

FILE

PUCO EXHIBIT FILING

Date of Hearing: 11/10/14

Case No. 14-841-EL-SSO/14-842-EL-ATA

PUCO Case Caption: 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 an Electric Security Plan, Accounting Modifications  
and Tariffs for Generation and In the Matter of the Application  
of Duke Energy Ohio for Authority to Amend its Certified Supply Contract  
P.U.C.O. No. 20.

List of exhibits being filed:

Volume IV

IGS II

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Reporter's Signature: Karen Sue Gibson  
Date Submitted: 11/24/14

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 : Case No. 14-841-EL-SSO  
Code, in the Form of an :  
Electric Security Plan, :  
Accounting Modifications :  
and Tariffs for Generation:  
Service. :

- - -

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

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PROCEEDINGS

before Ms. Christine M.T. Pirik and Mr. Nick Walstra,  
Attorney Examiners, at the Public Utilities  
Commission of Ohio, 180 East Broad Street, Room 11-A,  
Columbus, Ohio, called at 9:00 a.m. on Monday,  
November 10, 2014.

- - -

VOLUME XIV

- - -

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**Duke Energy Ohio**  
**Case No. 14-841-EL-SSO, 14-842-EL-ATA**  
**RESA First Set Interrogatories**  
**Date Received: August 1, 2014**

**RESA-INT-01-040**

**REQUEST:**

Referencing the testimony of Duke Witness Jones at page 8, lines 12-16, does Duke currently bill for and collect the non-commodity charges described by Witness Jones?

**RESPONSE:** No.

**PERSON RESPONSIBLE:** Daniel L. Jones

**Duke Energy Ohio**  
**Case No. 14-841-EL-SSO, 14-842-EL-ATA**  
**RESA First Set Interrogatories**  
**Date Received: August 1, 2014**

**RESA-INT-01-041**

**REQUEST:**

Referencing the testimony of Duke witness Jones at page 8, lines 6-16, will Duke still permit a CRES provider to put line item charges on its bills for non-commodity charges? If so, please explain how Duke will invoice via the consolidated bill, collect, and remit payment for the non-commodity line items to CRES providers outside of the purchase of receivables program.

**RESPONSE:**

Duke Energy Ohio has never permitted CRES providers to put line item charges on its bills for non-commodity charges.

**PERSON RESPONSIBLE:** Daniel L. Jones

**Duke Energy Ohio**  
**Case No. 14-841-EL-SSO, 14-842-EL-ATA**  
**RESA First Set Interrogatories**  
**Date Received: August 1, 2014**

**RESA-INT-01-042**

**REQUEST:**

Referencing the testimony of Duke Witness Jones at page 8, lines 6-16, and assuming Witness Jones' proposal is accepted, beginning on the effective date of the proposed ESP, would Duke refuse to collect an early termination fee or other non-commodity charge for a CRES provider even if that fee or charge was agreed to by the customer prior to the effective date of the ESP or a Commission Order in this case?

**RESPONSE:**

See the response to RESA-INT-01-042.

**PERSON RESPONSIBLE:** Daniel L. Jones

**Duke Energy Ohio**  
**Case No. 14-841-EL-SSO, 14-842-EL-ATA**  
**RESA First Set Interrogatories**  
**Date Received: August 1, 2014**

**RESA-INT-01-043**

**REQUEST:**

Referencing the testimony of Duke witness Jones at page 8, lines 6-16 and the Commission's June 11, 2014 Finding and Order at 6-7 in Case No. 14-689-EL-UNC, will Duke bill for and collect from standard service offer customers any non-commodity charges (as defined in lines 12-16) for fees or charges related to the services approved in the June 11, 2014 Finding and Order provided by Duke? If the answer is yes, will Duke also provide the same billing and collection services for CRES providers that provide the same or similar services, on an equal basis as Duke?

**RESPONSE:**

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is both irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Interrogatory addresses issues that have been recently resolved by the Commission in Case No. 14-689-EL-UNC and thus must be viewed as an untimely and improper collateral attack on that decision.

**PERSON RESPONSIBLE:** Daniel L. Jones