

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke : Case No. 14-2209-EL-ATA  
Energy Ohio, Inc., for Tariff Approval :  
Regarding Customer Energy Usage Data. :

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**REPLY COMMENTS  
SUBMITTED ON BEHALF OF THE STAFF OF  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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The initial comments filed by the various parties in this case have been helpful in developing a broad scope of issues associated with competitive retail electric service (CRES) providers' access to smart meter data from Duke Energy Ohio, Inc. (the Company or Duke). Staff recognizes that customer energy usage data (CEUD) must be exchanged between the Company and the CRES providers in an appropriate format, quality, and frequency before smart meter enabled products and services can be developed in Ohio's retail electric market. However, Staff believes there is still insufficient information on the record for the Commission to issue an order in this case. As such, Staff

recommends that a procedural schedule be established, including an opportunity for discovery, intervenor testimony, and a hearing. Staff believes the Company should explicitly address the following items in its testimony:<sup>1</sup>

- The appropriate definition of “Interval Meter,” as proposed in the Company’s application;
- The Company’s ability (or inability) to satisfy the obligations identified in the Initial Comments, including but not limited to: (1) the Company’s ability to meet the commitment to provide access to 24 months of historical smart meter data through the supplier web portal<sup>2</sup> and (2) the Company’s ability to offer Rate-Ready billing for time differentiated rates on behalf of the CRES providers<sup>3</sup>;
- An estimate of the costs, justification for costs, and timeline for implementing: (1) phase one of Direct Energy’s proposed “system preferences” matrix and (2) the

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<sup>1</sup> Staff does not intend for this list of items to be exhaustive. It may be necessary for the Company to address additional items to resolve all of the issues in this case.

<sup>2</sup> *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 Service*, Case No. 11-3549-EL-SSO (Stipulation and Recommendation at 33-34) (Oct. 24, 2011).

<sup>3</sup> *In the Matter of the Application of Duke Energy Ohio, Inc. to Adjust and Set Its Gas and Electric Recovery Under Riders AU and Rider DR-IM and Mid-deployment Review of AML/SmartGrid Program*, Case No. 10-2326-GE-RDR (Stipulation and Recommendation at 11) (Feb. 24, 2012).

15-minute interval frequency components of phase two of Direct Energy's proposed "system preferences" matrix; and

- The appropriate recovery mechanism for costs associated with providing smart meter data access not including the \$500,000 regulatory asset established in Case No. 11-3549-EL-SSO.

Respectfully submitted,

**Michael DeWine**  
Ohio Attorney General

**William L. Wright**  
Section Chief

*/s/ Katie L. Johnson*

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**On behalf of the Staff of  
The Public Utilities Commission of Ohio**

## PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Comments** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, electronic mail, or hand-delivered, upon the following Parties of Record, this 27<sup>th</sup> day of March, 2015.

/s/ Katie L. Johnson

**Katie L. Johnson**

Assistant Attorney General

### Parties of Record:

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Summary: Reply Comments submitted by Assistant Attorney General Katie Johnson on behalf of the Staff of the Public Utilities Commission of Ohio. electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio