

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Regulation of the)	
Purchased Gas Adjustment Clauses)	
Contained within the Rate Schedules of)	Case No. 15-218-GA-GCR
Duke Energy Ohio, Inc. and Related)	
Matters)	

**JOINT POST-HEARING REPLY BRIEF OF THE RETAIL ENERGY SUPPLY
ASSOCIATION AND INTERSTATE GAS SUPPLY, INC.**

Michael J. Settineri (0073369)
Counsel of Record
Stephen M. Howard (0022421)
Gretchen L. Petrucci (0046608)
Vorys, Sater, Seymour and Pease LLP
52 E. Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008
614-464-5462
614-719-5146 (fax)
mjsettineri@vorys.com
smhoward@vorys.com
glpetrucci@vorys.com

***Attorneys for the Retail Energy
Supply Association***

Joseph Olikier
Counsel of Record
joliker@igsenergy.com
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
Telephone: (614) 659-5000
Facsimile: (614) 659-5073

Attorney for IGS Energy

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I. INTRODUCTION

In this proceeding, the Public Utilities Commission of Ohio (“Commission”) must evaluate the reasonableness of Duke Energy Ohio Inc.’s (“Duke”) gas cost recovery (“GCR”) procurement decisions, and the impact that those decisions have on default service customers and customers taking service from competitive retail natural gas suppliers. This proceeding provides the Commission with an opportunity to better understand why RESA witness Tom Scarpitti’s proposal to address Firm Balancing Service (“FBS”) and Enhanced Firm Balancing Service (“EFBS”) is a practical compromise for future gas years relative to Duke’s proposed mandate that suppliers take EFBS service. Mr. Scarpitti’s proposal presents the most reasonable compromise because his proposal allows suppliers to retain the flexibility of taking FBS unless a baseline amount of storage is not met through EFBS subscription, in which case a pro-rata amount of the undersubscribed storage level would be assigned to suppliers to rectify the drop in EFBS subscription. Simply put, so long as EFBS subscription is adequate to meet the baseline storage (a level that was adequate for the coldest winter on record – 2013/2014), suppliers can and should continue to operate under the current

FBS and EFBS system and avoid new cost impacts that both Duke's and the auditor's approaches will create. Mr. Scarpitti's proposal presents a win-win situation for all parties and customers on this issue, and is a solution that is properly before the Commission in this proceeding.

Unlike Mr. Scarpitti's win-win solution, Duke and Staff offer illusory commitments in the Stipulation. Agreeing to take on certain evaluations and assessments with no guidelines or timeframes is similar to assigning a project with open-ended deadlines or direction. The odds of the project being completed promptly and correctly drop dramatically when no direction is given. Likewise, the open-ended evaluations and assessments that Duke has agreed to "complete" in the Stipulation have very good odds of not being completed or being completed with no stakeholder input. Additional guidance, including timeframes and stakeholder input, are necessary to ensure those evaluations and assessments are successfully completed.

Another example of what is not a practical win-win solution is the attempt by the Ohio Consumers' Counsel ("OCC") and Ohio Partners for Affordable Energy ("OPAЕ") to force a bill disclosure of the GCR price compared to a historical, weighted average supplier cost. A simple historical weighted average presented as a straight price comparison provides little insight into the value presented by prospective offers currently available in the market. In fact, that information, coupled with the fact that the information would not include direct-billed gas customers, would lead to misinformation for consumers. OCC's proposal will not benefit the public interest; it would work against it, and the Commission should reject OCC's proposal to require Duke to place on customers' bills the weighted average price that suppliers bill to choice customers.

Accordingly, the Commission should modify and approve the Stipulation and implement the practical solution proposed by RESA witness Tom Scarpitti. The Commission should also provide more guidance and direction to Duke on its soft commitments to perform certain evaluations and reject OCC's and OPAE's attempt to force Duke to publish misleading cost comparisons.

II. BACKGROUND

In this proceeding, the Commission must evaluate the reasonableness of Duke's GCR procurement decisions, and the impact that those decisions have on default service customers and customers taking service from competitive retail natural gas suppliers.¹ On January 29, 2016, Duke and Staff filed a partial Stipulation and Recommendation ("Stipulation") that purported to resolve the contested issues. The Stipulation, however, contains illusory commitments and fails to resolve several outstanding issues that may detrimentally affect the competitive market; thus, the Stipulation is not in the public interest and violates regulatory practices and principles. Therefore, the Retail Energy Supply Association ("RESA")² and Interstate Gas Supply, Inc. ("IGS") (collectively "Suppliers") recommended in their testimony and Joint Post-Hearing Brief ("Brief") that the Commission modify the Stipulation.

¹ Competitive retail natural gas suppliers are referred to as "suppliers" throughout this Joint Reply Brief.

² The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

Specifically, the Suppliers recommended that the Commission adopt the following recommendations:

- (1) Direct Duke to modify its gas balancing service options for the 2017-2018 gas year, such that all suppliers may elect rate Firm Balancing Service, subject to Mr. Scarpitti's contingency allocation plan;
- (2) Regarding the multiple provisions in the Stipulation that require Duke to perform additional evaluation and analysis, the Commission should direct Duke to file the results of its evaluation in a formal Commission docket and provide interested parties an opportunity to comment;
- (3) Require Duke to evaluate the ability to reduce its storage levels by 20% and allow interested parties to submit formal comments in a Commission proceeding in response;
- (4) Direct Duke to immediately undertake an analysis of alternatives to its KO Pipeline capacity entitlements, including infrastructure enhancements that would allow Duke and suppliers to reduce their KO entitlements and otherwise increase the flexibility of operating the Duke system.
- (5) Direct Duke to file an application to convert from volume-based billing to therm billing within one year from a final order in this proceeding.

The initial briefs submitted by Staff, Duke, OPAE and the OCC fail to demonstrate that the Stipulation should be approved without the modifications recommended above.

III. ARGUMENT

The Commission should not approve the Stipulation without the recommended modifications because it does not benefit ratepayers and the public interest and violates regulatory principles and practices.

A. **Balancing Tariffs**

1. Balancing issues are not resolved for the 2017-2018 gas year.

Duke alleges that the Stipulation is in the public interest because “the Company agreed in the Stipulation to accept all of the findings in an audit done on behalf of the Staff of the Public Utilities Commission of Ohio (Staff), by Exeter.”³ Similarly, Staff alleges that the “Company has agreed to adopt the findings of a financial audit.”⁴ Moreover, Duke claims that the Suppliers have not identified how the Stipulation violates regulatory policy, practice, or principle.⁵

The claim that the Stipulation adopted all recommendations contained in the Exeter Audit Report is simply not true. The Exeter Audit Report addressed issues related to Duke’s gas balancing tariffs.⁶ But Duke’s own witness—the individual presented to support the Stipulation—testified that the Stipulation does not address *any balancing issues*:

Q. You would agree that the stipulation does not specifically address any of the recommendations in the audit report related to EFBS or FBS.

A. Yes, I would agree.⁷

Accordingly, the Stipulation does not provide a resolution or recommendation for the Commission to consider regarding Duke’s balancing tariffs and how they should apply to suppliers in future years.

³ Duke Brief at 4.

⁴ Staff Brief at 3.

⁵ Duke Brief at 5.

⁶ Commission-Ordered Ex. 1 at 78-80.

⁷ Tr. at 77.

Moreover, the Commission's Order in last year's *EFBS Case*⁸ has not resolved all of the issues related to Duke's gas balancing service options. Applications for rehearing are pending in that matter, awaiting a final ruling from the Commission and presumably awaiting Commission consideration of the recommendations presented in this proceeding. Neither the Stipulation in this case nor the EFBS Order provides a resolution or recommendation for the Commission to consider regarding Duke's balancing tariffs and how they should apply to suppliers beyond the current gas year. It is not in the public interest to leave such an important matter unresolved.

2. The Commission should adopt Mr. Scarpitti's balancing proposal because it presents the most practical and reasonable solution for if and when any undersubscription arises.

The Suppliers recommend that the Commission modify and approve the Stipulation consistent with RESA witness Scarpitti's recommendations regarding Duke's gas balancing tariffs because Mr. Scarpitti's recommendations will resolve undersubscription concerns, but do so only if actually needed and only to the extent of the undersubscription. As discussed further in Mr. Scarpitti's testimony and the Supplier's Brief, Mr. Scarpitti recommended a compromise solution that would ensure that Duke could still manage its system reliability in the event fewer suppliers elected EFBS, but also would allow suppliers to maintain the option to retain FBS if the EFBS elections remained at current levels. Specifically, Mr. Scarpitti recommended that Duke implement a contingency plan in the event there is an actual need due to an undersubscription of EFBS. Mr. Scarpitti explained the contingency plan recommendation as tailored to the level of undersubscription—only mandating an

⁸ *In the Matter of the Application of Duke Energy Ohio, Inc. for Approval to Modify Rider FBS, Rider EFBS, and Rider FRAS*, Case No. 15-50-GA-RDR (Jan. 15, 2015) (hereinafter "*EFBS Case*").

EFBS-type service for just the amount needed to address the undersubscription.⁹ Mr. Scarpitti's contingency proposal is practical and in the public interest, and should be approved.

Duke's and OCC's arguments in opposition to Mr. Scarpitti's proposal are at best conclusory and otherwise lack merit. Duke and OCC both claim that the Commission has already rejected Mr. Scarpitti's proposal in the *EFBS Case*.¹⁰ The Commission Order in the *EFBS Case*, the Exeter Audit Report, and the Stipulation have not addressed the merits of Mr. Scarpitti's contingency plan.¹¹ The Suppliers urge the Commission to address Mr. Scarpitti's contingency plan proposal in this proceeding.

OCC also claims that Mr. Scarpitti's contingency plan does not take into account the ongoing analysis Duke has committed to make regarding its KO capacity and propane entitlements; thus, it does not "effectively take into account the current uncertainty regarding Duke's system."¹² This is a red herring. If Duke replaces KO capacity with capacity on a different pipeline, it will not impact Duke's balancing tariffs. Likewise, Duke's analysis with respect to its propane assets is largely irrelevant to Duke's balancing tariffs—Duke has no intention of changing its propane asset mix.¹³ Rather, Duke has committed to evaluate the integrity of those assets.

Indeed, Duke's evaluation of its propane assets is likely to support Mr. Scarpitti's contingency proposal. As the Exeter Auditor indicated,¹⁴ assuming that Duke's analysis determines that its propane caverns are not going to fail, Duke can maintain system

⁹ RESA Ex. 1 at 6-11; IGS Ex. 1 at 5-14.

¹⁰ Duke Brief at 5; OCC Brief at 12.

¹¹ See, Commission-Order Ex. 1 and Company and Staff Joint Ex. 1.

¹² OCC Brief at 12.

¹³ Tr. 75-77.

¹⁴ Commission-Order Ex. 1 at 80.

integrity with 20% less storage. Reducing Duke's storage assets by 20%, moreover, would improve Duke's ability to cycle through its remaining storage assets—thereby eliminating the need to forcibly require suppliers to take EFBS service to cycle through Duke's storage.¹⁵

Next, OCC claims that Mr. Scarpitti's proposal would place "strain on the Duke system,"¹⁶ relying on the following factually unsupported testimony from Duke witness Kern:

Mr. Scarpitti's proposal does not address that adequately. It's -- the threshold is set much too low. It does not address the issue of capacity, whose paying for the capacity. The GCR would still be paying for all the demand charges for the storage. And it does not give us adequate flexibility because it -- it contemplates setting up a schedule for injections and withdrawals thought [sic] the year that would be set, you know, at one point without giving us the flexibility of changing if the beginning of the summer is colder or warmer than normal or the winter starts out colder or warmer -- warmer or colder than normal. It would not give us the flexibility to adequately adjust.¹⁷

For the four reasons discussed below, OCC's and Mr. Kern's claims lack merit.

First, Mr. Kern has yet to identify in either this case or the *EFBS Case* what "threshold" would satisfy him.¹⁸ And, history shows that Duke capably balanced the system at levels significantly below the threshold level recommended by Mr. Scarpitti, when the weather was both colder-than-normal and warmer-than-normal. Therefore, the 41,000 dekatherm ("dth") threshold level recommended by Mr. Scarpitti is appropriate.

¹⁵ Tr. at 105.

¹⁶ OCC Brief at 12-13.

¹⁷ Tr. at 81.

¹⁸ Claims that Mr. Scarpitti's proposed threshold of 41,000 dekatherms is concerning should be rejected because no additional reasoning or factual support was provided.

Second, it is not clear what capacity Mr. Kern is referring to. In any event, when Duke procures capacity assets, a pro-rata portion is allocated to the GCR and a portion is allocated to suppliers under Duke's FRAS tariff. The capacity allocation process would be no different under Mr. Scarpitti's proposal.

Third, it is not correct that GCR customers will be paying for all of the demand charges associated with storage. Suppliers subscribing to EFBS service pay for Duke's storage assets at the full rate. Moreover, Mr. Scarpitti indicated that suppliers allocated a pro rata portion of storage under his contingency plan would be willing to pay a fee for their limited use of storage to the extent the Commission deemed it necessary.¹⁹ Mr. Scarpitti recommended that the fee in this instance be based on (a) historical seasonal NYMEX price differentials between summer and winter, and (b) throughput into storage. Mr. Scarpitti calculated it to be \$0.21, based on many years of actual historical data.²⁰

Fourth, it is incorrect that the contingency proposal would not provide Duke with sufficient flexibility to adjust supplier injections and withdrawals in colder-than-normal and warmer-than-normal weather. Duke has already been able to manage its system during colder-than-normal winters with EFBS subscription below the threshold level that Mr. Scarpitti has proposed. Further, the Suppliers have not proposed that Duke establish injection and withdrawal schedules at one static point in the year that cannot be changed. Indeed, the impacted suppliers on rate FBS are already required to deliver gas to Duke's city gate in accordance with a target supply quantity that Duke provides the morning that the gas must be delivered. The Suppliers would thus be willing to work

¹⁹ RESA Ex. 1 at 10; IGS Ex. 1 at 10 and Ex. TS2.

²⁰ *Id.*

with Duke to adjust their injection and withdrawal schedules to accommodate colder- and warmer-than-normal weather.

In sum, the arguments put forth by Duke and OCC against Mr. Scarpitti's recommendations for the gas balancing service options should be rejected. Mr. Scarpitti's recommendation is practical and narrowly tailored—the contingency plan would be established and triggered only if and when an undersubscription occurs. Moreover, the contingency plan will cover the extent of the undersubscription, not revamp the EFBS subscription. Thus, Mr. Scarpitti's recommendation is the most reasonable option for the Commission to adopt to benefit ratepayers and the public interest.

B. The Stipulation will Violate Regulatory Practices and Principles.

Duke's claim that the Suppliers cannot identify how the Stipulation violates regulatory practices or principles is also incorrect. Regulatory practices and principles favor certainty, yet the Stipulation fails to address the terms of Duke's gas balancing tariffs or provide the desired certainty. Further, it is the state policy to "[p]romote the availability of unbundled and comparable natural gas services and goods that provide **wholesale and retail consumers** with the supplier, price, terms, conditions, and quality options they elect to meet their respective needs."²¹ State policy further requires that the Commission "[p]romote diversity of natural gas supplies and suppliers, by giving consumers effective choices over the selection of those supplies and suppliers" and to "[r]ecognize the continuing emergence of competitive natural gas markets through the

²¹ Ohio Revised Code Section ("R.C.") 4929.02(A)(2). (Emphasis added)

development and implementation of flexible regulatory treatment.”²² Despite the pro-competitive nature of Ohio law (i.e., the requirement to develop the competitive market through flexible regulatory treatment and the requirement to promote diversity of supplier products), the Stipulation fails to address or propose balancing tariffs that will achieve any of those outcomes. Thus, the Stipulation is contrary to regulatory practices, principles, and the state policy codified by Ohio law. In order to address the shortcomings in the Stipulation, the Suppliers recommend that the Commission adopt Mr. Scarpitti’s contingency plan proposal, which strikes the appropriate balance between maintaining system integrity, flexibility, and promoting development of the competitive market.

In summary, the Suppliers recommend that the Commission modify and approve the Stipulation to require Duke to implement the contingency plan proposed by RESA witness Scarpitti in advance of the 2017-2018 gas year. This modification will resolve undersubscription concerns with the EFBS option, but do so only if actually needed and only to the extent of the undersubscription. This modification of the Stipulation is necessary to ensure that Duke’s gas balancing tariffs are in the public interest and comport with regulatory practices and principles that favor competitive markets and regulatory flexibility.

²² R.C. 4929.02(A)(3) and (4).

C. Illusory Stipulation Commitments are Not in the Public Interest.

The Stipulation requires Duke to perform several additional evaluations to ensure that GCR and Choice customers receive the most efficient and reasonably priced natural gas service.²³

- “The Company agrees to reevaluate whether its current KO Transmission capacity entitlements are reasonable, and adjust those entitlements as appropriate;”
- “The Company agrees to assess the potential for loss of the two remaining propane facilities and evaluate the optimal interstate pipeline capacity portfolio that would be required to replace the loss of supply;”
- “The Company agrees to reevaluate whether it could meet its firm customers' balancing requirements at reduced storage levels, taking into consideration the possibility that the propane plants may not be available.”²⁴
- “The Company agrees to assess whether adopting daily balancing tolerances for IT service would improve the Company's ability to manage storage and/or reduce its contract storage capacity entitlements and to investigate making changes to the rates charged for interruptible monthly balancing service to provide a more significant contribution toward recovery of storage demand charges.”

²³ Company and Staff Joint Ex. 1 at 6-7.

²⁴ This provision is discussed in more depth in Section III.A.

Staff and Duke allege that Duke's agreement to perform these evaluations is in the public interest.²⁵ Duke even goes as far to claim this is "the best possible outcome."²⁶ While the Suppliers support requiring Duke to perform these evaluations, the timing in which those evaluations are conducted and the forum in which they are presented for consideration is of great importance. Unfortunately, the Stipulation places no real obligations on Duke or any meaningful opportunity for stakeholders to view or participate in the evaluation process. Such illusory commitments are contrary to the public interest and are unlikely to be any real benefit to customers.

The Commission should require Duke to perform the evaluations and analyses discussed above, but the Commission should also require Duke to file its results in this docket within a set period of time.²⁷ Since the Stipulating Parties found it important to recommend these evaluations to be conducted, it should be found equally important for interested parties to participate, provide input, and to require publication of the evaluations. Parties should also have an opportunity to work with Duke prior to filing to discuss concerns and make suggestions. Another opportunity after filing of the results in this docket should be given to parties to submit written comments. If this formal process is not put into place, Duke will be in the position to selectively determine the timing and venue for which it shall make public its findings.

D. The Commission Should Reject OCC's Price-Comparison Tool.

OCC proposes that the Commission modify the Stipulation to require Duke to provide a comparison of its GCR price to the weighted average of suppliers' prices for natural gas (hereinafter "average price"). The Suppliers' Brief anticipated and

²⁵ Staff Brief at 4; Duke Brief at 4.

²⁶ Duke Brief at 5.

²⁷ Joint Post-Hearing Brief of the Retail Energy Supply Association and Interstate Gas Supply, Inc. at 12-19.

addressed many of the claims contained in OCC's brief; therefore, the Suppliers will succinctly respond to OCC's remaining arguments below.

OCC claims that its average price would provide an educational tool to inform customers of the value of competitive offers. In reality, it would have the opposite effect. A simple historical weighted average presented as a straight price comparison provides little insight into the value presented by prospective offers currently available in the market. Thus, OCC's proposal will not benefit the public interest; it would work against it.

Moreover, customers already have a valuable price comparison tool available on the Commission's Apples-to-Apples website (<http://www.energychoice.ohio.gov/>). At that location, customers can compare current supplier offers with the current GCR rate, and make informed decisions based upon that comparison. The website also contains links to both historical apples-to-apples charts and a graph of historical GCR rates. The information that OCC proposes is available to customers today in a format that will not mislead or be viewed in a manner that could lead to misleading information.

OCC claims that the Commission Staff proposed a similar price comparison tool in 1998, stating "[y]ears ago, this same information was contemplated to be included in the PUCO's Apples to Apples website."²⁸ OCC mischaracterizes and takes out of context the apples-to-apples comparison tool proposed by the Commission Staff during the infancy of retail choice in the Columbia service territory.

In that proceeding, the Staff proposed a tool that would allow customers to evaluate the bill impact of **prospective** supplier offers based upon estimated customer

²⁸ OCC Brief at 7.

usage.²⁹ Moreover, the Staff proposed that the comparison tool be specific to each supplier offer available in the market.³⁰ Thus, the apples-to-apples comparison proposed by the Commission Staff in 1998 was more akin to the existing comparison that is available to customers on the Commission Apples-to-Apples website.

Here, however, OCC proposes that the Commission require Duke to present customers with a historical aggregate price that is non-specific to any particular offer or product in the marketplace—rather, OCC seeks to present a comparison of the weighted average historical price billed to choice customers and without taking into account value-added products and services or all choice customers. Such a comparison will not provide customers with useful information to make informed decisions going forward. This is also something the Commission could view as misleading marketing under its own consumer protection rules regarding supplier statements of savings.³¹ OCC is proposing something the Commission has already deemed misleading. Therefore, the Suppliers recommend that the Commission reject OCC's proposal.

²⁹ See, *In the Matter of the Commission's Investigation of the Customer Choice Program of Columbia Gas of Ohio, Inc.*, Case No. 98-593-GA-COI, et al., Finding and Order at 10.

³⁰ *Id.*

³¹ See, Rule 4901:1-29-05(D)(8)(a), Ohio Administrative Code.

IV. CONCLUSION

For the reasons stated herein, the Suppliers urge the Commission to modify and approve the Stipulation as recommended herein to ensure that is in the public interest.

Respectfully submitted,

/s/ Michael J. Settineri

Michael J. Settineri (0073369)
Counsel of Record
Stephen M. Howard (0022421)
Gretchen L. Petrucci (0046608)
Vorys, Sater, Seymour and Pease LLP
52 E. Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008
614-464-5462
mjsettineri@vorys.com
smhoward@vorys.com
glpetrucci@vorys.com

***Attorneys for the Retail Energy
Supply Association***

/s/ Joseph Olikier (per authorization)

Joseph Olikier
Counsel of Record
joliker@igsenergy.com
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
Telephone: (614) 659-5000

Attorney for IGS Energy

CERTIFICATE OF SERVICE

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/s/ Gretchen L. Petrucci

Gretchen L. Petrucci

Amy B. Spiller
Elizabeth H. Watts
Duke Energy Business Services, LLC
139 E. Fourth Street, 1303-Main
P.O. Box 961
Cincinnati, OH 45201-0960
amy.spiller@duke-energy.com
elizabeth.watts@duke-energy.com

Thomas McNamee
Natalia Messenger
Assistant Attorneys General
180 E. Broad St., 6th Floor
Columbus, OH 43215-3793
thomas.mcnamee@ohioattorneygeneral.gov
natalia.messenger@ohioattorneygeneral.gov

Joseph Olikier
IGS Energy
6100 Emerald Parkway
Dublin, OH 43016
joliker@igsenergy.com

William J. Michael
Ajay Kumar
Office of the Ohio Consumers' Counsel
10 W. Broad St., Suite 1800
Columbus, OH 43215
william.michael@occ.ohio.gov
ajay.kumar@occ.ohio.gov

Colleen L. Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45839-1793
cmooney@ohiopartners.org

Scott R. Dismukes
Eckert Seamans Cherin & Mellott LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
sdismukes@eckertseamans.com

Daniel Clearfield
Sarah Stoner
Eckert Seamans Cherin & Mellott LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
sstoner@eckertseamans.com

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