

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke)
Energy Ohio, Inc., for Administration of the)
Significantly Excessive Earnings Test under) Case No. 17-932- EL-UNC
Section 4928.143(F), Revised Code, and Rule)
4901:1-35-10, Ohio Administrative Code.)

DIRECT TESTIMONY OF

LISA D. STEINKUHL

ON BEHALF OF

DUKE ENERGY OHIO, INC.

April 13, 2017

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LDS-1: Return Earned on Average Electric Common Equity

LDS-2: Adjusted Net Income as of December 31, 2016

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LDS-6: Summary of Assumptions

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I. INTRODUCTION AND PURPOSE

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Lisa D. Steinkuhl. My business address is 139 East Fourth Street,
3 Cincinnati, Ohio 45202.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am employed as Rates & Regulatory Strategy Manager by Duke Energy
6 Business Services LLC, an affiliate service company of Duke Energy Ohio, Inc.,
7 (Duke Energy Ohio or Company).

8 **Q. PLEASE SUMMARIZE YOUR EDUCATION AND PROFESSIONAL**
9 **QUALIFICATIONS.**

10 A. I received a Bachelor Degree in Mathematics from Western Kentucky University
11 in Bowling Green, Kentucky. After completing my Bachelor Degree, I received a
12 Post Baccalaureate Certificate in Professional Accountancy from the University
13 of Southern Indiana in Evansville, Indiana. I became a Certified Public
14 Accountant (CPA) in the State of Ohio in 1993.

15 **Q. PLEASE SUMMARIZE YOUR PROFESSIONAL EXPERIENCE.**

16 A. After receiving my Post Baccalaureate Certificate in 1988, I was employed by
17 small public accounting firms. I was hired by Cinergy Services, Inc., the
18 predecessor to Duke Energy Business Services LLC, in 1996, as a tax accountant.
19 I held various positions with Cinergy Services, Inc., including responsibilities in
20 Regulated Business Financial Operations, Commercial Business Asset
21 Management, and Budgets and Forecasts. I joined the Rates Department in April
22 2006 as a Lead Rates Analyst and have held my current position as Rates &

1 Regulatory Strategy Manager since January 2014.

2 **Q. PLEASE DESCRIBE YOUR DUTIES AS RATES & REGULATORY**
3 **STRATEGY MANAGER.**

4 A. As Rates & Regulatory Strategy Manager, I am responsible for the preparation of
5 financial and accounting data used in retail rate filings and various other rate
6 recovery mechanisms for Duke Energy Ohio and its subsidiary, Duke Energy
7 Kentucky, Inc.

8 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PUBLIC**
9 **UTILITIES COMMISSION OF OHIO (COMMISSION)?**

10 A. Yes.

11 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS**
12 **PROCEEDING?**

13 A. I will first provide a brief overview of the Significantly Excessive Earnings Test
14 (SEET) and then I will discuss the SEET calculation of Duke Energy Ohio and the
15 attachments supporting the calculation.

II. BACKGROUND

16 **Q. WHY IS IT NECESSARY FOR DUKE ENERGY OHIO TO SHOW THAT**
17 **IT DOES NOT HAVE SIGNIFICANTLY EXCESSIVE EARNINGS?**

18 A. Pursuant to R.C. 4928.143(F), the Commission is required to evaluate the
19 earnings of each electric distribution utility's approved ESP to determine whether
20 the adjustments in the ESP result in significantly excessive earnings. R.C.
21 4928.143(E) addresses the issue of significantly excessive earnings in the context
22 of an ESP having a term longer than three years.

1 Duke Energy Ohio is currently providing a standard service offer (SSO) of
2 competitive retail electric services pursuant to an ESP that was approved by the
3 Commission on April 2, 2015. The terms of the ESP are set forth in the
4 Commission's Opinion and Order in Case No. 14-841-EL-SSO (ESP Order).

5 **Q. DID THE ESP ORDER THAT THE COMMISSION ISSUED ON APRIL 2,**
6 **2015, ADDRESS THE ADMINISTRATION OF THE SEET TO DUKE**
7 **ENERGY OHIO?**

8 A. Yes. With regard to calculation parameters, the ESP Order did not disagree with
9 the methodology proposed by Duke Energy Ohio and used in its prior SEET
10 proceedings. That methodology provides as follows:

- 11 • Net income as shown on page 117, column (c), line (78) of
12 the [FERC] Form 1, adjusted for the following, if
13 necessary:
- 14 • Eliminate all impacts related to the purchase accounting
15 recorded pursuant to the Duke Energy/Cinergy merger.
- 16 • Eliminate all impacts of refunds to customers pursuant to
17 R.C. 4928.143(F).
- 18 • Eliminate all impacts of mark-to-market accounting.
- 19 • Eliminate all impacts of material, non-recurring
20 gains/losses, including, but not limited to, the sale or
21 disposition of assets.
- 22 • Eliminate all impacts of material, non-recurring revenue or
23 expenses.

- 1 • Eliminate all impacts of parent, affiliated, or subsidiary
2 companies and, to the extent reasonably feasible and
3 prudently justified in the opinion of Duke Energy Ohio,
4 eliminate the impacts of its natural gas distribution
5 business.

6 The adjusted net income will be divided by Common Equity to determine the
7 resulting return on equity. Certain adjustments will be made to Common Equity.

- 8 • Common Equity used in the calculation will be the
9 beginning and ending average common equity of Duke
10 Energy Ohio on a stand-alone basis.
- 11 • Equity will be adjusted to eliminate the acquisition
12 premium recorded to equity pursuant to the Duke
13 Energy/Cinergy merger.
- 14 • Eliminate the cumulative effect of the Net Income
15 adjustments.

16 **Q. DOES THE ESP ORDER DEFINE “SIGNIFICANTLY EXCESSIVE**
17 **EARNINGS”?**

18 A. No. Pursuant to the ESP Order, the threshold for significantly excessive earnings
19 will be determined with the context of this case for calendar year 2016.

III. COMMISSION’S SEET GUIDELINES

20 **Q. WHAT GUIDELINES DID THE COMPANY FOLLOW WHEN**
21 **PREPARING ITS 2016 SEET FILING?**

22 A. The Company has followed the guidelines found in the relevant provision of the

1 ESP Order. Additionally, the Company has incorporated into its SEET the
2 Commission's recommendations from Case No. 09-786-EL-UNC (SEET Case).¹

3 **Q. PLEASE IDENTIFY THE ADDITIONAL RECOMMENDATIONS OF**
4 **THE COMMISSION IN THE SEET CASE.**

5 A. The Commission's orders in that case generally defer to each company's specific
6 situation.

7 As I discuss further below, the Commission directed utilities to: (1) base
8 average equity balances on the average of the balances at the beginning and at the
9 end of the year;² (2) adjust out all impacts from affiliates and other services (*e.g.*,
10 natural gas distribution);³ and (3) address deferrals and other certain factors.⁴

11 **Q. DID THE COMPANY HAVE ANY ESP-RELATED DEFERRALS IN 2016**
12 **THAT IMPACTED EARNINGS?**

13 A. No.

14 **Q. WILL YOU DESCRIBE THE OTHER INFORMATION THAT THE**
15 **COMMISSION DIRECTED COMPANIES TO PROVIDE AS PART OF**
16 **THEIR SEET REVIEWS?**

17 A. On page 29 of its June 30, 2010, Order, the Commission provided a list of factors
18 it identified as worthy of its consideration in any SEET review. The listed factors
19 include the following:

20 • the electric utility's most recently authorized return on equity,

¹ *In the Matter of the Investigation into the Development of the Significantly Excessive Earnings Test Pursuant to Amended Substitute Senate Bill 221 for Electric Utilities*, Case No. 09-786-EL-UNC.

² *Id.*, Entry on Rehearing, at pg. 6 (Aug. 25, 2010).

³ *Id.*, Finding and Order, at pg. 12 (June 30, 2010).

⁴ *Id.*

- 1 • the electric utility's risk, including:
- 2 ○ whether the electric utility owns generation;
- 3 ○ whether the ESP includes a fuel and purchased power
- 4 adjustment or similar adjustments;
- 5 ○ the rate design and extent to which the electric utility
- 6 remains subject to weather and economic risk;
- 7 ○ capital commitments and future capital requirements;
- 8 ○ indicators of management performance and benchmarks to
- 9 other utilities;
- 10 ○ innovation and industry leadership with respect to meeting
- 11 industry challenges to maintain and improve the
- 12 competitiveness of Ohio's economy, including research and
- 13 development expenditures, investments in advanced
- 14 technology, and innovative practices; and
- 15 ○ the extent to which the electric utility has advanced state
- 16 policy.

17 **Q. WHAT IS THE COMPANY'S MOST RECENTLY APPROVED RETURN**
18 **ON COMMON EQUITY?**

19 A. The Company's most recently approved return on common equity is 9.84 percent
20 for its jurisdictional electric distribution service in Ohio.⁵

21 **Q. DOES THE COMPANY HAVE A MECHANISM FOR RECOVERY OF**

⁵ *In the Matter of the Application of Duke Energy Ohio for an Increase in Electric Distribution Rates*, Case No. 12-1682-EL-AIR, *et al.*, Stipulation and Recommendation, at pg. 6 (April 2, 2013), and Opinion and Order, at pg. 6 (May 1, 2013).

1 **PURCHASED POWER EXPENSES?**

2 A. Yes. The Company procured 100 percent of the generation services provided to
3 its SSO load in 2016 through an auction process approved in the ESP Order. The
4 Company recovers the cost of this competitively procured power via riders. Duke
5 Energy Ohio makes no profit or loss on power that is procured via the auction
6 process and is ultimately delivered to its SSO customers.

7 **Q. DESCRIBE THE COMPANY'S RATE DESIGN.**

8 A. The Company's rate design for noncompetitive service has been essentially the
9 same since its unbundled rates became effective on January 1, 2001. The
10 Stipulation in Case No. 11-3549-EL-SSO eliminated some riders that existed at
11 the end of 2011 and added certain new riders for competitive retail services. As a
12 result, there were new rates for competitive retail services based on allocation
13 methods and rate design processes that were approved by the Commission in that
14 case. The 2014 ESP Order further eliminated some riders for competitive service
15 and modified the design of some riders. Depending on the rate class, some
16 customers may have energy-based rates, demand-based rates, or a combination of
17 both. All customers have some form of a customer charge and some non-
18 residential customers have demand ratchets intended to encourage efficient use of
19 resources. For customers who shop, it is not possible for the Company to know
20 the essentially infinite number of rate design options that may be offered by their
21 competitive retail electric service providers.

22 **Q. DESCRIBE THE EXTENT TO WHICH WEATHER AND ECONOMIC**
23 **RISKS IMPACT THE COMPANY.**

1 A. As part of the Stipulation in Case No. 11-3549-EL-SSO, Duke Energy Ohio
2 agreed to file an application to implement a decoupling mechanism for its non-
3 demand-metered customers. The Commission approved the Company's
4 subsequent application toward that end in early 2012, and the Company began
5 accruing a deferral related to the decoupling mechanism. The decoupling
6 mechanism excludes all demand-metered sales but mitigates the impact of certain
7 sales losses, particularly due to compliance with Ohio's energy efficiency
8 mandates. I should note that the approved decoupling mechanism is based on
9 weather-normalized sales; consequently, the Company is still exposed to weather-
10 related earnings risks. The administration of the SEET expressly contemplates
11 that the impacts of Duke Energy Ohio's natural gas are to be eliminated. As such,
12 Duke Energy Ohio does not address, in this proceeding, the weather risks relevant
13 to its natural gas operations.

14 **Q. WILL YOU ADDRESS THE CAPITAL COMMITMENTS AND CAPITAL**
15 **REQUIREMENTS?**

16 A. As stated in the Company's April 13, 2017, Application filed contemporaneously
17 with my testimony in this case, the current ESP expires on May 31, 2018. The
18 capital budget requirements for the future, committed, electric investments in
19 Ohio are \$355 million for 2017 and \$422 million for 2018.

20 **Q. ARE YOU SPONSORING ANY INFORMATION REGARDING**
21 **MANAGEMENT PERFORMANCE AND BENCHMARKS TO OTHER**
22 **UTILITIES?**

23 A. Yes. First, it is important to realize that there is no data that compares the Duke

1 Energy Ohio operating company to its peers. As such, and in an effort to address
2 the Commission's prior directive, reference is made to the information that does
3 exist, on a corporate-wide basis. Attachment LDS-7 is a summary of how Duke
4 Energy Corporation's returns compare to some of its peers. The data represented
5 in this chart represents a comparison of total shareholder return (TSR), which is
6 defined as the sum of dividends and share appreciation divided by a starting price.
7 In this attachment, the first set of numbers shows the TSR for stocks from January
8 1, 2014, through December 31, 2016. The second set of numbers shows the TSR
9 for stocks purchased from January 1, 2015, through December 31, 2016. The
10 third set of numbers shows the TSR for stocks purchased from January 1, 2016,
11 through December 31, 2016.

12 **Q. HAS THE COMPANY BEEN INNOVATIVE IN ADVANCING STATE**
13 **POLICY?**

14 A. Yes. Duke Energy Ohio is the first utility in Ohio to deploy smart meters across
15 its entire service territory. Additionally, the Company has installed and/or
16 automated with two-way communications capabilities over 1,152 system devices
17 inside substations and over 6,723 system devices on distribution circuits. Duke
18 Energy Ohio's self-healing teams have saved many millions of customer outage
19 minutes annually. As a state leader in deployment of the smart grid, Duke Energy
20 Ohio plans to participate in the Commission's "PowerForward" program to share
21 its expertise and to work with interested stakeholders to enhance further
22 innovation.

IV. SCHEDULES SPONSORED BY WITNESS

1 **Q. PLEASE DESCRIBE ATTACHMENT LDS-1.**

2 A. Attachment LDS-1 is a schedule showing that the Company's return earned on
3 average electric common equity for the year ended December 31, 2016, is 8.08
4 percent.

5 **Q. PLEASE DESCRIBE ATTACHMENT LDS-2.**

6 A. Attachment LDS-2 is a schedule showing the calculation of the Company's
7 adjusted electric net income for the calendar year 2016. The source of the utility
8 operating income for the twelve months ended December 31, 2016, is the
9 Company's 2016 FERC Form 1 report, pages 114 to 117. Continuing the
10 methodology used in prior SEET proceedings, which methodology was approved
11 in the ESP Order, purchase accounting recorded as a result of the Duke
12 Energy/Cinergy merger, all impacts of refunds to customers pursuant to R.C.
13 4928.143(F), all impacts of mark-to-market accounting, all impacts of material,
14 non-recurring gains/losses, all impacts of material, non-recurring revenue or
15 expenses, and all impacts of the natural gas business were eliminated. As shown
16 on the attachment, no refunds were returned to customers during the twelve
17 months ended December 31, 2016. Equity in earnings of subsidiary companies
18 was also eliminated so that the return earned on average common equity would be
19 on a Duke Energy Ohio stand-alone basis.

20 **Q. PLEASE DESCRIBE ATTACHMENT LDS-3.**

21 A. Attachment LDS-3 is a summary of the items eliminated from net income. The
22 schedule shows, by Company account, the impact on net income of eliminating

1 purchase accounting, mark-to-market accounting, non-recurring gains and/or
2 losses, material non-recurring revenues and expenses, and the equity in earnings
3 of subsidiary companies.

4 **Q. PLEASE DESCRIBE ATTACHMENT LDS-4.**

5 A. Attachment LDS-4 is an exhibit showing the calculation of the Company's
6 average electric common stock equity as of December 31, 2016. The attachment
7 shows the common stock equity balances for December 31, 2015, and December
8 31, 2016, and the calculation of the average electric common equity balance as of
9 December 31, 2016, to be used in determining if Duke Energy Ohio has
10 significantly excessive earnings. Pursuant to the ESP Order, the following items
11 were eliminated in calculating the ending balance for each calendar year: (1)
12 impacts of purchase accounting recorded pursuant to the Duke Energy/Cinergy
13 merger; (2) all impacts of mark-to-market accounting; and (3) all impacts of
14 material, non-recurring gains and/or losses.

15 **Q. PLEASE DESCRIBE ATTACHMENT LDS-5.**

16 A. Attachment LDS-5 is a schedule showing the calculation of a net plant allocation
17 factor used to allocate total average common equity to electric operations. The
18 gas and electric plant data is from the Company's 2015 and 2016 FERC Form 1,
19 pages 200-201. The schedule shows that, based on net plant, 62.11 percent of the
20 Company's 2016 common equity should be allocated to electric operations.

21 **Q. PLEASE DESCRIBE ATTACHMENT LDS-6.**

22 A. Attachment LDS-6 is a summary of assumptions used in this filing, most of which
23 are from Attachment PAL-2 in Peggy A. Laub's testimony in Case No. 14-841-

1 EL-SSO. I have discussed all of the other relevant assumptions in my testimony.

2 **Q. PLEASE DESCRIBE ATTACHMENT LDS-7.**

3 A. Attachment LDS-7 is a summary showing Duke Energy Corporation's TSR in
4 comparison to some of its peer companies in the Philadelphia Utility Index.

V. CONCLUSION

5 **Q. DOES DUKE ENERGY OHIO HAVE SIGNIFICANTLY EXCESSIVE**
6 **EARNINGS THAT WOULD REQUIRE A REFUND TO CUSTOMERS?**

7 A. No. As shown on Attachment LDS-1, Duke Energy Ohio's return earned on
8 average electric common equity is 8.08 percent. Since the return on average
9 electric common equity is substantially less than the Company's approved 9.84
10 percent rate of return, the Company does not have significantly excess earnings
11 and, therefore, no refund to customers is warranted.

12 **Q. WERE ATTACHMENTS LDS-1, LDS-2, LDS-3, LDS-4, LDS-5, LDS-6 AND**
13 **LDS-7 PREPARED BY YOU OR UNDER YOUR SUPERVISION?**

14 A. Yes.

15 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

16 A. Yes.

Duke Energy Ohio, Inc.
Significantly Excessive Earnings Test
Case No. 17-932-EL-UNC
December 31, 2016

Attachment LDS-1
Page 1 of 1

<u>Description</u>	<u>Source</u>	<u>Amount</u>
Including Non-SSO Sales and ESP Deferrals		
Adjusted Electric Net Income	LDS-2	69,235,970
Average Electric Common Equity	LDS-4	856,799,025
Return Earned on Average Electric Common Equity		<u>8.08%</u>

12 Months Ended December 31, 2016					Eliminations							
Description	Account Level Desc	Account Level	Total	Electric	Purchase Accounting	Mark-to-Market	Non-Recurring Gains / Losses	Non-Recurring Rev / Exp	Equity in Earnings of Subsidiaries	Amounts Refunded to Customers	Total Eliminations	Adjusted December 31, 2016
Utility Operating Income												
Operating Revenues	F_UTIL_OP_REV	Level 6	1,510,039,945	1,093,254,621							0	1,093,254,621
Operation Expenses	F_OP_EXP	Level 8	722,143,068	563,984,940				(916,847)			(916,847)	563,068,093
Maintenance Expenses	F_MAINT_EXP	Level 8	64,361,764	58,108,085				0			0	58,108,085
Depreciation Expense	F_DEPR_EXP	Level 8	117,380,574	71,778,187				(1,519,606)			(1,519,606)	70,258,581
Depreciation Expense for Asset Retirement Costs	F_DEPR_EXP_ARO	Level 8	0	0							0	0
Amort. & Depl. Of Utility Plant	F_AMORT_DEPL_UT_PLNT	Level 8	16,037,097	11,457,911							0	11,457,911
Amort. Of Utility Plant Acquisition Adj.	F_AMORT_UTIL_PLT_ADJ	Level 8	0	0							0	0
Regulatory Debits	FERC 407	FERC	69,018,312	46,280,605							0	46,280,605
Less: Regulatory Credits	Acct 407407, 407315, 407907	Account	(7,236,952)	(7,131,646)							0	(7,131,646)
Taxes Other Than Income Taxes	F_TAX_OTH_INC_TAX	Level 8	244,322,085	190,515,958							0	190,515,958
Income Taxes - Federal	F_INC_TAX_FED	Level 8	5,196,280	(28,024,233)		0	0	19,344,737		0	19,344,737	(8,679,496)
Income Taxes - Other	F_INC_TAX_OTH	Level 8	(11,023,987)	(10,804,457)				0			0	(10,804,457)
Provision For Deferred Income Taxes	F_PROV_DEF_INC_TAX	Level 9	216,357,743	172,204,893							0	172,204,893
Provision For Deferred Income Taxes - Credit	F_DEF_INC_TAX_CR	Level 9	(149,147,518)	(108,877,734)							0	(108,877,734)
Investment Tax Credit Adj - Net	F_INV_TAX_CR_ADJ	Level 8	(433,557)	(231,467)							0	(231,467)
Gains From Disp Of Allow - Credit	F_GAINS_DISP_ALLOW	Level 8	0	0							0	0
Accretion Expense	F_ACCRETION_EXP	Level 8	0	0							0	0
Total Utility Operating Expenses			1,286,974,909	959,261,042	0	0	0	16,908,284	0	0	16,908,284	976,169,326
Net Utility Operating Income			223,065,036	133,993,579	0	0	0	(16,908,284)	0	0	(16,908,284)	117,085,295
Other Income												
Revenues From Merchandising, Jobbing and Contract Work	F_MERCH_JOB_REV	Level 7	1,297,507	1,298,769							0	1,298,769
Less: Costs & Exp of Merchandising, Jobbing & Contract Work	F_MERCH_JOB_EXP	Level 7	2,110,991	2,115,597							0	2,115,597
Revenues From Nonutility Operations	F_TOT_EXP_NON_UTL_OP - Acct 417007	Level 8	65,638	61,423							0	61,423
Less: Expenses of Nonutility Operations	F_TOT_EXP_NON_UTL_OP - Acct 417320	Level 8	89,144	88,809							0	88,809
Non-operating Rental Income	F_NON_OP_RENTAL_INC	Level 8	(266,845)	(164,042)							0	(164,042)
Equity in Earnings of Subsidiary Companies			77,413,651	68,343,411					(68,343,411)		(68,343,411)	0
Interest and Dividend Income	F_INT_INC	Level 7	3,577,344	2,286,246							0	2,286,246
AFUDC	F_AFUDC	Level 7	4,645,340	3,673,050							0	3,673,050
Miscellaneous Non-operating Income	F_MISC_NON_OP_INC	Level 8	(769,867)	(1,348,335)		0					0	(1,348,335)
Gain on Disposition of Property	F_GAIN_DISP_PROP	Level 8	843,392	643,042			(643,042)				(643,042)	0
Total Other Income			84,606,025	72,589,158	0	0	(643,042)	0	(68,343,411)	0	(68,986,453)	3,602,705
Other Income Deductions												
Loss on Disposition of Property	F_LOSS_DISP_PROP		108,015	108,015			(108,015)				(108,015)	0
Misc. Amortization	F_MISC_AMORT	Level 8	0	0							0	0
Donations	F_DONATIONS	Level 8	1,221,441	920,683							0	920,683
Life Insurance	F_LIFE_INS	Level 8	0	0							0	0
Penalties	F_PENALTIES	Level 8	0	0							0	0
Civic, Political & Related Activities	F_EXP_CIVIC_POL	Level 8	1,689,681	1,006,430							0	1,006,430
Other Deductions	F_OTH_DED	Level 8	5,133,446	1,820,577		0	0	0			0	1,820,577
Total Other Income Deductions			8,152,583	3,855,705	0	0	(108,015)	0	0	0	(108,015)	3,747,690
Total Taxes On Other Income and Deductions	F_TAX_OTH_INC_DED	Level 6	2,620,316	1,131,410	(13,706)	0	(189,191)		0	0	(202,897)	928,513
Net Other Income and Deductions			73,833,126	67,602,043	13,706	0	(345,836)	0	(68,343,411)	0	(68,675,541)	(1,073,498)
Net Interest Charges	F_NET_INTEREST_CHGS	Level 4	68,428,290	46,737,067	38,760			0			38,760	46,775,827
Net Income			228,469,872	154,858,555	(25,054)	0	(345,836)	(16,908,284)	(68,343,411)	0	(85,622,585)	69,235,970

<u>Account ID CB</u>	<u>Account Long Descr CB</u>	<u>Account Level 6 Node Name</u>	<u>12 months Ended 12/31/2016</u>	<u>Elimination</u>	<u>Income Tax Effect</u>	<u>Impact on Net Income</u>
<u>Purchase Accounting</u>						
428200	Amort_Debt_Disc_Pur_Acctg_Adj		393,492	(393,492)		
429200	Amort_Debt_Prem_Pur_Acctg_Adj		<u>(432,252)</u>	<u>432,252</u>		
			<u>(38,760)</u>	<u>38,760</u>	<u>(13,706)</u>	<u>(25,054)</u>
	Total Purchase Accounting Adjustment		<u>(38,760)</u>	<u>38,760</u>	<u>(13,706)</u>	<u>(25,054)</u>
<u>Mark-to-Market</u>						
421530	Power Trading MTM Gains	REVENUE	0	0		
421631	MTM Unreal Gains - EA	FUEL	<u>0</u>	<u>0</u>		
	Other Income		<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
426531	MTM Unreal Loss-Reserve	REVENUE	0	0		
426631	MTM Unreal Losses - EA's	FUEL	<u>0</u>	<u>0</u>		
	Other Income Deductions		<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
	Net Other Income and Deductions		<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
	Total Mark-to-Market		<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Non-Recurring Gains / Losses</u>						
421100	Gain On Disposal Of Property	GAIN_LOSS_UTL_ASSETS	643,042	(643,042)	227,387	(415,655)
421200	Loss On Disposal Of Property	GAIN_LOSS_UTL_ASSETS	108,015	(108,015)	38,196	69,819
426510	Other	F_TOT_OTH_INC_DED	0	0	0	0
426513	Other Deductions - Impairments		0	0	0	0
426551	Impairment & other related charges	TTL_OTH_INC_&_EXP	0	0	0	0
426553	PP&E IMPAIRMENT	TTL_OTH_INC_&_EXP	0	0	0	0
426554	Impairment of Goodwill	TTL_OTH_INC_&_EXP	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
	Total Non-Recurring Gains / Losses		<u>535,027</u>	<u>(535,027)</u>	<u>(189,191)</u>	<u>(345,836)</u>
<u>Non-Recurring Revenue / Expense</u>						
CTA - Various	Operation Expenses		916,847	(916,847)	324,207	592,640
CTA - 935100	Maintenance Expenses		0	0	0	0
CTA - 404200	Depreciation Expense		1,519,606	(1,519,606)	537,349	982,257
CTA - Various	Income Taxes & Other Taxes		0	0	0	0
CTA - Various	Other Deductions		0	0	0	0
CTA - 431900	Net Interest Charges		0	0	0	0
Def Tax Basis	Deferred Tax		<u>0</u>	<u>0</u>	<u>18,483,181</u>	<u>(18,483,181)</u>
	Total Non-Recurring Revenue / Expense		<u>2,436,453</u>	<u>(2,436,453)</u>	<u>19,344,737</u>	<u>(16,908,284)</u>
<u>Equity in Earnings of Subsidiary Companies</u>						
418.1	Equity in Earnings of Subsidiary Companies		<u>68,343,411</u>	<u>(68,343,411)</u>		<u>(68,343,411)</u>
	Total Eliminations		<u>71,276,131</u>	<u>(71,276,131)</u>	<u>19,141,840</u>	<u>(85,622,585)</u>

Duke Energy Ohio, Inc.
Significantly Excessive Earnings Test
Average Common Stock Equity
December 31, 2016

Description	December 31, 2015					December 31, 2016					Average Common Equity
	Balance at 12-31-15	Other Adjustments	Remove Equity in Subsidiaries	Goodwill	Adjusted 12-31-15	Balance at 12-31-16	Other Adjustments'	Remove Equity in Subsidiaries	Goodwill & Remove Non-Regulated	Adjusted 12-31-16	
Common Stock Equity											
201000 Common Stock	762,136,231				762,136,231	762,136,231				762,136,231	
207001 Premium on capital stock	0				0	0				0	
208000 Donat Recvd From Stkhld	28,950,000				28,950,000	28,950,000				28,950,000	
208001 Donat Recvd From Duke	1,462,336,840				1,462,336,840	1,462,336,840				1,462,336,840	
208010 Donat Recvd From Stkhld Tax	15,641,578				15,641,578	15,641,578				15,641,578	
210020 Gain on Redemption of Capital	0				0	0				0	
211003 Misc Paid in Capital	(1,955,982,307)				(1,955,982,307)	(1,955,982,307)				(1,955,982,307)	
211004 Miscellaneous Paid in Capital Purch Acctg	943,842,010			(746,918,647)	196,923,363	943,842,010			(746,918,647)	196,923,363	
0211008 Misc PIC Pushdown Adj RE	1,667,546,493				1,667,546,493	1,642,546,493				1,642,546,493	
211005 Miscellaneous Paid in Capital Pre-Merger Equity	557,581,098				557,581,098	557,581,098				557,581,098	
211007 Misc PIC Premerg RE for Div	0				0	0				0	
211110 PIC - Sharesaver	0				0	0				0	
214010 Common stock equity inter-company	0				0	0				0	
216000 Unappropriated RE Bal	226,871,106		(908,809,161)	(2)	(681,938,055)	397,382,727		(645,701,441)		(248,318,714)	
216100 Unapp Ret Erngs-Curr Yr Net Income	(914,348,641)	40,272,787		(1)	(874,075,854)	(847,216,306)	(17,279,174)			(864,495,480)	
438000 Dividends Declared on Common Stock	0				0	0			0	0	
Accum other comprehensive income (loss)	4				4	0				0	
Total Common Stock Equity	<u>\$ 2,794,574,412</u>	<u>\$ 40,272,787</u>	<u>\$ (908,809,161)</u>	<u>\$ (746,918,647)</u>	<u>\$ 1,179,119,391</u>	<u>\$ 3,007,218,364</u>	<u>\$ (17,279,174)</u>	<u>\$ (645,701,441)</u>	<u>\$ (746,918,647)</u>	<u>\$ 1,597,319,102</u>	
Allocation to Duke Energy Ohio Electric (2)					61.19%					62.11%	
Average Common Equity Allocated to Duke Energy Ohio Electric					<u>\$ 721,503,155</u>					<u>\$ 992,094,894</u>	<u>\$ 856,799,025</u>

(1) LDS-3 income adjustments

(2) Source: Attachment LDS-5.

Duke Energy Ohio, Inc.
Significantly Excessive Earnings Test
Net Plant Allocation Factor
December 31, 2016

Attachment LDS-5
1 of 1

	2016	Duke Energy Ohio, Inc.		
<u>Description</u>		<u>Gas</u>	<u>Electric</u>	<u>Total</u>
Gross Plant (Line 13)		2,048,722,041	3,507,202,613	5,555,924,654
Accumulated Depreciation (Line 33)		575,768,498	1,092,348,193	1,668,116,691
Net Plant		<u>1,472,953,543</u>	<u>2,414,854,420</u>	<u>3,887,807,963</u>
Allocation Percentage		37.89%	62.11%	100.00%

Source of Data per Order in Case No. 14-841-EL-SSO:

- 1 Source of data is actual data from FERC Form 1 for the calendar year at issue.

Adjustments to Net Income per Order in Case No. 14-841-EL-SSO:

- 2 Eliminate all impacts related to the purchase accounting recorded pursuant to the Duke Energy / Cinergy Corp. Merger.
- 3 Eliminate all impacts of refunds to customers pursuant to R.C. 4928.143(F)
- 4 Eliminate all impacts of mark-to-market accounting.
- 5 Eliminate all impacts of material, non-recurring gains / losses, including, but not limited to, the sale or disposition of assets.
- 6 Eliminate all impacts of material, non-recurring revenue or expenses.
- 7 Eliminate all impacts of parent, affiliated, or subsidiary companies and, to the extent reasonably feasible and prudently justified in the opinion of Duke Energy Ohio, eliminate the impacts of its natural gas distribution business.

Adjustments to Common Equity per Order in Case No. 14-841-EL-SSO:

- 8 Common Equity used in the calculation will be the beginning and ending average common equity of Duke Energy Ohio on a stand-alone basis (i.e., equity associated with subsidiaries will be excluded and common equity will be allocated between gas and electric service to the extent practicable).
- 9 Eliminate the acquisition premium recorded to equity pursuant to the Duke / Cinergy Corp. merger.
- 10 Eliminate the cumulative effect of the Net Income adjustments.

	<u>Duke</u>	<u>Rank</u>	<u>Percentile Rank</u>
From January 2014 to:			
Mar-14	4.3%	15	26.3%
Jun-14	9.9%	17	15.7%
Sep-14	12.0%	11	47.3%
Dec-14	26.4%	13	36.8%
Mar-15	17.3%	13	36.8%
Jun-15	9.0%	15	26.3%
Sep-15	12.3%	14	31.5%
Dec-15	12.8%	14	31.5%
Mar-16	28.8%	15	26.3%
Jun-16	38.4%	15	26.3%
Sep-16	30.5%	15	22.2%
Dec-16	28.0%	16	16.6%
From January 2015 to:			
Mar-15	-7.2%	14	31.5%
Jun-15	-13.7%	14	31.5%
Sep-15	-11.2%	14	31.5%
Dec-15	-10.8%	14	31.5%
Mar-16	1.9%	14	31.5%
Jun-16	9.5%	14	31.5%
Sep-16	3.2%	14	27.7%
Dec-16	1.3%	16	16.6%
From January 2015 to:			
Mar-16	13.5%	14	31.5%
Jun-16	20.1%	10	52.6%
Sep-16	19.3%	12	38.8%
Dec-16	14.3%	14	27.7%

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in

Case No(s). 17-0932-EL-UNC

Summary: Testimony DIRECT TESTIMONY OF
LISA D. STEINKUHL
ON BEHALF OF
DUKE ENERGY OHIO, INC. electronically filed by Carys Cochern on behalf of Kingery,
Jeanne W Ms.