

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)
Investigation of the Disconnection Policies and) Case No. 17-2089-GE-COI
Practices of Duke Energy Ohio, Inc.)

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED UPON DUKE ENERGY OHIO, INC.**

**BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

FIRST SET

October 26, 2017

The Office of the Ohio Consumers' Counsel, in the above-captioned proceeding before the Public Utilities Commission of Ohio ("PUCO"), submits the following Interrogatories, Requests for Admission, and Requests for Production of Documents pursuant to Sections 4901-1-19 and 4901-1-20 of the Ohio Administrative Code for response by Duke Energy Ohio, Inc. within the 20-day period of time as provided for in the PUCO's Rules. An electronic response should be provided to the extent possible, with hard copies of materials not available electronically, to the Office of the Ohio Consumers' Counsel at the following addresses:

Terry L. Etter, Counsel of Record
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
(614) 466-7964
Terry.etter@occ.ohio.gov

Kimberly W. Bojko
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, Ohio 43215
(614) 365-4124
Bojko@carpenterlipps.com

Additionally, Duke Energy Ohio, Inc. must follow the instructions provided herein in responding to the inquiries.

DEFINITIONS

As used herein the following definitions apply:

1. "Document" or "Documentation" when used herein, is used in its customary broad sense, and means all originals of any nature whatsoever, identical copies, and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in your possession, custody, or control regardless of where located; including any kind of printed, recorded, written, graphic, or photographic matter and things similar to any of the foregoing, regardless of their author or origin.

The term specifically includes, without limiting the generality of the following:

punchcards, printout sheets, movie film, slides, PowerPoint slides, phonograph records, photographs, memoranda, ledgers, work sheets, books, magazines, notebooks, diaries, calendars, appointment books, registers, charts, tables, papers, agreements, contracts, purchase orders, checks and drafts, acknowledgments,

invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meetings of any kind, telegrams, drafts, instructions, announcements, schedules, price lists, electronic copies, reports, studies, statistics, forecasts, decisions, and orders, intra-office and inter-office communications, correspondence, financial data, summaries or records of conversations or interviews, statements, returns, diaries, workpapers, maps, graphs, sketches, summaries or reports of investigations or negotiations, opinions or reports of consultants, brochures, bulletins, pamphlets, articles, advertisements, circulars, press releases, graphic records or representations or publications of any kind (including microfilm, videotape and records, however produced or reproduced), electronic (including e-mail), mechanical and electrical records of any kind and computer produced interpretations thereof (including, without limitation, tapes, tape cassettes, disks and records), other data compilations (including, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, disks and recordings used in automated data processing together with the programming instructions and other material necessary to translate, understand or use the same), all drafts, prints, issues, alterations, modifications, changes, amendments, and mechanical or electric sound recordings and transcripts to the foregoing. A request for discovery concerning documents addressing, relating or referring to, or discussing a specified matter encompasses documents having a factual, contextual, or logical nexus to the matter, as well as documents making explicit or implicit reference thereto in the body of the documents. Originals and duplicates of the same document need not be separately identified or produced; however, drafts of a document or documents differing from

- one another by initials, interlineations, notations, erasures, file stamps, and the like shall be deemed to be distinct documents requiring separate identification or production. Copies of documents shall be legible.
2. “Communication” shall mean any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means, including, but not limited to, telephone conversations, letters, telegrams, and personal conversations. A request seeking the identity of a communication addressing, relating or referring to, or discussing a specified matter encompasses documents having factual, contextual, or logical nexus to the matter, as well as communications in which explicit or implicit reference is made to the matter in the course of the communication.
 3. The “substance” of a communication or act includes the essence, purport or meaning of the same, as well as the exact words or actions involved.
 4. “And” or “Or” shall be construed conjunctively or disjunctively as necessary to make any request inclusive rather than exclusive.
 5. “You,” and “Your,” or “Yourself” refer to the party requested to produce documents and answer interrogatories includes any present or former director, officer, agent, contractor, consultant, advisor, employee, partner, or joint venturer of such party.

The Party requested to produce documents and answer interrogatories is Duke Energy Ohio, Inc.
 6. Each singular shall be construed to include its plural, and vice versa, so as to make the request inclusive rather than exclusive.

7. Words expressing the masculine gender shall be deemed to express the feminine and neuter genders; those expressing the past tense shall be deemed to express the present tense; and vice versa.
8. “Person” includes any firm, corporation, joint venture, association, entity or group of persons, unless the context clearly indicates that only an individual person is referred to.
9. “Identify,” or “the identity of,” or “identified” means as follows:
 - A. When used in reference to an individual, to state his full name and present or last known position and business affiliation, and his position and business affiliation at the time in question;
 - B. When used in reference to a commercial or governmental entity, to state its full name, type of entity (e.g., corporation, partnership, single proprietorship), and its present or last known address;
 - C. When used in reference to a document, to state the date, author, title, type of document (e.g., letter, memorandum, photograph, tape recording, etc.), general subject matter of the document, and its present or last known location and custodian;
 - D. When used in reference to a communication, to state the type of communication (i.e., letter, personal conversation, etc.), the date thereof, and the parties thereto and, in the case of a conversation, to state the substance, place, and approximate time thereof, and identity of other persons in the presence of each party thereto;

- E. When used in reference to an act, to state the substance of the act, the date, time, and place of performance, and the identity of the actor and all other persons present.
10. The terms “PUCO” and “Commission” refer to the Public Utilities Commission of Ohio, including its Commissioners, personnel (including persons working in the Public Utilities Section of the Ohio Attorney General’s Office), and offices.
11. The term “e.g.” connotes illustration by example, not limitation.
12. “Duke” and “Company” refer to Duke Energy Ohio, Inc.
13. “OCC” means the Office of the Ohio Consumers’ Counsel.
14. “Proceeding” means the above-captioned case.
15. “Rule 4901: X-XX-XX” means the Chapter 4901 rule contained within the Ohio Administrative Code.
16. “Winter heating season” refers to the time period described in Ohio Adm. Code 4901:1-18-01(V).

INSTRUCTIONS FOR ANSWERING

1. All information is to be divulged which is in your possession or control, or within the possession or control of your attorney, agents, or other representatives of yours or your attorney.
2. Where an interrogatory calls for an answer in more than one part, each part should be separate in the answer so that the answer is clearly understandable.
3. Each interrogatory shall be answered separately and fully in writing under oath, in accordance with Ohio Adm. Code 4901-1-19(A), unless it is objected to, in which event the reasons for objection shall be stated in lieu of an answer. The answers are to be signed by the person making them, and the objections are to be signed by the attorney making them.
4. If any answer requires more space than provided, continue the answer on the reverse side of the page or on an added page.
5. Your organization(s) is requested to produce responsive materials and information within its physical control or custody, as well as that physically controlled or possessed by any other person acting or purporting to act on your behalf, whether as an officer, director, employee, agent, independent contractor, attorney, consultant, witness, or otherwise.
6. Where these requests seek quantitative or computational information (e.g., models, analyses, databases, and formulas) stored by your organization(s) or its consultants in computer-readable form, in addition to providing hard copy (if an electronic response is not otherwise provided as requested), you are requested to produce such computer-readable information, in order of preference:

- A. Microsoft Excel worksheet files on compact disk;
 - B. other Microsoft Windows or Excel compatible worksheet or database diskette files;
 - C. ASCII text diskette files; and
 - D. such other magnetic media files as your organization(s) may use.
7. Conversion from the units of measurement used by your organization(s) in the ordinary course of business need not be made in your response; e.g., data requested in kWh may be provided in mWh or gWh as long as the unit measure is made clear.
8. Unless otherwise indicated, the following requests shall require you to furnish information and tangible materials pertaining to, in existence, or in effect for the whole or any part of the period from January 1, 2011 through and including the date of your response.
9. Responses must be complete when made, and must be supplemented with subsequently acquired information at the time such information is available.
10. In the event that a claim of privilege is invoked as the reason for not responding to discovery, the nature of the information with respect to which privilege is claimed shall be set forth in responses together with the type of privilege claimed and a statement of all circumstances upon which the respondent to discovery will rely to support such a claim of privilege (i.e., provide a privilege log). Respondent to the discovery must a) identify (see definition) the individual, entity, act, communication, and/or document that is the subject of the withheld information based upon the privilege claim, b) identify all persons to whom the information has already been

revealed, and c) provide the basis upon which the information is being withheld and the reason that the information is not provided in discovery.

INTERROGATORIES

INT-1-001. How many disconnections for nonpayment of residential electric service did Duke make in each month from June 2017 to date?

RESPONSE:

INT-1-002. How many Duke residential electric customers were disconnected for nonpayment during the following timeframes:

- a. October 17, 2011 through April 15, 2012?
- b. October 15, 2012 through April 15, 2013?
- c. October 14, 2013 through April 15, 2014?
- d. October 20, 2014 through April 15, 2015?
- e. October 19, 2015 through April 15, 2016?
- f. October 17, 2016 through April 14, 2017?

RESPONSE:

INT-1-003. Regarding Duke's response to OCC INT-1-002., how many of the disconnections involved arrearages that were not incurred during the applicable winter heating season (i.e., November 1 through April 15) during the following timeframes?

- a. October 17, 2011 through April 15, 2012?
- b. October 15, 2012 through April 15, 2013?
- c. October 14, 2013 through April 15, 2014?
- d. October 20, 2014 through April 15, 2015?
- e. October 19, 2015 through April 15, 2016?
- f. October 17, 2016 through April 14, 2017?

RESPONSE:

INT-1-004. How many disconnections for nonpayment of residential natural gas service did the Company make in each month from June 2017 to date?

RESPONSE:

INT-1-005. How many Duke residential gas customers were disconnected for nonpayment during the following timeframes:

- a. October 17, 2011 through April 15, 2012?
- b. October 15, 2012 through April 15, 2013?
- c. October 14, 2013 through April 15, 2014?
- d. October 20, 2014 through April 15, 2015?
- e. October 19, 2015 through April 15, 2016?
- f. October 17, 2016 through April 14, 2017?

RESPONSE:

INT-1-006. Regarding Duke's response to OCC INT-1-010, how many of the disconnections involved arrearages that were not incurred during the applicable winter heating season (i.e., November 1 through April 15) during the following timeframes?

- a. October 17, 2011 through April 15, 2012?
- b. October 15, 2012 through April 15, 2013?
- c. October 14, 2013 through April 15, 2014?
- d. October 20, 2014 through April 15, 2015?
- e. October 19, 2015 through April 15, 2016?
- f. October 17, 2016 through April 14, 2017?

RESPONSE:

INT-1-007. What are the remote disconnection and reconnection capabilities of the Automated Metering Infrastructure (“AMI”) meters that were procured as part of Duke’s Grid Modernization Program?

RESPONSE:

INT-1-008. How many disconnections of residential electric service were performed using the remote disconnection capabilities of the AMI meters for each month of the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date?

RESPONSE:

INT-1-009. How many residential customers whose electric service was disconnected for nonpayment to date were reconnected using the remote reconnection capabilities of the AMI meters for each month of the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017?

RESPONSE:

INT-1-010. Have any changes been made in Duke’s credit and collection policies and practices as a result of the implementation of remote disconnection and reconnection capabilities associated with AMI? If so, provide a detailed explanation of each change.

RESPONSE:

INT-1-011. For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what are the total revenues that Duke collected from residential natural gas customers in late payment charges?

RESPONSE:

INT-1-012. For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what are the total revenues that Duke collected from residential electric customers in late payment charges?

RESPONSE:

INT-1-013. For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what are the total revenues that Duke collected from residential natural gas customers in reconnection charges?

RESPONSE:

INT-1-014. For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what are the total revenues that Duke collected from residential electric customers in reconnection charges?

RESPONSE:

INT-1-015. What are the total costs incurred by the Company to perform a reconnection using the remote reconnection capabilities of the AMI meters?

RESPONSE:

INT-1-016. For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many of Duke's residential customers were enrolled in one of the following PUCO-mandated payment plans (see Ohio Adm. Code 4901:1-18-05)?

- a. One-third.
- b. One-sixth.
- c. One-ninth.

RESPONSE:

INT-1-017. Referring to Duke's response to OCC INT-1-016, for each year, how many Duke residential customers defaulted on one of the PUCO-mandated payment plans and were disconnected for non-payment?

RESPONSE:

INT-1-018. For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many Duke residential customers were enrolled in a payment plan other than the PUCO-mandated payment plans?

RESPONSE:

INT-1-019. Referring to Duke's response to OCC INT-1-018, for each year, how many of the customers were enrolled in a payment plan other than the PUCO-mandated payment plans during the applicable winter heating season (i.e., November 1 of one year through April 15 of the next year)?

RESPONSE:

INT-1-020. Referring to Duke's response to OCC INT-1-018, for each year, how many Duke residential customers were disconnected for non-payment as a result of defaulting on a payment plan other than a PUCO-mandated payment plan?

RESPONSE:

INT-1-021. For each month in the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many residential premise visits did Duke perform on the day of disconnection before disconnecting a residential customer's electric service, as required by Ohio Adm. Code 4901:1-06(A)(2)?

RESPONSE:

INT-1-022. What options were provided to customers during the premise visits to avoid disconnection?

RESPONSE:

INT-1-023. Before Duke's disconnection waiver pilot took effect on May 1, 2017, if contact was not made with the customer or adult consumer during the premise visit and a disconnection notice was hung on the door, when was the service actually disconnected?

RESPONSE:

INT-1-024. For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many of the residential premise visits that Duke performed resulted in the avoidance of a disconnection for nonpayment?

RESPONSE:

INT-1-025. Provide a detailed timeline of Duke's credit and collection process related to residential electric customers including the number of days for each step in the process from the time a bill generates until a disconnection for non-payment would occur if the bill were not paid during the summer months.

RESPONSE:

INT-1-026. Provide a detailed timeline of Duke's credit and collection process related to residential electric customers including the number of days for each step in the process from the time a bill generates until a disconnection for non-payment would occur if the bill were not paid during a winter month.

RESPONSE:

INT-1-027. Referring to Duke's response to INT-1-025 and INT-1-026, provide an explanation of any disconnection notice(s) that are provided to residential electric customers throughout the timeline.

RESPONSE:

INT-1-028. What criteria does Duke use to determine that a residential electric customer's service should be disconnected?

RESPONSE:

INT-1-029. Does Duke have a threshold past-due balance amount that triggers disconnection of residential electric service?

RESPONSE:

INT-1-030. If the response to OCC INT-1-029 is affirmative, what is the threshold past-due balance amount that triggers disconnection of residential electric service?

RESPONSE:

INT-1-031. Provide a detailed timeline of Duke's credit and collection process related to residential natural gas customers including the number of days for each step in the process from the time a bill generates until a disconnection for non-payment would occur if the bill were not paid during the summer months.

RESPONSE:

INT-1-032. Provide a detailed timeline of Duke's credit and collection process related to residential natural gas customers including the number of days for each step in the process from the time a bill generates until a disconnection for non-payment would occur if the bill were not paid during a winter month.

RESPONSE:

INT-1-033. Referring to Duke's response to INT-1-031 and INT-1-032, provide an explanation of any disconnection notice(s) that are provided to residential natural gas customers throughout the timeline.

RESPONSE:

INT-1-034. What criteria does Duke use to determine that a residential natural gas customer's service should be disconnected?

RESPONSE:

INT-1-035. Does Duke have a threshold past-due balance amount that triggers disconnection of residential natural gas service?

RESPONSE:

INT-1-036. If the response to OCC INT-1-035 is affirmative, what is the threshold past-due balance amount that triggers disconnection of residential natural gas service?

RESPONSE:

INT-1-037. For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what was the average unpaid residential customer bill at the time of disconnection?

RESPONSE:

INT-1-038. Provide a detailed timeline of Duke's credit and collection process related to residential combination electric and natural gas customers including the number of days for each step in the process from the time a bill generates until a disconnection for nonpayment would occur if the bill were not paid during the summer months.

RESPONSE:

INT-1-039. Provide a detailed timeline of Duke's credit and collection process related to residential combination electric and natural gas customers including the number of days for each step in the process from the time a bill generates until a disconnection for nonpayment would occur if the bill were not paid during a winter month.

RESPONSE:

INT-1-040. Referring to Duke's response to INT-1-038 and INT-1-039, provide an explanation of any disconnection notice(s) that are provided to residential combination electric and natural gas customers throughout the timeline.

RESPONSE:

INT-1-041. When and how are Duke's residential combination natural gas and electric customers informed about the option to retain either gas or electric service in the event of disconnection or pending disconnection of both gas and electric services?

RESPONSE:

INT-1-042. For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many residential combination natural gas and electric customers who were either disconnected or had a pending disconnection of gas and electric service chose to retain their electric service by paying or arranging payment for the past due electric balance?

RESPONSE:

INT-1-043. For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many residential combination natural gas and electric customers who were either disconnected or had a pending disconnection of gas and electric service chose to retain their natural gas service by paying or arranging payment for the past due natural gas balance?

RESPONSE:

INT-1-044. How does Duke define a customer “complaint”?

RESPONSE:

INT-1-045. How does Duke receive complaints directly from a customer (e.g., by telephone, email, letter, etc.)?

RESPONSE:

INT-1-046. Who is responsible for receiving and responding to customer complaints for Duke?

RESPONSE:

INT-1-047. What protocols and policies does Duke have in place for handling customer complaints?

RESPONSE:

INT-1-048. Please identify any and all meetings Duke has had with Public Utilities Commission of Ohio employees about disconnections of Duke's customers for each of the following years:

- a. 2011
- b. 2012
- c. 2013
- d. 2014
- e. 2015
- f. 2016
- g. 2017 to date

RESPONSE:

INT-1-049. For each meeting listed above in response to INT-1-048, please identify the following:

- a. The date the meeting occurred.
- b. Who was in attendance.
- c. The subject matter of the meeting.

RESPONSE:

INT-1-050. What was the credit and collection budget for Duke Energy Ohio for each of the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017?

RESPONSE:

INT-1-051. Referring to the Duke response to INT-1-050, what were the total expenditures for credit and collection activities for each of the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date?

RESPONSE:

INT-1-052. For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many medical certifications were accepted by Duke?

RESPONSE:

INT-1-053. For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many medical certifications were accepted by Duke where more than one certification was accepted for the same address?

RESPONSE:

INT-1-054. For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many medical certifications were accepted telephonically by Duke?

RESPONSE:

INT-1-055. For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many medical certifications were rejected by Duke?

RESPONSE:

INT-1-056. Referring to Duke's response to INT-1-055, why were the medical certifications rejected, and what is the number of medical certifications that were rejected for each reason?

RESPONSE:

INT-1-057. What are the different methods in which Duke enables medical professionals to request a medical certification form?

RESPONSE:

INT-1-058. Does Duke reconnect electric service on a 24-hour per-day basis, seven days per week after the medical certification form is received from medical professionals?

RESPONSE:

INT-1-059. Referring to Duke's online "Medical Certification Request" form, how many medical certifications were rejected by year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date because the form was not completed in its entirety?

RESPONSE:

INT-1-060. Since May 1, 2017, have any Duke customers whose electric service was subject to disconnection met the definition of "Critical Care" customers, as mentioned on page 6 Duke's application in Case No. 16-1609-EL-WVR, but were not participating in the "Critical Care" program? If so, how many?

RESPONSE:

INT-1-061. Of the customers identified in Duke's response to OCC INT-1-060, how many became participants in the "Critical Care" program?

RESPONSE:

INT-1-062. Of the customers identified in Duke's response to OCC INT-1-060, how many had their electric service disconnected for nonpayment?

RESPONSE:

INT-1-063. Of the customers identified in Duke's response to OCC INT-1-062, how many received an in-person visit from Duke personnel on the day service was disconnected?

RESPONSE:

INT-1-064. What criteria Duke does Duke use in identifying "Critical Care" customers?

RESPONSE:

INT-1-065. How many Duke residential electric customers do not have AMI meters?

RESPONSE:

INT-1-066. How does Duke provide disconnection notices to residential electric customers:

- a. who have AMI meters?
- b. who do not have AMI meters?

RESPONSE:

INT-1-067. After residential customers have received a disconnection notice for electric service, how many days do they have to respond to the disconnection notice before service is actually disconnected?

RESPONSE:

INT-1-068. How does Duke provide disconnection notices to residential natural gas customers?

RESPONSE:

INT-1-069. After residential customers have received a disconnection notice for natural gas service, how many days do they have to respond to the disconnection notice before service is actually disconnected?

RESPONSE:

INT-1-070. Does Duke apply the procedures set forth in Ohio Adm. Code 4901:1-18-06(B) to a customer if the customer's arrearages were not incurred during the winter heating season defined in Ohio Adm. Code 4901:1-18-01(V)?
If not, why?

RESPONSE:

INT-1-071. Does Duke apply the procedures set forth in the PUCO's annual Winter Reconnect Order (such as the Finding and Order issued on September 13, 2017 in Case No. 17-1829-GE-UNC) to a customer if the customer's arrearages were not incurred during the winter heating season set forth in the annual Winter Reconnect Order? If not, why?

RESPONSE:

REQUESTS FOR PRODUCTION

- RPD-1-001. Please provide a copy of all formal and informal requests (e.g., interrogatories, data requests) made to the Company by the Commission, the independent auditor for this case, the PUCO Staff, and/or the PUCO's Attorneys General in this proceeding and the Company's responses to those requests.
- RPD-1-002. Please provide a copy of all formal and informal requests (e.g., interrogatories, data requests) made to the Company by intervenors in this proceeding and the Company's responses to those requests.
- RPD-1-003. Produce all documents referenced by Duke in response to OCC INT-1-001 through OCC INT-1-071.
- RPD-1-004. Please provide a copy of Duke's current residential customer credit and collection policies and practices.
- RPD-1-005. Please provide a copy of the disconnection notice(s) that Duke provides to residential customers who become delinquent in payments.

- RPD-1-006. Please provide a copy of all training materials used by Duke to train call center and credit and collection personnel about the options available for residential customers to avoid disconnection for non-payment.
- RPD-1-007. Please provide a copy of all complaints regarding Duke's disconnection of residential customers for nonpayment that Duke received from January 1, 2011 through October 2017 to date.
- RPD-1-008. Please provide copies of any and all guidelines or internal policies Duke has about handling customer complaints.
- RPD-1-009. Please provide a copy of any instructions that are provided to medical professionals concerning completion of the online "Medical Certification Request" form.
- RPD-1-010. Please provide a copy of any and all guidelines or internal policies Duke has concerning the processing and administration of medical certifications.
- RPD-1-011. Please provide a copy of any guidance that Duke has received from the PUCO since January 2011 that is related to Duke's use of AMI meters for remote disconnection or reconnection.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the forgoing Interrogatories and Request for Production of Documents Propounded Upon Duke Energy Ohio, First Set, were served upon the parties listed below via electronic transmission this 26th day of October 2017.

/s/ Terry L. Etter
Terry L. Etter
Assistant Consumers' Counsel

SERVICE LIST

William Wright
Attorney General's Office
Public Utilities Commission of Ohio
30 E. Broad St., 16th Floor
Columbus, Ohio 43215
William.wright@ohioattorneygeneral.gov

Amy B. Spiller
Elizabeth H. Watts
Duke Energy Business Services
139 East Fourth Street
1303-Main
Cincinnati, Ohio 45202
Amy.Spiller@duke-energy.com
Elizabeth.watts@duke-energy.com

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's)
Investigation of the Disconnection Policies) Case No. 17-2089-GE-COI
and Practices of Duke Energy Ohio, Inc.)

**DUKE ENERGY OHIO'S RESPONSES TO THE
FIRST SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
FROM THE OFFICE OF THE OHIO CONSUMERS' COUNSEL TO
DUKE ENERGY OHIO, INC.**

Dated: November 15, 2017

Duke Energy Ohio, Inc., (Duke Energy Ohio or Company) hereby submits its responses and objections to the First Set of Interrogatories and Request for Production of Documents (Discovery Request) submitted by The Ohio Consumers' Counsel (OCC) to Duke Energy Ohio in the above-captioned case.

Duke Energy Ohio's responses are being provided subject to, and without waiver of, the general objections stated below and the specific objections posed in response to each Discovery Request. The general objections are hereby incorporated by reference into the individual response made to each Discovery Request. Duke Energy Ohio's responses to these Discovery Requests are submitted without prejudice to, and without waiving, any general objections not expressly set forth herein. The provision of any response shall not waive Duke Energy Ohio's objections.

Duke Energy Ohio expressly reserves the right to supplement these responses, as required under Ohio law and Public Utilities Commission of Ohio (Commission) rule. The Company further expressly reserves the right to object, on appropriate grounds, to the use of any or all of its responses for purposes of discovery or as evidence in the hearing of the captioned matter. Duke Energy Ohio hereby fully preserves all of its objections to the Discovery Requests or the use of its responses for any purpose.

Duke Energy Ohio's responses to the Discovery Requests shall not be construed as a waiver of the attorney-client privilege, trial preparation and/or work product doctrine, or any other applicable privilege or doctrine. Duke Energy Ohio reserves the right to seek protective treatment in respect of discovery, as permitted under the Ohio Rules of Civil Procedure and Commission Rule.

GENERAL OBJECTIONS

1. Duke Energy Ohio objects to any Discovery Request as improper, overbroad, and unduly burdensome to the extent it purports to impose upon the Company any obligations broader than those set forth the Commission's rules or as otherwise allowed by law.
2. Duke Energy Ohio objects to these Discovery Requests and to OCC's Definitions and Instructions as improper, overbroad, and unduly burdensome to the extent that they seek or purport to require the disclosure of information protected by the attorney-client privilege, trial preparation and/or work product doctrine, or any other applicable privilege or doctrine. Duke Energy Ohio's responses as may hereinafter be given shall not include any information protected by such privileges or doctrines, and any inadvertent disclosure of such information shall not be deemed as a waiver of any such privilege or doctrine.
3. Duke Energy Ohio objects to these Discovery Requests and to the OCC's Definitions and Instructions to the extent they improperly seek or purport to require Duke Energy Ohio to provide documents and information not in the possession, custody, or control of Duke Energy Ohio.
4. The objections and responses contained herein and produced in response hereto are not intended to, nor they, be construed as waiving Duke Energy Ohio's right to object to these Discovery Requests or the information provided in response thereto for any purpose, including but not limited to discovery, motion practice, and hearing.
5. Duke Energy Ohio objects to these Discovery Requests to the extent they improperly seek or purport to require the production of documents or information that is not relevant to the subject matter of the captioned proceeding and/or not reasonably calculated to lead to the discovery of admissible evidence.

6. Duke Energy Ohio objects to these Discovery Requests and the OCC's Definitions and Instructions to the extent they improperly seek or purport to require production of documents in a form other than how the documents are maintained by the Company in the ordinary course of business.
7. Duke Energy Ohio objects to these Discovery Requests to the extent they seek documents or information that is publically available to, and thus equally accessible by, the OCC.
8. Duke Energy Ohio objects to those Discovery Requests that seek "all" or "any" document, to the extent that such requests are overly broad, unduly burdensome, expose the Company to undue expense, and are designed to elicit information that is irrelevant or not likely to lead to the discovery of admissible evidence.
9. Duke Energy Ohio objects to those Discovery Requests that fail to include reasonable time parameters pursuant to which they are to be answered, on the basis that said requests are overly broad, unduly burdensome, expose the Company to undue expense, and are designed to elicit information that is irrelevant or not likely to lead to the discovery of admissible evidence.
10. Duke Energy Ohio objects to these Discovery Requests to the extent they are vague, ambiguous, lacking in definition, include terminology that is subject to differing interpretations, and otherwise force the Company to engage in speculation and guesswork as to their intended meaning.
11. Duke Energy Ohio objects to these Discovery Requests and to the OCC's Definitions and Instructions to the extent they improperly seek or purport to require the production of information relating to entities not within the jurisdiction of the Commission.

12. The objections and responses contained herein are not intended to be, nor should they be construed as, a waiver of Duke Energy Ohio's right to object to other discovery involving or relating to the subject matter of these requests and responses.

**THE OHIO CONSUMERS' COUNSEL
FIRST SET OF DISCOVERY REQUESTS
TO DUKE ENERGY OHIO, INC.
Docket No. 17-2089-GE-COI**

INTERROGATORIES

INTERROGATORY NO. 1:

How many disconnections for nonpayment of residential electric service did Duke make in each month from June 2017 to date?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 2:

How many Duke residential electric customers were disconnected for nonpayment during the following timeframes:

- a. October 17, 2011 through April 15, 2012?
- b. October 15, 2012 through April 15, 2013?
- c. October 14, 2013 through April 15, 2014?
- d. October 20, 2014 through April 15, 2015?
- e. October 19, 2015 through April 15, 2016?
- f. October 17, 2016 through April 14, 2017?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 3:

Regarding Duke's response to OCC INT-1-002., how many of the disconnections involved arrearages that were not incurred during the applicable winter heating season (i.e., November 1 through April 15) during the following timeframes?

- a. October 17, 2011 through April 15, 2012?
- b. October 15, 2012 through April 15, 2013?
- c. October 14, 2013 through April 15, 2014?
- d. October 20, 2014 through April 15, 2015?

- e. October 19, 2015 through April 15, 2016?
- f. October 17, 2016 through April 14, 2017?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 4:

How many disconnections for nonpayment of residential natural gas service did the Company make in each month from June 2017 to date?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 5:

How many Duke residential gas customers were disconnected for nonpayment during the following timeframes:

- a. October 17, 2011 through April 15, 2012?
- b. October 15, 2012 through April 15, 2013?
- c. October 14, 2013 through April 15, 2014?
- d. October 20, 2014 through April 15, 2015?
- e. October 19, 2015 through April 15, 2016?
- f. October 17, 2016 through April 14, 2017?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 6:

Regarding Duke's response to OCC INT-1-010, how many of the disconnections involved arrearages that were not incurred during the applicable winter heating season (i.e., November 1 through April 15) during the following timeframes?

- a. October 17, 2011 through April 15, 2012?
- b. October 15, 2012 through April 15, 2013?
- c. October 14, 2013 through April 15, 2014?
- d. October 20, 2014 through April 15, 2015?
- e. October 19, 2015 through April 15, 2016?

f. October 17, 2016 through April 14, 2017?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 7:

What are the remote disconnection and reconnection capabilities of the Automated Metering Infrastructure (“AMI”) meters that were procured as part of Duke’s Grid Modernization Program?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 8:

How many disconnections of residential electric service were performed using the remote disconnection capabilities of the AMI meters for each month of the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 9:

How many residential customers whose electric service was disconnected for nonpayment to date were reconnected using the remote reconnection capabilities of the AMI meters for each month of the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 10:

Have any changes been made in Duke’s credit and collection policies and practices as a result of the implementation of remote disconnection and reconnection capabilities associated with AMI? If so, provide a detailed explanation of each change.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 11:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what are the total revenues that Duke collected from residential natural gas customers in late payment charges?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 12:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what are the total revenues that Duke collected from residential electric customers in late payment charges?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 13:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what are the total revenues that Duke collected from residential natural gas customers in reconnection charges?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 14:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what are the total revenues that Duke collected from residential electric customers in reconnection charges?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 15:

What are the total costs incurred by the Company to perform a reconnection using the remote reconnection capabilities of the AMI meters?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 16:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many of Duke's residential customers were enrolled in one of the following PUCO-mandated payment plans (see Ohio Adm. Code 4901:1-18-05)?

- a. One-third.
- b. One-sixth.
- c. One-ninth.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 17:

Referring to Duke's response to OCC INT-1-016, for each year, how many Duke residential customers defaulted on one of the PUCO-mandated payment plans and were disconnected for non-payment?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 18:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many Duke residential customers were enrolled in a payment plan other than the PUCO-mandated payment plans?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 19:

Referring to Duke's response to OCC INT-1-018, for each year, how many of the customers were enrolled in a payment plan other than the PUCO-mandated payment plans during the applicable winter heating season (i.e., November 1 of one year through April 15 of the next year)?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 20:

Referring to Duke's response to OCC INT-1-018, for each year, how many Duke residential customers were disconnected for non-payment as a result of defaulting on a payment plan other than a PUCO-mandated payment plan?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 21:

For each month in the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many residential premise visits did Duke perform on the day of disconnection before disconnecting a residential customer's electric service, as required by Ohio Adm. Code 4901:1-06(A)(2)?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 22:

What options were provided to customers during the premise visits to avoid disconnection?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 23:

Before Duke's disconnection waiver pilot took effect on May 1, 2017, if contact was not made with the customer or adult consumer during the premise visit and a disconnection notice was hung on the door, when was the service actually disconnected?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 24:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many of the residential premise visits that Duke performed resulted in the avoidance of a disconnection for nonpayment?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 25:

Provide a detailed timeline of Duke's credit and collection process related to residential electric customers including the number of days for each step in the process from the time a bill generates until a disconnection for non-payment would occur if the bill were not paid during the summer months.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 26:

Provide a detailed timeline of Duke's credit and collection process related to residential electric customers including the number of days for each step in the process from the time a bill generates until a disconnection for non-payment would occur if the bill were not paid during a winter month.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 27:

Referring to Duke's response to INT-1-025 and INT-1-026, provide an explanation of any disconnection notice(s) that are provided to residential electric customers throughout the timeline.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 28:

What criteria does Duke use to determine that a residential electric customer's service should be disconnected?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 29:

Does Duke have a threshold past-due balance amount that triggers disconnection of residential electric service?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 30:

If the response to OCC INT-1-029 is affirmative, what is the threshold past-due balance amount that triggers disconnection of residential electric service?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 31:

Provide a detailed timeline of Duke's credit and collection process related to residential natural gas customers including the number of days for each step in the process from the time a bill generates until a disconnection for non-payment would occur if the bill were not paid during the summer months.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 32:

Provide a detailed timeline of Duke's credit and collection process related to residential natural gas customers including the number of days for each step in the process from the time a bill generates until a disconnection for non-payment would occur if the bill were not paid during a winter month.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 33:

Referring to Duke's response to INT-1-031 and INT-1-032, provide an explanation of any disconnection notice(s) that are provided to residential natural gas customers throughout the timeline.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 34:

What criteria does Duke use to determine that a residential natural gas customer's service should be disconnected?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 35:

Does Duke have a threshold past-due balance amount that triggers disconnection of residential natural gas service?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 36:

If the response to OCC INT-1-035 is affirmative, what is the threshold past-due balance amount that triggers disconnection of residential natural gas service?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 37:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what was the average unpaid residential customer bill at the time of disconnection?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 38:

Provide a detailed timeline of Duke's credit and collection process related to residential combination electric and natural gas customers including the number of days for each step in the process from the time a bill generates until a disconnection for nonpayment would occur if the bill were not paid during the summer months.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 39:

Provide a detailed timeline of Duke's credit and collection process related to residential combination electric and natural gas customers including the number of days for each step in the process from the time a bill generates until a disconnection for nonpayment would occur if the bill were not paid during a winter month.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 40:

Referring to Duke's response to INT-1-038 and INT-1-039, provide an explanation of any disconnection notice(s) that are provided to residential combination electric and natural gas customers throughout the timeline.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 41:

When and how are Duke's residential combination natural gas and electric customers informed about the option to retain either gas or electric service in the event of disconnection or pending disconnection of both gas and electric services?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 42:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many residential combination natural gas and electric customers who were either disconnected or had a pending disconnection of gas and electric service chose to retain their electric service by paying or arranging payment for the past due electric balance?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 43:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many residential combination natural gas and electric customers who were either disconnected or had a pending disconnection of gas and electric service chose to retain their natural gas service by paying or arranging payment for the past due natural gas balance?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 44:

How does Duke define a customer "complaint"?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 45:

How does Duke receive complaints directly from a customer (e.g., by telephone, email, letter, etc.)?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 46:

Who is responsible for receiving and responding to customer complaints for Duke?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 47:

What protocols and policies does Duke have in place for handling customer complaints?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 48:

Please identify any and all meetings Duke has had with Public Utilities Commission of Ohio employees about disconnections of Duke's customers for each of the following years:

- a. 2011
- b. 2012
- c. 2013
- d. 2014
- e. 2015
- f. 2016
- g. 2017 to date

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 49:

For each meeting listed above in response to INT-1-048, please identify the following:

- a. The date the meeting occurred.
- b. Who was in attendance.
- c. The subject matter of the meeting.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 50:

What was the credit and collection budget for Duke Energy Ohio for each of the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 51:

Referring to the Duke response to INT-1-050, what were the total expenditures for credit and collection activities for each of the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 52:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many medical certifications were accepted by Duke?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 53:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many medical certifications were accepted by Duke where more than one certification was accepted for the same address?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 54:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many medical certifications were accepted telephonically by Duke?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 55:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many medical certifications were rejected by Duke?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 56:

Referring to Duke's response to INT-1-055, why were the medical certifications rejected, and what is the number of medical certifications that were rejected for each reason?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 57:

What are the different methods in which Duke enables medical professionals to request a medical certification form?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 58:

Does Duke reconnect electric service on a 24-hour per-day basis, seven days per week after the medical certification form is received from medical professionals?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 59:

Referring to Duke's online "Medical Certification Request" form, how many medical certifications were rejected by year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date because the form was not completed in its entirety?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 60:

Since May 1, 2017, have any Duke customers whose electric service was subject to disconnection met the definition of "Critical Care" customers, as mentioned on page 6 Duke's application in Case No. 16-1609-EL-WVR, but were not participating in the "Critical Care" program? If so, how many?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 61:

Of the customers identified in Duke's response to OCC INT-1-060, how many became participants in the "Critical Care" program?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 62:

Of the customers identified in Duke's response to OCC INT-1-060, how many had their electric service disconnected for nonpayment?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 63:

Of the customers identified in Duke's response to OCC INT-1-062, how many received an in-person visit from Duke personnel on the day service was disconnected?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 64:

What criteria Duke does Duke use in identifying "Critical Care" customers?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 65:

How many Duke residential electric customers do not have AMI meters?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 66:

How does Duke provide disconnection notices to residential electric customers:

- a. who have AMI meters?
- b. who do not have AMI meters?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 67:

After residential customers have received a disconnection notice for electric service, how many days do they have to respond to the disconnection notice before service is actually disconnected?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 68:

How does Duke provide disconnection notices to residential natural gas customers?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 69:

After residential customers have received a disconnection notice for natural gas service, how many days do they have to respond to the disconnection notice before service is actually disconnected?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 70:

Does Duke apply the procedures set forth in Ohio Adm. Code 4901:1-18-06(B) to a customer if the customer's arrearages were not incurred during the winter heating season defined in Ohio Adm. Code 4901:1-18-01(V)? If not, why?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 71:

Does Duke apply the procedures set forth in the PUCO's annual Winter Reconnect Order (such as the Finding and Order issued on September 13, 2017 in Case No. 17-1829-GE-UNC) to a customer if the customer's arrearages were not incurred during the winter heating season set forth in the annual Winter Reconnect Order? If not, why?

Response: See response provided contemporaneously herewith.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION OF DOCUMENT NO. 1:

Please provide a copy of all formal and informal requests (e.g., interrogatories, data requests) made to the Company by the Commission, the independent auditor for this case, the PUCO Staff, and/or the PUCO's Attorneys General in this proceeding and the Company's responses to those requests.

Responses: See response provided contemporaneously herewith.

REQUEST FOR PRODUCTION OF DOCUMENT NO. 2:

Please provide a copy of all formal and informal requests (e.g., interrogatories, data requests) made to the Company by intervenors in this proceeding and the Company's responses to those requests.

Responses: See response provided contemporaneously herewith.

REQUEST FOR PRODUCTION OF DOCUMENT NO. 3:

Produce all documents referenced by Duke in response to OCC INT-1-001 through OCC INT-1-071.

Responses: See response provided contemporaneously herewith.

REQUEST FOR PRODUCTION OF DOCUMENT NO. 4:

Please provide a copy of Duke's current residential customer credit and collection policies and practices.

Responses: See response provided contemporaneously herewith.

REQUEST FOR PRODUCTION OF DOCUMENT NO. 5:

Please provide a copy of the disconnection notice(s) that Duke provides to residential customers who become delinquent in payments.

Responses: See response provided contemporaneously herewith.

REQUEST FOR PRODUCTION OF DOCUMENT NO. 6:

Please provide a copy of all training materials used by Duke to train call center and credit and collection personnel about the options available for residential customers to avoid disconnection for non-payment.

Responses: See response provided contemporaneously herewith.

REQUEST FOR PRODUCTION OF DOCUMENT NO. 7:

Please provide a copy of all complaints regarding Duke's disconnection of residential customers for nonpayment that Duke received from January 1, 2011 through October 2017 to date.

Responses: See response provided contemporaneously herewith.

REQUEST FOR PRODUCTION OF DOCUMENT NO. 8:

Please provide copies of any and all guidelines or internal policies Duke has about handling customer complaints.

Responses: See response provided contemporaneously herewith.

REQUEST FOR PRODUCTION OF DOCUMENT NO. 9:

Please provide a copy of any instructions that are provided to medical professionals concerning completion of the online "Medical Certification Request" form.

Responses: See response provided contemporaneously herewith.

REQUEST FOR PRODUCTION OF DOCUMENT NO. 10:

Please provide a copy of any and all guidelines or internal policies Duke has concerning the processing and administration of medical certifications.

Responses: See response provided contemporaneously herewith.

REQUEST FOR PRODUCTION OF DOCUMENT NO. 11:

Please provide a copy of any guidance that Duke has received from the PUCO since January 2011 that is related to Duke's use of AMI meters for remote disconnection or reconnection.

Responses: See response provided contemporaneously herewith.

Respectfully submitted,

Amy Spiller/mra
Amy B. Spiller (0047277)
Deputy General Counsel
Duke Energy Business Services, Inc.
139 Fourth Street, 1303-Main
Cincinnati, Ohio 45202-0960
(513) 287-4359 (telephone)
(513) 287-4385 (facsimile)
Amy.Spiller@duke-energy.com (e-mail)

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was delivered by U.S. mail (postage prepaid), personal, or electronic mail, on this 15th day of November 2017, to the parties listed below.

Terry L. Etter
Office of the Ohio Consumers' Counsel
10 W. Broad St., Suite 1800
Columbus, Ohio 43215
terry.etter@occ.ohio.gov

Kimberly W. Bojko
Carpenter Lipps & Leland LLP
280 N. High St., Suite 1300
Columbus, Ohio 43215
bojko@carpenterlipps.com

William Wright
Attorney General's Office
Public Utilities Commission of Ohio
30 E. Broad St., 16th Floor
Columbus, Ohio 43215
William.wright@ohioattorneygeneral.gov



Amy B. Spiller

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-001

REQUEST:

How many disconnections for nonpayment of residential electric service did Duke make in each month from June 2017 to date?

RESPONSE:

Objection. This Interrogatory seeks to elicit information that is of public record and readily available to and equally accessible by the OCC and thus must be viewed as intending to harass. See generally, OAC § 4901-1-20(D). Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see Duke Energy Ohio's report filed in Case No. 17-106-GE-UNC, as required by ORC § 4933.123.

Number of Residential Electric Disconnections (AMI and Non-AMI)

June 2017	4,384
July 2017	4,304
August 2017	4,877
September 2017	4,094
October 2017	4,762

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-002

REQUEST:

How many Duke residential electric customers were disconnected for nonpayment during the following timeframes:

- a. October 17, 2011 through April 15, 2012?
- b. October 15, 2012 through April 15, 2013?
- c. October 14, 2013 through April 15, 2014?
- d. October 20, 2014 through April 15, 2015?
- e. October 19, 2015 through April 15, 2016?
- f. October 17, 2016 through April 14, 2017?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Moreover, it seeks public information which is readily available to and equally accessible by the OCC and thus must be viewed as intending to harass. See generally, OAC § 4901-1-20(D). Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see Duke Energy Ohio's report filed in Case No. 17-106-GE-UNC, as required by ORC § 4933.123.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-003

REQUEST:

Regarding Duke's response to OCC INT-1-002., how many of the disconnections involved arrearages that were not incurred during the applicable winter heating season (i.e., November 1 through April 15) during the following timeframes?

- a. October 17, 2011 through April 15, 2012?
- b. October 15, 2012 through April 15, 2013?
- c. October 14, 2013 through April 15, 2014?
- d. October 20, 2014 through April 15, 2015?
- e. October 19, 2015 through April 15, 2016?
- f. October 17, 2016 through April 14, 2017?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio does not track this information.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-004

REQUEST:

How many disconnections for nonpayment of residential natural gas service did the Company make in each month from June 2017 to date?

RESPONSE:

Objection. This Interrogatory seeks to elicit information that is of public record and readily available to and equally accessible by the OCC and thus must be viewed as intending to harass. See generally, OAC § 4901-1-20(D). Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see Duke Energy Ohio's report filed in Case No. 17-106-GE-UNC, as required by ORC § 4933.123.

Number of Residential Gas Disconnections

June 2017	631
July 2017	506
August 2017	656
September 2017	427
October 2017	522

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-005

REQUEST:

How many Duke residential gas customers were disconnected for nonpayment during the following timeframes:

- a. October 17, 2011 through April 15, 2012?
- b. October 15, 2012 through April 15, 2013?
- c. October 14, 2013 through April 15, 2014?
- d. October 20, 2014 through April 15, 2015?
- e. October 19, 2015 through April 15, 2016?
- f. October 17, 2016 through April 14, 2017?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Moreover, it seeks public information which is readily available to and equally accessible by the OCC and thus must be viewed as intending to harass. See generally, OAC § 4901-1-20(D). Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see Duke Energy Ohio's report filed in Case No. 17-106-GE-UNC, as required by ORC § 4933.123.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-006

REQUEST:

Regarding Duke's response to OCC INT-1-010, how many of the disconnections involved arrearages that were not incurred during the applicable winter heating season (i.e., November 1 through April 15) during the following timeframes?

- a. October 17, 2011 through April 15, 2012?
- b. October 15, 2012 through April 15, 2013?
- c. October 14, 2013 through April 15, 2014?
- d. October 20, 2014 through April 15, 2015?
- e. October 19, 2015 through April 15, 2016?
- f. October 17, 2016 through April 14, 2017?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio does not track this information.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-007

REQUEST:

What are the remote disconnection and reconnection capabilities of the Automated Metering Infrastructure (“AMI”) meters that were procured as part of Duke’s Grid Modernization Program?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad and ambiguous. It also causes Duke Energy Ohio to engage in speculation and guesswork given its susceptibility to different interpretations. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio has the ability to connect or disconnect service remotely using its AMI meters.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Evan Shearer

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-008

REQUEST:

How many disconnections of residential electric service were performed using the remote disconnection capabilities of the AMI meters for each month of the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery:

Remote AMI Residential Disconnections (2017 – Year to Date)

January	3,310
February	4,106
March	3,708
April	4,016
May	5,151
June	4,307
July	4,255
August	4,763
September	4,052
October	4,671

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Caramosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-009

REQUEST:

How many residential customers whose electric service was disconnected for nonpayment to date were reconnected using the remote reconnection capabilities of the AMI meters for each month of the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery:

Remote AMI Residential Reconnections (2017 – Year to Date)

January	2,376
February	2,955
March	3,011
April	2,870
May	3,439
June	3,123
July	2,949
August	3,328
September	2,921
October	3,569

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Caramosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-010

REQUEST:

Have any changes been made in Duke's credit and collection policies and practices as a result of the implementation of remote disconnection and reconnection capabilities associated with AMI? If so, provide a detailed explanation of each change.

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, no.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-011

REQUEST:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what are the total revenues that Duke collected from residential natural gas customers in late payment charges?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, this information does not exist.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-012

REQUEST:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what are the total revenues that Duke collected from residential electric customers in late payment charges?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see Duke Energy Ohio's pending electric rate case, PUCO Case No. 17-0032-EL-AIR for offset to revenue requirements.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-013

REQUEST:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what are the total revenues that Duke collected from residential natural gas customers in reconnection charges?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding, see October 11, 2017 Entry.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-014

REQUEST:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what are the total revenues that Duke collected from residential electric customers in reconnection charges?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see Duke Energy Ohio's pending electric rate case, PUCO Case No. 17-0032-EL-AIR for offset to revenue requirements.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-015

REQUEST:

What are the total costs incurred by the Company to perform a reconnection using the remote reconnection capabilities of the AMI meters?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Further, it causes Duke Energy Ohio to engage in speculation and guesswork given the lack of a definition for "total costs," a phrase that is susceptible to different interpretations. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-016

REQUEST:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many of Duke's residential customers were enrolled in one of the following PUCO-mandated payment plans (see Ohio Adm. Code 4901:1-18-05)?

- a. One-third.
- b. One-sixth.
- c. One-ninth.

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Moreover, it seeks public information which is readily available to and equally accessible by the OCC and thus must be viewed as intending to harass. See generally, OAC § 4901-1-20(D). Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see the PIPP Metrics submitted to the Commission by Duke Energy Ohio on a monthly basis.

**Number of Customers on an Extended Payment Plan
(January – September 2017)**

One-third	591
One-sixth	84,705
One-ninth	33,479

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-017

REQUEST:

Referring to Duke's response to OCC INT-1-016, for each year, how many Duke residential customers defaulted on one of the PUCO-mandated payment plans and were disconnected for non-payment?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Moreover, it seeks public information which is readily available to and equally accessible by the OCC and thus must be viewed as intending to harass. See generally, OAC § 4901-1-20(D). Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see the PIPP Metrics submitted to the Commission by Duke Energy Ohio on a monthly basis.

**Number of Customers that Defaulted on an Extended Payment Plan
and Disconnected for non-payment
(January – September 2017)**

One-third	62
One-sixth	3,559
One-ninth	977

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-018

REQUEST:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many Duke residential customers were enrolled in a payment plan other than the PUCO-mandated payment plans?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Moreover, it seeks public information which is readily available to and equally accessible by the OCC and thus must be viewed as intending to harass. See generally, OAC § 4901-1-20(D). Without waiving said objection, to the extent discoverable, and in the spirit of discovery, for January through September 2017, 33,760. See also, the PIPP Metrics submitted to the Commission by Duke Energy Ohio on a monthly basis.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017

OCC-INT-01-019

REQUEST:

Referring to Duke's response to OCC INT-1-018, for each year, how many of the customers were enrolled in a payment plan other than the PUCO-mandated payment plans during the applicable winter heating season (i.e., November 1 of one year through April 15 of the next year)?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Moreover, it seeks public information which is readily available to and equally accessible by the OCC and thus must be viewed as intending to harass. See generally, OAC § 4901-1-20(D). Without waiving said objection, to the extent discoverable, and in the spirit of discovery, for November 2016 through April 2017, 26,286. See also, the PIPP Metrics submitted to the Commission by Duke Energy Ohio on a monthly basis.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-020

REQUEST:

Referring to Duke's response to OCC INT-1-018, for each year, how many Duke residential customers were disconnected for non-payment as a result of defaulting on a payment plan other than a PUCO-mandated payment plan?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Moreover, it seeks public information which is readily available to and equally accessible by the OCC and thus must be viewed as intending to harass. See generally, OAC § 4901-1-20(D). Without waiving said objection, to the extent discoverable, and in the spirit of discovery, zero. See also, the PIPP Metrics submitted to the Commission by Duke Energy Ohio on a monthly basis.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-021

REQUEST:

For each month in the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many residential premise visits did Duke perform on the day of disconnection before disconnecting a residential customer's electric service, as required by Ohio Adm. Code 4901:1-06(A)(2)?

RESPONSE:

Objection. This Interrogatory, with regard to 2011 through 2016, is overly broad, unduly burdensome, vague, and confusing as written. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio would have conducted premises visits until the waiver went into effect on May 1, 2017.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-022

REQUEST:

What options were provided to customers during the premise visits to avoid disconnection?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Without waiving said objection, to the extent discoverable, assuming residential customer eligible for disconnection for nonpayment and interaction with the customer, and in the spirit of discovery, customers were provided with the applicable options as required under PUCO rules.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-023

REQUEST:

Before Duke's disconnection waiver pilot took effect on May 1, 2017, if contact was not made with the customer or adult consumer during the premise visit and a disconnection notice was hung on the door, when was the service actually disconnected?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, vague, and confusing as written. Without waiving said objection, to the extent discoverable, assuming residential customer eligible for disconnection due to nonpayment, and in the spirit of discovery, as to 2017, Duke Energy Ohio would have disconnected electric service following the premises visit, provided no alternate arrangements were made to avoid disconnection.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-024

REQUEST:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many of the residential premise visits that Duke performed resulted in the avoidance of a disconnection for nonpayment?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio does not track this information.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017

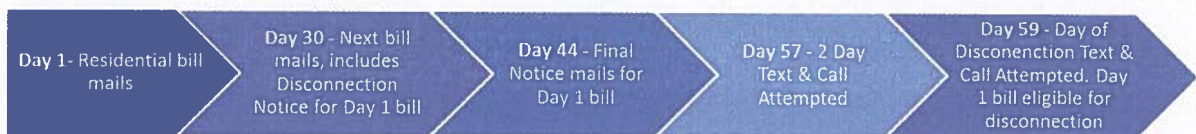
OCC-INT-01-025

REQUEST:

Provide a detailed timeline of Duke's credit and collection process related to residential electric customers including the number of days for each step in the process from the time a bill generates until a disconnection for non-payment would occur if the bill were not paid during the summer months.

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery:



PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017

OCC-INT-01-026

REQUEST:

Provide a detailed timeline of Duke's credit and collection process related to residential electric customers including the number of days for each step in the process from the time a bill generates until a disconnection for non-payment would occur if the bill were not paid during a winter month.

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery:



PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-027

REQUEST:

Referring to Duke's response to INT-1-025 and INT-1-026, provide an explanation of any disconnection notice(s) that are provided to residential electric customers throughout the timeline.

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see PUCO rules for explanation of notices. See also, Order in PUCO Case No. 16-1096-EL-WVR and ATTACHMENT OCC-POD-01-005.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-028

REQUEST:

What criteria does Duke use to determine that a residential electric customer's service should be disconnected?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, assuming disconnection for nonpayment, limited to 2017, and in the spirit of discovery, the criteria is failure to enter into alternate arrangements or pay the minimum amount due to avoid disconnection.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-029

REQUEST:

Does Duke have a threshold past-due balance amount that triggers disconnection of residential electric service?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, assuming disconnection for nonpayment, limited to 2017, and in the spirit of discovery, no.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017

OCC-INT-01-030

REQUEST:

If the response to OCC INT-1-029 is affirmative, what is the threshold past-due balance amount that triggers disconnection of residential electric service?

RESPONSE:

Not Applicable. See response to OCC-INT-01-029.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

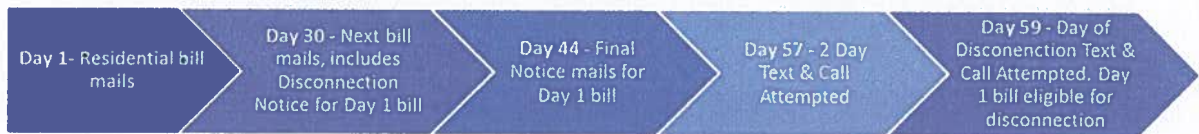
OCC-INT-01-031

REQUEST:

Provide a detailed timeline of Duke's credit and collection process related to residential natural gas customers including the number of days for each step in the process from the time a bill generates until a disconnection for non-payment would occur if the bill were not paid during the summer months.

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery:



PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017

OCC-INT-01-032

REQUEST:

Provide a detailed timeline of Duke's credit and collection process related to residential natural gas customers including the number of days for each step in the process from the time a bill generates until a disconnection for non-payment would occur if the bill were not paid during a winter month.

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery:



PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017

OCC-INT-01-033

REQUEST:

Referring to Duke's response to INT-1-031 and INT-1-032, provide an explanation of any disconnection notice(s) that are provided to residential natural gas customers throughout the timeline.

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see PUCO rules for explanation of notices. See also, Order in PUCO Case No. 16-1096-EL-WVR and ATTACHMENT OCC-POD-01-005.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-034

REQUEST:

What criteria does Duke use to determine that a residential natural gas customer's service should be disconnected?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, assuming disconnection for nonpayment, limited to 2017, and in the spirit of discovery, the criteria is failure to enter into alternate arrangements or pay the minimum amount due to avoid disconnection.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-035

REQUEST:

Does Duke have a threshold past-due balance amount that triggers disconnection of residential natural gas service?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, no.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-036

REQUEST:

If the response to OCC INT-1-035 is affirmative, what is the threshold past-due balance amount that triggers disconnection of residential natural gas service?

RESPONSE:

See response to OCC-INT-01-035.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-037

REQUEST:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, what was the average unpaid residential customer bill at the time of disconnection?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Further, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Moreover, it seeks to elicit information that is of public record and readily available to and equally accessible by the OCC and thus must be viewed as intending to harass. See generally, OAC § 4901-1-20(D). Without waiving said objection, to the extent discoverable, assuming disconnection for nonpayment, limited to 2017, and in the spirit of discovery, see Duke Energy Ohio's report filed in Case No. 17-106-GE-UNC, as required by ORC § 4933.123.

**Average Unpaid Residential Customer Bill at Time of Disconnection
(June – October 2017)**

Average Electric	\$314.44
Average Gas	\$368.73

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

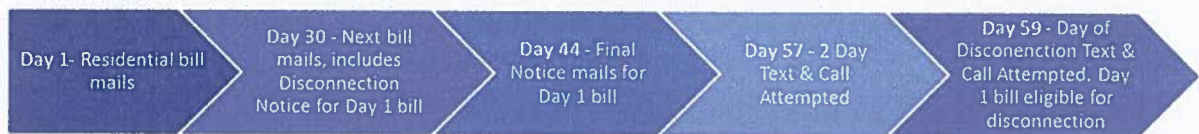
OCC-INT-01-038

REQUEST:

Provide a detailed timeline of Duke's credit and collection process related to residential combination electric and natural gas customers including the number of days for each step in the process from the time a bill generates until a disconnection for nonpayment would occur if the bill were not paid during the summer months.

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery:



PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

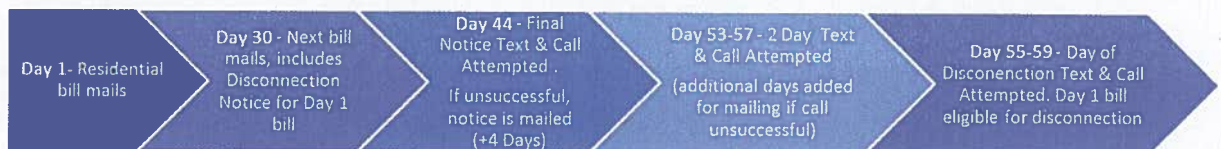
OCC-INT-01-039

REQUEST:

Provide a detailed timeline of Duke's credit and collection process related to residential combination electric and natural gas customers including the number of days for each step in the process from the time a bill generates until a disconnection for nonpayment would occur if the bill were not paid during a winter month.

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery:



PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017

OCC-INT-01-040

REQUEST:

Referring to Duke's response to INT-1-038 and INT-1-039, provide an explanation of any disconnection notice(s) that are provided to residential combination electric and natural gas customers throughout the timeline.

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see PUCO rules for explanation of notices. See also, Order in PUCO Case No. 16-1096-EL-WVR and ATTACHMENT OCC-POD-01-005.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-041

REQUEST:

When and how are Duke's residential combination natural gas and electric customers informed about the option to retain either gas or electric service in the event of disconnection or pending disconnection of both gas and electric services?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, assuming disconnection for nonpayment, limited to 2017, and in the spirit of discovery, Duke Energy Ohio affirmatively informs via notices required under Commission regulation. The company also provides information in the event a customer initiates contact. See also, response to OCC-POD-01-005.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-042

REQUEST:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many residential combination natural gas and electric customers who were either disconnected or had a pending disconnection of gas and electric service chose to retain their electric service by paying or arranging payment for the past due electric balance?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, assuming disconnection for nonpayment, limited to 2017, and in the spirit of discovery, Duke Energy Ohio does not track this information separately.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-043

REQUEST:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many residential combination natural gas and electric customers who were either disconnected or had a pending disconnection of gas and electric service chose to retain their natural gas service by paying or arranging payment for the past due natural gas balance?

RESPONSE:

See response to OCC-INT-01-042.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-044

REQUEST:

How does Duke define a customer “complaint”?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. This Interrogatory further reflects an impermissible fishing expedition as the Audit does not include any allegations relating to customer complaints. *Kenna v. Adecco Employment Services, Inc.*, 2006-Ohio-3633 ¶ 15. This Interrogatory is further objectionable given that it exposes Duke Energy Ohio to speculation and guesswork. The use of quotes around the word complaint is unintelligible. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-045

REQUEST:

How does Duke receive complaints directly from a customer (e.g., by telephone, email, letter, etc.)?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. This Interrogatory further reflects an impermissible fishing expedition as the Audit does not include any allegations relating to customer complaints. *Kenna v. Adecco Employment Services, Inc.*, 2006-Ohio-3633 ¶ 15. This Interrogatory is further objectionable given that it exposes Duke Energy Ohio to speculation and guesswork and also improperly seeks a legal interpretation. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-046

REQUEST:

Who is responsible for receiving and responding to customer complaints for Duke?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. This Interrogatory further reflects an impermissible fishing expedition as the Audit does not include any allegations relating to customer complaints. *Kenna v. Adecco Employment Services, Inc.*, 2006-Ohio-3633 ¶ 15. This Interrogatory is further objectionable given that it exposes Duke Energy Ohio to speculation and guesswork. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-047

REQUEST:

What protocols and policies does Duke have in place for handling customer complaints?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. This Interrogatory further reflects an impermissible fishing expedition as the Audit does not include any allegations relating to customer complaints. *Kenna v. Adecco Employment Services, Inc.*, 2006-Ohio-3633 ¶ 15. This Interrogatory is further objectionable given that it exposes Duke Energy Ohio to speculation and guesswork. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-048

REQUEST:

Please identify any and all meetings Duke has had with Public Utilities Commission of Ohio employees about disconnections of Duke's customers for each of the following years:

- a. 2011
- b. 2012
- c. 2013
- d. 2014
- e. 2015
- f. 2016
- g. 2017 to date

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-049

REQUEST:

For each meeting listed above in response to INT-1-048, please identify the following:

- a. The date the meeting occurred.
- b. Who was in attendance.
- c. The subject matter of the meeting.

RESPONSE:

Not Applicable. See response to OCC-INT-01-048.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-050

REQUEST:

What was the credit and collection budget for Duke Energy Ohio for each of the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Further, it causes Duke Energy Ohio to engage in speculation and guesswork given the lack of a definition for "credit and collection budget," a phrase that is susceptible to different interpretations. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-051

REQUEST:

Referring to the Duke response to INT-1-050, what were the total expenditures for credit and collection activities for each of the years 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Further, it causes Duke Energy Ohio to engage in speculation and guesswork given the lack of a definition for "total expenditures" and "credit and collection activities," phrases that are susceptible to different interpretations. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-052

REQUEST:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many medical certifications were accepted by Duke?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, 9,838 medical certifications were accepted by Duke Energy Ohio between January and September 2017.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-053

REQUEST:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many medical certifications were accepted by Duke where more than one certification was accepted for the same address?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Further, it exposes Duke Energy Ohio to undue burden and expense. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio does not track this information.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017

OCC-INT-01-054

REQUEST:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many medical certifications were accepted telephonically by Duke?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Further, it exposes Duke Energy Ohio to undue burden and expense. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio does not track this information.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-055

REQUEST:

For each year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date, how many medical certifications were rejected by Duke?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Further, it exposes Duke Energy Ohio to undue burden and expense. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio does not track this information.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017

OCC-INT-01-056

REQUEST:

Referring to Duke's response to INT-1-055, why were the medical certifications rejected, and what is the number of medical certifications that were rejected for each reason?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Further, it exposes Duke Energy Ohio to undue burden and expense. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio does not track this information.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-057

REQUEST:

What are the different methods in which Duke enables medical professionals to request a medical certification form?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, limited to 2017, and in the spirit of discovery, Duke Energy Ohio enables medical professionals to request a medical certification form by phone or web.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-058

REQUEST:

Does Duke reconnect electric service on a 24-hour per-day basis, seven days per week after the medical certification form is received from medical professionals?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Also this Interrogatory causes Duke Energy Ohio to engage in speculation and guesswork given the confusing nature of the question. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, limited to 2017, and in the spirit of discovery, no.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-059

REQUEST:

Referring to Duke's online "Medical Certification Request" form, how many medical certifications were rejected by year 2011, 2012, 2013, 2014, 2015, 2016, and 2017 to date because the form was not completed in its entirety?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, limited to 2017, and in the spirit of discovery, none.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-060

REQUEST:

Since May 1, 2017, have any Duke customers whose electric service was subject to disconnection met the definition of "Critical Care" customers, as mentioned on page 6 Duke's application in Case No. 16-1609-EL-WVR, but were not participating in the "Critical Care" program? If so, how many?

RESPONSE:

Objection. This Interrogatory is overly broad and vague. It also causes Duke Energy Ohio to engage in speculation and guesswork given the confusing nature of the question. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio cannot answer because it cannot say whether an unknown customer meets the definition if they are not in the program.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017

OCC-INT-01-061

REQUEST:

Of the customers identified in Duke's response to OCC INT-1-060, how many became participants in the "Critical Care" program?

RESPONSE:

See response to OCC-INT-01-060.

PERSON RESPONSIBLE: Legal

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017

OCC-INT-01-062

REQUEST:

Of the customers identified in Duke's response to OCC INT-1-060, how many had their electric service disconnected for nonpayment?

RESPONSE:

See response to OCC-INT-01-060.

PERSON RESPONSIBLE: Legal

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017

OCC-INT-01-063

REQUEST:

Of the customers identified in Duke's response to OCC INT-1-062, how many received an in-person visit from Duke personnel on the day service was disconnected?

RESPONSE:

See response to OCC-INT-01-060.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-064

REQUEST:

What criteria Duke does Duke use in identifying “Critical Care” customers?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see PUCO Case No. 16-1096-EL-WVR for purposes of current waiver of Rule (premises visit). See also, OAC § 4901:10-01(H).

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-065

REQUEST:

How many Duke residential electric customers do not have AMI meters?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, as of 2017, there are 2,729 residential electrical customers that do not have AMI meters.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-066

REQUEST:

How does Duke provide disconnection notices to residential electric customers:

- a. who have AMI meters?
- b. who do not have AMI meters?

RESPONSE:

Objection. This Interrogatory causes Duke Energy Ohio to engage in speculation and guesswork given the lack of a definition for “disconnection notice,” a word that is susceptible to different interpretations. Further, it fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Further, it is confusing as written given that PUCO rules speak to a disconnection notice under part A of rule and this Interrogatory does not define what comprises a disconnect notice. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, as of 2017, see PUCO Case No. 16-1096-EL-WVR.

Method of Delivery of Disconnection Notices

AMI	NON-AMI
DNP Notice – Mailed Final Notice – Mailed or Phone 2 Day Notice – Phone and/or Text Day of Notice – Text and/or Phone	DNP Notice – Mailed Final Notice – Mailed or Phone 2 Day Notice – Phone and/or Text Day of Notice – Text and/or Phone and Premises Visit Notice

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-067

REQUEST:

After residential customers have received a disconnection notice for electric service, how many days do they have to respond to the disconnection notice before service is actually disconnected?

RESPONSE:

Objection. This Interrogatory causes Duke Energy Ohio to engage in speculation and guesswork given the lack of a definition for “disconnection notice,” a word that is susceptible to different interpretations. Further, this Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, assuming disconnection for nonpayment, limited to 2017, and in the spirit of discovery, at least 24 days from disconnection notice under Part (A)(5) of the disconnection rules as provided in PUCO Case No. 16-1096-EL-WVR.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017

OCC-INT-01-068

REQUEST:

How does Duke provide disconnection notices to residential natural gas customers?

RESPONSE:

See response to OCC-INT-01-066.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-069

REQUEST:

After residential customers have received a disconnection notice for natural gas service, how many days do they have to respond to the disconnection notice before service is actually disconnected?

RESPONSE:

Objection. This Interrogatory causes Duke Energy Ohio to engage in speculation and guesswork given the lack of a definition for "disconnection notice," a word that is susceptible to different interpretations. Further, this Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, assuming disconnection for nonpayment, limited to 2017, and in the spirit of discovery, at least 24 days from disconnection notice under Part (A)(5) of the disconnection rules as provided in PUCO Case No. 16-1096-EL-WVR.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017

OCC-INT-01-070

REQUEST:

Does Duke apply the procedures set forth in Ohio Adm. Code 4901:1-18-06(B) to a customer if the customer's arrearages were not incurred during the winter heating season defined in Ohio Adm. Code 4901:1-18-01(V)? If not, why?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. It also causes Duke Energy Ohio to engage in speculation and guesswork given the confusing nature of the question. Further, OAC 4901:1-18-01(V) does not exist. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio applies the procedures under the waiver, which include sending the notice under OAC § 4901:1-18-06(B).

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Interrogatories
Date Received: October 26, 2017**

OCC-INT-01-071

REQUEST:

Does Duke apply the procedures set forth in the PUCO's annual Winter Reconnect Order (such as the Finding and Order issued on September 13, 2017 in Case No. 17-1829-GE-UNC) to a customer if the customer's arrearages were not incurred during the winter heating season set forth in the annual Winter Reconnect Order? If not, why?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. It also causes Duke Energy Ohio to engage in speculation and guesswork given the confusing nature of the question. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio adheres to the winter rule during the period designated by the PUCO. Answering further, if customers invoke the winter rule, the date at which the arrearages accrued is immaterial. Also, customers have an obligation under the winter rule to take action to avoid disconnection of service for nonpayment.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Production of Documents
Date Received: October 26, 2017

OCC-POD-01-001

REQUEST:

Please provide a copy of all formal and informal requests (e.g., interrogatories, data requests) made to the Company by the Commission, the independent auditor for this case, the PUCO Staff, and/or the PUCO's Attorneys General in this proceeding and the Company's responses to those requests.

RESPONSE:

To date, Duke Energy Ohio has not received any formal or informal requests from the Commission, independent auditor, PUCO Staff, and/or PUCO's Attorneys General in this proceeding.

PERSON RESPONSIBLE: Legal

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Production of Documents
Date Received: October 26, 2017

OCC-POD-01-002

REQUEST:

Please provide a copy of all formal and informal requests (e.g., interrogatories, data requests) made to the Company by intervenors in this proceeding and the Company's responses to those requests.

RESPONSE:

To date, Duke Energy Ohio has not received any formal or informal requests from other intervenors in this proceeding.

PERSON RESPONSIBLE: Legal

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Production of Documents
Date Received: October 26, 2017

OCC-POD-01-003

REQUEST:

Produce all documents referenced by Duke in response to OCC INT-1-001 through OCC INT-1-071.

RESPONSE:

Not Applicable.

PERSON RESPONSIBLE: Legal

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Production of Documents
Date Received: October 26, 2017

OCC-POD-01-004

REQUEST:

Please provide a copy of Duke's current residential customer credit and collection policies and practices.

RESPONSE:

Please see ATTACHMENT OCC-POD-01-004.

PERSON RESPONSIBLE: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Production of Documents
Date Received: October 26, 2017

OCC-POD-01-005

REQUEST:

Please provide a copy of the disconnection notice(s) that Duke provides to residential customers who become delinquent in payments.

RESPONSE:

Objection. This Document Request causes Duke Energy Ohio to engage in speculation and guesswork given the lack of a definition for “disconnection notice,” a word that is susceptible to different interpretations. Further, it fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Moreover, it is confusing as written given that PUCO rules speak to a disconnection notice under part (A) of OAC § 4901:1-18-06 and this Document Request does not define what comprises a disconnect notice. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see ATTACHMENT OCC-POD-01-005.

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Production of Documents
Date Received: October 26, 2017

OCC-POD-01-006

REQUEST:

Please provide a copy of all training materials used by Duke to train call center and credit and collection personnel about the options available for residential customers to avoid disconnection for non-payment.

RESPONSE:

Objection. This Document Request fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see ATTACHMENT OCC-POD-01-006.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Production of Documents
Date Received: October 26, 2017

OCC-POD-01-007

REQUEST:

Please provide a copy of all complaints regarding Duke's disconnection of residential customers for nonpayment that Duke received from January 1, 2011 through October 2017 to date.

RESPONSE:

Objection. This Document Request causes Duke Energy Ohio to engage in speculation and guesswork given the lack of a definition for "complaints," a word that is susceptible to different interpretations. Further, it is overly broad, unduly burdensome, and vague. Moreover, it seeks to elicit information that is of public record and is equally accessible to the OCC, thus it must be viewed as harassing in nature. See generally, OAC § 4901-1-20(D).

PERSON RESPONSIBLE: Legal

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Production of Documents
Date Received: October 26, 2017

OCC-POD-01-008

REQUEST:

Please provide copies of any and all guidelines or internal policies Duke has about handling customer complaints.

RESPONSE:

Objection. This Document Request fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Further, it causes Duke Energy Ohio to engage in speculation and guesswork given the lack of a definition for "customer complaints," a phrase that is susceptible to different interpretations. Moreover, it seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Production of Documents
Date Received: October 26, 2017

OCC-POD-01-009

REQUEST:

Please provide a copy of any instructions that are provided to medical professionals concerning completion of the online "Medical Certification Request" form.

RESPONSE:

Objection. This Document Request fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Further, the request misconstrues the form located on the public website as it's only a form to request a "Medical Certification Request" form, not the form itself. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Production of Documents
Date Received: October 26, 2017

OCC-POD-01-010

REQUEST:

Please provide a copy of any and all guidelines or internal policies Duke has concerning the processing and administration of medical certifications.

RESPONSE:

Objection. This Document Request fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see ATTACHMENT OCC-POD-01-010.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC First Set Production of Documents
Date Received: October 26, 2017

OCC-POD-01-011

REQUEST:

Please provide a copy of any guidance that Duke has received from the PUCO since January 2011 that is related to Duke's use of AMI meters for remote disconnection or reconnection.

RESPONSE:

Objection. This Document Request fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal



Office of the Ohio Consumers' Counsel

February 2, 2018

Elizabeth Watts
Duke Energy Ohio Inc.
155 East Broad Street, 20th Floor
Columbus, Ohio 43215

Dear Elizabeth:

We have received the discovery responses Duke provided to OCC on November 15, 2017. We have reviewed the interrogatories to which Duke only objected and did not respond substantively, i.e., INT-01-013 through INT-01-015 and INT-01-044 through INT-01-051. Although we disagree with Duke's objections to the interrogatories, in the spirit of discovery we have reworded these interrogatories and have resent them, along with additional interrogatories and document requests, as part of the attached 2nd set of discovery.

We look forward to your responses. If you have questions or concerns, please do not hesitate to contact me or Kim Bojko.

Sincerely,

/s/ *Terry Etter*

Terry Etter
Assistant Consumers' Counsel

cc: Discovery service list

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)
Investigation of the Disconnection) Case No. 17-2089-GE-COI
Policies and Practices of Duke)
Energy Ohio, Inc.)

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS
PROPOUNDED UPON DUKE ENERGY OHIO, INC.**

**BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

SECOND SET

February 2, 2018

The Office of the Ohio Consumers' Counsel, in the above-captioned proceeding before the Public Utilities Commission of Ohio ("PUCO"), submits the following Interrogatories and Requests for Production of Documents pursuant to Sections 4901-1-19 and 4901-1-20 of the Ohio Administrative Code for response by Duke Energy Ohio, Inc. within the 20-day period of time as provided for in the PUCO's Rules. An electronic response should be provided to the extent possible, with hard copies of materials not available electronically, to the Office of the Ohio Consumers' Counsel at the following addresses:

Terry L. Etter, Counsel of Record
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
65 East Broad Street, 7th Floor
Columbus, Ohio 43215-4213
(614) 466-7964
Terry.etter@occ.ohio.gov

Kimberly W. Bojko
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, Ohio 43215
(614) 365-4124
Bojko@carpenterlipps.com

Additionally, Duke Energy Ohio, Inc. must follow the instructions provided herein in responding to the inquiries.

DEFINITIONS

As used herein the following definitions apply:

1. "Document" or "Documentation" when used herein, is used in its customary broad sense, and means all originals of any nature whatsoever, identical copies, and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in your possession, custody, or control regardless of where located; including any kind of printed, recorded, written, graphic, or photographic matter and things similar to any of the foregoing, regardless of their author or origin.

The term specifically includes, without limiting the generality of the following:

punchcards, printout sheets, movie film, slides, PowerPoint slides, phonograph records, photographs, memoranda, ledgers, work sheets, books, magazines, notebooks, diaries, calendars, appointment books, registers, charts, tables, papers, agreements, contracts, purchase orders, checks and drafts, acknowledgments,

invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meetings of any kind, telegrams, drafts, instructions, announcements, schedules, price lists, electronic copies, reports, studies, statistics, forecasts, decisions, and orders, intra-office and inter-office communications, correspondence, financial data, summaries or records of conversations or interviews, statements, returns, diaries, workpapers, maps, graphs, sketches, summaries or reports of investigations or negotiations, opinions or reports of consultants, brochures, bulletins, pamphlets, articles, advertisements, circulars, press releases, graphic records or representations or publications of any kind (including microfilm, videotape and records, however produced or reproduced), electronic (including e-mail), mechanical and electrical records of any kind and computer produced interpretations thereof (including, without limitation, tapes, tape cassettes, disks and records), other data compilations (including, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, disks and recordings used in automated data processing together with the programming instructions and other material necessary to translate, understand or use the same), all drafts, prints, issues, alterations, modifications, changes, amendments, and mechanical or electric sound recordings and transcripts to the foregoing. A request for discovery concerning documents addressing, relating or referring to, or discussing a specified matter encompasses documents having a factual, contextual, or logical nexus to the matter, as well as documents making explicit or implicit reference thereto in the body of the documents. Originals and duplicates of the same document need not be separately identified or produced; however, drafts of a document or documents differing from

- one another by initials, interlineations, notations, erasures, file stamps, and the like shall be deemed to be distinct documents requiring separate identification or production. Copies of documents shall be legible.
2. “Communication” shall mean any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means, including, but not limited to, telephone conversations, letters, telegrams, and personal conversations. A request seeking the identity of a communication addressing, relating or referring to, or discussing a specified matter encompasses documents having factual, contextual, or logical nexus to the matter, as well as communications in which explicit or implicit reference is made to the matter in the course of the communication.
 3. The “substance” of a communication or act includes the essence, purport or meaning of the same, as well as the exact words or actions involved.
 4. “And” or “Or” shall be construed conjunctively or disjunctively as necessary to make any request inclusive rather than exclusive.
 5. “You,” and “Your,” or “Yourself” refer to the party requested to produce documents and answer interrogatories includes any present or former director, officer, agent, contractor, consultant, advisor, employee, partner, or joint venturer of such party.

The Party requested to produce documents and answer interrogatories is Duke Energy Ohio, Inc.
 6. Each singular shall be construed to include its plural, and vice versa, so as to make the request inclusive rather than exclusive.

7. Words expressing the masculine gender shall be deemed to express the feminine and neuter genders; those expressing the past tense shall be deemed to express the present tense; and vice versa.
8. “Person” includes any firm, corporation, joint venture, association, entity or group of persons, unless the context clearly indicates that only an individual person is referred to.
9. “Identify,” or “the identity of,” or “identified” means as follows:
 - A. When used in reference to an individual, to state his full name and present or last known position and business affiliation, and his position and business affiliation at the time in question;
 - B. When used in reference to a commercial or governmental entity, to state its full name, type of entity (e.g., corporation, partnership, single proprietorship), and its present or last known address;
 - C. When used in reference to a document, to state the date, author, title, type of document (e.g., letter, memorandum, photograph, tape recording, etc.), general subject matter of the document, and its present or last known location and custodian;
 - D. When used in reference to a communication, to state the type of communication (i.e., letter, personal conversation, etc.), the date thereof, and the parties thereto and, in the case of a conversation, to state the substance, place, and approximate time thereof, and identity of other persons in the presence of each party thereto;

- E. When used in reference to an act, to state the substance of the act, the date, time, and place of performance, and the identity of the actor and all other persons present.
10. The terms “PUCO” and “Commission” refer to the Public Utilities Commission of Ohio, including its Commissioners, personnel (including persons working in the Public Utilities Section of the Ohio Attorney General’s Office), and offices.
11. The term “e.g.” connotes illustration by example, not limitation.
12. “Duke” and “Company” refer to Duke Energy Ohio, Inc.
13. “OCC” means the Office of the Ohio Consumers’ Counsel.
14. “Proceeding” means the above-captioned case.
15. “Rule 4901: X-XX-XX” means the Chapter 4901 rule contained within the Ohio Administrative Code.
16. “Winter heating season” refers to the time period described in Ohio Adm. Code 4901:1-18-01(V).

INSTRUCTIONS FOR ANSWERING

1. All information is to be divulged which is in your possession or control, or within the possession or control of your attorney, agents, or other representatives of yours or your attorney.
2. Where an interrogatory calls for an answer in more than one part, each part should be separate in the answer so that the answer is clearly understandable.
3. Each interrogatory shall be answered separately and fully in writing under oath, in accordance with Ohio Adm. Code 4901-1-19(A), unless it is objected to, in which event the reasons for objection shall be stated in lieu of an answer. The answers are to be signed by the person making them, and the objections are to be signed by the attorney making them.
4. If any answer requires more space than provided, continue the answer on the reverse side of the page or on an added page.
5. Your organization(s) is requested to produce responsive materials and information within its physical control or custody, as well as that physically controlled or possessed by any other person acting or purporting to act on your behalf, whether as an officer, director, employee, agent, independent contractor, attorney, consultant, witness, or otherwise.
6. Where these requests seek quantitative or computational information (e.g., models, analyses, databases, and formulas) stored by your organization(s) or its consultants in computer-readable form, in addition to providing hard copy (if an electronic response is not otherwise provided as requested), you are requested to produce such computer-readable information, in order of preference:

- A. Microsoft Excel worksheet files on compact disk;
 - B. other Microsoft Windows or Excel compatible worksheet or database diskette files;
 - C. ASCII text diskette files; and
 - D. such other magnetic media files as your organization(s) may use.
7. Conversion from the units of measurement used by your organization(s) in the ordinary course of business need not be made in your response; e.g., data requested in kWh may be provided in mWh or gWh as long as the unit measure is made clear.
8. Unless otherwise indicated, the following requests shall require you to furnish information and tangible materials pertaining to, in existence, or in effect for the whole or any part of the period from January 1, 2011 through and including the date of your response.
9. Responses must be complete when made, and must be supplemented with subsequently acquired information at the time such information is available.
10. In the event that a claim of privilege is invoked as the reason for not responding to discovery, the nature of the information with respect to which privilege is claimed shall be set forth in responses together with the type of privilege claimed and a statement of all circumstances upon which the respondent to discovery will rely to support such a claim of privilege (i.e., provide a privilege log). Respondent to the discovery must a) identify (see definition) the individual, entity, act, communication, and/or document that is the subject of the withheld information based upon the privilege claim, b) identify all persons to whom the information has already been

revealed, and c) provide the basis upon which the information is being withheld and the reason that the information is not provided in discovery.

INTERROGATORIES

INT-2-072. Referring to Duke's responses to OCC INT-1-044 and INT-1-045, Ohio Adm. Code 4901:1-10-21(A) defines a customer/consumer complaint as "a customer/consumer contact when such contact necessitates follow-up by or with the electric utility to resolve a point of contention." Does Duke have a process for attempting to resolve customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), about disconnection of natural gas and/or electric service?

RESPONSE:

INT-2-073. Referring to Duke's response to OCC INT-1-047, if Duke's response to OCC INT-2-072 is affirmative, please describe the process Duke currently has in place for attempting to resolve customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), about disconnection of natural gas and/or electric service.

RESPONSE:

INT-2-074. Has the process described in Duke's response to OCC INT-2-073 changed since November 2011?

RESPONSE:

INT-2-075. If Duke's response to INT-2-074 is affirmative, please identify all changes made to the process since November 2011 and give the approximate date each change was made.

RESPONSE:

INT-2-076. Referring to Duke's response to OCC INT-1-046, what is the name of the department, division, or similar unit within Duke that is responsible for attempting to resolve customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), about disconnection of natural gas and/or electric service?

RESPONSE:

INT-2-077. Referring to Duke's response to OCC INT-1-046, what is the name and title of the person in charge of the department, division, or similar unit identified in Duke's response to OCC INT-2-076?

RESPONSE:

INT-2-078. How many customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), regarding disconnection of residential natural gas service did Duke attempt to resolve for each calendar year beginning with 2012 through 2017?

RESPONSE:

INT-2-079. How many customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), regarding disconnection of residential electric service did Duke attempt to resolve for each calendar year beginning with 2012 through 2017?

RESPONSE:

INT-2-080. How many disconnections of residential electric service for nonpayment did Duke make for the month of November 2017 and the month of December 2017?

RESPONSE:

INT-2-081. How many disconnections of residential natural gas service for nonpayment did Duke make for the month of November 2017 and the month of December 2017?

RESPONSE:

INT-2-082. Referring to Duke's response to OCC INT-01-007, please explain how the remote disconnection and reconnection capabilities of the advanced metering infrastructure ("AMI") meters are used (including each step in the process) when the capability is used.

RESPONSE:

INT-2-083. Referring to Duke's response to OCC INT-1-008, what was the average disconnection amount on a monthly basis between January 2017 and October 2017 for Duke residential customers who were disconnected for nonpayment using the remote AMI disconnection capabilities?

RESPONSE:

INT-2-084. Referring to Duke's response to OCC-INT-01-009, for each month between January 2017 and October 2017, what was the average length of time that Duke's residential customers were without service following disconnection for nonpayment before the service was remotely reconnected?

RESPONSE:

INT-2-085. On a monthly basis between January 2017 and December 2017, how many Duke residential electric customers were disconnected for nonpayment as a result of debt that originated through a competitive retail electric service ("CRES") provider?

RESPONSE:

INT-2-086. On a monthly basis between January 2017 and December 2017, how many Duke residential natural gas customers were disconnected for nonpayment as a result of debt that originated through a competitive retail natural gas service (“CRNGS”) provider?

RESPONSE:

INT-2-087. On consolidated bills where Duke includes CRES and/or CRNGS charges for residential electric and/or natural gas service, does Duke assess late payment charges if customer payments are not made for the CRES or CRNGS charges?

RESPONSE:

INT-2-088. Referring to Duke’s response to OCC-INT-01-021, for each month between January 2017 and December 2017, how many premise visits did Duke perform on the day that residential electric and/or natural gas services were scheduled for disconnection?

RESPONSE:

INT-2-089. On a monthly basis between January 2017 and December 2017, what is the total number of residential electric customers who were assessed a collection charge by Duke?

RESPONSE:

INT-2-090. Referring to Duke's responses to OCC-INT-01-048 and OCC-INT-01-049, has Duke met with any PUCO employee regarding credit or disconnection policies and procedures since February 1, 2015? If so, identify the date of the meeting, the attendees, and the specific subject matter.

RESPONSE:

INT-2-091. For each year 2011 through 2017, what was the total dollar amount of Duke's residential electric bad debt expense?

RESPONSE:

INT-2-092. For each year 2011 through 2017, what was the total dollar amount that Duke billed residential customers for electric service?

RESPONSE:

INT-2-093. For each year 2011 through 2017, what was the total dollar amount of Duke's residential natural gas bad debt expense?

RESPONSE:

INT-2-094. For each year 2011 through 2017, what was the total dollar amount that Duke billed residential customers for natural gas service?

RESPONSE:

INT-2-095. Referring to Duke's response to OCC-INT-01-054, is it Duke's current policy to accept telephonically provided medical certifications from residential customers?

RESPONSE:

INT-2-096. Is it Duke's current policy to provide medical certification forms to residential customers upon request?

RESPONSE:

REQUESTS FOR PRODUCTION

RPD-2-012 Referring to Duke's responses to OCC-INT-01-016 through OCC-INT-01-020, please provide a copy of the PIPP Metrics that were submitted to the Commission for each month between November 2016 and December 2017.

RPD-2-013 Please provide a copy of any and all written communications (including notices of probable non-compliance) between any employee of the PUCO and Duke regarding Duke's credit and disconnection policies and procedures since February 1, 2015.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the forgoing Interrogatories and Request for Production of Documents Propounded Upon Duke Energy Ohio, Second Set, were served upon the parties listed below via electronic transmission this 2nd day of February 2018.

/s/ Terry L. Etter
Terry L. Etter
Assistant Consumers' Counsel

SERVICE LIST

William Wright
Attorney General's Office
Public Utilities Commission of Ohio
30 E. Broad St., 16th Floor
Columbus, Ohio 43215
William.wright@ohioattorneygeneral.gov

Elizabeth H. Watts
Duke Energy Business Services
139 East Fourth Street
1303-Main
Cincinnati, Ohio 45202
Elizabeth.watts@duke-energy.com

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's)	
Investigation of the Disconnection Policies)	Case No. 17-2089-GE-COI
and Practices of Duke Energy Ohio, Inc.)	

**DUKE ENERGY OHIO'S RESPONSES TO THE
SECOND SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
FROM THE OFFICE OF THE OHIO CONSUMERS' COUNSEL TO
DUKE ENERGY OHIO, INC.**

Dated: February 22, 2018

Duke Energy Ohio, Inc., (Duke Energy Ohio or Company) hereby submits its responses and objections to the Second Set of Interrogatories and Request for Production of Documents (Discovery Request) submitted by The Ohio Consumers' Counsel (OCC) to Duke Energy Ohio in the above-captioned case.

Duke Energy Ohio's responses are being provided subject to, and without waiver of, the general objections stated below and the specific objections posed in response to each Discovery Request. The general objections are hereby incorporated by reference into the individual response made to each Discovery Request. Duke Energy Ohio's responses to these Discovery Requests are submitted without prejudice to, and without waiving, any general objections not expressly set forth herein. The provision of any response shall not waive Duke Energy Ohio's objections.

Duke Energy Ohio expressly reserves the right to supplement these responses, as required under Ohio law and Public Utilities Commission of Ohio (Commission) rule. The Company further expressly reserves the right to object, on appropriate grounds, to the use of any or all of its responses for purposes of discovery or as evidence in the hearing of the captioned matter. Duke Energy Ohio hereby fully preserves all of its objections to the Discovery Requests or the use of its responses for any purpose.

Duke Energy Ohio's responses to the Discovery Requests shall not be construed as a waiver of the attorney-client privilege, trial preparation and/or work product doctrine, or any other applicable privilege or doctrine. Duke Energy Ohio reserves the right to seek protective treatment in respect of discovery, as permitted under the Ohio Rules of Civil Procedure and Commission Rule.

GENERAL OBJECTIONS

1. Duke Energy Ohio objects to any Discovery Request as improper, overbroad, and unduly burdensome to the extent it purports to impose upon the Company any obligations broader than those set forth the Commission's rules or as otherwise allowed by law.
2. Duke Energy Ohio objects to these Discovery Requests and to OCC's Definitions and Instructions as improper, overbroad, and unduly burdensome to the extent that they seek or purport to require the disclosure of information protected by the attorney-client privilege, trial preparation and/or work product doctrine, or any other applicable privilege or doctrine. Duke Energy Ohio's responses as may hereinafter be given shall not include any information protected by such privileges or doctrines, and any inadvertent disclosure of such information shall not be deemed as a waiver of any such privilege or doctrine.
3. Duke Energy Ohio objects to these Discovery Requests and to the OCC's Definitions and Instructions to the extent they improperly seek or purport to require Duke Energy Ohio to provide documents and information not in the possession, custody, or control of Duke Energy Ohio.
4. The objections and responses contained herein and produced in response hereto are not intended to, nor they, be construed as waiving Duke Energy Ohio's right to object to these Discovery Requests or the information provided in response thereto for any purpose, including but not limited to discovery, motion practice, and hearing.
5. Duke Energy Ohio objects to these Discovery Requests to the extent they improperly seek or purport to require the production of documents or information that is not relevant to the subject matter of the captioned proceeding and/or not reasonably calculated to lead to the discovery of admissible evidence.

6. Duke Energy Ohio objects to these Discovery Requests and the OCC's Definitions and Instructions to the extent they improperly seek or purport to require production of documents in a form other than how the documents are maintained by the Company in the ordinary course of business.
7. Duke Energy Ohio objects to these Discovery Requests to the extent they seek documents or information that is publically available to, and thus equally accessible by, the OCC.
8. Duke Energy Ohio objects to those Discovery Requests that seek "all" or "any" document, to the extent that such requests are overly broad, unduly burdensome, expose the Company to undue expense, and are designed to elicit information that is irrelevant or not likely to lead to the discovery of admissible evidence.
9. Duke Energy Ohio objects to those Discovery Requests that fail to include reasonable time parameters pursuant to which they are to be answered, on the basis that said requests are overly broad, unduly burdensome, expose the Company to undue expense, and are designed to elicit information that is irrelevant or not likely to lead to the discovery of admissible evidence.
10. Duke Energy Ohio objects to these Discovery Requests to the extent they are vague, ambiguous, lacking in definition, include terminology that is subject to differing interpretations, and otherwise force the Company to engage in speculation and guesswork as to their intended meaning.
11. Duke Energy Ohio objects to these Discovery Requests and to the OCC's Definitions and Instructions to the extent they improperly seek or purport to require the production of information relating to entities not within the jurisdiction of the Commission.

12. The objections and responses contained herein are not intended to be, nor should they be construed as, a waiver of Duke Energy Ohio's right to object to other discovery involving or relating to the subject matter of these requests and responses.

**THE OHIO CONSUMERS' COUNSEL
SECOND SET OF DISCOVERY REQUESTS
TO DUKE ENERGY OHIO, INC.
Docket No. 17-2089-GE-COI**

INTERROGATORIES

INTERROGATORY NO. 72:

Referring to Duke's responses to OCC INT-1-044 and INT-1-045, Ohio Adm. Code 4901:1-10-21(A) defines a customer/consumer complaint as "a customer/consumer contact when such contact necessitates follow-up by or with the electric utility to resolve a point of contention." Does Duke have a process for attempting to resolve customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), about disconnection of natural gas and/or electric service?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 73:

Referring to Duke's response to OCC INT-1-047, if Duke's response to OCC INT-2-072 is affirmative, please describe the process Duke currently has in place for attempting to resolve customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), about disconnection of natural gas and/or electric service.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 74:

Has the process described in Duke's response to OCC INT-2-073 changed since November 2011?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 75:

If Duke's response to INT-2-074 is affirmative, please identify all changes made to the process since November 2011 and give the approximate date each change was made.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 76:

Referring to Duke's response to OCC INT-1-046, what is the name of the department, division, or similar unit within Duke that is responsible for

attempting to resolve customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), about disconnection of natural gas and/or electric service?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 77:

Referring to Duke's response to OCC INT-1-046, what is the name and title of the person in charge of the department, division, or similar unit identified in Duke's response to OCC INT-2-076?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 78:

How many customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), regarding disconnection of residential natural gas service did Duke attempt to resolve for each calendar year beginning with 2012 through 2017?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 79:

How many customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), regarding disconnection of residential electric service did Duke attempt to resolve for each calendar year beginning with 2012 through 2017?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 80:

How many disconnections of residential electric service for nonpayment did Duke make for the month of November 2017 and the month of December 2017?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 81:

How many disconnections of residential natural gas service for nonpayment did Duke make for the month of November 2017 and the month of December 2017?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 82:

Referring to Duke's response to OCC INT-01-007, please explain how the remote disconnection and reconnection capabilities of the advanced metering

infrastructure (“AMI”) meters are used (including each step in the process) when the capability is used.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 83:

Referring to Duke’s response to OCC INT-1-008, what was the average disconnection amount on a monthly basis between January 2017 and October 2017 for Duke residential customers who were disconnected for nonpayment using the remote AMI disconnection capabilities?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 84:

Referring to Duke’s response to OCC-INT-01-009, for each month between January 2017 and October 2017, what was the average length of time that Duke’s residential customers were without service following disconnection for nonpayment before the service was remotely reconnected?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 85:

On a monthly basis between January 2017 and December 2017, how many Duke residential electric customers were disconnected for nonpayment as a result of debt that originated through a competitive retail electric service (“CRES”) provider?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 86:

On a monthly basis between January 2017 and December 2017, how many Duke residential natural gas customers were disconnected for nonpayment as a result of debt that originated through a competitive retail natural gas service (“CRNGS”) provider?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 87:

On consolidated bills where Duke includes CRES and/or CRNGS charges for residential electric and/or natural gas service, does Duke assess late payment charges if customer payments are not made for the CRES or CRNGS charges?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 88:

Referring to Duke's response to OCC-INT-01-021, for each month between January 2017 and December 2017, how many premise visits did Duke perform on the day that residential electric and/or natural gas services were scheduled for disconnection?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 89:

On a monthly basis between January 2017 and December 2017, what is the total number of residential electric customers who were assessed a collection charge by Duke?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 90:

Referring to Duke's responses to OCC-INT-01-048 and OCC-INT-01-049, has Duke met with any PUCO employee regarding credit or disconnection policies and procedures since February 1, 2015? If so, identify the date of the meeting, the attendees, and the specific subject matter.

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 91:

For each year 2011 through 2017, what was the total dollar amount of Duke's residential electric bad debt expense?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 92:

For each year 2011 through 2017, what was the total dollar amount that Duke billed residential customers for electric service?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 93:

For each year 2011 through 2017, what was the total dollar amount of Duke's residential natural gas bad debt expense?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 94:

For each year 2011 through 2017, what was the total dollar amount that Duke billed residential customers for natural gas service?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 95:

Referring to Duke's response to OCC-INT-01-054, is it Duke's current policy to accept telephonically provided medical certifications from residential customers?

Response: See response provided contemporaneously herewith.

INTERROGATORY NO. 96:

Is it Duke's current policy to provide medical certification forms to residential customers upon request?

Response: See response provided contemporaneously herewith.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION OF DOCUMENT NO. 12:

Referring to Duke's responses to OCC-INT-01-016 through OCC-INT-01-020, please provide a copy of the PIPP Metrics that were submitted to the Commission for each month between November 2016 and December 2017.

Response: See response provided contemporaneously herewith.

REQUEST FOR PRODUCTION OF DOCUMENT NO. 13:

Please provide a copy of any and all written communications (including notices of probable non-compliance) between any employee of the PUCO and Duke regarding Duke's credit and disconnection policies and procedures since February 1, 2015.

Response: See response provided contemporaneously herewith.

Respectfully submitted,



Elizabeth H. Watts (0031092)
Associate General Counsel
Duke Energy Business Services LLC
PNC Bank Plaza
155 East Broad Street, 20th Floor
Columbus, Ohio 43215
(614) 222-1331 (telephone)
(614) 222-1337 (facsimile)
Elizabeth.Watts@duke-energy.com (e-mail)

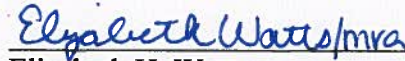
CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was delivered by U.S. mail (postage prepaid), personal, or electronic mail, on this 22nd day of February 2018, to the parties listed below.

Terry L. Etter
Office of the Ohio Consumers' Counsel
10 W. Broad St., Suite 1800
Columbus, Ohio 43215
terry.etter@occ.ohio.gov

Kimberly W. Bojko
Carpenter Lipps & Leland LLP
280 N. High St., Suite 1300
Columbus, Ohio 43215
bojko@carpenterlipps.com

William Wright
Attorney General's Office
Public Utilities Commission of Ohio
30 E. Broad St., 16th Floor
Columbus, Ohio 43215
William.wright@ohioattorneygeneral.gov


Elizabeth H. Watts

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-072

REQUEST:

Referring to Duke's responses to OCC INT-1-044 and INT-1-045, Ohio Adm. Code 4901:1-10-21(A) defines a customer/consumer complaint as "a customer/consumer contact when such contact necessitates follow-up by or with the electric utility to resolve a point of contention." Does Duke have a process for attempting to resolve customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), about disconnection of natural gas and/or electric service?

RESPONSE:

Yes.

PERSON RESPONSIBLE: Ashley Newman

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-073

REQUEST:

Referring to Duke's response to OCC INT-1-047, if Duke's response to OCC INT-2-072 is affirmative, please describe the process Duke currently has in place for attempting to resolve customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), about disconnection of natural gas and/or electric service.

RESPONSE:

Customers who wish for Duke Energy to review the decision to disconnect their service for non-payment may reach out to Customer Care to discuss their concerns. Customer Care Specialists will review the customer's financial history, payments credit, and notifications provided to the customer. Specialists will provide the customer with duplicate billing statements and financial/payment history up to 24 months as necessary. If the customer chooses to escalate their concerns further, Specialists may follow their standard escalation process by seeking assistance from a Team Lead or Supervisor within Customer Care who may also review the customer's account and address their concerns.

If a Supervisor is unable to satisfy the customer's concerns, the customer's information will be provided to Duke Energy Consumer Affairs who will then review the account and contact the customer for further discussion. (See OCC-INT-02-073 Attachment for escalation processes.)

If a customer consults the Public Utilities Commission of Ohio (PUCO) to file a complaint regarding a possible or completed disconnection for non-payment, the PUCO will contact Duke Energy's Consumer Affairs team via e-mail for a review of the customer's account. If the service has not already been disconnected, and the customer is disputing charges, Consumer Affairs will suspend collections on the customer's account until the complaint can be reviewed and responded to. If the customer has been disconnected, Consumer Affairs will work with the PUCO and/or the customer to provide appropriate information regarding financial/payment history as well as any notifications the customer may have received.

At each stage of escalation, the customer will be provided with information addressing their concerns prompting their request to review the decision to disconnect service, and

payment, payment arrangement, or assistance options will be offered to avoid disconnection or reconnect service.

PERSON RESPONSIBLE: Ashley Newman

Escalated Call Work Process:
Customer Service Specialist

Customer inquiry may require a supervisor:

1. Attempt to resolve the customer concern without escalating the call:
 - Use the available online resources (i.e. The Source, external web, etc.) before escalating the call
 - Ask team lead/OJT for additional information, while resolving the customer call
2. **Call Transfer.** If customer is not satisfied and further escalation is needed, specialist may transfer the call to their team lead/OJT for resolution:
 - Complete a warm transfer providing details of the escalation
 - Note customer's account
3. **Call Back:** If team lead/OJT is not available, offer the customer a call back within 24 hours (*internal goal is to complete the callback within 1 - 4 hours*). Details of the escalation are entered into the team work file within the billing system.
 - If customer does not accept a call back, and your team lead/OJT is not available, transfer call to the Resource Support Line (RSL)
 - If RSL is unable to take the call, specialist transfers call to their supervisor or another available team lead/OJT
 - Specialist completes a warm transfer providing details of the escalation, and notes the customer's account

Resource Support Line

The Resource Support Line (RSL) is contacted to assist or advise in handling an escalated call:

- Provide the support needed for the customer care specialist to handle the escalated call
- Assist specialist as needed and, when appropriate, remind the specialist of online resources available

The RSL receives an escalated call from the customer care specialist:

- Attempt to resolve customer's concern without further escalating the call
- Note customer's account

If customer is not satisfied and further escalation is needed, the RSL transfers the call to their team lead/OJT to resolve:

- RSL initiates a warm transfer giving details of the escalation and note the customer's account

If their team lead/OJT is not available, offer a call back to the customer within 24-hours (internal goal is to complete the callback within 1 - 4 hours). Enter escalation details into the team work file.

If customer does not accept a call back and their team lead/OJT is not available, RSL transfers the caller to the next available team lead/OJT, their supervisor, or an available supervisor:

- Warm transfer providing escalation details
- Note customer's account

Team Lead/OJT

Team lead/OJT is asked for assistance or advice in handling an escalated call:

- Provide support needed for the customer care specialist to handle the escalated call
- Assist specialist as needed and, when appropriate, remind the specialist of online resources available
- The team lead/OJT receives an escalation from the specialist, Resource Support Line, or the team work file

Call Transfer:

- Team lead/OJT should attempt to resolve the customer concern without further escalating the call
- Team lead/OJT should note customer's account

Call Back:

Team lead/OJT returns the customer call within 1 - 4 hours and attempts to resolve the concern without further escalation:

- Team lead/OJT notes customer's account
- If customer is not satisfied and further escalation is needed, team lead/OJT transfers the call to their supervisor or another team lead/OJT:
 - Initiate warm transfer with details of the escalation
 - Note customer's account
- If their supervisor or another team lead/OJT is not available, offer the customer a call back within 24-hours (internal goal is to complete the callback within 1 - 4 hours)
- Team lead/OJT sends email to their supervisor for a callback to the customer.

Supervisor

Supervisor is unable to resolve the customer's concern, supervisor will send an email to I Can Help and Consumer Affairs will take ownership of the escalated callback request and contact the customer.

Consumer Affairs

Consumer Affairs Specialist will receive an email request through I Can Help to contact customer. Consumer Affairs will review the customer's concern and will contact customer within 24 hours.

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018

OCC-INT-02-074

REQUEST:

Has the process described in Duke's response to OCC INT-2-073 changed since November 2011?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-075

REQUEST:

If Duke's response to INT-2-074 is affirmative, please identify all changes made to the process since November 2011 and give the approximate date each change was made.

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-076

REQUEST:

Referring to Duke's response to OCC INT-1-046, what is the name of the department, division, or similar unit within Duke that is responsible for attempting to resolve customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), about disconnection of natural gas and/or electric service?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. This Interrogatory further reflects an impermissible fishing expedition as the Audit does not include any allegations relating to customer complaints. *Kenna v. Adecco Employment Services, Inc.*, 2006-Ohio-3633 ¶ 15. This Interrogatory is further objectionable given that it exposes Duke Energy Ohio to speculation and guesswork. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Consumer Affairs.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Ashley Newman

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-077

REQUEST:

Referring to Duke's response to OCC INT-1-046, what is the name and title of the person in charge of the department, division, or similar unit identified in Duke's response to OCC INT-2-076?

RESPONSE:

Objection. This Interrogatory fails to contain any reasonable time parameters pursuant to which it is to be answered, thereby rendering it overly broad, unduly burdensome, and vague. This Interrogatory further reflects an impermissible fishing expedition as the Audit does not include any allegations relating to customer complaints. *Kenna v. Adecco Employment Services, Inc.*, 2006-Ohio-3633 ¶ 15. This Interrogatory is further objectionable given that it exposes Duke Energy Ohio to speculation and guesswork. Moreover, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Ashley Newman, Manager Consumer Affairs.

PERSON RESPONSIBLE:

As to objection: Legal

As to response: Ashley Newman

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-078

REQUEST:

How many customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), regarding disconnection of residential natural gas service did Duke attempt to resolve for each calendar year beginning with 2012 through 2017?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-079

REQUEST:

How many customer complaints, as defined in Ohio Adm. Code 4901:1-10-21(A), regarding disconnection of residential electric service did Duke attempt to resolve for each calendar year beginning with 2012 through 2017?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-080

REQUEST:

How many disconnections of residential electric service for nonpayment did Duke make for the month of November 2017 and the month of December 2017?

RESPONSE:

Objection. This Interrogatory seeks to elicit information that is of public record and readily available to and equally accessible by the OCC and thus must be viewed as intending to harass. See generally, OAC § 4901-1-20(D). Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see Duke Energy Ohio's report filed in Case No. 17-106-GE-UNC, as required by R.C.4933.123.

Number of Residential Electric Disconnections (AMI and Non-AMI)

November 2017	3,699
December 2017	2,136

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018

OCC-INT-02-081

REQUEST:

How many disconnections of residential natural gas service for nonpayment did Duke make for the month of November 2017 and the month of December 2017?

RESPONSE:

Objection. This Interrogatory seeks to elicit information that is of public record and readily available to and equally accessible by the OCC and thus must be viewed as intending to harass. See generally, OAC § 4901-1-20(D). Without waiving said objection, to the extent discoverable, and in the spirit of discovery, see Duke Energy Ohio's report filed in Case No. 17-106-GE-UNC, as required by R.C.4933.123.

Number of Residential Gas Disconnections

November 2017	253
December 2017	177

PERSON RESPONSIBLE:

As to objection: Legal
As to response: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018

OCC-INT-02-082

REQUEST:

Referring to Duke's response to OCC INT-01-007, please explain how the remote disconnection and reconnection capabilities of the advanced metering infrastructure ("AMI") meters are used (including each step in the process) when the capability is used.

RESPONSE:

Disconnection Processes and Systems for Customers on AMI:

1. Disconnect orders are created in CMS (billing system)
2. Disconnect orders are placed in remote order queue (pending- notify order completion)
3. Notify orders are uploaded to Service Suite 9 (SS9-mobile application used to complete orders)
4. Electric notify orders are completed in SS9-sent to the remote order queue as completed
5. Disconnect orders are sent to EDMS/MDM
6. EDMS/MDM sends the signal to the meter to be disconnected
7. Disconnect orders are completed in CMS

Reconnection Processes and Systems for Customers on AMI:

1. Reconnect orders are created in CMS (billing system)
2. Reconnect orders are placed in remote order queue
3. Reconnect orders are sent to EDMS/MDM
4. EDMS/MDM sends the signal to the meter to be reconnected
5. Reconnect orders are completed in CMS

PERSON RESPONSIBLE: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018

OCC-INT-02-083

REQUEST:

Referring to Duke's response to OCC INT-1-008, what was the average disconnection amount on a monthly basis between January 2017 and October 2017 for Duke residential customers who were disconnected for nonpayment using the remote AMI disconnection capabilities?

RESPONSE:

January 2017	\$402.56
February 2017	\$562.23
March 2017	\$556.24
April 2017	\$501.44
May 2017	\$526.21
June 2017	\$488.24
July 2017	\$455.08
August 2017	\$486.65
September 2017	\$448.87
October 2017	\$444.09

PERSON RESPONSIBLE: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-084

REQUEST:

Referring to Duke's response to OCC-INT-01-009, for each month between January 2017 and October 2017, what was the average length of time that Duke's residential customers were without service following disconnection for nonpayment before the service was remotely reconnected?

RESPONSE:

2017	Avg. Days
January	1.6
February	1.9
March	1.1
April	1.7
May	1.8
June	2
July	1.9
August	1.6
September	1.8
October	2.1
November	1.6
December	1.8

PERSON RESPONSIBLE: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-085

REQUEST:

On a monthly basis between January 2017 and December 2017, how many Duke residential electric customers were disconnected for nonpayment as a result of debt that originated through a competitive retail electric service ("CRES") provider?

RESPONSE:

Duke Energy Ohio purchases the receivables, so the Company does not separately track disconnections for nonpay for CRES balances due.

PERSON RESPONSIBLE: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018

OCC-INT-02-086

REQUEST:

On a monthly basis between January 2017 and December 2017, how many Duke residential natural gas customers were disconnected for nonpayment as a result of debt that originated through a competitive retail natural gas service ("CRNGS") provider?

RESPONSE:

Duke Energy Ohio purchases the receivables, so the Company does not separately track for CRNGS balances due.

PERSON RESPONSIBLE: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018

OCC-INT-02-087

REQUEST:

On consolidated bills where Duke includes CRES and/or CRNGS charges for residential electric and/or natural gas service, does Duke assess late payment charges if customer payments are not made for the CRES or CRNGS charges?

RESPONSE:

Yes.

PERSON RESPONSIBLE: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018

OCC-INT-02-088

REQUEST:

Referring to Duke's response to OCC-INT-01-021, for each month between January 2017 and December 2017, how many premise visits did Duke perform on the day that residential electric and/or natural gas services were scheduled for disconnection?

RESPONSE:

Number of Residential Premise Visits

	Electric	Gas
January 2017	3,064	272
February 2017	3,870	352
March 2017	3,513	297
April 2017	3,803	268
May 2017	67	306
June 2017	39	602
July 2017	35	480
August 2017	67	608
September 2017	45	409
October 2017	52	511
November 2017	38	253
December 2017	35	177

PERSON RESPONSIBLE: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-089

REQUEST:

On a monthly basis between January 2017 and December 2017, what is the total number of residential electric customers who were assessed a collection charge by Duke?

RESPONSE:

Number of Residential Electric Customers Assessed Collection Charge

January 2017	2,008
February 2017	2,638
March 2017	2,075
April 2017	2,589
May 2017	3,042
June 2017	2,847
July 2017	2,672
August 2017	2,378
September 2017	2,693
October 2017	2,957
November 2017	2,876
December 2017	1,801

PERSON RESPONSIBLE: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018

OCC-INT-02-090

REQUEST:

Referring to Duke's responses to OCC-INT-01-048 and OCC-INT-01-049, has Duke met with any PUCO employee regarding credit or disconnection policies and procedures since February 1, 2015? If so, identify the date of the meeting, the attendees, and the specific subject matter.

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and vague. Furthermore, it seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-091

REQUEST:

For each year 2011 through 2017, what was the total dollar amount of Duke's residential electric bad debt expense?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-092

REQUEST:

For each year 2011 through 2017, what was the total dollar amount that Duke billed residential customers for electric service?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-093

REQUEST:

For each year 2011 through 2017, what was the total dollar amount of Duke's residential natural gas bad debt expense?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-094

REQUEST:

For each year 2011 through 2017, what was the total dollar amount that Duke billed residential customers for natural gas service?

RESPONSE:

Objection. This Interrogatory is overly broad, unduly burdensome, and seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-095

REQUEST:

Referring to Duke's response to OCC-INT-01-054, is it Duke's current policy to accept telephonically provided medical certifications from residential customers?

RESPONSE:

No.

PERSON RESPONSIBLE: Mitch Carmosino

**Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Interrogatories
Date Received: February 2, 2018**

OCC-INT-02-096

REQUEST:

Is it Duke's current policy to provide medical certification forms to residential customers upon request?

RESPONSE:

Yes.

PERSON RESPONSIBLE: Mitch Carmosino

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Production of Documents
Date Received: February 2, 2018

OCC-POD-02-013

REQUEST:

Please provide a copy of any and all written communications (including notices of probable non-compliance) between any employee of the PUCO and Duke regarding Duke's credit and disconnection policies and procedures since February 1, 2015.

RESPONSE:

Objection. This Document Request is overly broad, unduly burdensome, and vague. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, Duke Energy Ohio may have received a notice of probable non-compliance during this time period. However, no record of such notice exists. Duke Energy Ohio will supplement this discovery request as needed.

PERSON RESPONSIBLE: Legal

Duke Energy Ohio
Case No. 17-2089-GE-COI
OCC Second Set Production of Documents
Date Received: February 2, 2018

OCC-POD-02-012

REQUEST:

Referring to Duke's responses to OCC-INT-01-016 through OCC-INT-01-020, please provide a copy of the PIPP Metrics that were submitted to the Commission for each month between November 2016 and December 2017.

RESPONSE:

Objection. This Document Request seeks to elicit information that is irrelevant and not likely to lead to the discovery of admissible evidence as it falls outside the scope of this proceeding.

PERSON RESPONSIBLE: Legal

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/23/2018 5:29:45 PM

in

Case No(s). 17-2089-GE-COI

Summary: Motion Motion to Compel - Exhibits electronically filed by Ms. Jamie Williams on behalf of Etter, Terry Mr.