

**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.	)	

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**RESPONSES OF PEOPLE WORKING COOPERATIVELY, INC. TO  
DUKE ENERGY OHIO'S FIRST SET OF  
INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

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Comes now People Working Cooperatively, Inc. pursuant to Rules 4901-1-19 and 4901-1-20 of the Ohio Administrative Code, and submits its Responses to the First Set of Interrogatories and Requests for Production of Documents propounded by Duke Energy Ohio.

**INTERROGATORIES**

1. Identify each person who answered or furnished information or documents, or assisted in answering or in furnishing any information or documents, used in answering any of these Interrogatories and/or Requests for Production of Documents, and identify each Interrogatory and/or Document Request for which such person participated in the response.

**RESPONSE:** Legal counsel responded to each of these interrogatories and requests for production of documents.

2. Identify each person whom PWC intends to call to testify at the hearings in the above-captioned matters. To the extent PWC claims that it has not made a final determination as

to which witnesses it intends to call to testify on its behalf, please supplement this response as soon as such a determination is made.

**RESPONSE:** PWC has not yet identified a witness in this proceeding.

3. For each person identified in response to Interrogatory No. 2 above, please state (1) the subject matter upon which the witness is expected to testify; (2) the facts to which each witness is expected to testify; (3) the opinions to be rendered by each witness; (4) a summary of the witness's qualifications to provide the testimony; and (5) a summary of each witness's testimony. To the extent PWC claims that it has not made a final determination as to witnesses it intends to call to testify, please supplement this response as soon as such a determination is made.

**RESPONSE:** Not Applicable.

4. Please identify each expert whom PWC has retained or is in the process of retaining to testify in the above-captioned proceedings. If the response indicates that a decision has not been made, please supplement the response as soon as the decision is made.

**RESPONSE:** Please refer to PWC's response to Interrogatory No. 2.

5. For each expert identified in response to Interrogatory No. 4 above, please state (1) the subject matter upon which the witness is expected to testify; (2) the facts to which each expert is expected to testify; (3) the opinions to be rendered by each expert; (4) a summary of the expert's qualifications to provide the testimony; and (5) a summary of each expert's testimony.

**RESPONSE:** Not applicable.

6. For each witness identified in response to Interrogatory Nos. 2 and 4 above, please identify all proceedings in all jurisdictions in which the witness has offered evidence, including but not limited to, pre-filed testimony, sworn statements, and live testimony. For each response, please provide the following:

- (a) the jurisdiction in which the testimony or statement was pre-filed, offered, given, or admitted into the record;
- (b) the administrative agency and/or court in which the testimony or statement was pre-filed, offered, admitted, or given;
- (c) the date(s) the testimony or statement was pre-filed, offered, admitted, or given;
- (d) the identifying number for the case or proceeding in which the testimony or statement was pre-filed, offered, admitted, or given;
- (e) whether the witness was cross-examined; and
- (f) the custodian of the transcripts and pre-filed testimony or statements for each proceeding.

**RESPONSE:** Not applicable.

7. For each expert identified in Interrogatory No. 4, above, please identify all documents provided by PWC to the expert. To the extent that PWC contends that any such documents are privileged, please provide a privilege log for same.

**RESPONSE:** Not applicable.

8. Identify all documents or other evidence that PWC may seek to introduce as exhibits or for purposes of witness examination in any proceeding related to the above-captioned matter. To the extent that PWC contends that any such documents are privileged, please provide a privilege log for same.

**RESPONSE:** PWC objects to this Interrogatory because it seeks information that is protected by the attorney work product and/ or attorney-client privileges. Without waiving such objections, at this time PWC has not identified any documents or other evidence that it will introduce as exhibits in this proceeding.

9. Provide a list of each meeting, teleconference, or communication (written or oral), between PWC and any entity in the case, or member of any entity exhibiting interest in the case, regarding the any or all of the components of the electric security plan described

in the above-referenced matter and/or the procedural posture of these proceedings. For purposes of this Interrogatory, “entity exhibiting interest” includes any interested party that has not filed a motion to intervene in the above-captioned proceedings and “list” means to identify the date of each meeting, teleconference, or communication, each person in attendance at same, and the topics discussed. To the extent that PWC contends that any such documents are privileged, please provide a privilege log for same.

**RESPONSE:** PWC objects to this Interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence and seeks information that is protected by the attorney work product and/or attorney-client privileges. Without waiving these objections, PWC maintains no log of its communications with other parties.

10. Provide a list of each meeting, teleconference, or communication (written or oral), between PWC and any Intervening Party, or member of any Intervening Party, regarding the any or all of the components of the electric security plan described in the above-referenced matter and/or the procedural posture of these proceedings. For purposes of this Interrogatory, “intervening party” includes any party to have filed a motion to intervene in the above-captioned proceedings and “list” means to identify the date of each meeting, teleconference, or communication, each person in attendance at same, and the topics discussed. To the extent that PWC contends that any such documents are privileged, please provide a privilege log for same.

**RESPONSE:** PWC objects to this Interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence and seeks information that is protected by the attorney work product and/or attorney-client privileges. Without waiving these objections, PWC maintains no log of its communications with other parties.]

11. Identify all communications that PWC has had with PUCO Commissioners regarding the Company’s proposed ESP, as filed in these proceedings. For purposes of this Interrogatory, “identify” means to provide the (1) name of each Commissioner with whom PWC has communicated; (2) the date(s) on which each communication occurred; and (3) the name of each other person present during the communication.

**RESPONSE:** Not applicable.

12. Identify all communications that PWC has had with PUCO Commission Staff regarding the Company's proposed ESP, as filed in these proceedings. For purposes of this Interrogatory, "identify" means to provide the (1) name of each Commissioner Staff member with whom PWC has communicated; (2) the date(s) on which each communication occurred; and (3) the name of each other person present during the communication.

**RESPONSE:** Not applicable.

13. Please state whether there are any agreements between PWC and any Intervening Party to the above-captioned proceedings, or any member or affiliate of an Intervening Party to the proceeding, that concern said proceedings. "Agreements" mean written or oral terms agreed upon by the participants and include, but are not limited to, protective agreements, confidentiality agreements, joint defense agreements, agreements to support or oppose any item or position, and any other commitments made among PWC and any Intervening Party. For purposes of this Interrogatory, "intervening party" includes any party to have filed a motion to intervene in the above-captioned proceedings. To the extent that PWC contends that any such documents are privileged, please provide a privilege log for same.

**RESPONSE:** PWC objects to this Interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence and seeks information that is protected by the attorney work product and/or attorney-client privileges. Without waiving these objections, PWC has entered into no such agreement.

14. If the answer to Interrogatory No. 13, above, is in the affirmative, please identify each agreement and the other parties to same. To the extent that PWC contends that any such documents are privileged, please provide a privilege log for same.

**RESPONSE:** Not applicable.

15. Please state whether there are any agreements between PWC and any entity exhibiting interest in the above-captioned proceedings, or any member or affiliate of an entity exhibiting interest to the proceeding, that concern said proceeding. "Agreements" mean written or oral terms agreed upon by the participants and include, but are not limited to, protective agreements, confidentiality agreements, joint defense agreements, agreements to support or oppose any item or position, and any other commitments made among PWC and any entity exhibiting interest in the above-captioned proceedings. For purposes of this Interrogatory, "entity exhibiting interest" includes any party that has not filed a motion to intervene in the above-captioned proceedings. To the extent that PWC contends that any such documents are privileged, please provide a privilege log for same.

**RESPONSE:** PWC objects to this Interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence and seeks information that is protected by the attorney work product and/or attorney-client privileges. Without waiving these objections, PWC has entered into no such agreement.

16. If the answer to Interrogatory No. 15, above, is in the affirmative, please identify each agreement and the other parties to same. To the extent that PWC contends that any such documents are privileged, please provide a privilege log for same.

**RESPONSE:** Not applicable.

17. State whether any long-term forecasts of wholesale energy prices have been prepared by or on behalf of the PWC within the last twenty-four months. For purposes of this Interrogatory, "long-term" means a period of at least, but not limited to, three years. To the extent that PWC contends that any such documents are privileged, please provide a privilege log for same.

**RESPONSE:** PWC objects to this Interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence and seeks information that is protected by the attorney work product and/or attorney-client privileges. Without waiving these objections, PWC nor anyone on its behalf has prepared such forecasts...

18. State whether any long-term forecasts of the wholesale capacity prices have been prepared by or on behalf of PWC within the last twenty-four months. For purposes of this Interrogatory, “long term” means a period of at least, but not limited to, three years. To the extent that PWC contends that any such documents are privileged, please provide a privilege log for same.

**RESPONSE:** PWC objects to this Interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence and seeks information that is protected by the attorney work product and/or attorney-client privileges. Without waiving these objections, no such forecasts have been prepared.

19. Please state whether you agree to supplement your responses to these Interrogatories and Document Requests.

**RESPONSE:** PWC agrees to supplement its responses to the extent that relevant information or documents become available that are not subject to an objection or privilege.

#### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. Produce all forecasts of the wholesale energy market in the possession, custody, or control of PWC, regardless of the person or entity to have prepared said forecast.

**RESPONSE:** See response to Interrogatory No. 17.

2. Produce all forecasts of the wholesale capacity market in the possession, custody, or control of PWC, regardless of the person or entity to have prepared said forecast.

**RESPONSE:** See response to Interrogatory No. 18.

3. Any and all documents identified or referenced in response to any of the foregoing Interrogatories.

**RESPONSE:** Not applicable.

4. Any and all documents that contain any information used, reviewed, or referenced in preparing PWC’s responses to any of the foregoing Interrogatories.

**RESPONSE:** Not applicable.

5. Any and all documents that PWC may introduce as exhibits or use for purposes of witness examination at any hearing related to the above-captioned matter.

**RESPONSE:** PWC objects to this Interrogatory because it seeks information that is protected by the attorney work product and/or attorney-client privileges. Without waiving these objections, has not identified any responsive documents.

6. Any and all documents relating to the testimony of any of PWC's witnesses and/or expert witnesses including, but not limited to, any and all *curricula vitae*, reports, papers, statements, notes, other documents, and any correspondence, communications, or other documents exchanged between PWC and the expert.

**RESPONSE:** See Response to Interrogatory No. 2.

7. Any and all contracts for services between PWC and any expert retained or consulted to provide opinions, testimony, evidence, or analysis in relation to the above-captioned proceedings.

**RESPONSE:** See responses to Interrogatories No. 2 and 4.

8. Please provide copies of any and all documents, notes, presentations, and correspondence (including but not limited to, letters, emails, telephone transcripts, etc.) between PWC and any of the Intervening Parties, between January 1, 2013, and the present date regarding any or all of the issues raised in the above-captioned proceedings and/or the procedural posture of these proceedings. For purposes of this Document Request, "Intervening Party" means any party to have filed a motion to intervene in the captioned proceedings. To the extent that PWC contends that any such document is privileged, please provide a privilege log for same.

**RESPONSE:** PWC objects to this Interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence and seeks information that is protected by the attorney work product and/or attorney-client privileges. Without waiving these objections, PWC maintains no such compilation of records of its interactions or communications with other parties.



9. Please provide copies of any and all documents, notes, presentations, and correspondence (including but not limited to, letters, emails, telephone transcripts, etc.) between PWC and any entity expressing interest in these proceedings, between January 1, 2013, and the present date regarding any or all of the issues raised in the above-captioned proceedings, including the procedural posture of same. For purposes of this Document Request, “Entity Expressing Interest” means any party that has not filed a motion to intervene in the captioned proceedings. To the extent that PWC contends that any such document is privileged, please provide a privilege log for same.

**RESPONSE:** PWC objects to this Interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence and seeks information that is protected by the attorney work product and/or attorney-client privileges. Without waiving these objections, PWC maintains no such compilation of records of its interactions or communications with any entity expressing interest in these proceedings.

10. Please provide copies of any and all documents reflecting communications (including but not limited to, letters, emails, telephone transcripts, etc.) exchanged, shared and/or exchanged between PWC and PUCO Commissioners, between January 1, 2013, and the present date regarding any or all of the issues raised in the above-captioned proceedings. To the extent that PWC contends that any such document is privileged, please provide a privilege log for same.

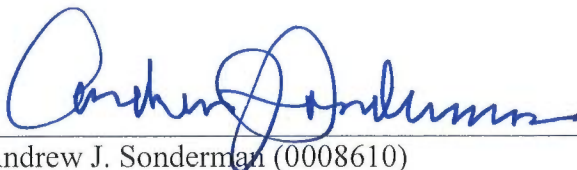
**RESPONSE:** See response to Interrogatory No. 11.

11. Please provide copies of any and all documents reflecting communications (including but not limited to, letters, emails, telephone transcripts, etc.) exchanged, shared and/or exchanged between PWC and PUCO Commission Staff, between January 1, 2013, and the present date regarding any or all of the issues raised in the above-captioned

proceedings. To the extent that PWC contends that any such document is privileged, please provide a privilege log for same.

**RESPONSE:** See Response to Interrogatory No. 12.

Respectfully submitted,

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

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Counsel For People Working Cooperatively, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served on the following parties this 6<sup>th</sup> day of August, 2014 by regular U. S. Mail, overnight delivery or electronic delivery.

  
Andrew J. Sonderman

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

**Commission of Ohio Docketing Information System on**

**8/6/2014 3:23:25 PM**

**in**

**Case No(s). 14-0841-EL-SSO, 14-0842-EL-ATA**

Summary: Response Responses of People Working Cooperatively, Inc. to the First Set of Interrogatories and Requests for Production of Documents propounded by Duke Energy Ohio electronically filed by Mr. Andrew J Sonderman on behalf of People Working Cooperatively, inc.