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Via E-file

March 12, 2018

Public Utilities Commission of Ohio
PUCO Docketing
180 E. Broad Street, 10th Floor
Columbus, Ohio 43215

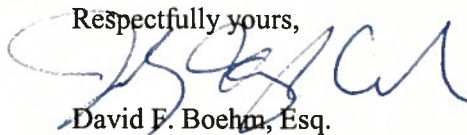
In re: Case Nos. 14-841-EL-SSO; 14-842-EL-ATA

Dear Sir/Madam:

Please find attached the MEMORANDUM IN SUPPORT OF THE OHIO ENERGY GROUP e-filed today in the above-referenced matters.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



David F. Boehm, Esq.
Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY

MLKkew
Encl.

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter Of The Application Of Duke Energy Ohio, Inc. For	:	Case No. 14-841-EL-SSO
Authority To Establish A Standard Service Offer Pursuant To Section	:	
4928.143, Revised Code, In The Form Of An Electric Security Plan,	:	
Accounting Modifications And Tariffs For Generation Service.	:	
	:	
In The Matter Of The Application Of Duke Energy Ohio, Inc. For	:	Case No. 14-842-EL-ATA
Authority To Amend Its Certified Supplier Tariff, P.U.C.O. No. 20.	:	

**MEMORANDUM IN SUPPORT
OF THE OHIO ENERGY GROUP**

The Ohio Energy Group (“OEG”) submits this Memorandum in Support to the Motion to Continue the Riders Included in the Electric Security Plan (“Motion”) filed by Duke Energy Ohio, Inc. (“Duke” or “Company”) on March 9, 2018. In its Motion, Duke explains that after a series of procedural developments, it is now uncertain whether the Commission will issue an order in Duke’s pending Electric Security Plan (“ESP”) case (Case No. 17-1263-EL-SSO, *et al.*) by June 1, 2018, when the Company’s current ESP is scheduled to expire. Consequently, Duke asks the Commission to confirm that the Company’s riders currently in effect under its existing ESP shall continue until the earlier of August 1, 2018 or the effective date of its new ESP.

OEG does not oppose Duke’s Motion, but asks that if the Commission approves the Motion, then its approval order should explicitly state that *all* provisions, terms, and conditions of the Company’s current ESP, including the large customer interruptible load program, will continue through whatever time period the Commission deems appropriate. Duke includes a similar request in its Motion,¹ but spends the majority of the pleading discussing the Company’s riders, particularly the Distribution Capital Investment Rider. However, it would be unworkable for the Commission to approve only the continuation of Duke’s riders without similarly

¹ Motion at 4-5 (“...Duke Energy Ohio requests that the Commission find that the provisions, terms, and conditions of the current ESP, continue until a subsequent SSO is approved and implemented.”).

continuing all other parts of the ESP. Accordingly, the Commission should expressly clarify that any continuation will apply to the entire ESP package.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "m.f. Boehm", is written over a horizontal line.

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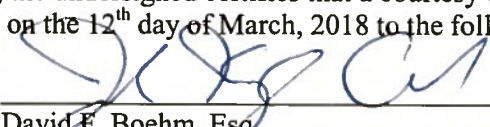
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March 14, 2018

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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 parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 12th day of March, 2018 to the following:



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This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 14-0841-EL-SSO, 14-0842-EL-ATA

Summary: Memorandum Ohio Energy Group (OEG) Memorandum in Support electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group