

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Complaint of Direct)	
Energy Business, LLC)	
)	
Complainant,)	
)	Case No. 14-1277-EL-CSS
v.)	
)	
Duke Energy Ohio, Inc.)	
)	
Respondent.)	

DIRECT PREPARED TESTIMONY OF ROBERT KENNELLY
ON BEHALF OF DIRECT ENERGY BUSINESS, LLC

CONFIDENTIAL INFORMATION REDACTED
PUBLIC VERSION

April 14, 2015

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1 **QUALIFICATION OF THE WITNESS**

2 **Q1. Please state your name and business address.**

3 **A1.** My name is Robert (Bob) Kennelly. My business address is 1001 Liberty Avenue,
4 Pittsburgh, PA 15222.

5
6 **Q2. By whom are you employed and in what capacity?**

7 **A2.** I am the Senior Revenue Assurance Analyst for Direct Energy Business, LLC (“DEB”).

8
9 **Q3. How long have you been employed by DEB?**

10 **A3.** I have been employed DEB since January 2013.

11
12 **Q4. Please explain the job responsibilities and duties in your current position.**

13 **A4.** My role at Direct Energy is to ensure that Direct Energy Business (DEB) has the systems,
14 processes and controls in place and functioning to ensure that we are invoicing our
15 customers timely, accurately and completely, based on the terms of their contract and in
16 accordance with regulatory guidelines. Sometimes that includes certain quality assurance
17 processes, or performing audits on controls, verifying calculations, or monitoring system
18 output.

19
20 **Q5. Please describe your educational background and relevant work experience prior to**
21 **joining DEB.**

22 **A5.** I have a BSBA in Accounting and a MBA from Robert Morris University. I am a
23 licensed Certified Public Accountant in Pennsylvania and a Chartered Global

1 management Accountant, as well as a member of the Pennsylvania Institute of Certified
2 Public Accountants and the American Institute of Certified Public Accountants.

3
4 Prior to joining DEB, I was a Regional Controller for Black Box Corporation (2004-
5 2012), where I was responsible for all accounting activities, compliance and internal
6 controls for various regions across the United States. Prior to Black Box, I worked as a
7 controller for various small businesses, and prior to that was an auditor in public
8 accounting and an internal auditor in banking.

9
10 **Q6. Have you ever testified before a regulatory agency?**

11 **A6.** No.

12
13 **Q7. What is the purpose of your testimony?**

14 **A7.** The purpose of my testimony is to explain the metering errors made by Duke Energy
15 Ohio (“Duke”) and the harm to DEB that led to this complaint proceeding.

16
17 **BACKGROUND**

18 **Q8. Can you provide an overview of the issue with Duke?**

19 **A8.** The issue between DEB and Duke revolves around Duke creating and sending erroneous
20 meter data to PJM Interconnection, LLC (“PJM”), causing DEB to be over-charged by
21 PJM for energy and related ancillary charges. The erroneous meter data and over-
22 charging continued from January 2013 through June 2013. This resulted in a [REDACTED]
23 impact on DEB’s cash flow at one point and DEB is still owed at least \$1.6 million. This

1 incident also damaged customer relations with SunCoke, the affected customer. Duke
2 acknowledged the metering errors and corrected the months of March 2013 through June
3 2013 via resettlements by PJM. January 2013 and February 2013 have not been
4 corrected.

5
6 **Q9. Please explain the DEB billing process.**

7 A9. Nationwide, DEB bills customers through one of three different billing methods: (i)
8 dual-billing (the customer receives an invoice from DEB for supplier charges and
9 receives an invoice from the utility for distribution charges); (ii) supplier consolidated
10 billing (the customer receives one invoice from DEB for both supplier charges and
11 distribution charges); utility consolidated billing (the customer receives one invoice from
12 the utility for DEB supplier charges and distribution charges). DEB utilizes dual-billing
13 and utility consolidated billing in the Duke territory. The billing process at DEB involves
14 receiving metered load data (usage) from the local distribution company (utility) and
15 applying rates, or price plans, that are stored in the DEB billing system to the usage data
16 for each individual customer account. Some customers, depending on their price plan
17 with DEB, require interval usage data on an hourly basis for billing purposes. Other
18 customers can be billed from summary usage data (on a monthly or meter-read cycle
19 basis). Most customers are billed at least monthly.

20
21 SunCoke was a new customer with DEB as January 4, 2013. The utility serving their
22 area is Duke. SunCoke signed a contract with DEB for a sophisticated price plan that
23 required interval usage data and was dual-billed. This type of product is intended for

1 large customers. It allows the customer to directly purchase large blocks of energy and
2 hedge their positions.

3
4 DEB is completely reliant on Duke to provide accurate meter data in order for DEB to
5 invoice its customers timely and accurately. In fact, receiving the usage from Duke via
6 EDI is what triggers DEB's systems to generate an invoice to the customer. Inaccurate
7 meter data from Duke (or any utility) will result in either the customer's invoice being
8 delayed, or the customer's invoice being incorrect. Both issues can have severe negative
9 effects on customer satisfaction and DEB's cash flow.

10
11 The settlement process at DEB involves receiving and paying invoices from the regional
12 transmission organization (RTO) for charges submitted to the RTO by local distribution
13 utilities for gross metered load within the utility's service territory (zone). Invoices from
14 the RTO are received and paid weekly, followed by a monthly summary invoice
15 representing total charges for a given calendar month. Payments cannot be withheld in
16 the case of disputed charges. It is normal for charges on the RTO invoice to "resettle"
17 (*i.e.*, be corrected) in subsequent months. Therefore, RTO settlements are not considered
18 to be final until four months after the close of the delivery month. Duke is a member of
19 the PJM RTO and submits DEB's gross metered load data to PJM. PJM invoices DEB
20 based on Duke's meter data. DEB has a history of timely payments to PJM.

21
22 **DUKE'S METERING ERRORS FOR DEB'S SUNCOKE LOAD**

23 **Q10. Please explain how DEB uncovered Duke's metering error.**

1 A10. Duke's metering errors were revealed by DEB's review of PJM's invoices to DEB and in
2 the process of billing SunCoke. Four months after the close of each delivery month ends,
3 DEB's finance team "actualizes" the month. Actualizing a month includes, among other
4 things, reconciling the difference between the forecasted load and the actual load billed
5 by the RTO (in this case PJM). On May 6, 2013, my department actualized January 2013
6 and noticed a [REDACTED] variance between DEB's expected load and the actual DEB load for
7 the Duke territory overall. At first, we suspected our billing system was not including all
8 the customers that Duke was including in their load total. However, we obtained a sync-
9 list (list of active accounts) from Duke and confirmed that we had the same accounts. A
10 further review of our billing metrics indicated that we billed the volume we expected to
11 bill in the Duke zone. However, the settlement data (*i.e.*, what we were charged by PJM
12 based on Duke's meter data) was significantly higher than in previous months. Further,
13 we discovered that almost all of the variance stemmed from purchases in the real-time
14 energy market, which results from actual load exceeding load scheduled in advance based
15 on DEB's forecasts. At that point, I decided to look closer at the PJM settlements data.
16
17 From May 6 through May 14, 2013, I performed an analysis aimed at determining the
18 source of the load spike for January 2013. After gathering and examining hourly meter
19 data provided by PJM, which is the same meter data that Duke submits to PJM, it was
20 clear that something happened on January 4, 2013 that caused DEB's load in the Duke
21 zone to almost [REDACTED]. The increase began at midnight going into January 4, 2013 and
22 continued at that relative level for the remainder of the month. Internally, we prepared
23 several graphs and charts to illustrate the dramatic spike in load being reported to PJM by

1 Duke. The spike in load simply was not reasonable for our business model (we would
2 have had to have [REDACTED] our entire customer portfolio in that market in one day). I
3 reached out to our team that handles key accounts to see if any new customers began
4 service in January 2013. The only one was SunCoke. DEB's service to SunCoke
5 commenced on January 4, 2013. SunCoke's expected volume was only [REDACTED] MWh per
6 month. However, the variance we were seeing was over [REDACTED] MWh per month.

7
8 **Q11. Did DEB contact Duke to try to understand the discrepancy?**

9 A11. On May 10, 2013, we contacted Duke via email regarding our load discrepancy. I
10 provided them with my analysis and asked them for assistance in determining why the
11 load increased so dramatically beginning on January 4, 2013. Initially, Duke saw no
12 problems with their meter data, as was indicated via their email responses. On May 14,
13 2013, Duke responded via email that the load reported to PJM looked appropriate
14 because we had added a large customer, SunCoke, which was taking service at a rate of
15 [REDACTED] MWh each hour. Duke's reported load for SunCoke was dramatically different than
16 our expected load; our indicators showed this should be a [REDACTED] MWh per hour customer.
17 Once again, I reached out to our key accounts team to confirm their expectations for this
18 customer. The [REDACTED] MWh per hour level was consistent with all historical usage records
19 obtained from Duke during the pricing process, and was consistent relative to other
20 facilities owned by the same company ([REDACTED]), which
21 is about [REDACTED] in capacity and uses about [REDACTED] MWh per hour).

22
23 **Q12. Did you go back to SunCoke after your conversations with Duke?**

1 A12. At this point I was still not able to convince Duke of a metering error on their part. So
2 we contacted the customer, SunCoke, and asked them to provide us with a copy of their
3 January invoice from Duke for electric distribution service. If Duke's meter data were
4 accurate, then the usage on that invoice should have matched the load that Duke was
5 allocating to DEB. However, the usage on that invoice was only [REDACTED] MWh for the
6 month of January. Since PJM invoices DEB based on usage sent to PJM by Duke via
7 Duke's meter reading and reporting process, the [REDACTED] MWh variance between the two
8 reported loads represents a meter reading/reporting error on the part of Duke. In other
9 words, Duke reported two radically different load totals for the DEB load delivered to
10 SunCoke for January 2013. Therefore, at least one of those amounts would have to be
11 based on incorrect meter data. Since the invoice sent by Duke to SunCoke had usage that
12 is consistent with historical usage, it was clear that the usage reported by Duke to PJM
13 for the purposes of PJM invoicing DEB was incorrect. Duke had billed SunCoke for only
14 [REDACTED] MWh, but had caused PJM to bill DEB for [REDACTED] MWh for the same period. I
15 forwarded this information, along with copies of the invoices, to our contact at Duke on
16 May 16, 2013.

17
18 **Q13. Did you discover metering errors for additional months?**

19 A13. At this time, it became apparent that the problem extended beyond January 2013. The
20 inflated load in our PJM settlements began in January 2013 and continued through June
21 2013. As of April 2013, the billing data sent to DEB electronically, through electronic
22 data interchange (EDI) and used by DEB to invoice customers, had been correct.
23 Therefore, while we were billing our customers the correct amount based on the interval

1 meter data Duke was providing to DEB, we were being grossly overcharged by PJM
2 because of the erroneous meter data Duke was providing to PJM, creating a serious cash
3 flow problem.
4

5 **Q14 You mentioned earlier there was a “Billing” data issue as well. Can you explain**
6 **what this is?**

7 A14 In addition to settlement invoices from PJM, we also receive meter data from the utility
8 that is used to bill our customers (billing data). Normally, DEB receives this data from
9 Duke in EDI format. After being adjusted for losses, this usage should equal the usage
10 we are being billed by PJM. In this case, the billing data was grossly different than the
11 settlement data. Initially, Duke was providing us with summary meter data via EDI. The
12 volume reported in the summary data was reasonable compared to our expected load for
13 SunCoke. This continued from January through April. On May 29, 2013 DEB received
14 a cancel/rebill from Duke that cancelled all the summary meter data for February through
15 April and replaced it with interval meter data. Our billing system automatically
16 processed the cancel/rebill and issued new invoices for those months to SunCoke.
17 However, the interval meter data provided directly by Duke was dramatically different
18 than the summary meter data sent earlier. The usage based on interval meter data totaled
19 approximately [REDACTED] MWh per month compared to approximately [REDACTED] MWh per
20 month based on the summary meter data. This resulted in SunCoke receiving invoices
21 from DEB for over [REDACTED] when they are accustomed to seeing invoices in the
22 [REDACTED] range.
23

1 Duke's meter data errors and the resulting billing problems related to SunCoke continued
2 for the remainder of the year. Duke was unable to provide DEB with billable interval
3 meter data in EDI format. So Duke began sending us Excel spreadsheets with interval
4 meter data, which needed to be manually uploaded into DEB's billing system. In
5 addition to being inefficient and unscalable, the manual steps put strain on our internal
6 control environment. However, we continued to operate this way through the end of
7 2013 because it was the only way to service the customer. In September 2013, SunCoke,
8 after becoming frustrated dealing with the billing issues related to the interval meter data,
9 informed us they intended to switch to a [REDACTED] with utility consolidated
10 billing when their contract expired in December 2013. We processed that enrollment
11 with Duke for SunCoke to be switched effective January 2014. When service under the
12 new contract began in January, Duke should have been billing for DEB charges on the
13 Duke invoice. They were not. In April 2014, we became aware that Duke had not billed
14 our charges to SunCoke for the January, February, and March delivery months. We
15 immediately scheduled a call with Duke to discuss the problem. Duke informed us that
16 their automated systems were not able to handle large industrial customers with co-
17 generation meters. They said it would be a completely manual process and they were not
18 willing to do that. This was surprising, given that DEB had to manually upload interval
19 meter data from Excel spreadsheets into DEB's billing system for all of 2013. Therefore,
20 we had to go back to SunCoke and ask them to switch back from a utility consolidated
21 bill to dual-billing. SunCoke could not understand why Duke had accepted the
22 enrollment if they could not deliver. Additionally, we had to invoice SunCoke for
23 January through April usage all at once, resulting in an extremely large electricity bill for

1 them. Again, they expressed their frustration on how resource-intensive managing their
2 electricity bill had become.

3
4 **Q15. Can you summarize Duke's metering errors and the problems they caused?**

5 A15. Yes. The root cause appears to be the erroneous interval meter data Duke provided to
6 PJM. The settlement data that Duke provides to PJM is based on interval meter data,
7 while the billing data provided by Duke was based on summary meter data. In the
8 absence of actual interval data, DEB had to internally de-aggregate the summary meter
9 data based on an estimated load shape to apply hourly rates in order to invoice SunCoke.
10 In May 2013 Duke initiated a cancel/rebill whereby they cancelled the summary meter
11 data they had sent to us for invoicing purposes for January through April and sent
12 replacement interval meter data. The interval meter data Duke provided were consistent
13 in volume with the inflated PJM settlement data. This triggered our billing system to
14 rebill our customer. The rebill increased the customer's invoice [REDACTED] (a normal
15 invoice of approximately [REDACTED] became a [REDACTED] invoice, for example). Our
16 customer was not pleased with the outrageous invoice. We quickly issued a credit so that
17 SunCoke would not have to carry the burden of Duke's error as a liability on its books.
18 Since then, DEB has carried the cash burden, which currently stands at approximately
19 \$1.6 million and was as high as [REDACTED] (before the corrections for incorrect interval
20 meter data from March 2013 through June 2013).

21
22 **Q16. Did DEB meet with Duke to further discuss these issues?**

1 A16. We met with representatives of Duke at their Cincinnati office on June 7, 2013. Amy
2 Spiller and Dana Adams were among those in attendance for Duke. Teresa Ringenbach,
3 Andy Vance, David Scarpignato, and I were among those in attendance for DEB.
4

5 I presented our findings related to the load discrepancy, as well as our conclusion that the
6 load was improperly reported by Duke to PJM. See RK Attachment 1. We also noted
7 that the problem, at that time, had extended into April, and that the financial impact was
8 estimated at [REDACTED], before interest. After our presentation, there was no
9 dispute from Duke that our load was incorrect. During the meeting Duke informed us
10 that the resettlements would have to go through the Resettlement C process at PJM. The
11 Resettlement C process requires each of the other affected load serving entities (LSE) in
12 the Duke zone to consent to the resettlement.
13

14 In subsequent emails Duke acknowledged their errors and detailed their actions to correct
15 those errors. See RK Attachment 2. DEB trusted Duke would honor their commitments
16 and resettle our load for January and February, and repeatedly engaged Duke on this
17 topic. I sent emails to Ms. Adams on June 20, 2013, July 11, 2013, September 10, 2013,
18 November 20, 2013, and December 3, 2013, with each inquiring about the status of the
19 January and February resettlements.
20

21 Duke sent an email to the affected LSEs on September 10, 2013 requesting consent to the
22 resettlement for January 2013 and February 2013. See RK Attachment 3. After the
23 January 13, 2013 email, Ms. Adams responded on December 2, 2013 that only 5 of the 44

1 suppliers consented to the Resettlement C process and that she was going to reach out to
2 legal to see what the next steps were. See RK Attachment 3.

3
4 **COMMISSION ACTION REQUESTED BY DEB**

5 **Q17. Can you quantify the amounts DEB is asking the Commission to award it for**
6 **Duke's metering error?**

7 A17. Yes. DEB witness Ringenbach will address the actions DEB is asking the Commission
8 to take to rectify this situation. I can describe the amounts owed to Direct Energy in
9 whatever fashion the Commission chooses to rectify the situation. As noted above,
10 Duke's metering error cost DEB approximately \$1.6 million in PJM over-charges. See
11 RK Attachment 4. Additionally, Direct Energy's carrying costs are approximately [REDACTED].
12 Therefore, on a daily basis, that amounts to approximately [REDACTED] per day [REDACTED]
13 [REDACTED]. Finally, DEB
14 anticipates its attorney's fees to bring this case to conclusion will amount to
15 approximately \$125,000.

16
17 **Q18. Can you explain why this is the fair thing to do?**

18 A18. A complete resettlement of January and February is the fair thing to do because it is the
19 right thing to do. DEB was overcharged by \$1.6 million due to an error by Duke Energy
20 and somebody has that money. Those are indisputable facts. Duke may claim they did
21 not benefit from DEB's overcharge by PJM, and they may be correct. But if they did not
22 benefit, then the other LSEs (including DEB's competitors) benefitted. A benefit to

1 DEB's competitors at the expense of DEB is anti-competitive and the Commission
2 should rectify the error.

3
4 **Q20. Does this conclude your testimony?**

5 A20. Yes. However, I reserve the right to supplement my testimony as needed or as
6 subsequent information becomes available.

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties. In addition, I hereby certify that a service copy of the foregoing *Direct Testimony of Robert Kennelly of Direct Energy Business* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 14th day of April 2015 via e-mail, except those specifically designated as being served via U.S. Mail.

/s/ Gerit F. Hull
Gerit F. Hull

Amy B. Spiller, Deputy General Counsel
Jeanne W. Kingery, Associate General Counsel
Duke Energy Business Services, Inc.
139 Fourth Street, 1303-Main
Cincinnati, OH 45202

Load Discrepancy with Duke Energy Regarding Sun Coke

Quick Summary

- Sun Coke Middletown, OH plant (LDC #) went on flow with Direct Energy on Jan. 4, 2013.
- Sun Coke is dual billed by Duke Energy (utility) and Direct energy (supplier).
- Anticipated usage, based on HU, was approximately mwh per month.
- Average usage reported to Direct Energy from Duke Energy (through PJM) was approximately mwh per month for January through April.
- Duke invoices sent to Sun Coke for utility charges show the average monthly usage for the same time period to be mwh.

Sun Coke Monthly Usage

The usage charged to Direct Energy at the PJM level is significantly more than what Duke Energy charged Sun Coke.

Sun Coke, Middletown, Usage (kwh)			
	Duke (via PJM) Billed to Direct Energy	Duke Billed to Sun Coke for TDSP	Variance
January			
February			
March			
April			
<i>Total</i>			

estimated.

Financial Impact to Direct Energy

- The financial impact of the overcharge is estimated to be from January through April 2013, with the problem still existing in June.
- May data is not included since Settlement B is at 60 days.

Total Duke Energy Load (mwh)								
						ESTIMATED		
Final Load	Demand	Real Time	Sun Coke Variance	Average DA Rate	Average RT Rate	Variance @ RT	Variance @ DA	Total Variance
January						\$		
February						\$		
March						\$		
April						\$		
Total								

The Impact

- **Direct Energy has a [REDACTED] negative cash position for 2013**
 - ❖ Direct energy has been overcharged by approximately [REDACTED] through May for usage that has been incorrectly reported to PJM.
 - ❖ Direct Energy is unable to withhold payment to PJM for inflated usage. Therefore, we are obligated to pay for the inflated load in dispute.
 - ❖ The carrying cost of the overcharge could easily cost Direct Energy over [REDACTED]
- **Strained customer relations**
 - ❖ Our customer is frustrated that we are unable to provide them with a correct invoice, showing correct usage.
 - ❖ Most recent invoice showed supplier charges of over [REDACTED], instead of the normal [REDACTED] based on interval meter reads provided by Duke.
 - ❖ We have suspended all invoicing to this customer until issue is resolved.
- Several conversations and emails with Duke Energy, beginning in April 2013, were initially responsive, but have recently stalled with no resolution.

Clark, Joseph

From: Adams, Dana S <Dana.Adams@duke-energy.com>
Sent: Monday, July 15, 2013 5:40 PM
To: Kennelly, Robert
Subject: RE: PJM Settlement C

My employee had left this in the hands of our Information Technology (IT) Department and he needed my assistance to make this their top priority. I just spoke with the IT Department and this is now their top priority and will be fixed by end of day tomorrow. I wasn't aware that my team was running into conflicts in priority, prior to me leaving to go on vacation; however, we are internally all on the same page now!

I honestly don't have any words to lighten this burden with your customer but I can commit to you to personally follow this through to ensure we send accurate preliminary data this week!!!

Dana S. Adams
System Operations Services
Manager - Energy Accounting
Office: 704-382-6292
Cell: 704-280-2809
Email: Dana.Adams@Duke-Energy.com

From: Kennelly, Robert [mailto:Robert.Kennelly@directenergy.com]
Sent: Monday, July 15, 2013 12:02 PM
To: Adams, Dana S
Subject: RE: PJM Settlement C

Ok... Thanks Dana!

From: Adams, Dana S [mailto:Dana.Adams@duke-energy.com]
Sent: Monday, July 15, 2013 12:01 PM
To: Kennelly, Robert
Subject: RE: PJM Settlement C

It was my understanding that May and June preliminary should have been accurate. I've been on vacation so let me do some checking on my end and I'll be in touch later this afternoon.

Dana S. Adams
System Operations Services
Manager - Energy Accounting
Office: 704-382-6292
Cell: 704-280-2809
Email: Dana.Adams@Duke-Energy.com

From: Kennelly, Robert [<mailto:Robert.Kennelly@directenergy.com>]
Sent: Thursday, July 11, 2013 9:27 AM
To: Adams, Dana S
Cc: Jones, Dan; Scheidler, Scott; Fossitt, Danny L; Bumgardner, Sherry J; Rasmussen, Jay; Vance, Andrew
Subject: RE: PJM Settlement C

Good Morning Everyone,

We are still seeing incorrect interval usage come through on our settlements AND through EDI for billing purposes. So, even though March and April have been resettled, May and June continue to show significantly inflated interval usage. Therefore, our cash position with Duke has not changed... we are still : dollars short due to being overcharged.

Additionally, our customer is irate.

What do we need to do to get this fixed? I was agreeable to Jan/Feb going through the Settlement C process while March and April were resettled at the 60-day mark assuming that going forward Duke would be reporting correct usage on settlements. As the May and June settlements have shown, that is not the case.

Please let me know when you are available to have a call to discuss what needs to be done to fixed this issue.
Regards,

Bob Kennelly, CPA MBA

Sr. Revenue Assurance Analyst

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From: Adams, Dana S [<mailto:Dana.Adams@duke-energy.com>]
Sent: Monday, June 24, 2013 4:37 PM
To: Kennelly, Robert
Cc: Jones, Dan; Scheidler, Scott; Fossitt, Danny L; Bumgardner, Sherry J; Rasmussen, Jay
Subject: FW: PJM Settlement C

The latest string of emails to hopefully close this loop for you all ASAP. (Attachment not included).

Dana S. Adams

System Operations Services
Manager - Energy Accounting
Office: 704-382-6292
Cell: 704-280-2809
Email: Dana.Adams@Duke-Energy.com

From: Adams, Dana S
Sent: Monday, June 24, 2013 4:35 PM
To: 'mccomb@pjm.com'; 'mktsettlements@pjm.com'
Cc: Scheidler, Scott; Jones, Dan; Bumgardner, Sherry J; Fossitt, Danny L; Rasmussen, Jay
Subject: FW: PJM Settlement C

Hi John,

I wanted to give you a heads up that Duke is working to obtain signatures for a Settlement C issue for January and February. Should Dan copy you and/or mktsettlements with each LSE email?

Thanks!

Dana S. Adams

System Operations Services
Manager - Energy Accounting
Office: 704-382-6292
Cell: 704-280-2809
Email: Dana.Adams@Duke-Energy.com

From: Adams, Dana S
Sent: Monday, June 24, 2013 4:29 PM
To: Jones, Dan
Cc: Scheidler, Scott; Bumgardner, Sherry J; Fossitt, Danny L; Spiller, Amy B; Abbott, Tim; Rasmussen, Jay; Bandenburg, Bob; Turner, Jeff O
Subject: PJM Settlement C

Hi Dan,

As noted during the meeting with Direct Energy, the PJM Settlement C process is the process used to credit Direct Energy for the Sun Coke January and February billing discrepancies. The current PJM process states that we must obtain official sign offs (emails are acceptable) from each impacted LSE before PJM will begin building a recon file. I need your assistance to obtain the approvals from each LSE please. Can you please reach out to your suppliers and/or LSE contacts and obtain the email approval from each LSE ASAP? A copy of each registered LSE, that has the potential of being impacted for January and February business, is included in the attachment.

I believe that you reach out to the contact name that signed each Declaration of Authority contract. If you need for me to send you a copy of the latest DOA's that I have on file just let me know. As soon as you have all of the approvals let me know and I'll reach out to the settlements team at PJM to begin the reconciliation process.

Also, can you please keep Bob Kennelly, at Direct Energy, updated on the approval progress? I know they are anxiously awaiting resettlement.

If you have any questions related to the PJM Settlement C process please work with John McComb at PJM. His email is: mccomb@pjm.com.

Thanks Dan!

Dana S. Adams
System Operations Services
Manager - Energy Accounting
Office: 704-382-6292
Cell: 704-280-2809
Email: Dana.Adams@Duke-Energy.com

From: Adams, Dana S
Sent: Monday, June 24, 2013 3:29 PM
To: 'Kennelly, Robert'
Subject: Update

Hi Bob,

I know we had a call scheduled for today but my earlier conference call is running over. If it's OK I'll just state the status via email below:

We have reviewed the changes based upon January and February's Sun Coke discrepancy and determined that the magnitude is large enough that we will work through the Settlement C process. I am sending Dan Jones an email right now to ask him to begin reaching out to all impacted LSE's. Once we have agreement from all LSE's we will notify PJM that we have all of the required approvals and then have them resettle January and February. Dan Jones and/or I will keep you updated as we work through this process.

Thanks!

Dana S. Adams
System Operations Services
Manager - Energy Accounting
Office: 704-382-6292
Cell: 704-280-2809
Email: Dana.Adams@Duke-Energy.com

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Clark, Joseph

From: Buelterman, Carol Lynne <Carol.Buelterman@duke-energy.com>
Sent: Friday, June 21, 2013 10:19 AM
To: Kennelly, Robert; Ringenbach, Teresa
Cc: Adams, Dana S; Jones, Dan; Spiller, Amy B; Vance, Andrew; Keith, Judy M
Subject: FW: Phone Call - DEB *Looking for an update*
Attachments: SUNCOKE_MAY 2013.xls; SUNCOKE_APR 2013.xls; SUNCOKE_FEB 2013.xls;
SUNCOKE_JAN 2013.xls; SUNCOKE_MAR 2013.xls

Importance: High

Robert and Teresa,

The attached Sun Coke data, January 2013 – May 2013, is provided per customer request. As an intermediate solution to the data issues, Duke Energy will provide Direct Energy Business the monthly data shortly after the beginning of each month.

Please let me know if you have any questions or concerns.

Sincerely,

Carol Buelterman

Account Manager
Customer Choice
W: 513-287-3341
carol.buelterman@duke-energy.com

From: Buelterman, Carol Lynne
Sent: Friday, June 21, 2013 9:46 AM
To: Seamon, Jennifer D; Adams, Dana S
Cc: Jones, Dan; Spiller, Amy B; Keith, Judy M
Subject: FW: Phone Call - DEB *Looking for an update*
Importance: High

Jennifer,

Amy Spiller reviewed the January data and suggested that the following verbiage be included on each datasheet - "Sun Coke – Month, 2013 – Provided Per Customer Request" - see example at the bottom of the attached spreadsheet.

I have little experience with PJM calculations, so I just that the information is correct. Please proceed with sending the rest of the monthly data required and be sure to add the statement suggested by Amy Spiller on each datasheet.

Thanks for all your help.

Carol

From: Seamon, Jennifer D
Sent: Thursday, June 20, 2013 11:01 AM
To: Buelterman, Carol Lynne
Subject: RE: Phone Call - DEB *Looking for an update*
Importance: High

Carol,

I have included the values for Suncoke for January 2013 in the attached spreadsheet. This is the format that we are able to provide directly from EDMS at this time. Could you please review and let me know if you have any questions or concerns? If you are good with the data for January, I will go ahead and send Feb-May. We will also plan to create the same for June around the 1st or 2nd of July (provided meter data is available).

Thank you so much for your patience!

Jennifer Seamon

Supervisor EDM Operations, Large C&I
(980) 232-0207 - office
(704) 785-4513 - cell
jennifer.seamon@duke-energy.com

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From: Buelterman, Carol Lynne
Sent: Thursday, June 20, 2013 9:14 AM
To: Adams, Dana S; Jones, Dan; Spiller, Amy B
Cc: Spiller, Amy B; Vance, Andrew; Keith, Judy M; Seamon, Jennifer D
Subject: RE: Phone Call - DEB *Looking for an update*

Amy,

Dan is on vacation this week so I wanted to provide you with a follow up in case you had any advice.

Jennifer Seamon is working on getting this data together. She indicated earlier in the week it would be no later than the end of next week. I sent her a follow up email this morning and am including her on this email as well.

Jennifer, do you have a better idea today as to when this data may be available?

Thanks

Carol

From: Ringenbach, Teresa [<mailto:Teresa.Ringenbach@directenergy.com>]
Sent: Thursday, June 20, 2013 9:09 AM
To: Kennelly, Robert; Buelterman, Carol Lynne; Adams, Dana S; Jones, Dan
Cc: Spiller, Amy B; Vance, Andrew
Subject: RE: Phone Call - DEB *Looking for an update*

Carol and Dana - this is causing some serious issues and we are now not only six months from when the issue began but end of next week will be 2 weeks from what I took away from our meeting as something that shouldn't have taken very long given it was only one customer.

Can we get a firm date so we can provide a firm date to our customer for resolution?

From: Kennelly, Robert
Sent: Thursday, June 20, 2013 8:18 AM
To: Buelterman, Carol Lynne; Adams, Dana S; Jones, Dan
Cc: Ringenbach, Teresa; Spiller, Amy B; Vance, Andrew
Subject: RE: Phone Call - DEB *Looking for an update*

Thanks for the update Carol.

From: Buelterman, Carol Lynne [<mailto:Carol.Buelterman@duke-energy.com>]
Sent: Thursday, June 20, 2013 8:15 AM
To: Kennelly, Robert; Adams, Dana S; Jones, Dan
Cc: Ringenbach, Teresa; Spiller, Amy B; Vance, Andrew
Subject: RE: Phone Call - DEB *Looking for an update*

Robert,

Dana Adams contacted me earlier this week regarding this issue and I did follow up. I was advised that the data should be ready no later than the end of next week.

I neglected to notify you of this and for that I apology.

Please let me know if you have any other questions or concerns.

Sincerely,

CAROL BUELTERMAN
Account Manager
Customer Choice
W: 513-287-3341
carol.buelterman@duke-energy.com

From: Kennelly, Robert [<mailto:Robert.Kennelly@directenergy.com>]
Sent: Thursday, June 20, 2013 8:07 AM
To: Adams, Dana S; Buelterman, Carol Lynne; Jones, Dan
Cc: Ringenbach, Teresa; Spiller, Amy B; Vance, Andrew
Subject: RE: Phone Call - DEB *Looking for an update*
Importance: High

Carol / Dan,

Can someone please let me know when we can expect to receive the hourly interval usage data for Sun Coke for January 2013 – May 2013? We had a call with Sun Coke recently, and to put it simply, they are not happy with the situation. They do not understand how Duke can provide them an invoice with interval usage information but cannot provide Direct Energy with accurate interval usage information. In our meeting on June 7th, Direct Energy agreed to

accept the interval usage in spreadsheet format until Duke was able to correct their internal system issues. We need that information to be provided to us in order to bill our customer accurately.

This issue is not only impacting us from a cash flow perspective, but it is also damaging our customer relations with Sun Coke... which could have a negative impact on future profitability.

Dana – Thank you for pushing along the resettlements... it is much appreciated. Please keep me in the loop with settlement C process for the Jan/Feb invoices.

If you have any questions, do not hesitate to contact me.

Regards,
Bob

Bob Kennelly, CPA MBA
Sr. Revenue Assurance Analyst

Direct Energy Business
1001 Liberty Center
Pittsburgh, PA 15222

412-667-5180 Office
412-398-0611 Mobile
412-667-6107 Fax
Robert.Kennelly@DirectEnergy.com

www.directenergybusiness.com



From: Adams, Dana S [<mailto:Dana.Adams@duke-energy.com>]
Sent: Monday, June 17, 2013 4:06 PM
To: Buelterman, Carol Lynne; Jones, Dan
Cc: Kennelly, Robert
Subject: FW: Phone Call - DEB *Looking for an update*

Hi Carol and Dan,

I spoke with Bob at Direct Energy today. He asked for an update on when he could expect the hourly data in the spreadsheet. Can one of you please reply with a timeframe?

Dana S. Adams
System Operations Services
Manager - Energy Accounting
Office: 704-382-6292

Cell: 704-280-2809

Email: Dana.Adams@Duke-Energy.com

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Clark, Joseph

From: Ringenbach, Teresa
Sent: Tuesday, June 11, 2013 9:35 AM
To: Vance, Andrew; Kennelly, Robert
Cc: Petricoff, M. Howard; Scarpignato, David
Subject: FW: Contacts at Direct Energy

Bob –

See the message below from Duke. It also has Dana's email.

From: Spiller, Amy B [<mailto:Amy.Spiller@duke-energy.com>]
Sent: Tuesday, June 11, 2013 9:10 AM
To: Ringenbach, Teresa
Cc: Petricoff, M. Howard
Subject: RE: Contacts at Direct Energy

Teresa

In follow up to our meeting on Friday, we have confirmed that Duke Energy did send to PJM correct data for Sun Coke for the month of March. This was done at the end of May, when March information was finalized. As such, only January and February should need to be resettled.

Dana's contact information is Dana.Adams@duke-energy.com.

I look forward to hearing from you later this week regarding the declarations of authority issues.

Thank you.

Amy B. Spiller
Deputy General Counsel
Duke Energy Business Services
139 E. Fourth Street, 1303-Main
Cincinnati, Ohio 45202
(513) 287-4359 (telephone)
(513) 287-4385 (facsimile)

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From: Ringenbach, Teresa [<mailto:Teresa.Ringenbach@directenergy.com>]
Sent: Monday, June 10, 2013 11:58 AM
To: Spiller, Amy B
Cc: Petricoff, M. Howard; Kennelly, Robert; Vance, Andrew; Scarpignato, David
Subject: Contacts at Direct Energy

Hi Amy –

Thank you for meeting with Direct Energy last week. I'm attaching Bob's contact information for the Suncoke issue. Can you forward to Dana so they can communicate on the resettlement and getting the interval data manually?

Thank you!

NOTE NEW ADDRESS!

Teresa Ringenbach
Senior Manager - Government and Regulatory Affairs (Midwest)
Direct Energy, LLC
21 E. State Street, Suite 1901
Columbus, OH 43215
Office: 1-614-220-4369 Ext. 230
Office Cell: 614-633-6829
Personal Cell: 216-308-0556

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Clark, Joseph

From: Kennelly, Robert <Robert.Kennelly@directenergy.com>
Sent: Tuesday, December 03, 2013 9:43 AM
To: 'Adams, Dana S'
Subject: RE: PJM Settlement C Billing Adjustment for Load Serving Entities (LSEs) Operating in the Duke Energy Ohio/Kentucky (DEOK) Load Zone

Thanks!

From: Adams, Dana S [mailto:Dana.Adams@duke-energy.com]
Sent: Tuesday, December 03, 2013 9:41 AM
To: Kennelly, Robert
Subject: RE: PJM Settlement C Billing Adjustment for Load Serving Entities (LSEs) Operating in the Duke Energy Ohio/Kentucky (DEOK) Load Zone

I reached out to our legal team yesterday in anticipation of disappointment. She is working with PJM's legal team and PJM settlements department to determine where we go from here. I'll keep you posted.

From: Kennelly, Robert [mailto:Robert.Kennelly@directenergy.com]
Sent: Tuesday, December 03, 2013 8:57 AM
To: Adams, Dana S
Subject: RE: PJM Settlement C Billing Adjustment for Load Serving Entities (LSEs) Operating in the Duke Energy Ohio/Kentucky (DEOK) Load Zone

Wow... that's a little disappointing. So, where do we go from here? Can a no-response be deemed a consent after a certain period of time is passed? We have about _____ tied up here, so if we can't resolve this through Settlement C process we may have to consider something outside of that process.

Let me know if you think we need to round everyone up for another discussion. I don't mind traveling if that is what it takes to get this resolved.

Thanks,
Bob

From: Adams, Dana S [mailto:Dana.Adams@duke-energy.com]
Sent: Monday, December 02, 2013 2:22 PM
To: Kennelly, Robert
Subject: RE: PJM Settlement C Billing Adjustment for Load Serving Entities (LSEs) Operating in the Duke Energy Ohio/Kentucky (DEOK) Load Zone

Hello,

Sorry for the delay. Below is the update relative to 44 suppliers:

5 consents
7 Asked questions but never followed up with a consent
32 No response

Thanks!

From: Kennelly, Robert [<mailto:Robert.Kennelly@directenergy.com>]
Sent: Wednesday, November 20, 2013 3:13 PM
To: Adams, Dana S
Subject: RE: PJM Settlement C Billing Adjustment for Load Serving Entities (LSEs) Operating in the Duke Energy Ohio/Kentucky (DEOK) Load Zone

That would be great. Thanks Dana!!

From: Adams, Dana S [<mailto:Dana.Adams@duke-energy.com>]
Sent: Wednesday, November 20, 2013 3:01 PM
To: Kennelly, Robert
Subject: RE: PJM Settlement C Billing Adjustment for Load Serving Entities (LSEs) Operating in the Duke Energy Ohio/Kentucky (DEOK) Load Zone

Hi Bob,

We have not submitted any settlement information to PJM. We are waiting on approval from all Suppliers. According to PJM we must have 100% permission from all suppliers. I'll check the status to see how many suppliers have and have not responded and let you know by the end of the week.

From: Kennelly, Robert [<mailto:Robert.Kennelly@directenergy.com>]
Sent: Wednesday, November 20, 2013 2:53 PM
To: Adams, Dana S
Subject: FW: PJM Settlement C Billing Adjustment for Load Serving Entities (LSEs) Operating in the Duke Energy Ohio/Kentucky (DEOK) Load Zone

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Hi Dana,

I hope all is well in NC. I was wondering if the Settlement C adjustment process (related to Sun Coke) has been completed yet. I haven't noticed it coming through the Settlement statements yet (through October), but if it was resolved in some other manner I might not have visibility to that. If it's been resolved to the best of your knowledge, could you just give me a heads-up and I run it down on my end?

Let me know if you have any questions.

Thanks,
Bob

Bob Kennelly, CPA MBA
Sr. Revenue Assurance Analyst

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1001 Liberty Center

Pittsburgh, PA 15222
412-667-5180 Office
412-398-0611 Mobile
412-667-6107 Fax
Robert.Kennelly@DirectEnergy.com

www.directenergybusiness.com



From: Vance, Andrew
Sent: Wednesday, September 11, 2013 7:57 AM
To: Kennelly, Robert
Cc: _DEB Utility Operations
Subject: FW: PJM Settlement C Billing Adjustment for Load Serving Entities (LSEs) Operating in the Duke Energy Ohio/Kentucky (DEOK) Load Zone

From: Rogers, Shelia J [<mailto:Shelia.Rogers@duke-energy.com>]
Sent: Tuesday, September 10, 2013 5:01 PM
To: Smardo, Frank -impa; CNorton@ampppartners.org; Tim.Bockhorn@dplinc.com; scott.maxwell@nesmarkets.com; mmann@ohgande.com; Palmese, Robert -palmcoenergy; rachael.cahan@macquarie.com; PA; Gonsales@ses4energy.com; rachael.cahan@macquarie.com; tcbanks@starenergypartners.com; ruzhdidi@starionenergy.com; tfitzgerald@verdeenergy.com; mborovik@aepenergy.com; Kirk.Heineman@edftrading.com; mborovik@aepenergy.com; amitrey@border-energy.com; pgarber9@gmail.com; bcrockett@championenergyservices.com; rachael.cahan@macquarie.com; Garretson, Steve -justenergy; Elena.Vekilov@exeloncorp.com; Vance, Andrew; USN Utility Contact; Iynn@discountenergygroup.com; mike.cornwell@dom.com; tim.bockhorn@aes.com; steckv@dteenergy.com; Fleissner, William E; eagleenergy@fuse.net; alexg@eligoenergy.com; msmith@encoa.com; kboltz@energypluscompany.com; jeff@energy.me; c.jamesdavis@firstenergycorp.com; kevin.stafford@gdfsuezna.com; adam.gusman@glacialenergy.vi; ssimins@hikoenergy.com; hsweeney@igsenergy.com; mstarck@independenceenergyco.com; DRPickett@integrsvsenergy.com; mitchm@konaenergy.com; hrosen@libertypowercorp.com; SMJansen@midamerican.com; edwin.dearman@gexaenergy.com; bwhite@noblesolutions.com; chris@napower.com
Subject: PJM Settlement C Billing Adjustment for Load Serving Entities (LSEs) Operating in the Duke Energy Ohio/Kentucky (DEOK) Load Zone

Dear LSEs:

The purpose of this letter is to notify you that PJM Settlements has undercharged your company for load settlement services for the months of January and February 2013. Due to this error, another LSE has been overcharged by PJM for load settlement services for January and February. In order to rectify the situation, we are requesting that your company agree to a resettlement with PJM for the months of January and February 2013 which will allow the overcharged LSE to be made

whole. The impact to load is approximately 30 MW's/hour that will spread across each LSE's percent of load compared to total DEOK load.

PJM allows for resettlements to occur outside of a 60 day window under the Settlement C process. This is an informal process followed by PJM. In order to initiate the Settlement C process, you will need to provide to Duke Energy Ohio consent to have your account resettled for the months of January and February. We will then provide this consent to PJM who will then resettle your account.

Please email PJMSettlementC@duke-energy.com with questions and your consent. We appreciate your attention to this matter.

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	March	April	
March PJM Invoice	\$		
Resettlement related to March Resettlement Percentage	\$		
	Jan	Feb	Total
Original PJM Invoice	\$		\$
Estimated resettlement %			
Estimated Resettlement	\$	\$	\$

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Case No(s). 14-1277-EL-CSS

Summary: Testimony of Robert Kennelly - PUBLIC version - electronically filed by Mr. Gerit F. Hull on behalf of Direct Energy Business, LLC