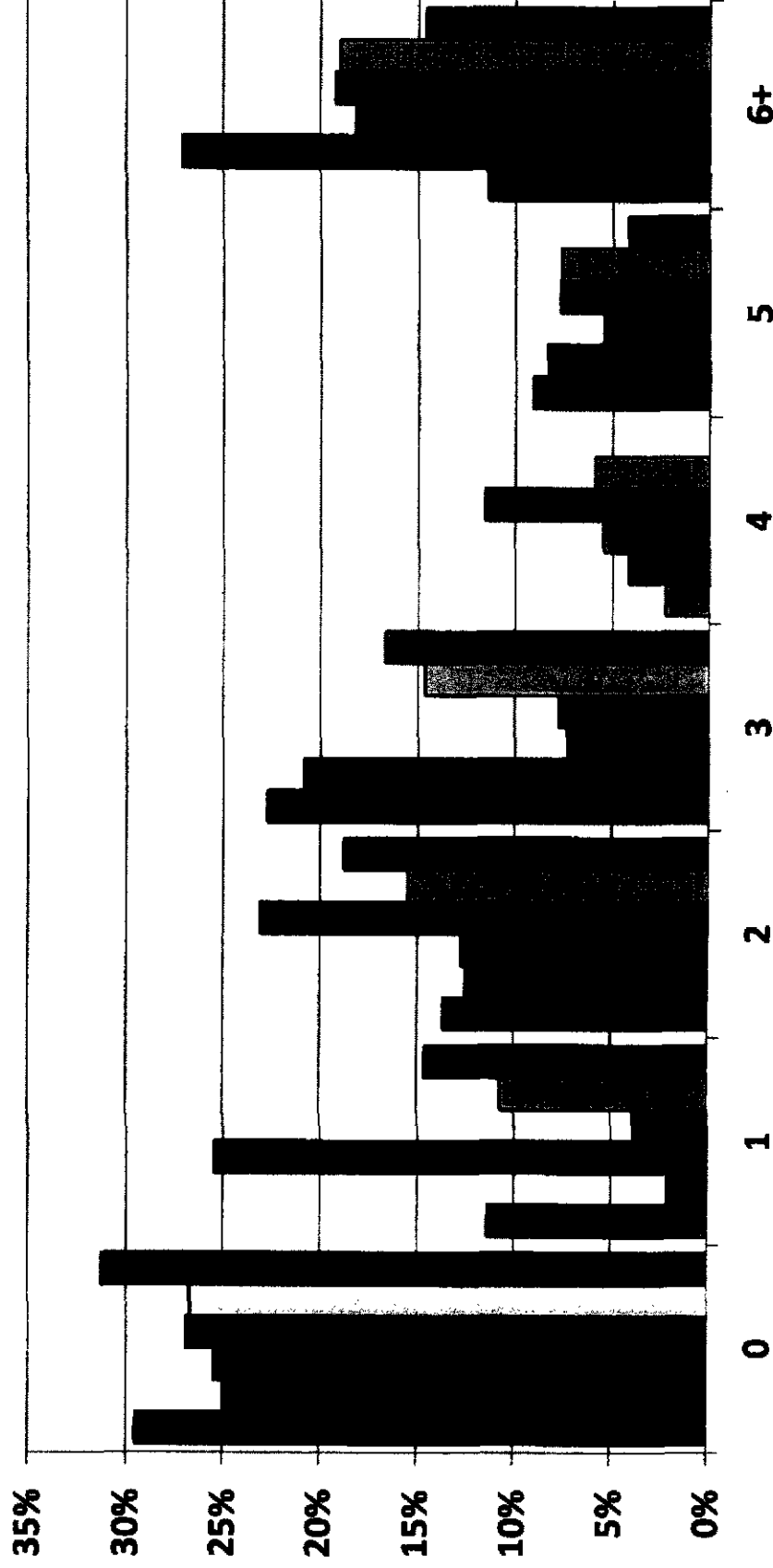
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



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Non-Regulated Customers

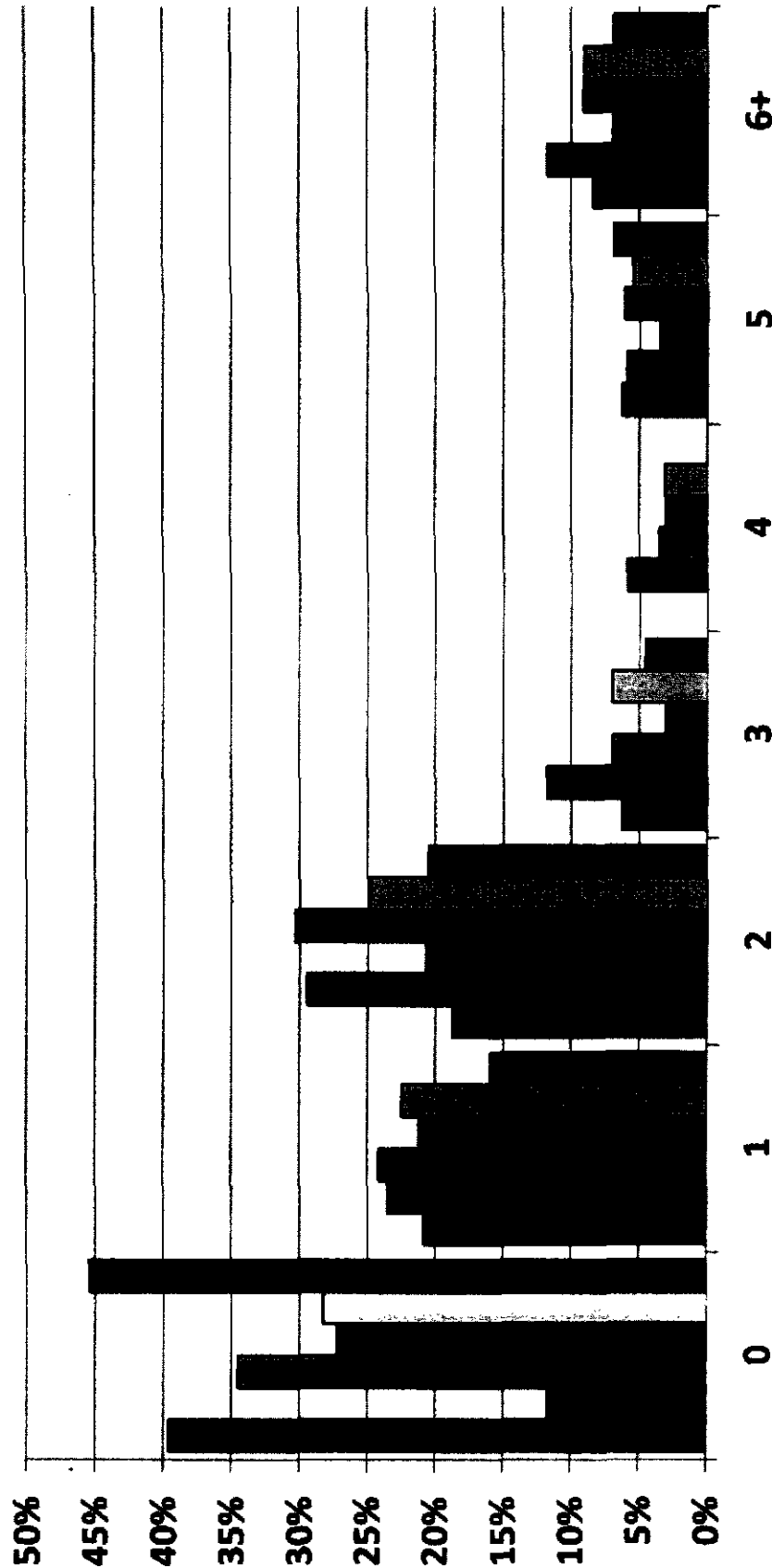
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How many brief interruptions of 5 minutes or less would you consider acceptable during a 12 month period?

Regulated Customers

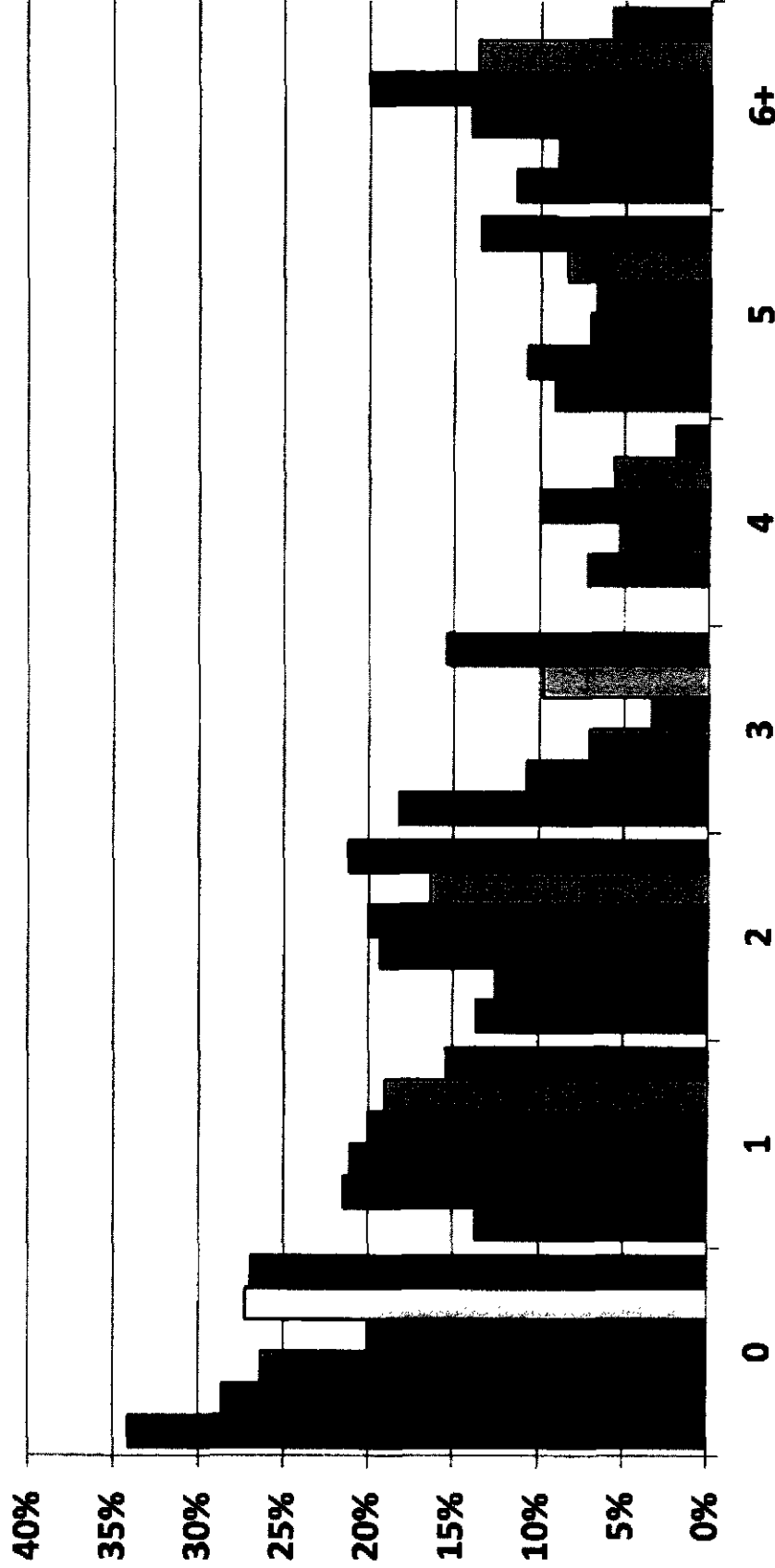
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How many brief interruptions of 5 minutes or less would you consider acceptable during a 12 month period?

Non-Regulated Customers

■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14

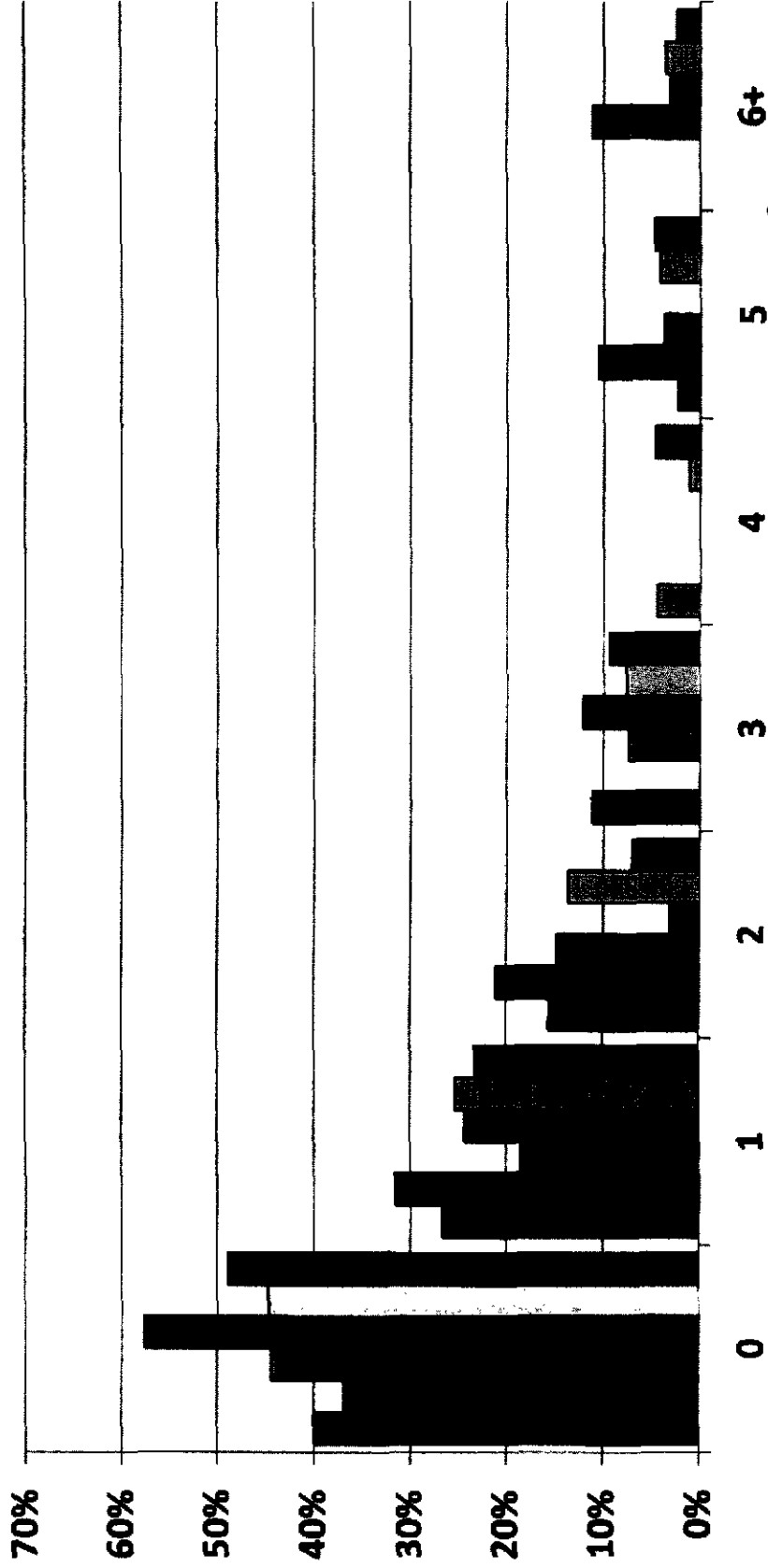




How many lengthy interruptions of more than 5 minutes have you experienced at your business in the past 12 months?

Regulated Customers

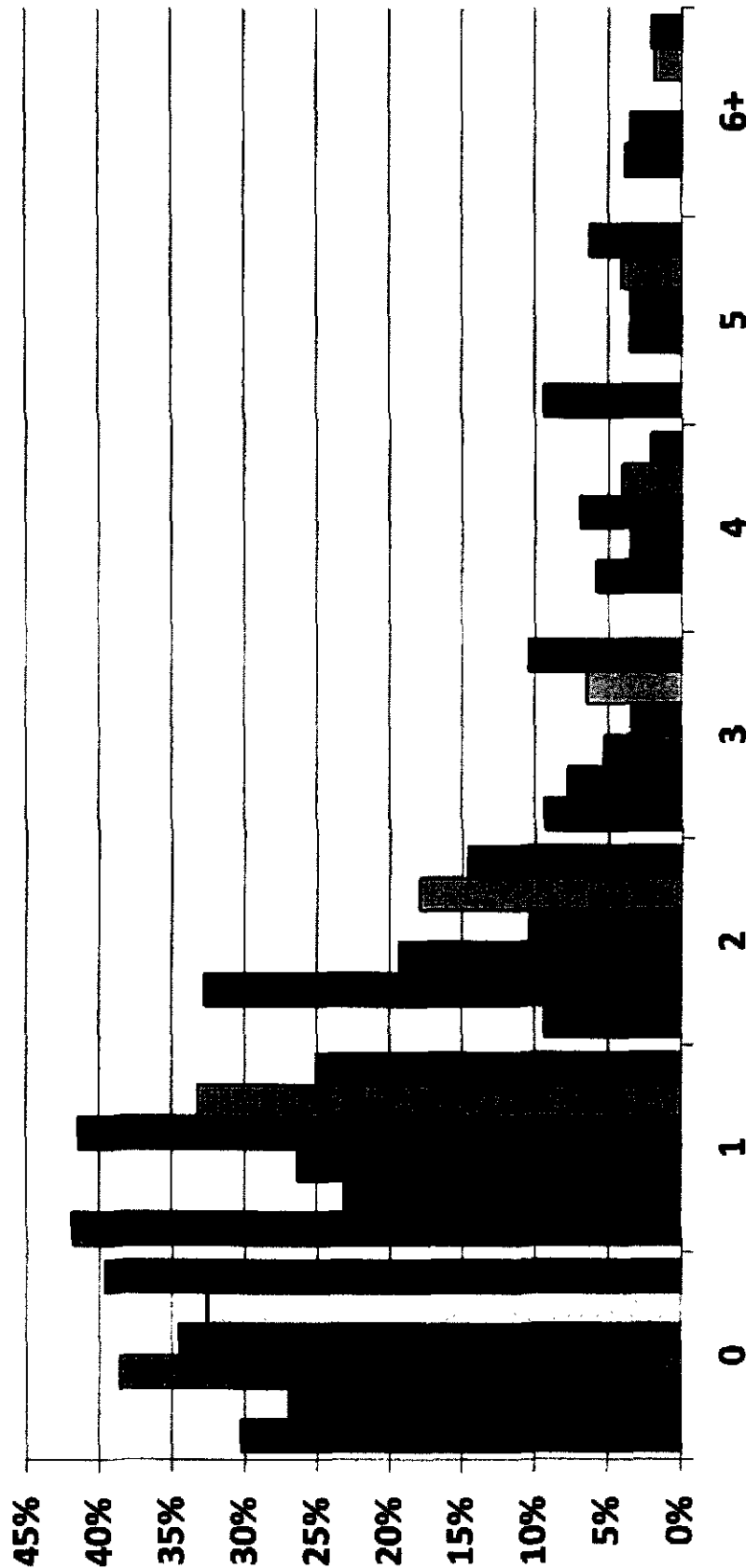
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How many lengthy interruptions of more than 5 minutes have you experienced at your business in the past 12 months?

Non-Regulated Customers

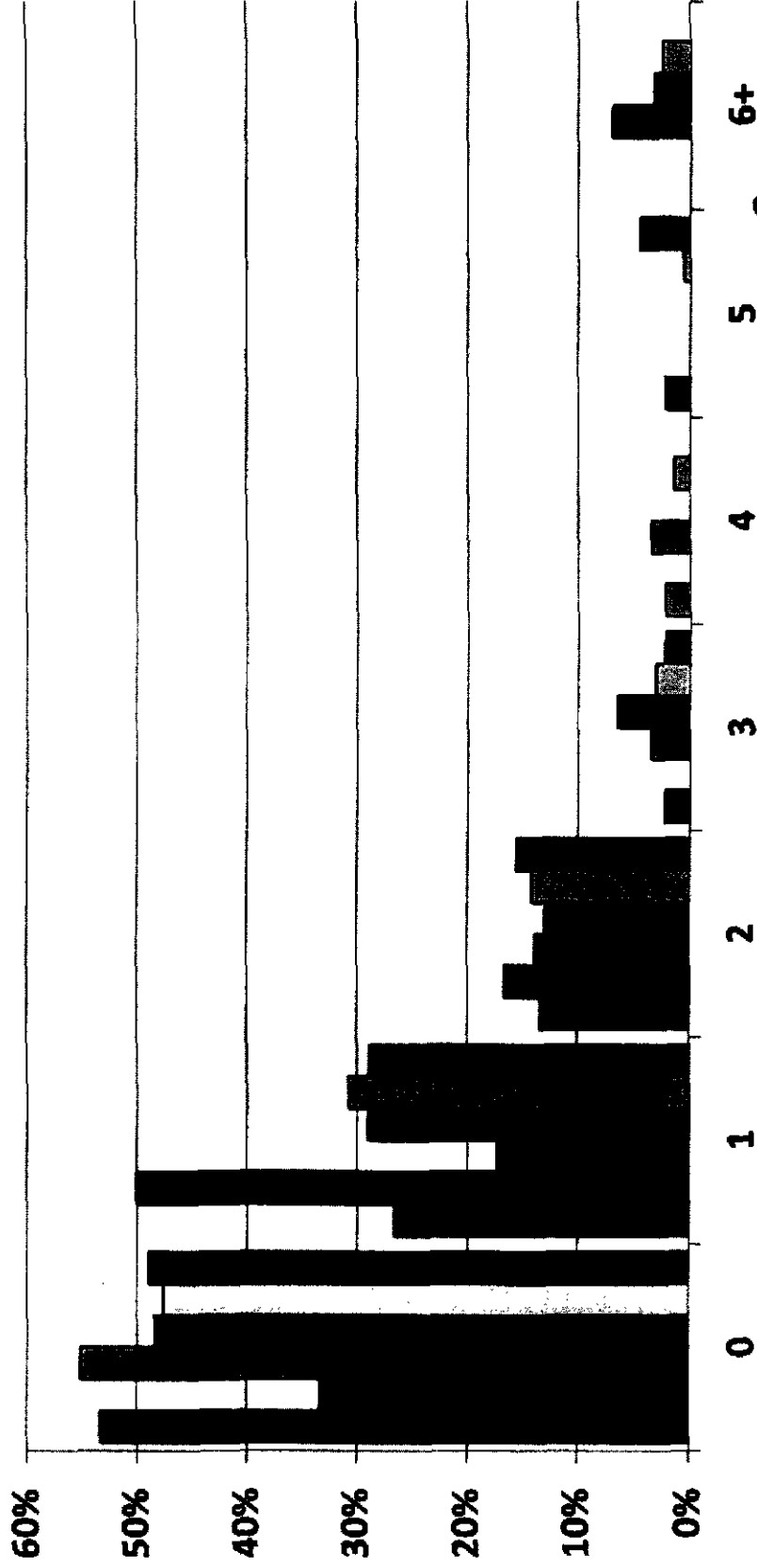
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



**How many lengthy interruptions of more than
5 minutes would you consider acceptable during
a 12 month period?**

Regulated Customers

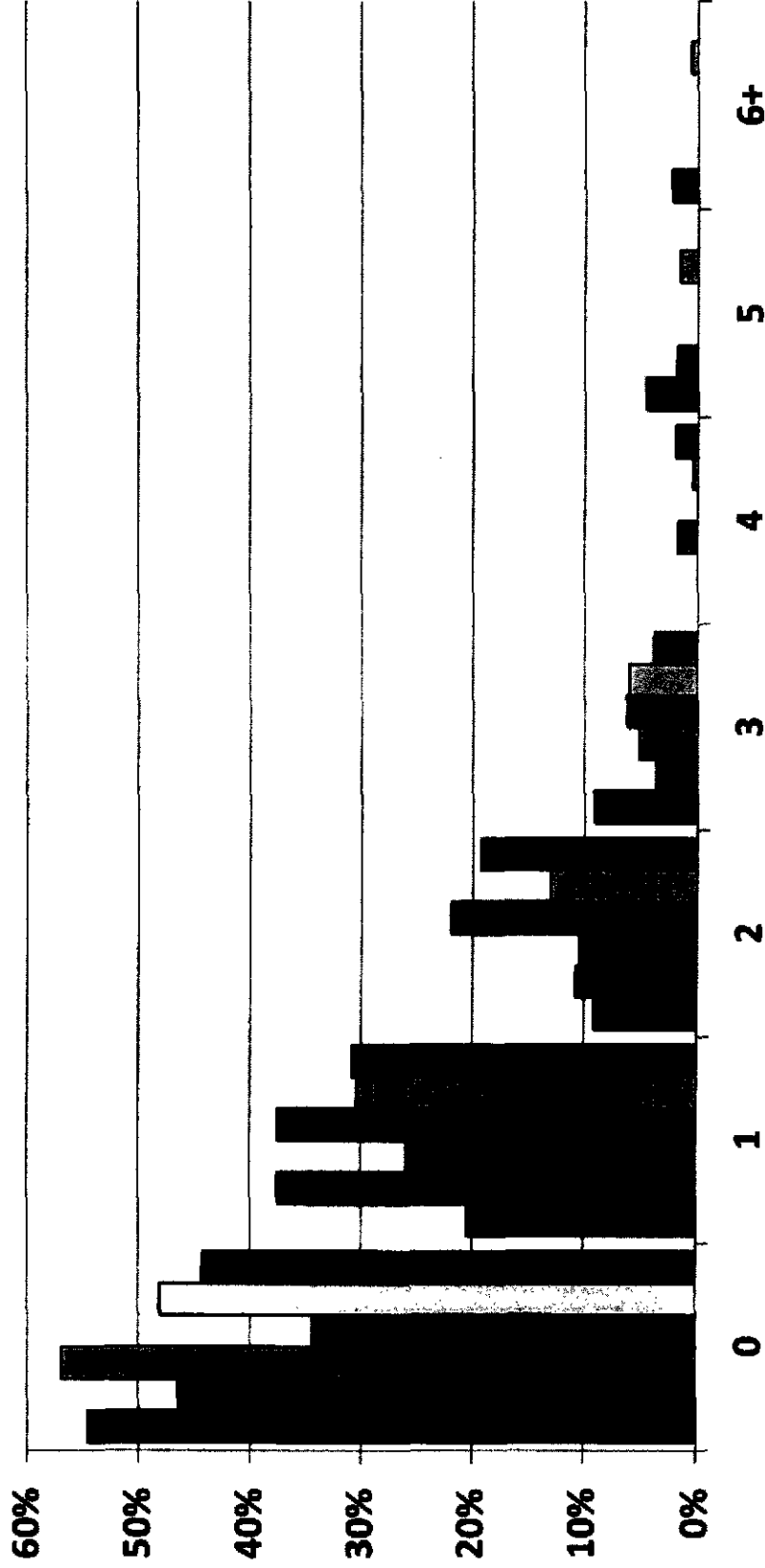
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How many lengthy interruptions of more than
5 minutes would you consider acceptable during
a 12 month period?

Non-Regulated Customers

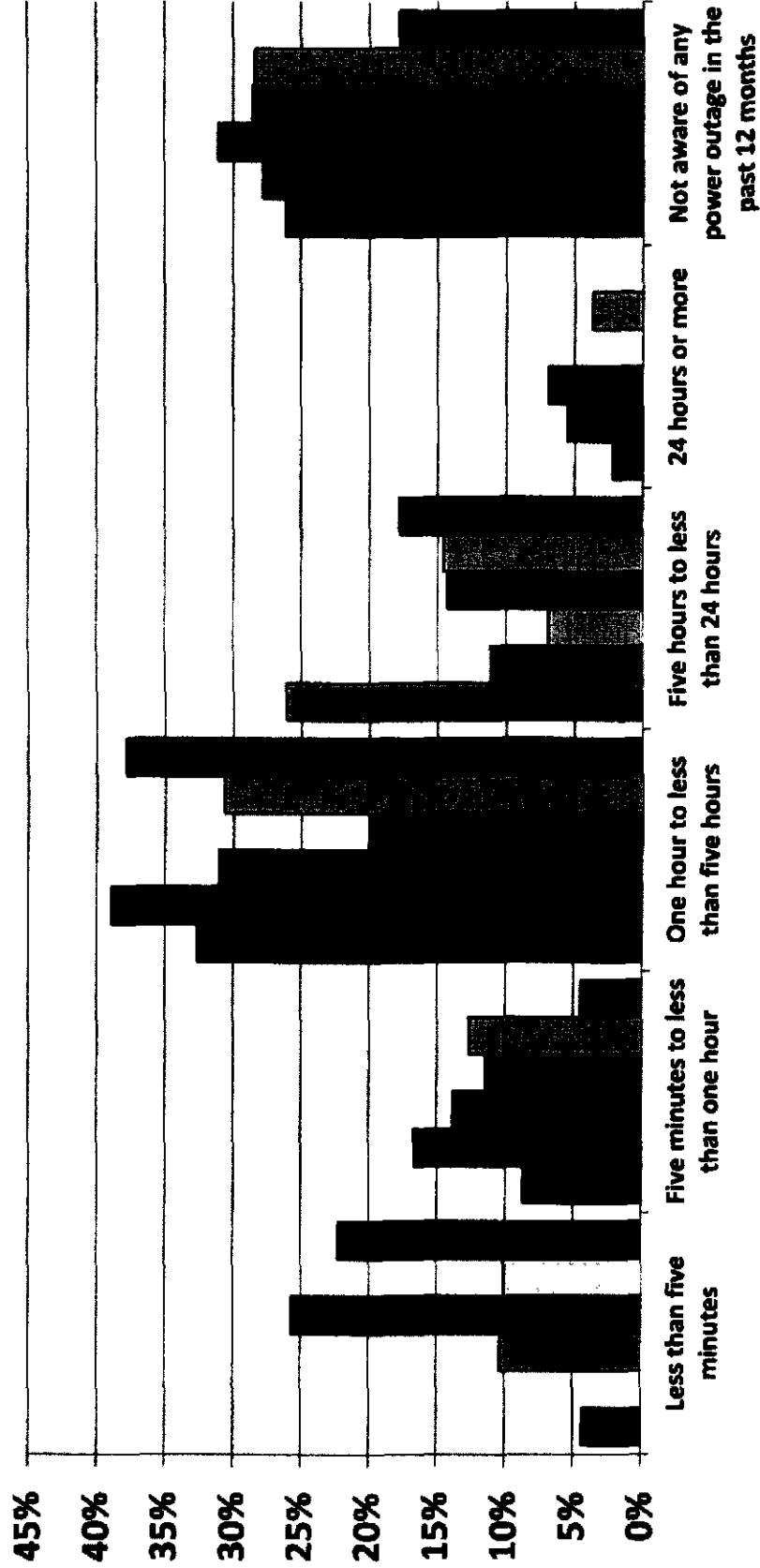
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



Would you estimate your longest power outage in the past 12 months to be:

Regulated Customers

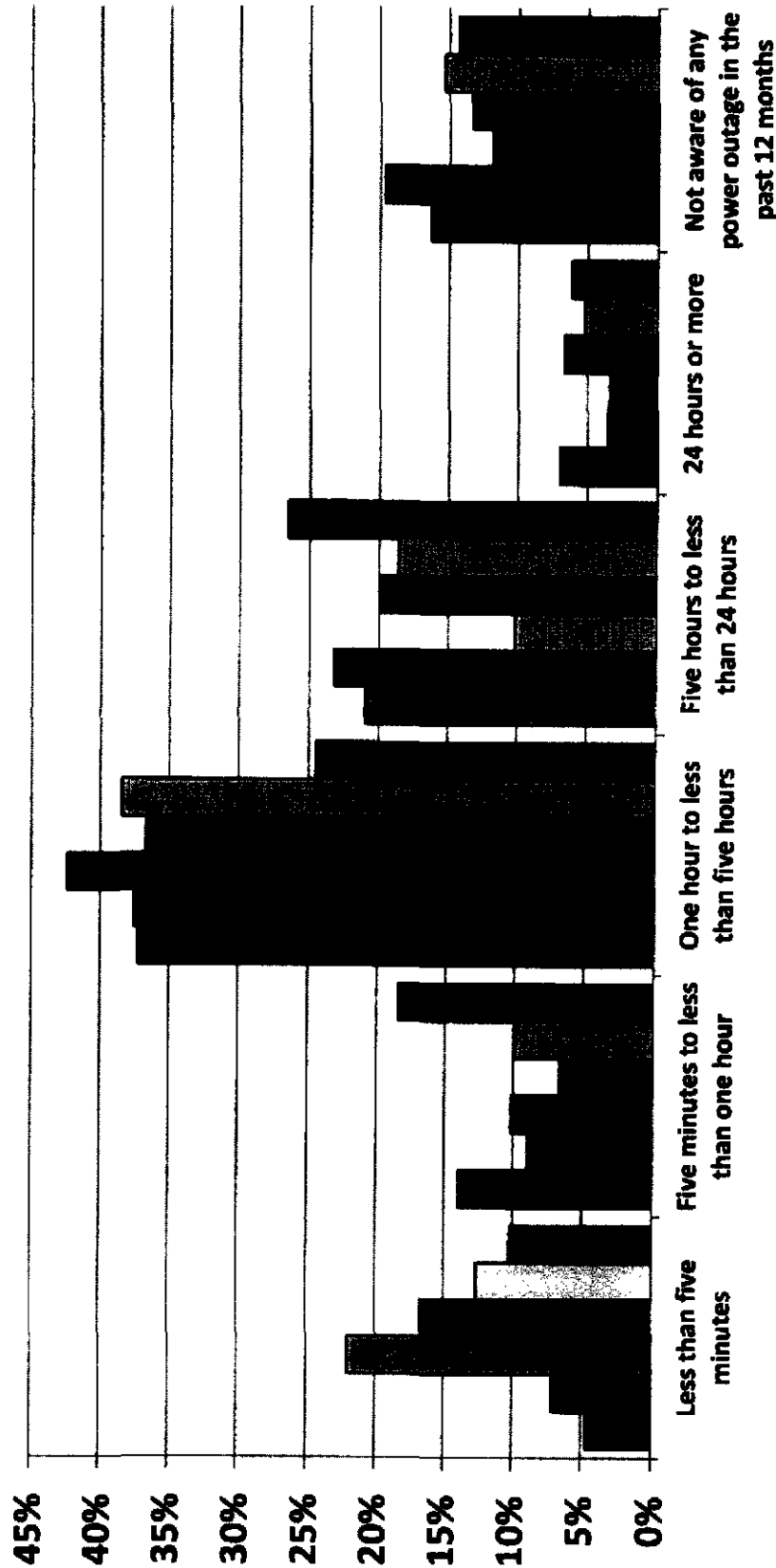
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



**Would you estimate your longest power outage
in the past 12 months to be:**

Non-Regulated Customers

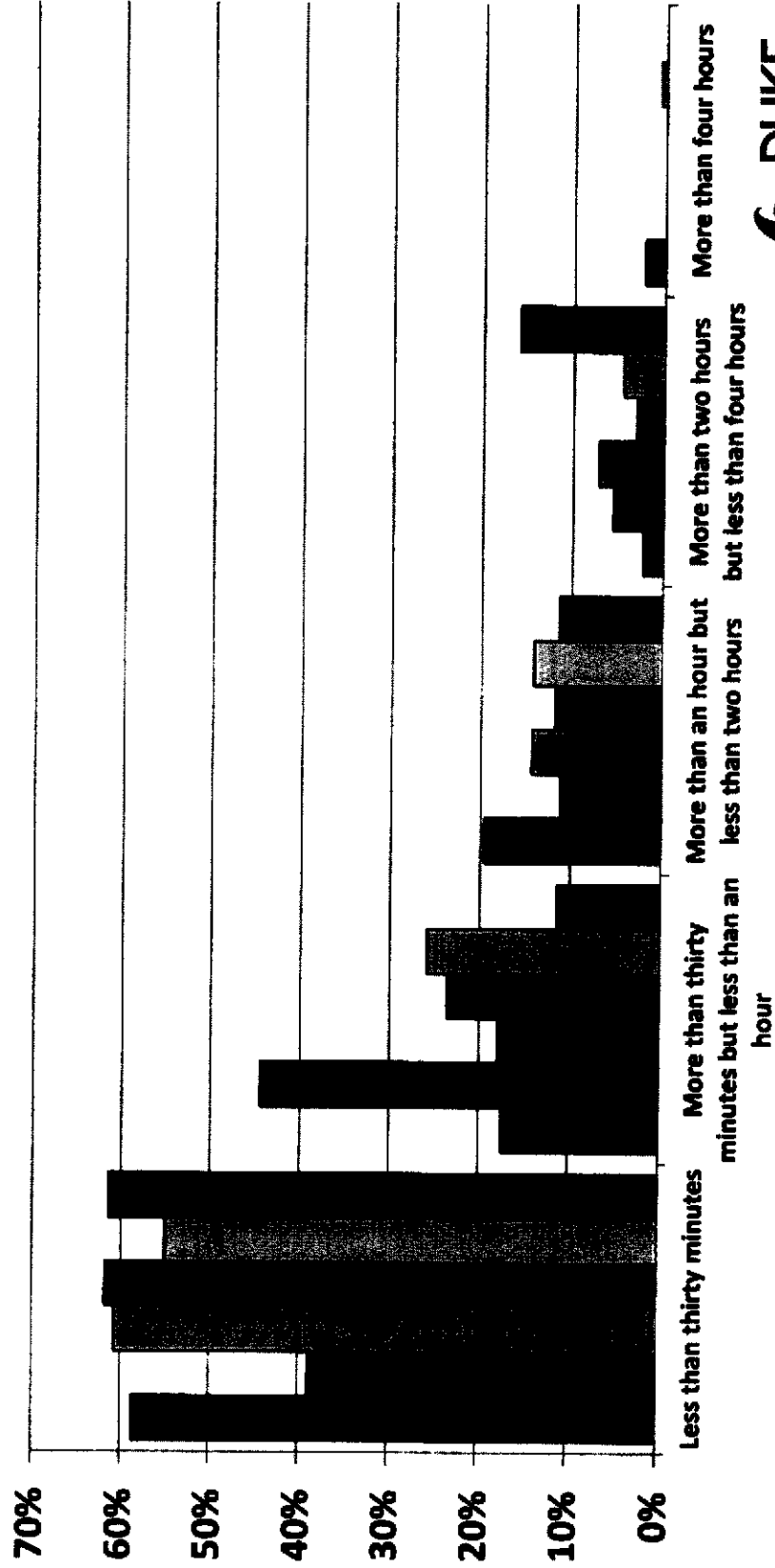
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



What do you consider to be an acceptable length
of a prolonged outage that was not storm related?

Regulated Customers

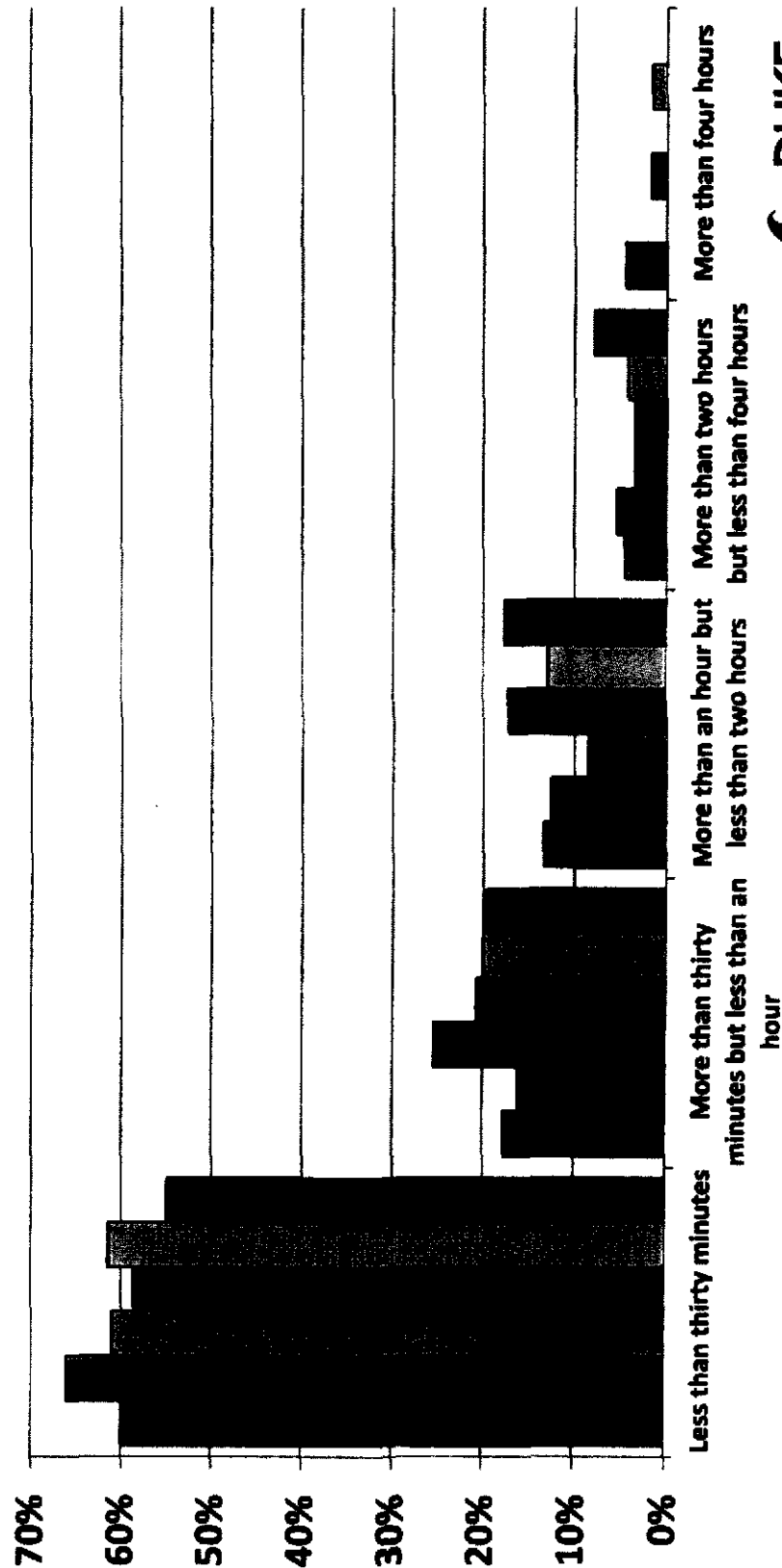
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



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Non-Regulated Customers

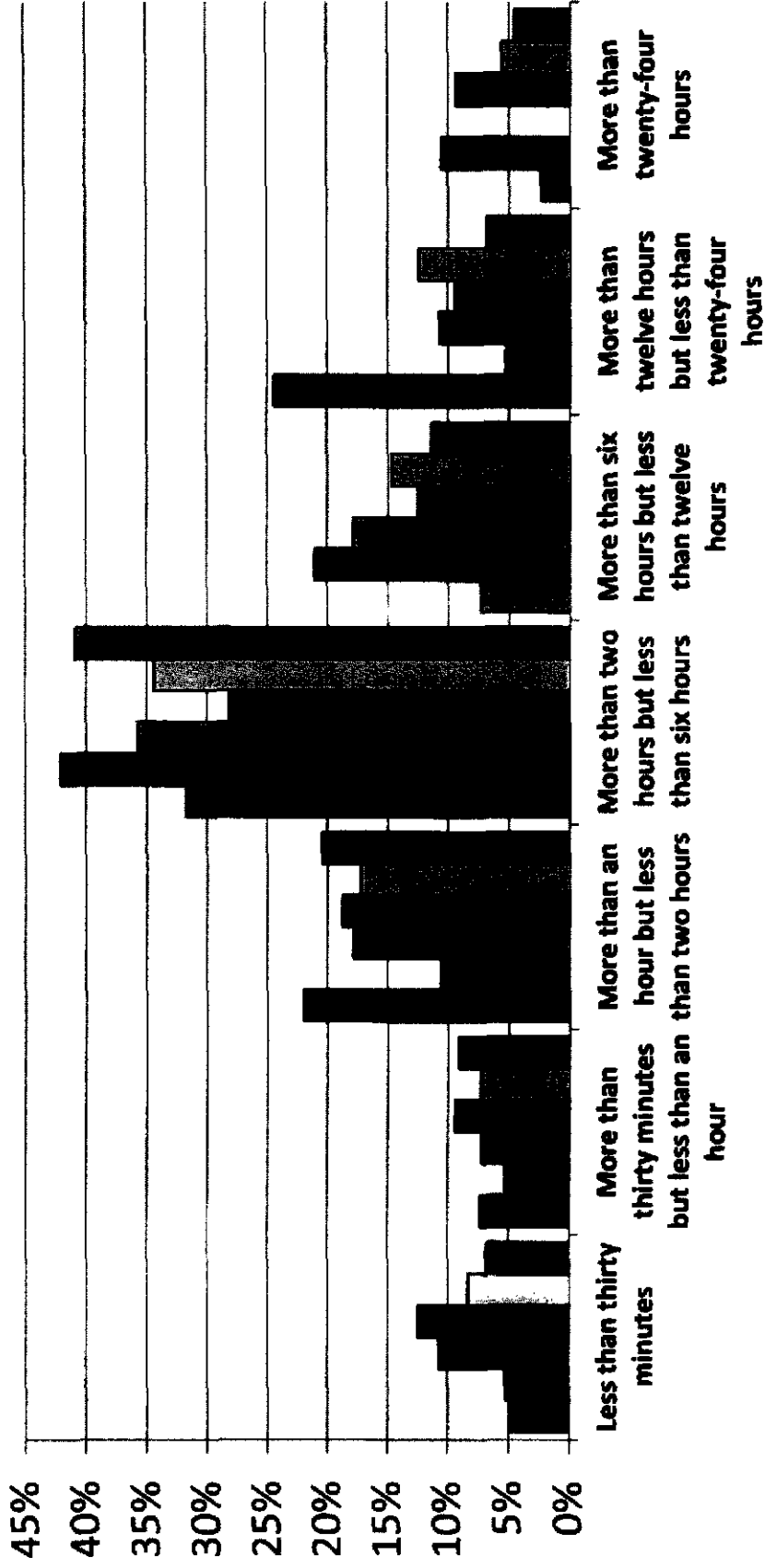
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What do you consider to be an acceptable length of a prolonged outage that was storm related?

Regulated Customers

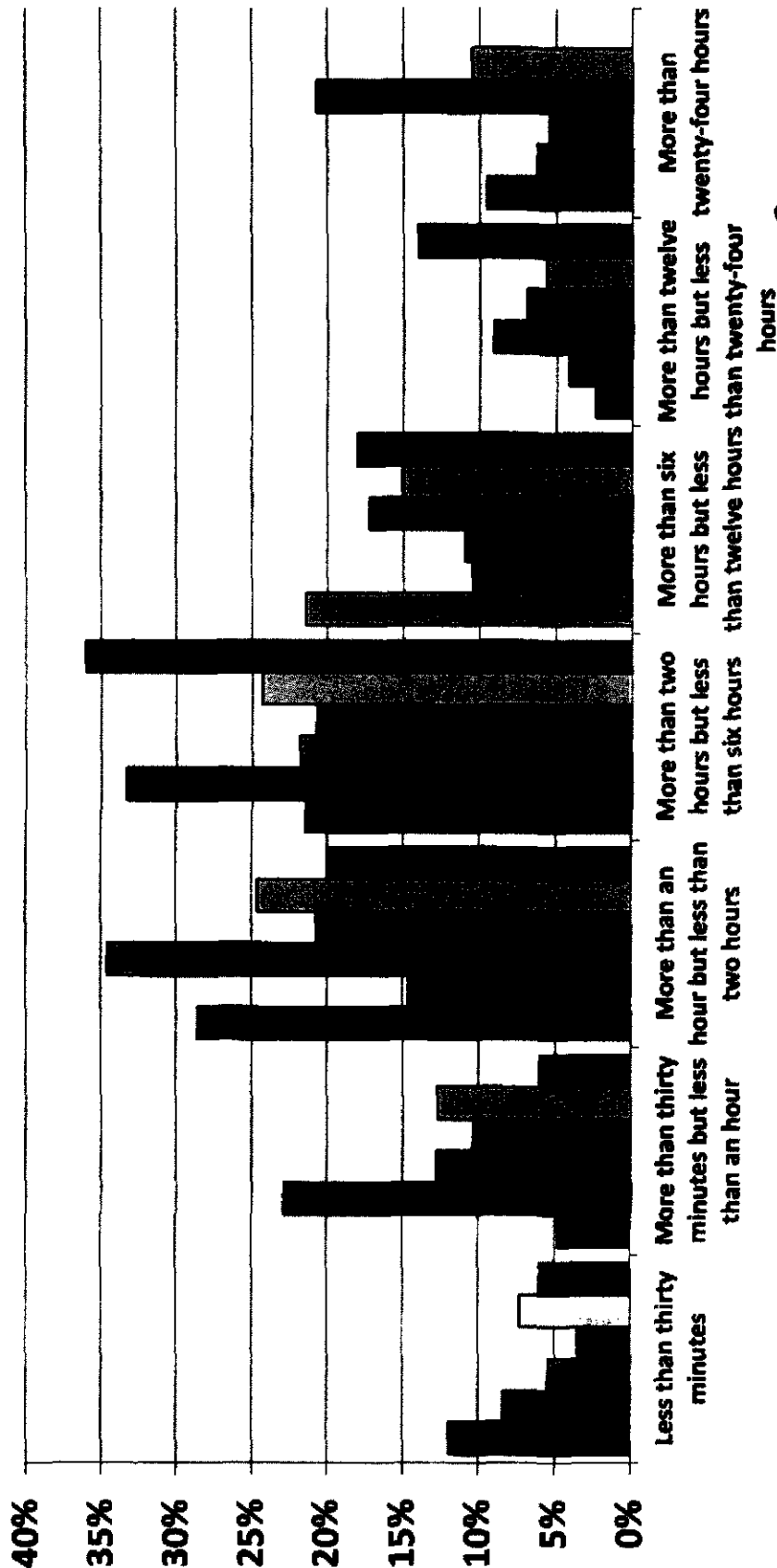
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



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Non-Regulated Customers

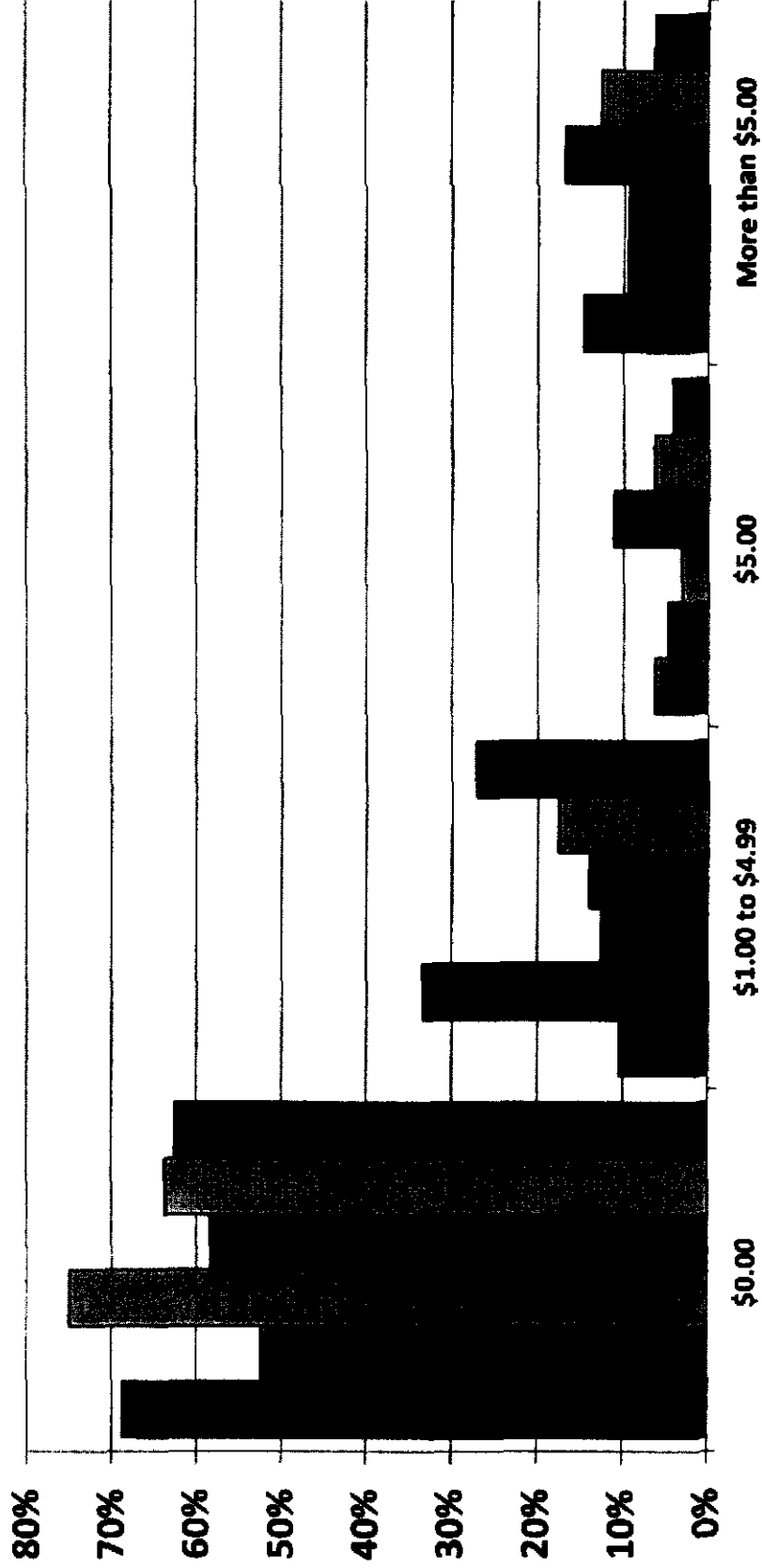
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



During a specified period of system stress, such as a hot summer day, what is the maximum amount that you would be willing to pay and have included in your electric bill in order to avoid a 1 hour electric service outage to your business?

Regulated Customers

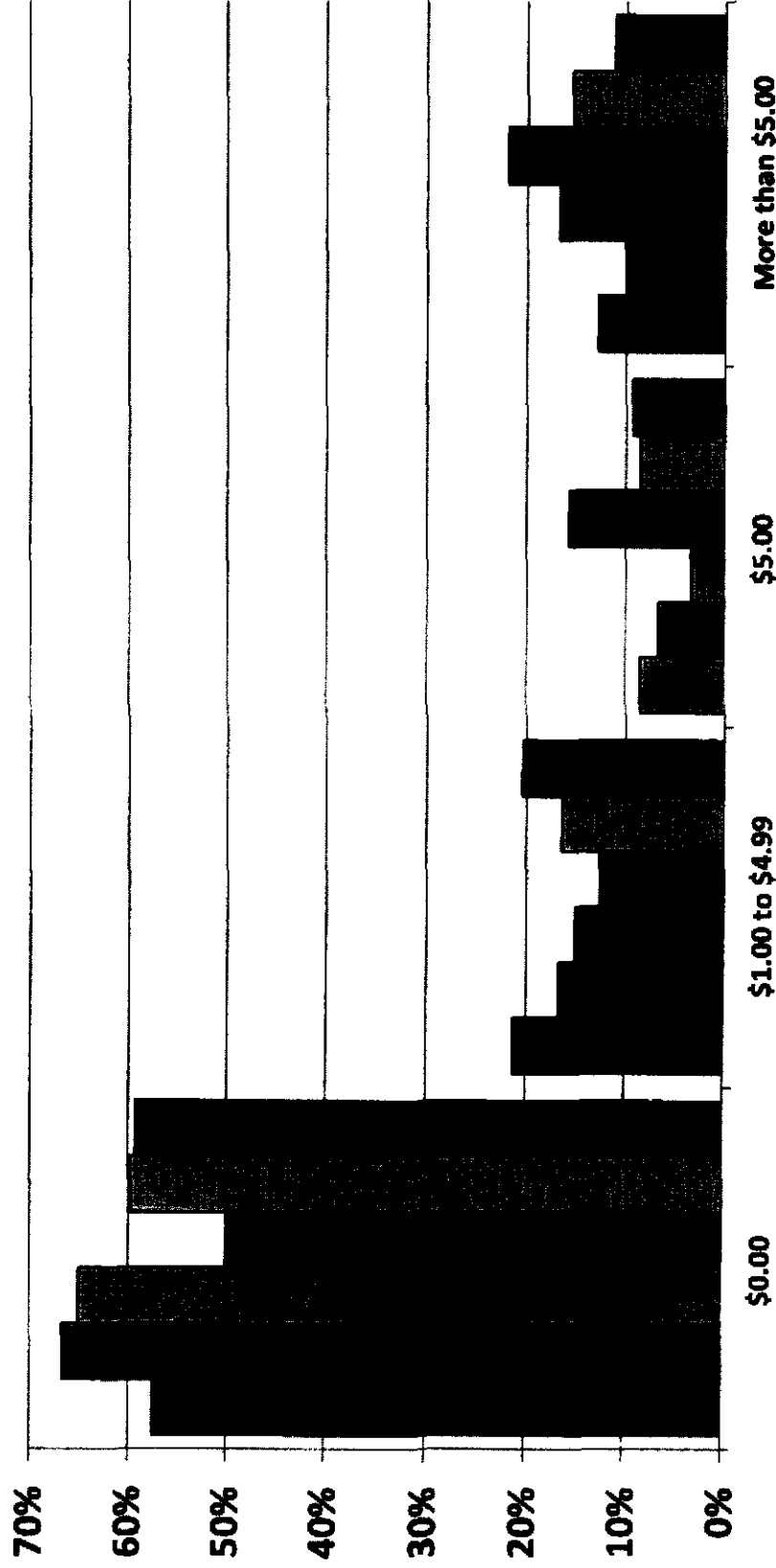
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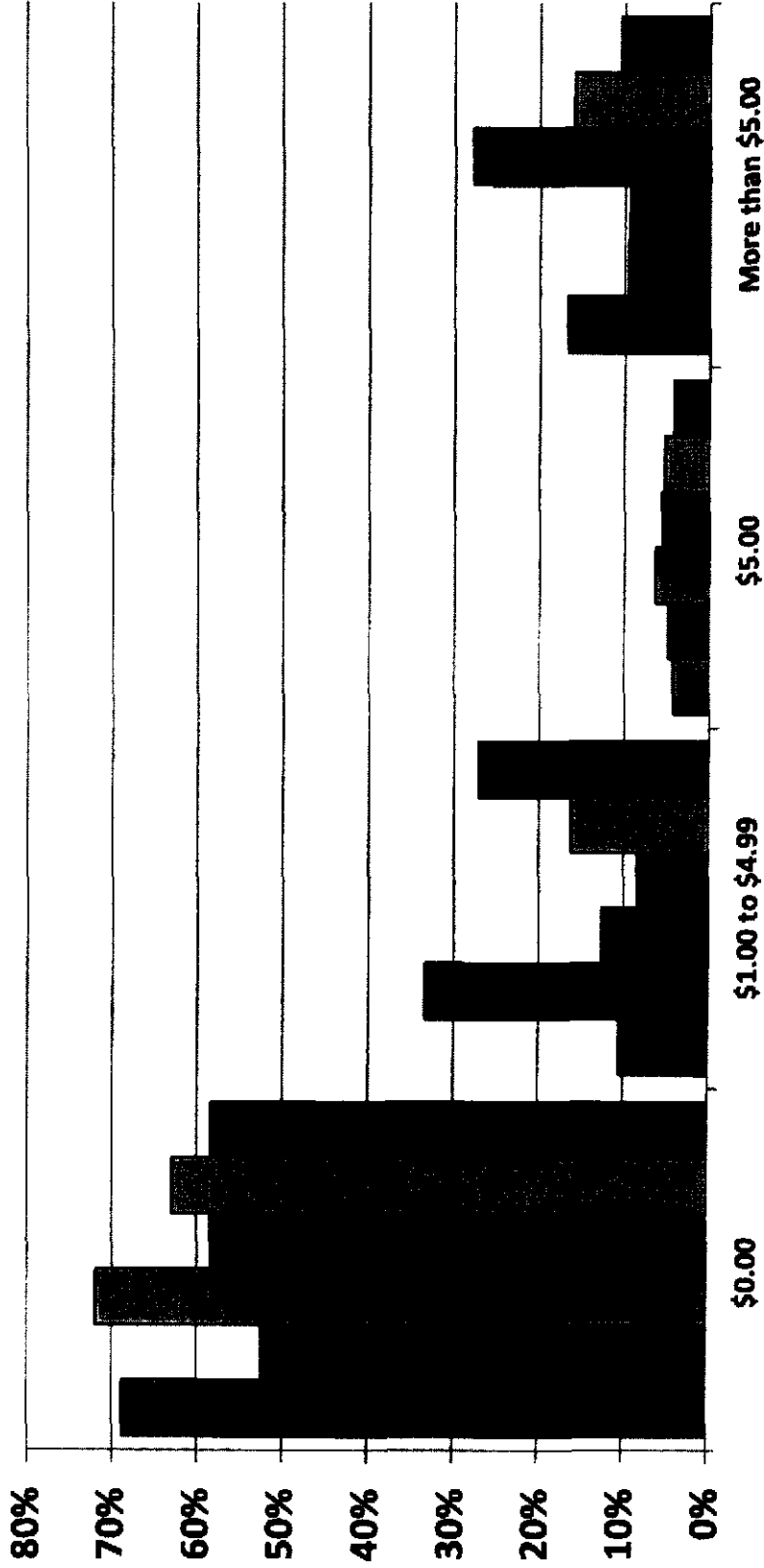
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



During a specified period of system stress, such as a hot summer day, what is the maximum amount that you would be willing to pay and have included in your electric bill in order to avoid a 2 hour electric service outage to your business?

Regulated Customers

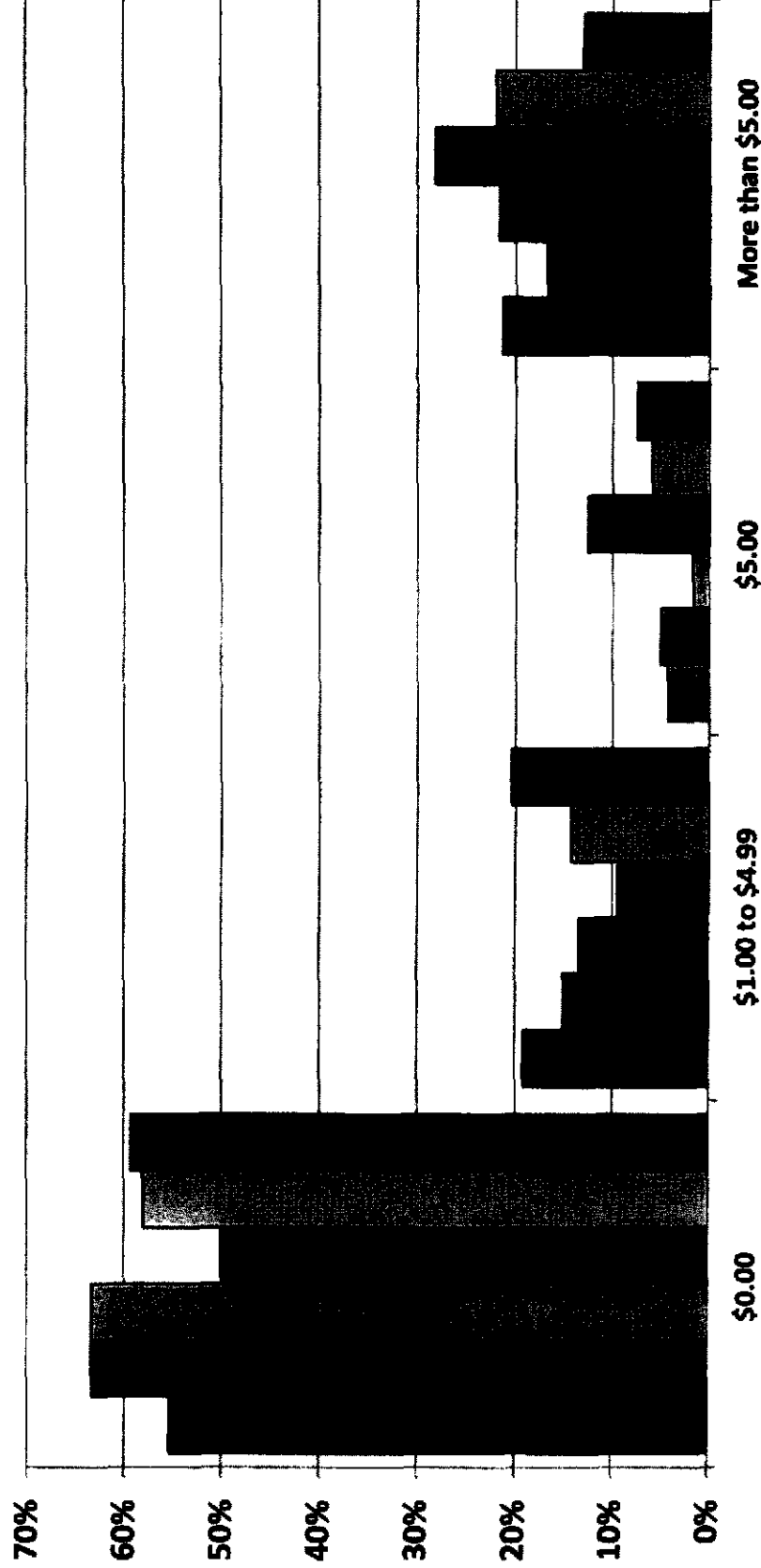
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Non-Regulated Customers

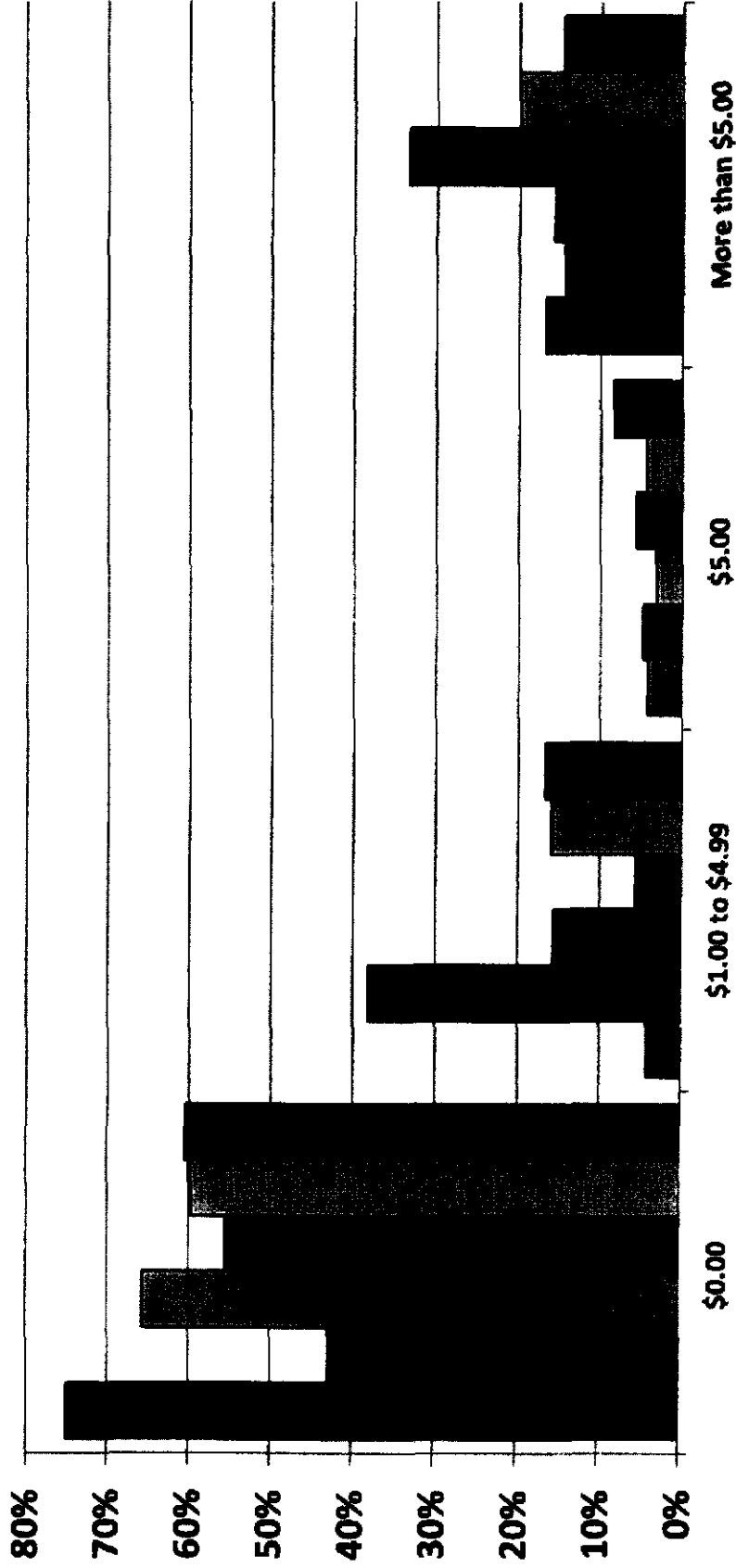
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During a specified period of system stress, such as a hot summer day, what is the maximum amount that you would be willing to pay and have included in your electric bill in order to avoid a 4 hour electric service outage to your business?

Regulated Customers

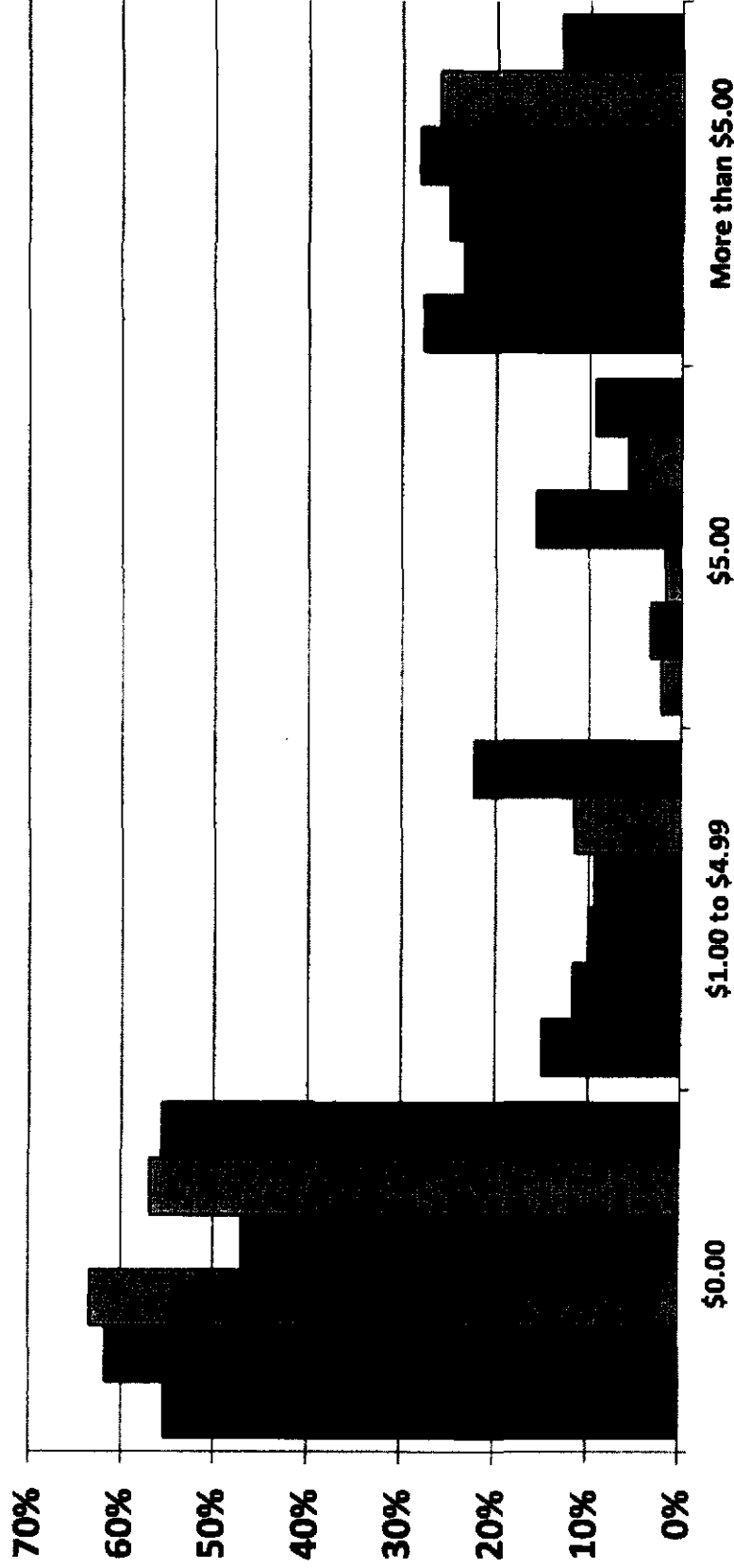
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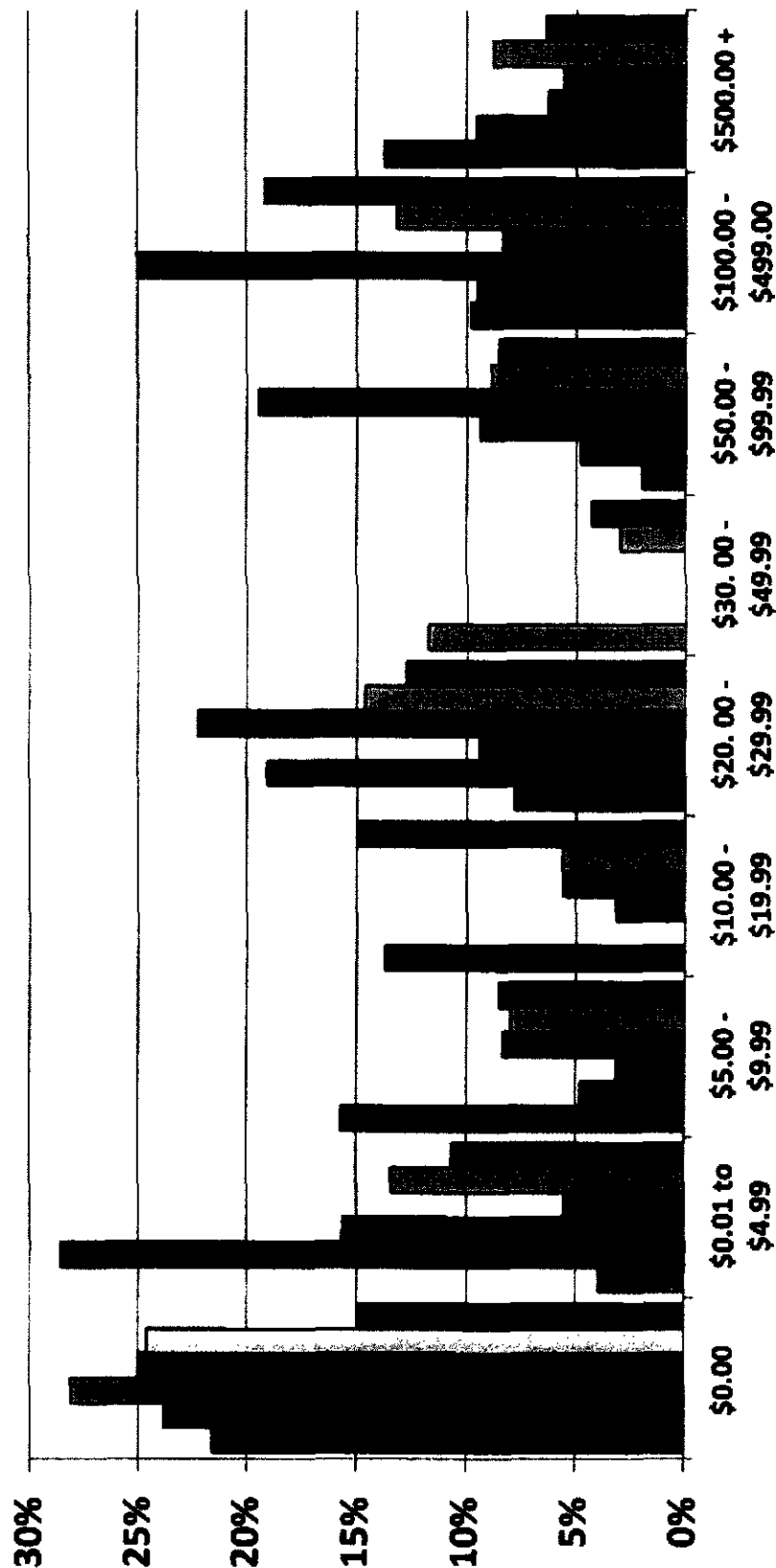
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How much of a credit to your electric bill would you require from the utility to allow the electric company to interrupt service to your business for 1 hour?

Regulated Customers

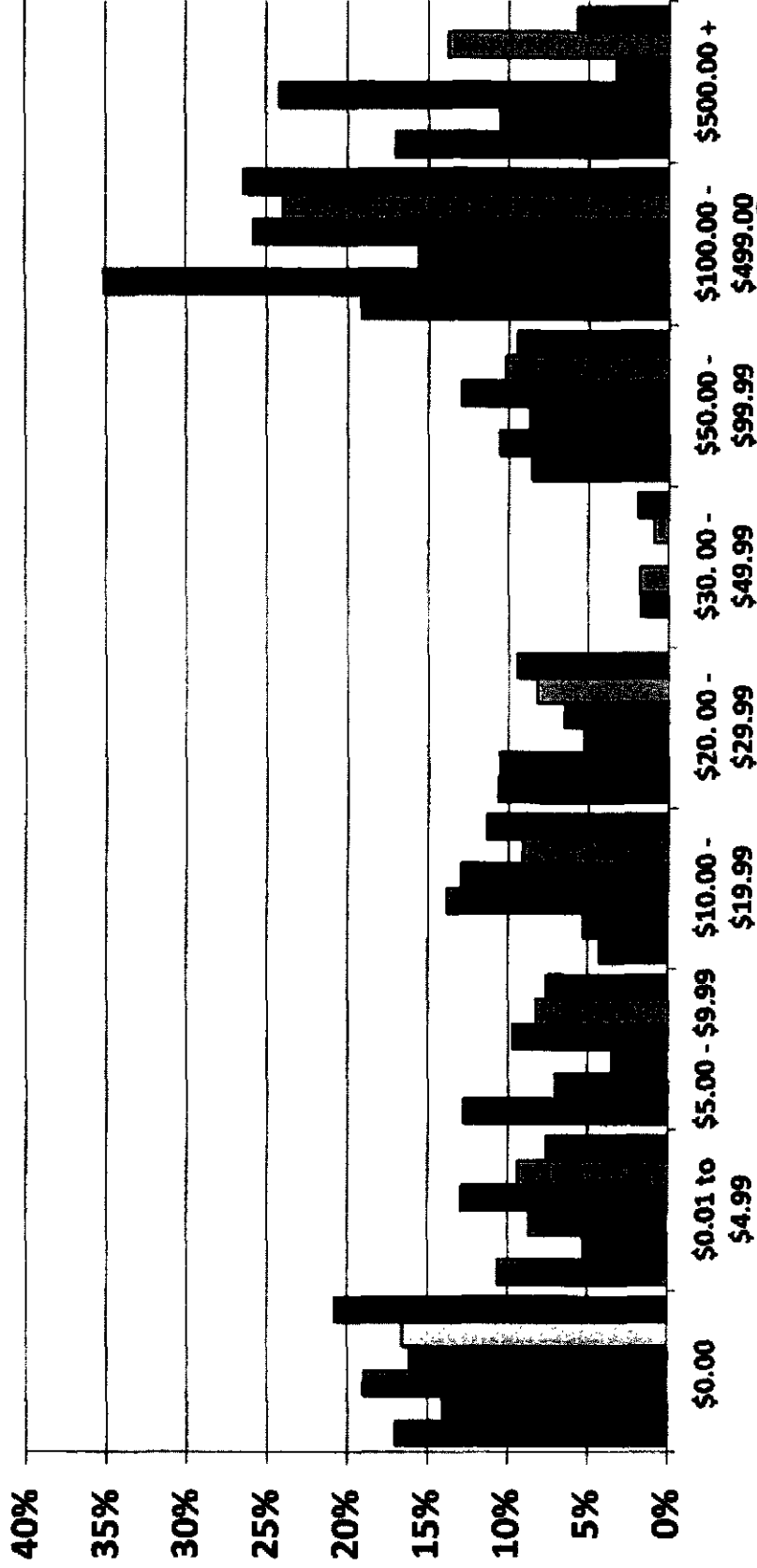
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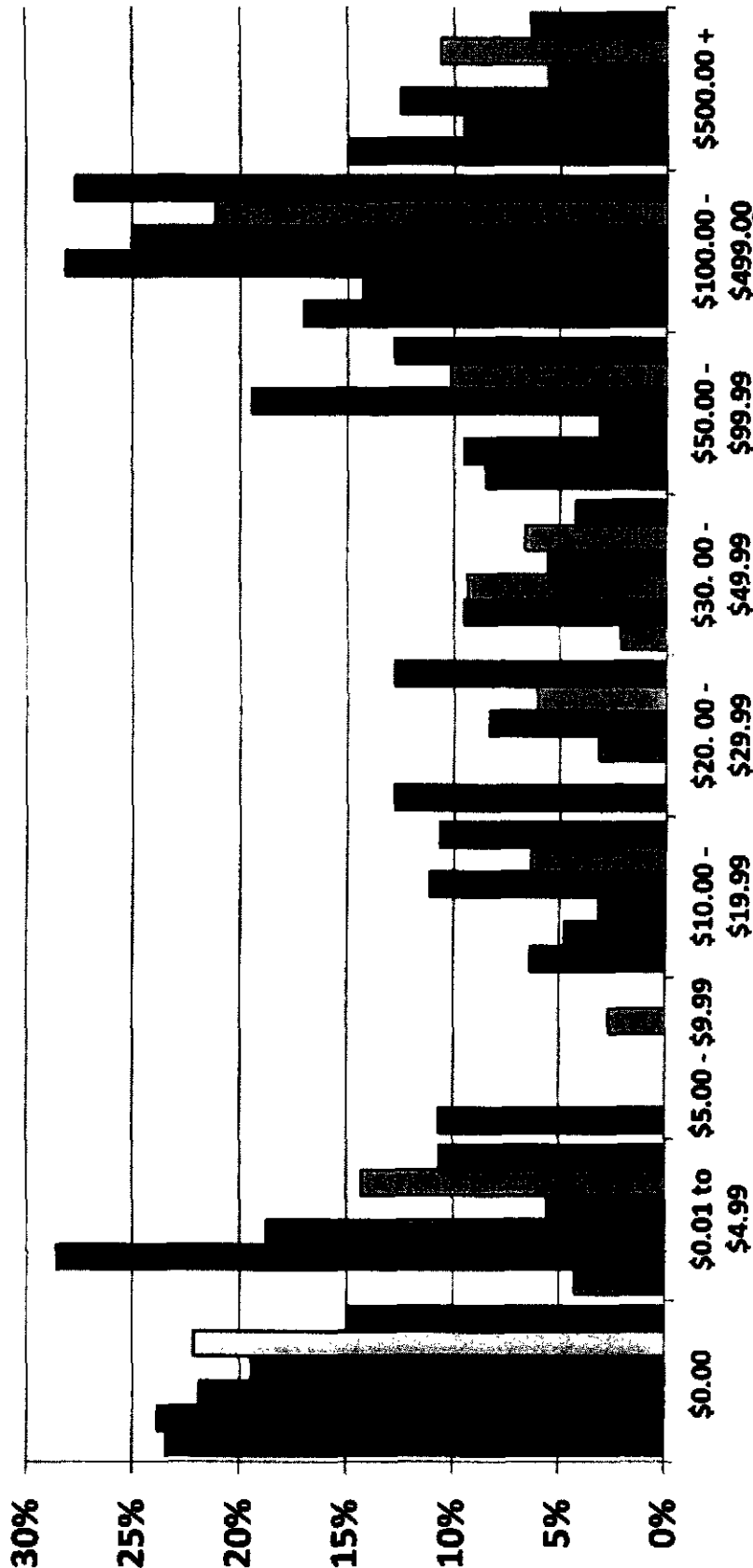
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How much of a credit to your electric bill would you require from the utility to allow the electric company to interrupt service to your business for 2 hours?

Regulated Customers

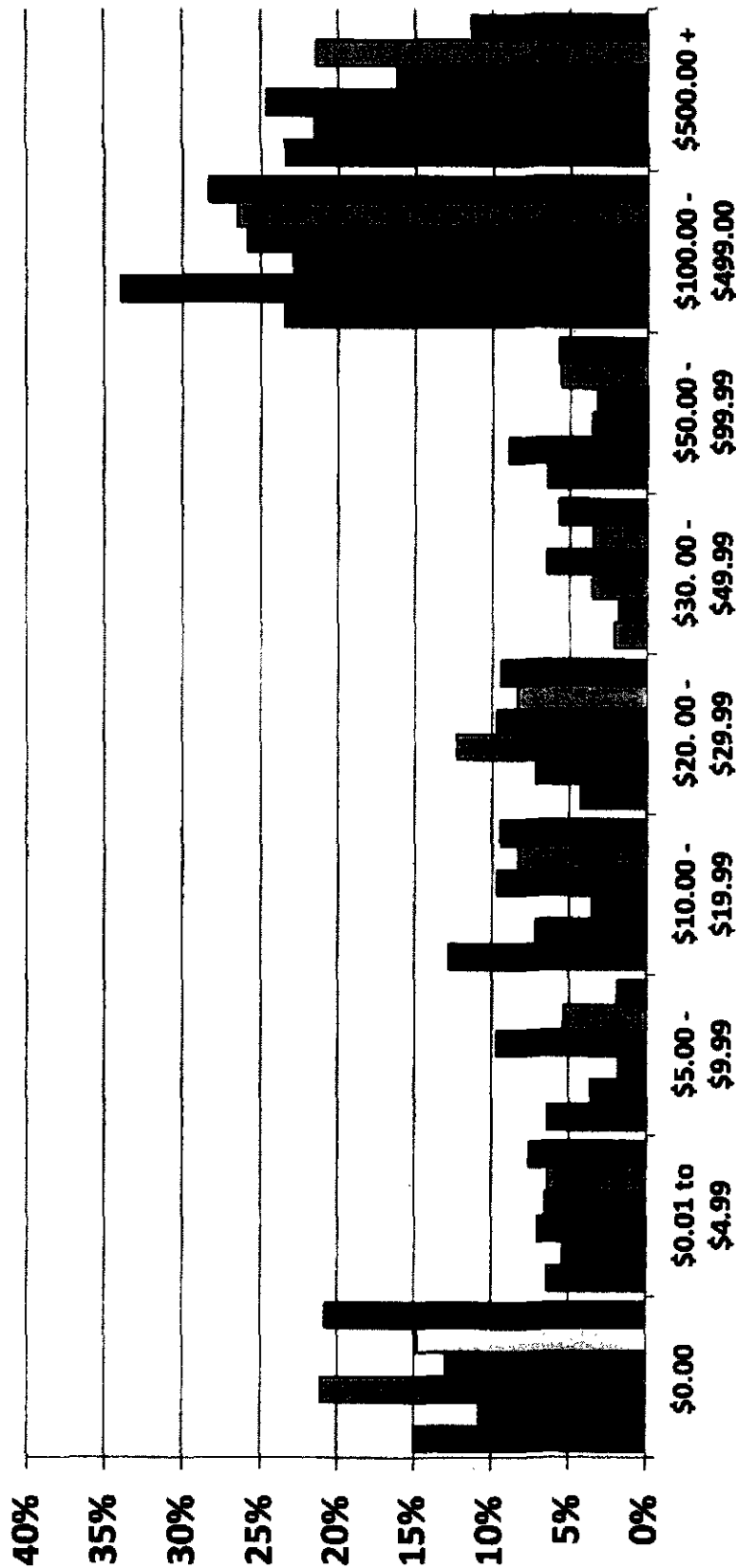
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Non-Regulated Customers

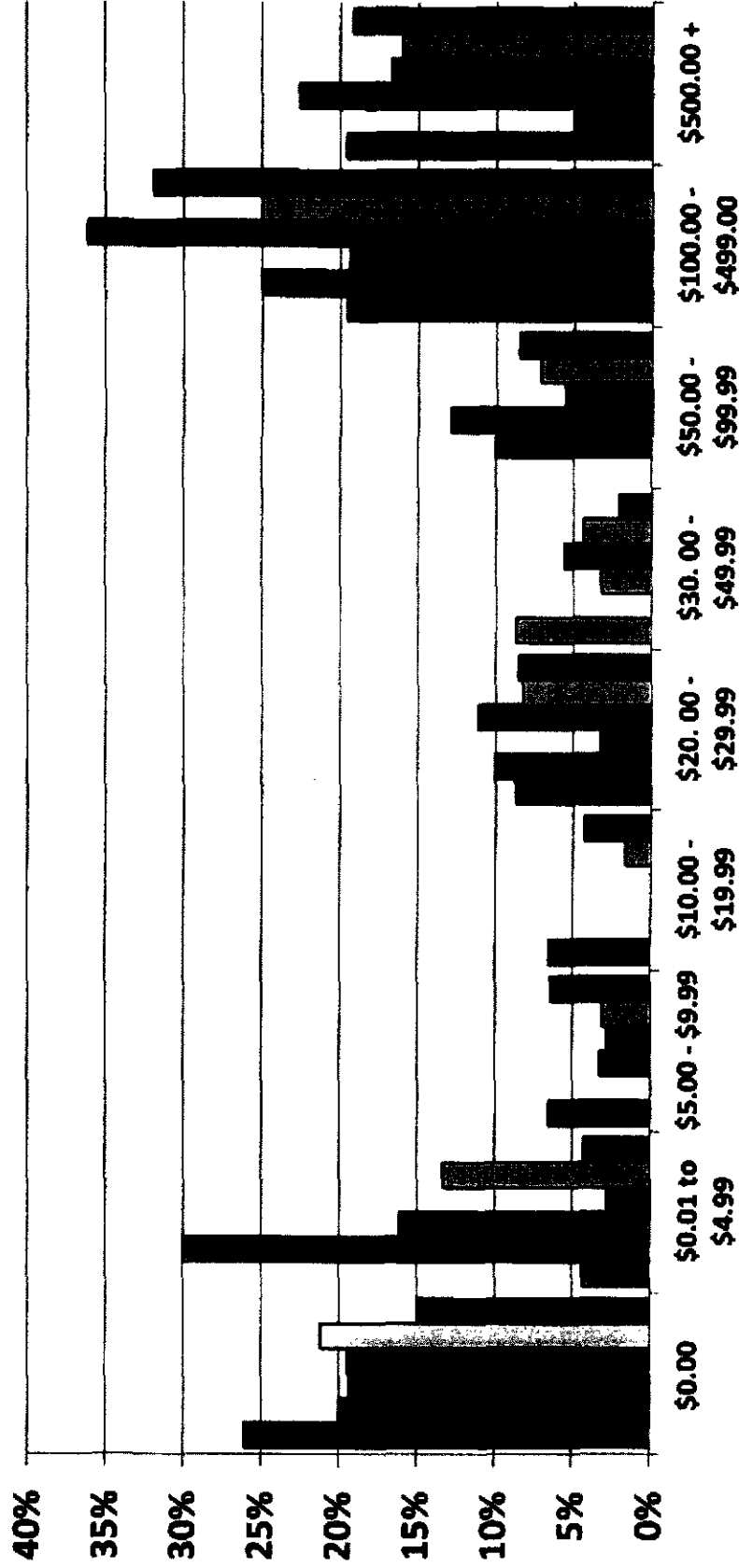
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How much of a credit to your electric bill would you require from the utility to allow the electric company to interrupt service to your business for 4 hours?

Regulated Customers

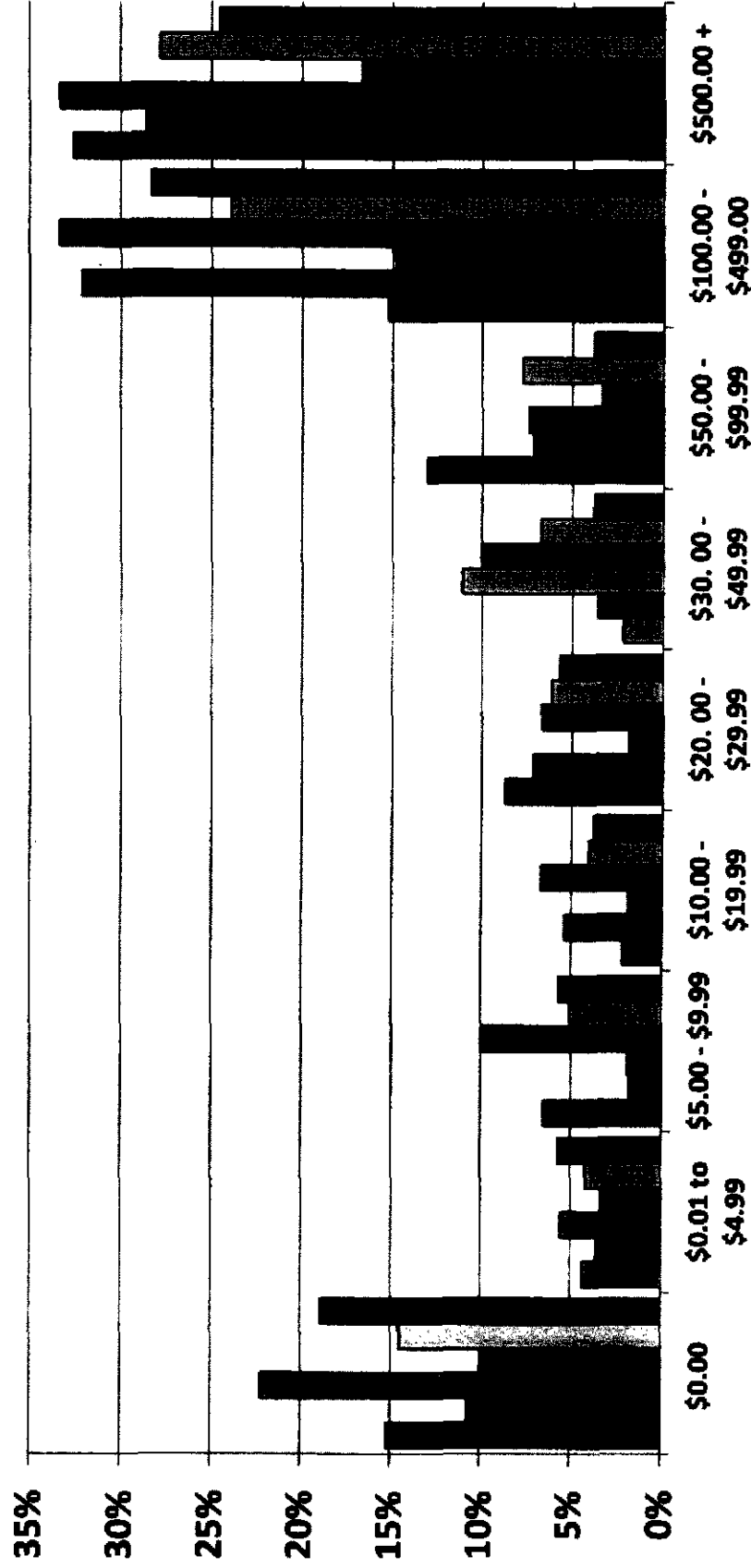
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Non-Regulated Customers

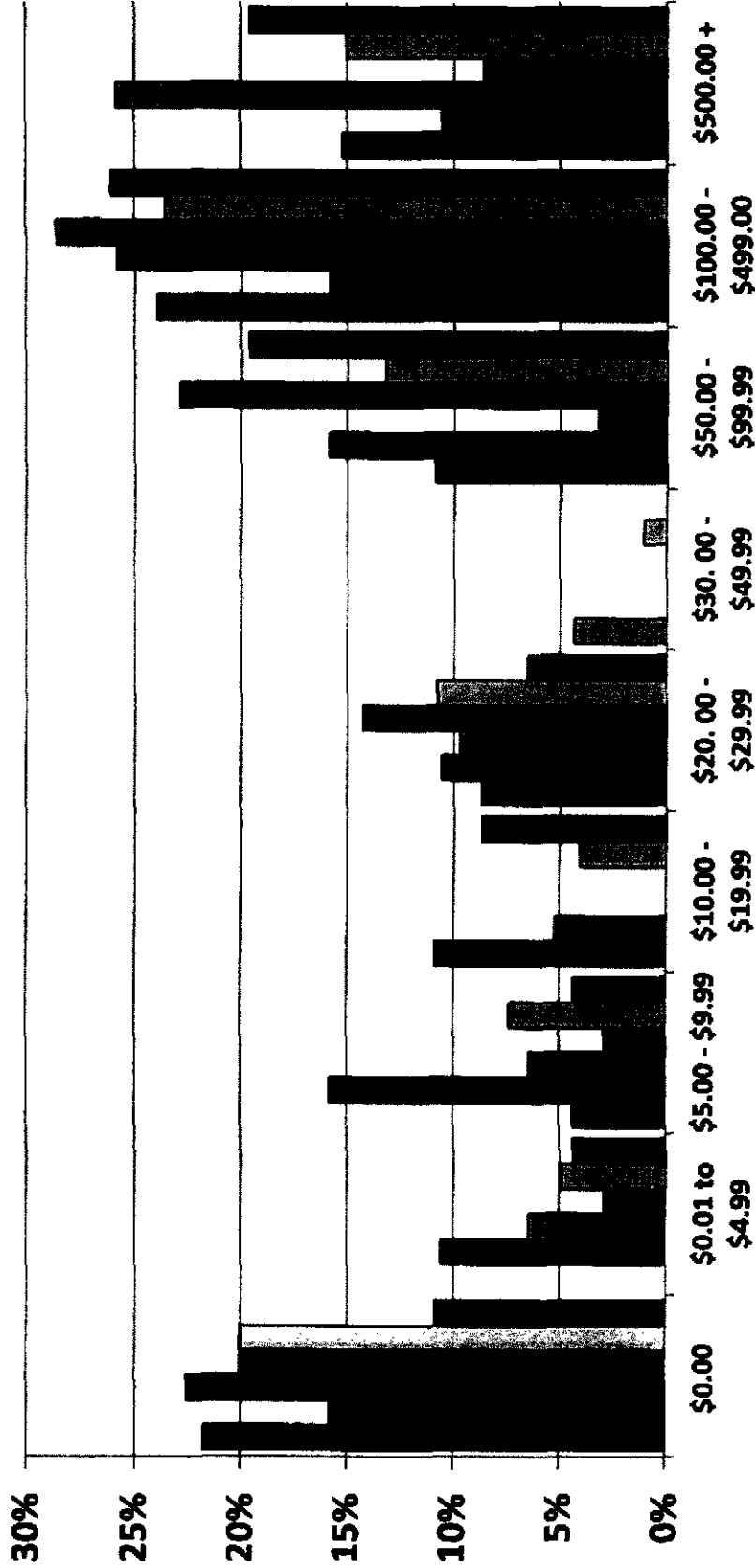
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



How much of a credit to your electric bill would you require from the utility to allow the electric company to control the usage of certain electrical equipment within your business during a time when its system is under stress?

Regulated Customers

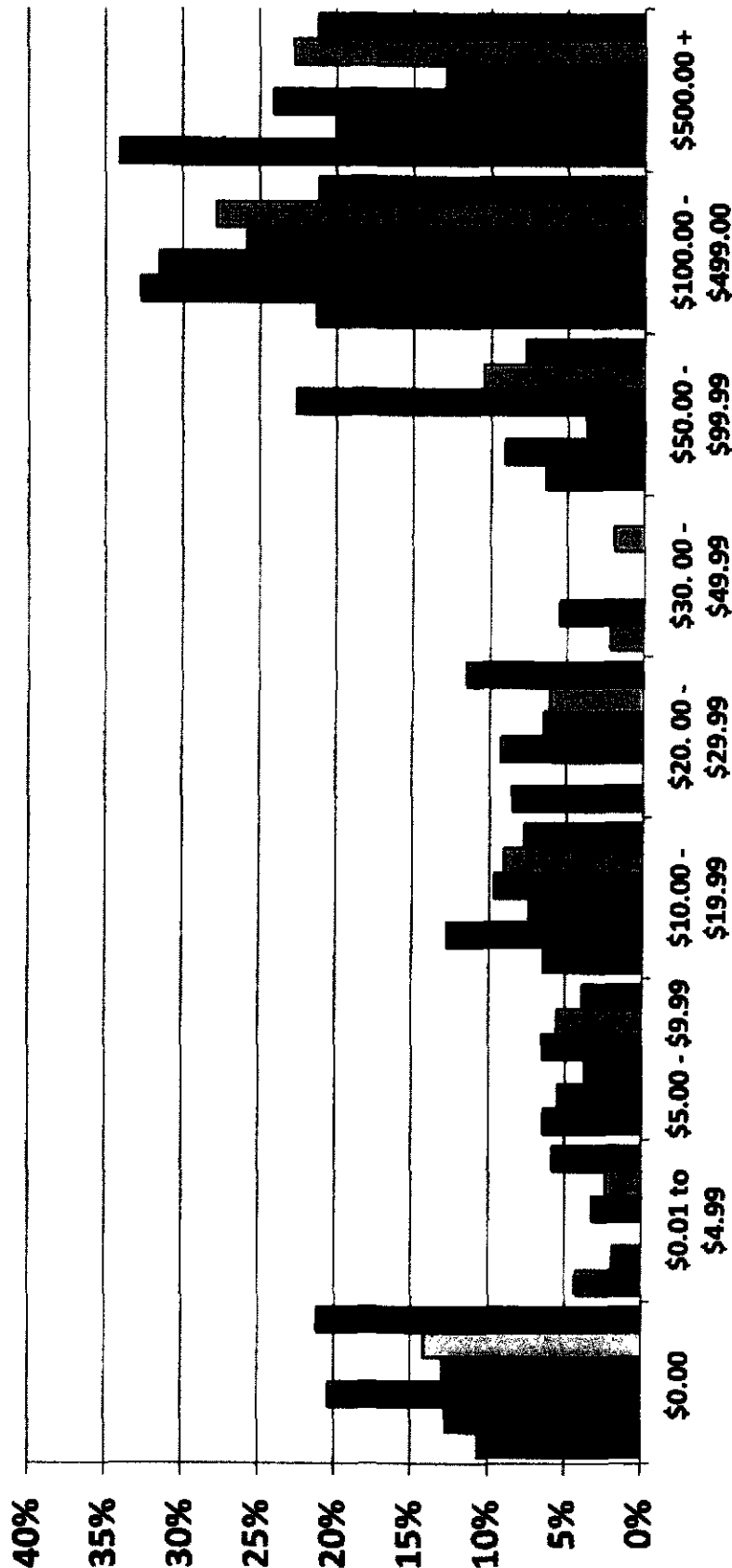
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How much of a credit to your electric bill would you require from the utility to allow the electric company to control the usage of certain electrical equipment within your business during a time when its system is under stress?

Non-Regulated Customers

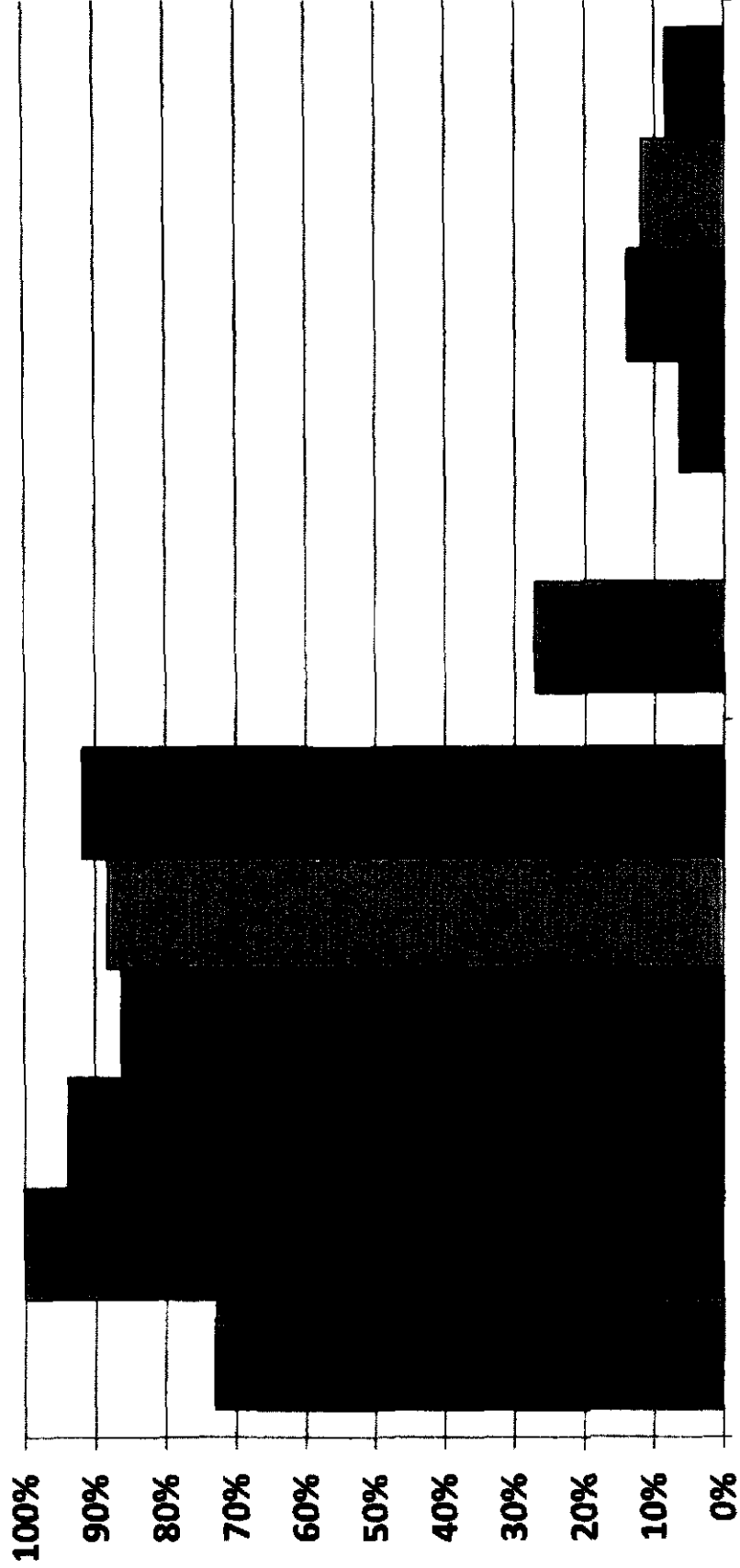
■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



During a time when your electric company's system is under stress and the company calls on its customers to conserve electricity, would you be willing to take measures to conserve your business's electric usage?

Regulated Customers

■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



Yes

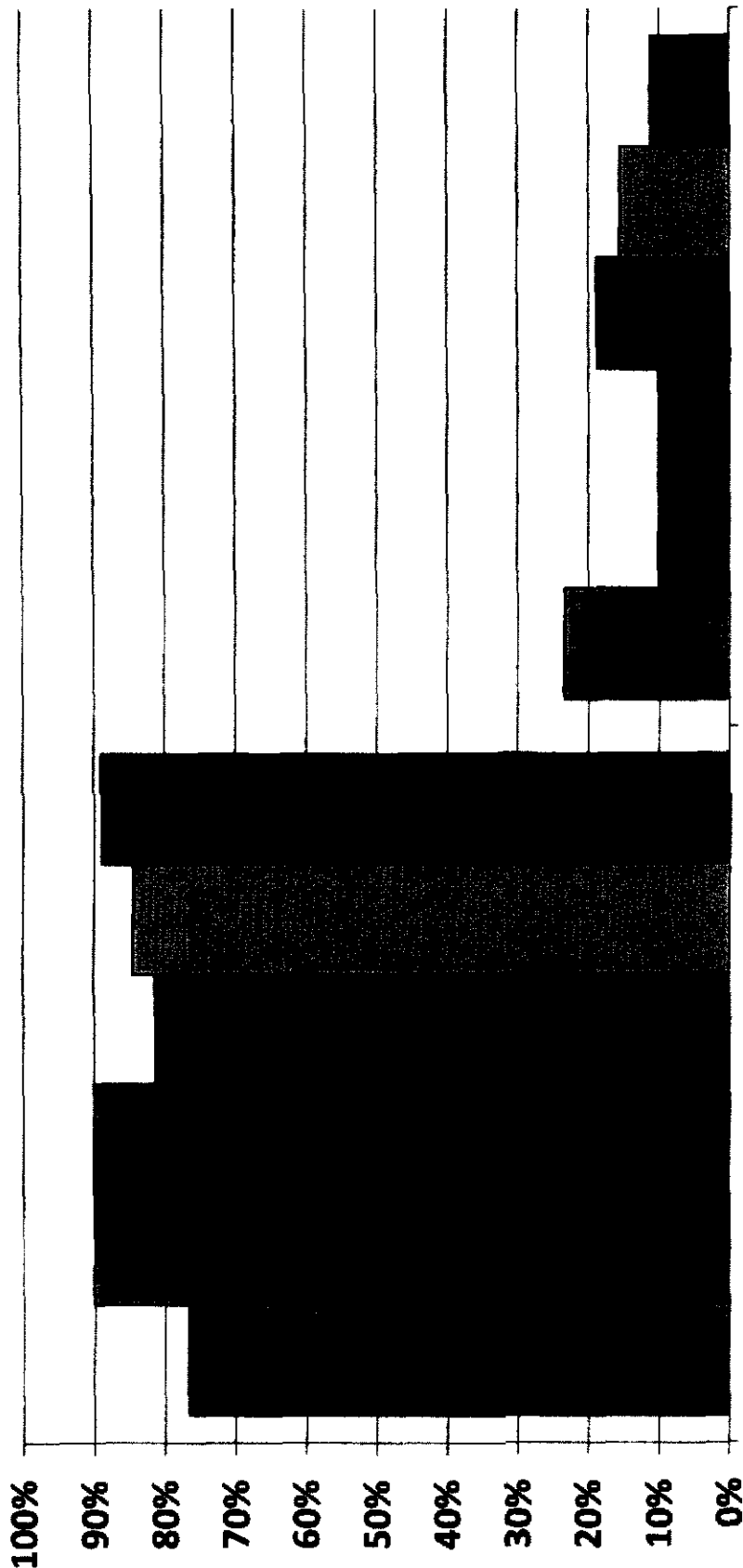
No



During a time when your electric company's system is under stress and the company calls on its customers to conserve electricity, would you be willing to take measures to conserve your business's electric usage?

Non-Regulated Customers

■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



Yes

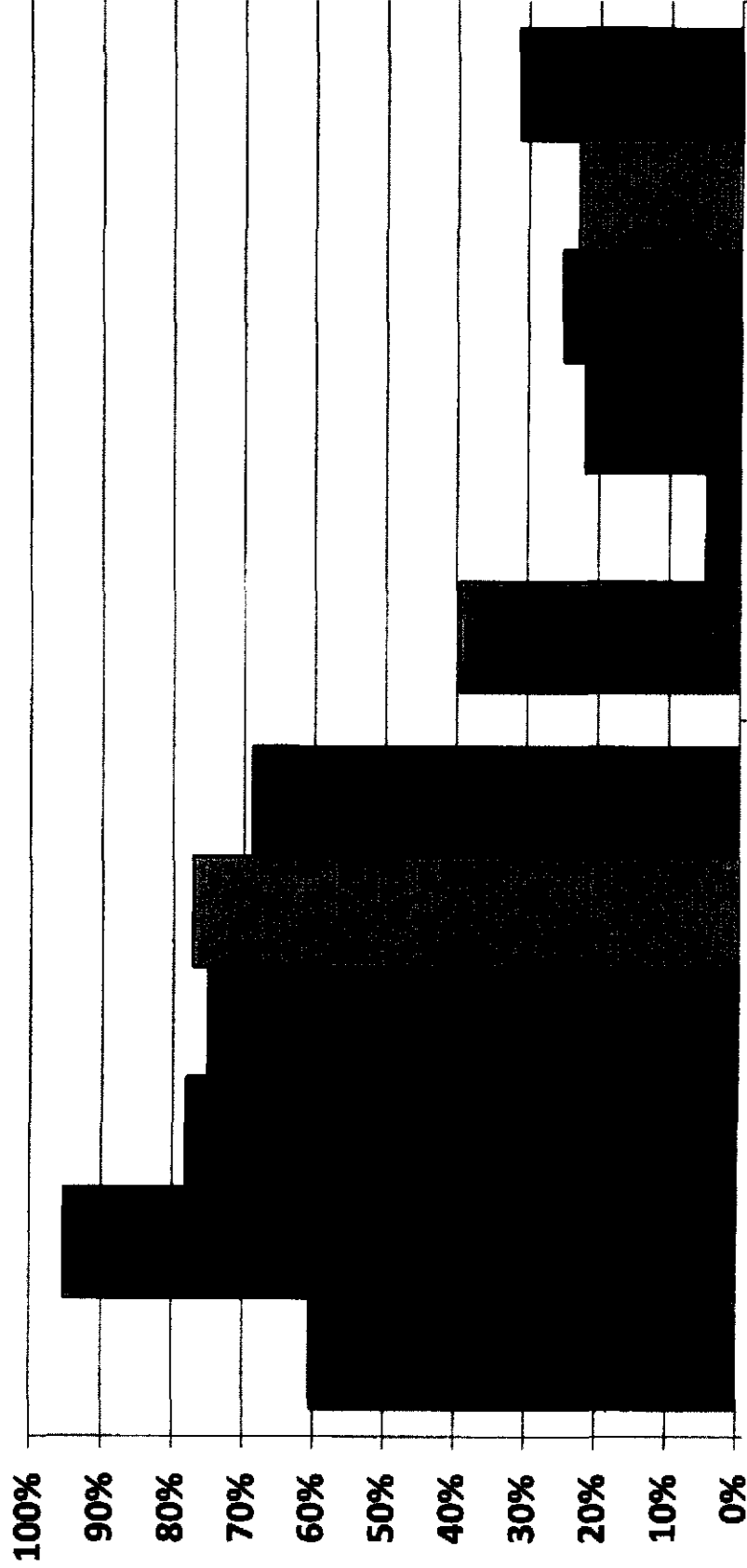
No



In helping with your energy conservation, would you be interested in new technology that lets you automate the settings for different electrical equipment to reduce electricity use when the cost to produce and deliver electricity is high?

Regulated Customers

■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



Yes

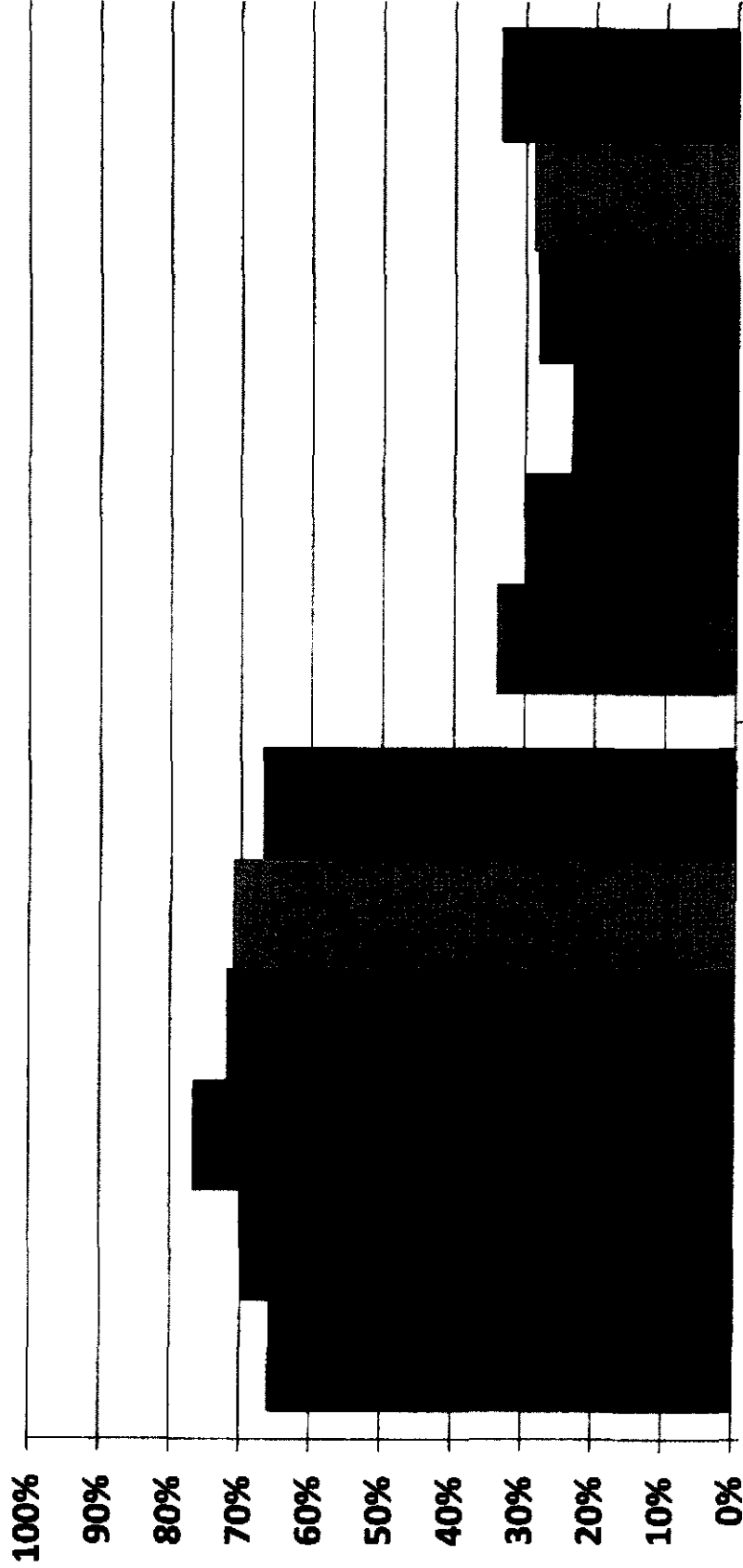
No



In helping with your energy conservation, would you be interested in new technology that lets you automate the settings for different electrical equipment to reduce electricity use when the cost to produce and deliver electricity is high?

Non-Regulated Customers

■ Q1-13 ■ Q2-13 ■ Q3-13 ■ Q4-13 ■ YE-13 ■ Q1-14



Yes

No



ATTACHMENT MWA- 7

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