

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Application of Duke)
Energy Ohio, Inc. to File for Tariff) Case No. 14-2209-EL-ATA
Approval)

COMMENTS OF IGS ENERGY

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I. INTRODUCTION

On March 26, 2014, the Public Utilities Commission of Ohio (“Commission”) issued a Finding and Order and policy statement in support of reforming utility practices to enable the competitive market to provide customers time-of-use products and services that promote efficient energy usage.¹ To that end, the Commission directed all electric distribution utilities to file a tariff specifying terms and conditions for the transfer of interval data, as well as proposed formulas for calculating customers’ individual network service peak load (“NSPL”) and peak load contribution (“PLCs”).² This proceeding relates to Duke Energy Ohio’s recent filing, which does not comport with the Commission’s directive.

In its required tariff filing, Duke has attempted to kick the can further down the road, stating, “[m]atters related to providing granular residential interval CEUD to CRES providers will require significant investment and will require additional stakeholder development”³ The Commission should decline Duke’s request. Every customer in Duke’s service territory has a smart meter. But no customer in Duke’s service territory can receive smart-meter enabled products from a competitive retail electric service (“CRES”) provider. This inequity is a direct consequence of Duke’s failure to invest in necessary meter data management systems—as it was required to pursuant to a stipulation and recommendation in its second electric security plan. While Duke was

¹ *In the Matter of the Commission’s Investigation of Ohio’s Retail Electric Service Market*, Case. No. 12-3151-EL-COI Finding and Order at 36 (Mar. 26, 2014) (hereinafter “*RMI Case*” or “*RMI Order*”); *RMI Case*, Entry on Rehearing at 19 (May 21, 2014).

² *Id.*

³ Application at 2.

more than willing to stipulate to receive \$330 million in above-market revenues in that case, it has refused to satisfy its end of the bargain.

Duke's refusal to satisfy its stipulation obligations is a symptom of a larger problem: Duke has failed to take the necessary steps to allow CRES providers to offer customers smart-meter enabled products and services that will allow for the more efficient use of energy. For example, while Duke has access to hourly interval data for each of its customers, Duke continues to calculate each customer's PLC and NSPL based upon profiled usage. Likewise, Duke calculates the hourly amount of energy that each CRES provider must deliver (and performs bill settlements) for each of its customers based upon customer load profiles rather than actual energy usage in each hour. As discussed further below in these comments, these practices prevent customers from unlocking the potential of their smart meters through innovative products and services.

Therefore, Interstate Gas Supply, Inc. ("IGS") recommends that the Commission direct Duke to implement the following:

- Immediately invest in the necessary meter data management systems necessary to allow CRES providers to receive customer interval data through an electronic data interchange ("EDI");
- Transition to calculating customers' peak load contribution ("PLC") based upon their actual usage;
- Transition to calculating NSPLs based upon actual peak usage on the Duke system during the coincident peak;
- Perform CRES provider settlements based upon actual meter data.

As discussed below, these measures are necessary to continue development of the market in Duke's service territory.

II. BACKGROUND AND COMMENTS

A. Duke must provide CRES providers interval data

The Commission authorized Duke to implement SmartGrid technology in its service territory in Duke's first electric security plan case.⁴ In each successive year, Duke has expanded its SmartGrid program: Duke has installed thousands of AMI smart meters and developed time-of-use tariffs and programs for its standard service offer ("SSO") customers. In fact, Duke is the first Ohio utility to provide all of its customers with a smart meter. In the process, Duke has collected hundreds of millions of dollars from its distribution customers.

At the same time, Duke has developed several time-of-use products that are available to only customers that remain on Duke's SSO.⁵ While Duke has rapidly expanded its rate base and its own time-of-use offerings, Duke has not invested in a meter data management system that would allow CRES providers to access customers' interval data—information that is critically necessary to enable CRES providers to offer time-of-use products and services to customers.

Initially, Duke has failed to make interval data available, despite its commitments to do so. In a stipulation and recommendation that Duke entered into in its second ESP case 11-3549-EL-SSO ("Stipulation"), Duke agreed to develop a web portal to electronically submit interval data to CRES providers:

Duke Energy Ohio agrees to work with interested CRES providers and Commission Staff to jointly develop a secure, ***web-based system that will provide electronic access to key customer usage and account***

⁴ *In the Matter of the Application of Duke Energy Ohio for Approval of an Electric Security Plan*, Case Nos. 08-920-EL-SSO, *et al.*, Opinion and Order (Dec. 17, 2008).

⁵ See Duke Energy Unbundled Retail Standard Tariff: Rate TD-2012 (Time-of-Day); Rate TD-13 (Time-of-Day); Rider PTR_3 (Peak Time Rebate).

data that can be accessed via a secure, supplier website that presents the following data and information in a format that can be automatically retrieved The following data and information, in a format that can be automatically retrieved, will be the subject of the web-based system:

- Account Numbers
- Meter numbers
- Names
- Service Address, including zip codes
- Billing Address, including zip code
- Email address (if available)
- Meter Reading Cycle Dates
- Meter Types
- Indicator if Customer has an Interval Meter
- Rate Code Indicator
- Load Profile Group Indicators
- PLC and NSPL values (capacity and transmission obligations)
- 24 months of consumption data (in kWh) by billing period including
- 24 months of demand data (in kW)
- ***24 months of interval data***
- Indicator if SSO customer
- Identifier as to whether customer is participating in the Budget Billing Plan.⁶

Moreover, Duke committed to provide this data through a web portal by June 1, 2014:

Duke Energy Ohio shall use commercially reasonable efforts to add to the existing web system the Load Profile Group Indicators and the customer service addresses by March 1, 2012, but shall complete such additions no later than June 1, 2012. ***Duke Energy Ohio shall make a commercially reasonable effort to add the other items by June 1, 2013, but agrees to complete the additional data items no later than June 1, 2014,*** and will work with Commission Staff and interested CRES providers to stage the implementation of various portions of this website, as possible

Duke Energy Ohio shall recover the actual costs to develop said web-based system, ***recovery not to exceed \$500,000***, on a non-bypassable basis. Duke Energy Ohio shall be permitted to create a regulatory asset for purposes of recording said costs for future recovery through electric distribution rates.⁷

⁶ Stipulation at 33-34 (emphasis added).

⁷ Stipulation at 34-35 (emphasis added).

It should be noted that the Stipulation indicates that the provision of customer data to CRES providers is subject to customer privacy rules. But that does not mean that Duke can unilaterally ignore its obligation to make residential interval data available to CRES providers that are able to get the required customer authorizations required under the Commission's rules.⁸ At the time the Stipulation was entered into there were Commission rules relating to the privacy of customer energy usage data. Those rules have since been modified. Effective December 1, 2014 new rules set forth in revised OAC 4901:1-10-24 govern disclosure of customer energy usage data. But, Duke has simply failed to develop systems that are capable of providing the residential customer usage data required in the Stipulation. Thus, a CRES provider cannot receive the AMI customer data required in the Stipulation *even if the CRES fully complies with the requirements set forth in revised 4901:1-10-24.*

Finally, Duke agreed in the stipulation to make interval data available to all customers on a competitively neutral basis:

All energy efficiency programs and rebates shall be made available at the same terms and conditions to customers, regardless of whether they purchase generation service from a CRES provider or Duke Energy Ohio. ***Duke Energy Ohio shall maintain its policy to make SmartGrid meters and data available to all customers on a competitively neutral basis and without regard to their status as a shopping or non-shopping customer.***⁹

Further reinforcing its commitment, Duke entered into a stipulation in 2012, agreeing to "provide CRES providers the necessary billing system functionality to offer CRES

⁸ Effective December 1, 2014 rules were put into place that govern disclosure of customer energy usage data.

⁹ *Id.* at 37 (emphasis added).

customers time differentiated rates consistent with its existing supplier tariff beginning January 1, 2013.”¹⁰

In Duke’s 2012 Application to adjust Rider DR-IM, Duke lead CRES providers and the Commission to believe that its web portal would be available and capable of transferring residential customers’ interval data to CRES providers by June 1, 2014. In that case, the Commission’s Opinion and Order noted that Duke submitted sworn testimony indicating that its systems cannot currently provide interval data to CRES providers, but that functionality will be available by June 1, 2014:

Mr. Schneider states that, pursuant to the stipulation In re Application Duke Energy Ohio's, Case No. 11-3549-EL-SSO, et al., ***Duke is enhancing the existing web portal (CRES Portal) that will improve interaction with CRES providers and allow online access to customer data with proper authorization.*** Mr. Schneider states that Duke is currently finalizing the internet technology required to allow this enhancement to the CRES Portal to be available and that some of the details of interacting with CRES providers, including appropriate authorization, are still being developed by the Commission in a rulemaking proceeding. ***He points out that interval customer usage data will be available with the CRES Portal enhancements on June 1, 2014. These data will enable Duke to provide interval, customer-usage AMI data from both MDM systems to CRES providers via the CRES Portal,*** with an indicator if the AMI data are not billing-quality, interval, customer usage AMI data that have been processed through VEE.¹¹

If the laundry list of Duke’s commitments identified above are not convincing, in its Finding and Order in Case No. 12-3151-EL-COI, the Commission further reinforced

¹⁰ In the Matter of the Application of Duke Energy Ohio, Inc. to Adjust and Set Its Gas and Electric Recovery Rate for 2010 SmartGrid Costs Under Riders AU and Rider DR-IM and Mid-deployment Review of AMI/SmartGrid Program, Case No. 10-2326-GE-RDR, Stipulation at 11.

¹¹ 2012 Grid Modernization Case, Opinion and Order at 15 (Apr. 9, 2014) (emphasis added); see also 2012 Grid Modernization Case, Supplemental Direct Testimony of Donald Schneider at 5-6 (Jan. 29, 2014).

the importance of Duke (and other utilities) providing interval data to CRES providers.¹² Indeed, Duke and each other utility was required to propose a tariff setting forth terms and conditions for transferring such information by November 21, 2014.¹³

On December 14, 2014, Duke filed an application in this proceeding allegedly to comply with the RMI Order. Despite the Commission's RMI Order, stipulation obligations, and public representations, Duke has not made smart meter interval data available. Instead, Duke claims that it "has website and Electronic Data Interchange (EDI) system capabilities to share interval data with CRES providers for approximately 4,000 traditional *nonresidential* Interval Data Recorders (IDRs). These meters have traditionally been installed at large commercial and industrial facilities."¹⁴

IDR interval data, however, has absolutely nothing to do with Duke's AMI deployment. IDR meters were around before Duke's Smart Grid initiative, and CRES providers had the capability of getting access to the largest customers IDR interval meter data before Duke spent hundreds of millions of dollars on AMI meter deployment. Therefore, it cannot be reasonably claimed that Duke has somehow met its obligations and commitments to provide CRES providers with interval data, when all Duke has really proposed is allowed CRES providers to have access to a very small amount of customers interval data that was already available before AMI meters were deployed.

Although Duke previously committed to making interval data available by June 1, 2014—costs not to exceed \$500,000—Duke now claims that "[m]atters related to

¹² *RMI Case*, Finding and Order at 36 (Mar. 26, 2014); *RMI Case*, Entry on Rehearing at 19 (May 21, 2014).

¹³ *RMI Case*, Finding and Order at 36.

¹⁴ Application at 1.

providing *granular residential interval* CEUD to CRES providers will require significant investment and will require additional stakeholder development in a designated working group with Commission Staff participation.”¹⁵

The Commission should hold Duke to its stipulation obligations and end Duke’s perpetual foot dragging. The Commission has already rejected a similar Duke attempt to avoid its ESP stipulation obligation in Case No. 12-2400. In that case, the Commission forcefully stated, “[t]he bottom line is: ***Duke agreed to the pricing and compensation for capacity service in the ESP Stipulation and Duke should not, at this late date, be permitted to renege on the package deal approved by the Commission.***”¹⁶ The Commission further noted that “there is no dispute that the doctrine of res judicata, through the form of collateral estoppel, precludes the relitigation in a second action of an issue that has been actually and necessarily determined in a prior action.”¹⁷ The Commission’s holdings related to capacity-related commitments in the ESP Stipulation are equally applicable here.

Duke committed to provide interval data to CRES providers through its web portal by June 1, 2014. And it agreed to do so at a cost of no greater than \$500,000. Thus, Duke’s claim that it will cost more money is completely irrelevant to this case—that issue has already been decided in a prior case. A deal is a deal. Duke received over \$300 million dollars; it should not be allowed to take the benefits of the deal and ignore its obligations. Therefore, IGS urges the Commission to direct Duke to

¹⁵ Application at 2.

¹⁶ In the Matter of the Application of Duke Energy Ohio, Inc., for the Establishment of a Charge Pursuant to Section 4909.18, Revised Code, Case Nos. 12-2400-EL-UNC, *et al.*, Opinion and Order at 31 (emphasis added).

¹⁷ *Id.* at 36.

immediately pursue measures to make bill quality interval data available to CRES providers. IGS recommends that the Commission adopt the recommendations and deliverable deadlines set forth in the Comments of the Retail Energy Supply Association:

- Within 30 days of Order in this case: Provide to CRES providers 12 and 24 months of historical, billing quality, hourly interval data via its web portal for any customer who authorizes the CRES provider such access.¹⁸
- Within 3 months of Order in this case: Provide to CRES providers (with proper customer Letters of Authorization, as per Commission rules) billable quality interval data in one-hour increments (hourly intervals) on a monthly basis via EDI at least three business days before the customer bills or a time period no shorter than already provided to CRES providers using bill-ready utility-consolidated billing.
- Within 6 months of Order in this case: (A) Non-billing quality (AMI meter data) in hourly intervals via an FTP file on a next-day, daily basis for any customer of a CRES provider with a verified AMI meter who authorizes the CRES provider such access; and (B) Proposed budget as well as listing of benchmarks/tasks with deadlines for the capabilities listed in the chart contained in these comments and designated for Phase 2 and Phase 3 capabilities.

Explicit deadlines are necessary to ensure that Duke complies with the Commission's directive.

B. Duke should calculate PLCs and NSPLs based upon actual usage

PJM Interconnection ("PJM") calculates capacity obligations based upon contributions to the system-wide peak demand during the five highest hours of usage. This is commonly referred to as a customer's PLC, which determines the amount of capacity a CRES provider must procure for that customer. Moreover, PJM calculates

¹⁸ Duke explicitly committed to giving CRES providers this information in *In the Matter of the Application of Duke Energy Ohio Inc. 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 Service*, Case Nos. 11-3549-EL-SSO.

NSPLs based upon a customer's usage during the peak demand hour on Duke's transmission system. Based upon information and belief, Duke calculates each customer PLC and NSPL based upon a profile rather than the customer's actual energy usage.¹⁹ To the extent that Duke disagrees, it should explain how it calculates residential customers' PLCs and NSPLs. Duke should transition toward calculating its customers' PLCs and NSPLs based upon their actual usage.

CRES providers have the ability to offer customers products and services that will reduce their usage during peak demand hours (usually between the hours of 4:00 pm and 6:00 pm). But customers will not get "credit" for their efforts under Duke's current methodologies. Thus, customers have little incentive to use energy efficiently

¹⁹ In response to discovery, Duke indicated that it will calculate PLCs as follows:

The PLC value for any residential customer is calculated using the appropriate load profile segment assigned to the account and the five hourly coincident P JM peaks. The load profile segments assigned to the residential class are RSO (default segment - new account or account without enough history to determine winter kWh), RS5 (winter month kWh less than 1,190 kWh), and RS6 (winter month kWh greater than or equal to 1,190 kWh). Duke Energy Ohio posts the annual hourly weather response functions on its customer choice website used to convert the annual kWh of monthly metered accounts to hourly usage on an annual basis. After determining the hourly usage of each account, Duke Energy Ohio determines the average of the five P JM coincident peak hours by account, inflates the average by the appropriate distribution and transmission losses, applies the appropriate unaccounted for energy (UFE), and adjusts the resulting value with a weather normalization factor. This calculation methodology results in the assignment of unique PLC values for each residential account.

This methodology, however, differs from the calculation of a PLC for a customer with an Interval Data Recorder (emphasis added):

The PLC values for accounts with traditional IDRs (approximately 4,300 of the 700,000 accounts within Duke Energy Ohio) **are calculated based on the actual hourly data as recorded by the meter.** Duke Energy Ohio determines the average of the five PJM coincident peak hours for each account metered with a traditional IDR, inflates the average by the appropriate distribution and transmission losses, and adjusts the resulting value with a weather normalization factor. This calculation methodology, once again, results in the assignment of unique PLC values for each non-residential account having a traditional IDR.

Unless the residential PLC is based upon a profiled calculation, there is no reason to calculate the PLCs of these customers differently. Thus, it appears that Duke calculates residential customer PLCs based upon a combination of total usage and a load profile. Duke's response is attached as IGS Ex. 1.

under the current paradigm. For example, a customer that shifts their energy usage to off-peak times will have the same PLC or NSPL as a customer that runs their air conditioner at full blast. In effect, the customer that uses their energy in an efficient manner will subsidize less efficient customers.

Given that Duke now has access to its customer's usage levels during peak hours of usage, the Commission should direct Duke to end its practice of profiling. Accordingly, IGS recommends that the Commission direct Duke to convene a collaborative to modify its methodology for calculating PLCs and NSPLs.

Moreover, the Commission should establish deadlines for adopting methodologies for both PLCs and NSPLs. The Commission should require Duke to implement new methodologies based upon actual customer usage no later than November 30, 2015 to ensure that CRES providers can calculate customers' NSPLs and capacity obligations sufficiently in advance of new network service and capacity rates going into effect.

C. Duke should perform energy-related settlements based upon actual interval data hourly usage

CRES providers deliver energy to serve customers in Duke's service territory twenty-four hours a day and seven days a week. Based upon information and belief, Duke does not use non-commercial customers' actual energy usage in each hour for purposes of determining the quantity of energy a CRES provider must deliver in each hour. Like PLCs and NSPLs, Duke profiles customers' energy usage during each hour of the day. This process undermines the value of smart meter-enabled products and services.

If a CRES provider provides a customer a time-of-use rate or direct load control product, a customer's usage may decrease during times of peak usage. Under Duke's current settlement process, the CRES provider will be required to deliver the same amount of energy to the grid during peak hours. In other words, the CRES provider and customer will not receive credit for reducing usage at times when the wholesale market places a higher price on energy. Duke has access to customer usage levels during each hour. Thus, the Commission should direct Duke to modify its settlement system so that it is consistent with the actual energy usage at the meter level in all hours of the day.

III. CONCLUSION

For the reasons stated herein, IGS recommends that the Commission direct Duke to implement the following:

- Immediately invest in the necessary meter data management systems necessary to allow CRES providers to receive customer interval data through EDI;
- Transition to calculating each customer's PLC based upon their actual usage;
- Transition to calculating each customer's NSPL based upon actual peak usage on the Duke system during the coincident peak;
- Perform CRES provider settlements based upon actual meter data.

As discussed below, these measures are necessary to continue development of the market in Duke's service territory.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Comments of IGS Energy* was served this 6th day of March 2015 via electronic mail upon the following:

/s/ Joseph Olikier

Joseph Olikier

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Duke Energy Ohio
Case No. 14-2209-EL-ATA
Direct Energy First Set of Interrogatories
Date Received: February 12, 2015

DE-INT-01-012

REQUEST:

Please describe how Duke calculates the peak load contribution ("PLC") for customers taking service on a Distribution Voltage Service rate. Please explain how the calculation may differ for service between any of Tariff Sheets 40 through 49 (respectively).

- a. Please also indicate, if the PLC calculations for Distribution Voltage Service rate customers are assigned based on individual usage peaks, which customers on Distribution Voltage Service rate (by Tariff) are assigned these types of individual PLC calculations.

RESPONSE:

Objection. This Interrogatory is overly broad and unduly burdensome, given that it seeks information that is not reflective of the actual filing made by the Company and, thus, is neither relevant to this proceeding nor likely to lead to the discovery of admissible evidence in this proceeding. Objecting further, to the extent that this Interrogatory calls for the disclosure of documents that include or reference legal advice or that include or reference efforts to provide information needed to facilitate the rendition of legal advice, it impermissibly seeks information that, on the basis of attorney-client privilege and O.A.C. Rule 4901-1-16(B), is not subject to disclosure. Objecting further, this Interrogatory impermissibly calls for the disclosure of information that is proprietary, trade secret information. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio does not calculate PLCs at the rate class level, only at the account level.

The PLC value for any residential customer is calculated using the appropriate load profile segment assigned to the account and the five hourly coincident PJM peaks. The load profile segments assigned to the residential class are RS0 (default segment – new account or account without enough history to determine winter kWh), RS5 (winter month kWh less than 1,190 kWh), and RS6 (winter month kWh greater than or equal to 1,190 kWh). Duke Energy Ohio posts the annual hourly weather response functions on its customer choice website used to convert the annual kWh of monthly metered accounts to hourly usage on an annual basis. After determining the hourly usage of each account, Duke Energy Ohio determines the average of the five PJM coincident peak hours by account, inflates the average by the appropriate distribution and transmission losses, applies the appropriate unaccounted for energy (UFE), and adjusts the resulting value with a weather normalization factor. This calculation methodology results in the assignment of unique PLC values for each residential account.

The PLC value for any non-residential customer whose energy usage is not metered with a traditional Interval Data Recorder (IDR) is calculated using the appropriate load profile segment assigned to the account and the five hourly coincident PJM peaks. The load profile segments assigned to non-residential customers are DM0 (for all accounts billed on Rate DM), DS4 (demand less than 100 kW), and DS5 (demand greater than or equal to 100 kW). Duke Energy Ohio posts the annual hourly weather response functions on its customer choice website used to convert the annual kWh of these monthly metered accounts to hourly usage on an annual basis. After determining the hourly usage of the account, Duke Energy Ohio determines the average of the five PJM coincident peak hours by account, inflates the average by the appropriate distribution and transmission losses, applies the appropriate unaccounted for energy (UFE), and adjusts the resulting value with a weather normalization factor. This calculation methodology results in the assignment of unique PLC values for each non-residential account whose energy usage is not measured by a traditional IDR.

The PLC values for accounts with traditional IDRs (approximately 4,300 of the 700,000 accounts within Duke Energy Ohio) are calculated based on the actual hourly data as recorded by the meter. Duke Energy Ohio determines the average of the five PJM coincident peak hours for each account metered with a traditional IDR, inflates the average by the appropriate distribution and transmission losses, and adjusts the resulting value with a weather normalization factor. This calculation methodology, once again, results in the assignment of unique PLC values for each non-residential account having a traditional IDR.

PERSON RESPONSIBLE: As to Objection- Legal
As to response- Daniel L. Jones

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Case No(s). 14-2209-EL-ATA

Summary: Comments of IGS Energy electronically filed by Mr. Joseph E. Olier on behalf of IGS Energy