

Public Utilities Section
Office 614.466.4395
Fax 614.644.8764

30 East Broad Street, 16th Floor Columbus, OH 43215-3414 www.ohioattorneygeneral.gov

January 25, 2017

The Honorable Richard Bulgrin, Attorney Examiner Public Utilities Commission of Ohio 180 East Broad Street, 12th Floor Columbus, OH 43215

> Re: Staff Data Request No. 1, Case No. 16-576-EL-POR

Dear Honorable Richard Bulgrin:

The Staff of the Public Utilities Commission of Ohio (Staff) is filing this letter in response to Duke Energy Ohio, Inc.'s (Duke or the Company) letter dated January 23, 2017.

Unfortunately, the values presented in the Company's January 23, 2017 response now directly contradict values previously presented by the Company. Specifically, Staff found that the value now provided for "Projected KWh" for 2012 conflicts with the response Duke previously provided for that category. Staff also found that the individual values provided on January 23, 2017 for the following categories do not result in the aggregate total for these categories that Duke previously provided:

- Projected KWh for 2009-2011; and
- Actual KWh for 2009-2011.

Staff asks that the Company clarify which response is accurate and provide an explanation for the discrepancy. Staff also asks that the Company clarify that the values provided for projected and actual energy savings represent KWh and not MWh, as stated in the latest response.

Staff notes that its Data Request No. 1 was originally submitted to Duke on December 23, 2016. Staff neither changed nor added to the questions originally contained in the Data Request. Given Duke's delay in responding fully to Data Request No. 1, it is inaccurate and misleading to characterize this delay as intended by Staff.

Staff requests that the testimony deadline continue to be delayed until the Company rectifies the discrepancy created through in its latest response.

Respectfully submitted,

/s/ Natalia V. Messenger

John H. Jones Natalia V. Messenger Assistant Attorneys General Public Utilities Section 30 E. Broad St., 16th Floor Columbus, OH 43215 Phone: (614) 466-4395

john.jones@ohioattorneygeneral.gov natalia.messenger@ohioattorneygeneral.gov

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

NVM/tys

cc: Parties of Record

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/25/2017 5:01:15 PM

in

Case No(s). 16-0576-EL-POR

Summary: Letter of Notification electronically filed by Ms. Tonnetta Scott on behalf of PUC