

**OCC EXHIBIT NO. \_\_\_\_\_**

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of The Regulation of the )  
Purchased Gas Adjustment Clauses Contained ) Case No. 18-0218-GA-GCR  
within the Rate Schedules of Duke Energy )  
Ohio Inc., and Related Matters. )

In the Matter of The Audit of the )  
Uncollectable Expense Rider of Duke Energy ) Case No. 18-0318-GA-UEX  
Ohio Inc., and Related Matters. )

In the Matter of The Application of Duke )  
Energy Ohio Inc., for Approval of an ) Case No. 18-0418-GA-PIP  
Adjustment to its Interim and Temporary PIPP )  
Plan and Rider Case. )

**DIRECT TESTIMONY  
OF  
MICHAEL P. HAUGH**

**On Behalf of the  
The Office of the Ohio Consumers' Counsel**  
*65 East State Street 7th floor  
Columbus, Ohio 43215*

**SEPTEMBER 3, 2019**

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## **ATTACHMENTS**

Attachment MPH-1	List of Testimony Michael Haugh
Attachment MPH-2	Testimony of Michael Haugh (Case 15-218-GA-GCR).
Attachment MPH-3	Duke Response to OCC INT-5-001.
Attachment MPH-4	Duke Response to OCC INT-3-001.
Attachment MPH-5	Duke Response to OCC INT-4-003.
Attachment MPH-6	Duke Response to OCC INT-3-002.

1    **I.        OVERVIEW**

2

3    ***Q1.    PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.***

4    ***A1.***    My name is Michael P. Haugh. I am an independent contractor testifying on  
5            behalf of the Office of the Ohio Consumers' Counsel ("OCC"). My business  
6            address at OCC is 65 East State Street, 7<sup>th</sup> Floor, Columbus, Ohio 43215.

7

8    ***Q2.    PLEASE BRIEFLY SUMMARIZE YOUR EDUCATION AND***  
9            ***PROFESSIONAL EXPERIENCE.***

10   ***A2.***    I have a Bachelor of Science in Business Administration from the Ohio State  
11            University with a major in Finance. I have also attended the Institute of Public  
12            Utilities Advanced Regulatory Studies at Michigan State University. I have over  
13            20 years working in the energy industry with experience in wholesale and retail  
14            energy trading, risk management, natural gas purchasing and scheduling, and  
15            regulatory affairs. I started with Enron Energy Services in 1995 as an Energy  
16            Trader and then moved on to American Electric Power Energy Services in 1998  
17            where I worked in Risk Management and Wholesale Energy Trading. In January  
18            2004 I went to work for MidAmerican Energy Services as a Senior Product  
19            Manager. In October of 2004 I began work as a Senior Regulatory Analyst with  
20            the OCC. I left the OCC in September 2007 and joined Integrys Energy Services  
21            as a Regulatory Affairs Analyst. I joined Just Energy in 2009 and held the  
22            position of Manager of Regulatory Affairs before becoming Manager of Market  
23            Relations in 2011. I was re-hired at the OCC in June 2014 as the Assistant  
24            Director of Analytical Services where I worked until May 2018. I then worked for

1 Genie Energy as the Director of Energy Affairs until December of 2018. I have  
2 been an independent consultant since January 2019.

3

4 ***Q3. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN UTILITY CASES***  
5 ***BEFORE REGULATORY COMMISSIONS?***

6 ***A3.*** Yes, I have testified before the Public Utilities Commission of Ohio (“PUCO”)  
7 and the Michigan Public Service Commission. The complete list of cases in which  
8 I have testified is attached as Attachment MPH-1.

9

10 **II. PURPOSE OF TESTIMONY**

11

12 ***Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS***  
13 ***PROCEEDING?***

14 ***A4.*** On July 27, 2019, Duke Energy Ohio (“Duke” or “Utility”) filed a Joint  
15 Stipulation and Recommendation (“Settlement”) supported by certain parties that  
16 was intended to resolve issues in these cases. My testimony addresses whether the  
17 Settlement is reasonable and meets the test that the PUCO uses to evaluate  
18 settlements.

19

20 I examine three issues with the Settlement. First, I address whether the assignment  
21 of propane commodity costs (discussed in Section 6.5.5 of the Management and  
22 Performance Audit prepared by Exeter and Associates (“Exeter”) and filed with  
23 the PUCO on January 24, 2019) are properly allocated and in the public interest.  
24 Second, my testimony recommends the PUCO encourage Duke to switch to a

1 competitive procurement process for natural gas in lieu of a Gas Cost Recovery  
2 (“GCR”) mechanism, which is not included in the Settlement. Third, I address the  
3 subject of information that should be provided to Duke consumers that are  
4 looking to buy natural gas from marketers. Providing information to consumers  
5 about how consumers have fared historically with prices they paid for natural gas  
6 from marketers compared to GCR prices would be informative and educational  
7 for consumers.

8

9 ***Q5. PLEASE SUMMARIZE YOUR RECOMMENDATIONS REGARDING THE***  
10 ***SETTLEMENT.***

11 ***A5.*** I recommend that the PUCO amend the Settlement to properly allocate the  
12 propane commodity costs during the audit period and to require a refund of those  
13 costs to the GCR customers. In addition, I recommend that the PUCO amend the  
14 Settlement by encouraging Duke to transition from the GCR to a standard service  
15 offer (“SSO”) procurement mechanism. Finally, I recommend that the PUCO  
16 order Duke to provide information to the public regarding the natural gas  
17 commodity price differences between what marketer and GCR customers are  
18 paying.

19

20 ***Q6. PLEASE SUMMARIZE EXETER’S FINDINGS REGARDING THE***  
21 ***ASSIGNMENT OF PROPANE COMMODITY COSTS.***

22 ***A6.*** Duke has propane facilities that allow the Utility to maintain proper operating  
23 pressure during periods of peak demand. These facilities can also be used to meet

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1 customers' gas requirements during periods of peak demand if Duke determines it  
2 is the least expensive option. During the audit period Duke utilized the propane  
3 facilities to maintain distribution operating pressure on a number of days.  
4 Maintaining proper operating pressure is necessary to keep the system running,  
5 thereby providing benefits to all customers. Had it not been for the need to  
6 maintain distribution system operating pressures, it would not have been  
7 necessary for Duke to use its propane facilities during the audit period.<sup>1</sup> Yet  
8 Exeter found that during the audit period the costs associated with the propane  
9 facilities were allocated only to Duke's GCR customers, even though all firm  
10 transportation customers (marketer customers) also benefited from the use of the  
11 propane facilities. However, marketer customers were not assessed costs  
12 associated with the use of the propane facilities even though they benefitted from  
13 the use of the facilities. Exeter determined that both GCR and marketer customers  
14 should be responsible for their proportional share of incremental propane costs  
15 during the audit period.<sup>2</sup>

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<sup>1</sup> *Report to the Public Utilities Commission of Ohio on the Management and Performance Audit of Duke Energy Ohio Inc.*, dated January 2019 at page 6-24.

<sup>2</sup> *See id.*

1    **III.    EVALUATION OF THE PROPOSED STIPULATION**

2

3    ***Q7.    WHAT IS THE PUCO'S STANDARD OF REVIEW FOR EVALUATING***  
4    ***PROPOSED SETTLEMENTS?***

5    **A7.**    The PUCO uses these criteria for evaluating the reasonableness of a proposed  
6    settlement:

7

8                    1.        Is the settlement a product of serious bargaining among  
9                                capable, knowledgeable parties? And the PUCO also has  
10                              considered at times if there is diversity of interests among  
11                              the stipulating parties?

12                    2.        Does the settlement, as a package, benefit customers and  
13                              the public interest?<sup>3</sup>

14                    3.        Does the settlement package violate any important  
15                              regulatory principle or practice?

16

17    ***Q8.    WHO ARE THE SIGNATORY PARTIES TO THE STIPULATION?***

18    **A8.**    The Signatory Parties are the PUCO Staff ("Staff"), Duke, and IGS Energy, Inc.  
19            ("IGS").

---

<sup>3</sup> *Consumers' Counsel v. Pub.Util. Comm.*, 64 Ohio St.3d 123, 125(1992), citing *Akron v. Pub.Util. Comm.*, 55 Ohio St.2d 155, 157 (1978).

1   ***Q9. DOES THE SETTLEMENT, AS A PACKAGE, BENEFIT CUSTOMERS AND***  
2   ***THE PUBLIC INTEREST?***

3   ***A9.***   No. The Settlement falls short of benefitting customers and the public interest by  
4           not properly allocating the propane commodity costs. The Settlement also is  
5           inconsistent with the regulatory practice of assessing costs to those who caused or  
6           benefited from the expenditure. The audit report clearly states that GCR  
7           customers were assessed the full costs associated with the propane use and  
8           “Exeter believes this to have been unreasonable.”<sup>4</sup> Because all customers  
9           benefited from using the propane, which kept Duke’s system running, all  
10          customers should pay for it.

11  
12          Additionally, Exeter found that Duke’s GCR rates have been higher than the  
13          standard choice offers of the other three major natural gas distribution companies  
14          in the state. Therefore, it is appropriate to switch to a competitive auction process  
15          which has led to lower gas commodity prices for customers in other Ohio gas  
16          utility service territories. Without a requirement in the Settlement for this  
17          examination, the Settlement falls short of benefitting customers and the public  
18          interest. Also, an appropriate regulatory principle in Ohio has been that energy  
19          utility default rates should be priced according to a competitive auction, to benefit  
20          consumers.

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<sup>4</sup> Audit Report at page 6-24.



1 Finally, the Settlement should require Duke to make information publicly  
2 available to consumers, to show cost differences between what GCR customers  
3 are paying versus what marketer customers are paying for their natural gas.  
4 Without this requirement, the Settlement falls short of benefitting customers and  
5 the public interest. And it violates the regulatory practice for providing  
6 information and education to consumers about their choices.

7  
8 ***Q10. DOES THE SETTLEMENT ADDRESS THE ASSIGNMENT OF PROPANE***  
9 ***COMMODITY COSTS?***

10 ***A10.*** Yes, item number 7 on page 5 allows for a proper allocation of costs in the future.  
11 However, Exeter's recommendation addressed the incorrect and unreasonable  
12 allocation of costs that occurred during the audit period. The Settlement does not.

13  
14 ***Q11. DOES THE ALLOCATION OF PROPANE COSTS TO ONLY GCR***  
15 ***CUSTOMERS VIOLATE IMPORTANT REGULATORY PRINCIPLES OR***  
16 ***PRACTICES?***

17 ***A11.*** Yes. The Settlement violates the important principle of cost-causation. It ignores  
18 an auditor recommendation that would have more fairly allocated the incremental  
19 propane costs to all firm transportation customers who benefited from the use of  
20 the propane facilities during the audit period rather than to just GCR customers.

***Q12. WHAT IS YOUR RECOMMENDATION REGARDING THE COSTS  
ASSOCIATED WITH THE PROPANE FACILITIES?***

***A12.*** The Settlement should be amended to properly allocate costs to all customers that benefitted from the use of the propane to balance the system during peak usage during the audit period. The PUCO should follow Exeter's recommendation to take the incremental costs incurred during the audit period and include those costs in Duke's Contract Commitment Cost Recovery Rider ("CCCR"). The CCCR is set up to collect costs associated with pipeline capacity, storage commitments and propane costs. The propane costs should have been collected through this rider all along. This is the appropriate rider that should be used to fairly allocate the costs.

***Q13. WHAT WERE EXETER'S FINDINGS REGARDING THE COMPARISON  
OF GAS COMMODITY COSTS BETWEEN DUKE AND THE OTHER  
OHIO NATURAL GAS UTILITIES?***

***A13.*** Exeter found that the from 2016 – 2018 the Duke GCR that customers pay averaged \$0.684/Mcf more than the standard offer prices that the other major gas utilities in Ohio provide to their customers. Some might assert that including Dominion East Ohio ("DEO") is unreasonable due to DEO's large on-system storage and close proximity to the Marcellus Shale gas reserves and, therefore, that it should not be included in the comparison. As shown in the table below, however, even if DEO is removed from the comparison there is still a difference between Duke and the standard offer's of Vectren Energy Delivery Ohio

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1 (“VEDO”) and Columbia Gas of Ohio, that average \$0.225/Mcf more for  
2 consumers to pay during the three-year period.

3  
4 Further, Exeter found that Duke’s hedging activities averaged approximately  
5 \$0.40/Mcf as a cost to GCR consumers. The costs associated with hedging would  
6 be unnecessary if Duke transitioned from the GCR to a competitive auction  
7 process similar to the COH and DEO SCO.

Comparison of Duke GCR vs COH and VEDO (per Mcf)

	2016	2017	2018	Average
COH	\$ 3.6504	\$ 4.6378	\$ 4.3742	\$ 4.2208
VEDO	\$ 3.9667	\$ 4.6375	\$ 4.1492	\$ 4.2511
Average	\$ 3.8086	\$ 4.6377	\$ 4.2617	\$ 4.2360
Duke	\$ 3.9593	\$ 4.7989	\$ 4.6337	\$ 4.4640
Difference	\$ 0.1508	\$ 0.1612	\$ 0.3720	\$ 0.2280

8

9 ***Q14. DOES THE SETTLEMENT REQUIRE DUKE TO EXAMINE THE***  
10 ***POTENTIAL BENEFITS OF TRANSITIONING TO A STANDARD***  
11 ***OFFER FOR THE SUPPLY OF NATURAL GAS?***

12 ***A14.*** No. The Settlement is silent on the topic.

1    ***Q15. IS IT IN THE PUBLIC INTEREST FOR DUKE TO PROCURE NATURAL***  
2            ***GAS COMPETITIVELY IF IT RESULTS IN LOWER COSTS FOR***  
3            ***CONSUMERS?***

4    ***A15.*** Yes. Duke should always be mindful of ways to help reduce natural gas costs for  
5            consumers. The public interest is best served when customers are safely provided  
6            the lowest rates possible. In recent years, the competitive standard offer auctions  
7            at the other large natural gas utilities in the state have produced lower rates for  
8            consumers.

9  
10   ***Q16. DOES THE SETTLEMENT'S SILENCE ON DUKE'S GAS PROCUREMENT***  
11            ***PRACTICES VIOLATE IMPORTANT REGULATORY PRINCIPLES OR***  
12            ***PRACTICES?***

13   ***A16.*** Yes. Ohio law requires a natural gas company's procurement planning to maintain  
14            reliable service at optimal prices.<sup>5</sup> Ignoring alternatives such as using a  
15            competitive auction process to procure natural gas, like the other three large gas  
16            utilities have done, results in prices that may be less than optimal and are  
17            potentially unreasonable for consumers.<sup>6</sup>

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<sup>5</sup> R.C. 4905.302(C)(2)(b).

<sup>6</sup> R.C. 4929.02(A).

1    ***Q17. ARE YOU RECOMMENDING THAT DUKE TRANSITION TO AN***  
2            ***AUCTION PROCESS NOW TO BENEFIT CONSUMERS TO REPLACE***  
3            ***THE CURRENT GCR PROCESS?***

4    ***A17.*** Yes. The PUCO should order that change unless Duke can affirmatively show  
5            that its GCR process is in the customers' interest. The standard offer competitive  
6            auctions in other Ohio gas utilities have been very successful and allowed the  
7            utilities to take advantage the abundance of in-state natural gas, for the benefit of  
8            consumers. The audit report mentions a white paper that was filed in PUCO Case  
9            No. 07-589-GA-AIR. This report was filed in May 2009 and was based on  
10           meetings that occurred in July and August of 2008. There have been many  
11           changes in the natural gas markets since that time, which could possibly benefit  
12           customers through the use of a competitive auction process.

13  
14           My recommendation is that the PUCO retain an intendent consultant to conduct  
15           an evaluation of Duke's current procurement process and compare it against a  
16           competitive process similar to those conducted by the other large Ohio natural gas  
17           utilities. Also, a competitive auction would eliminate the need for Duke to  
18           continue its hedging activities (and the associated costs to consumers). The  
19           findings from this evaluation by the consultant should be reported to the PUCO  
20           within nine months of the Order in this proceeding, with a timeline of  
21           transitioning to a competitive standard offer within eighteen months if there is  
22           convincing evidence that a competitively bid standard offer would deliver the

1 optimal pricing standards contemplated in ORC 4905.32 (C)(2)(b) and would  
2 benefit consumers.

3

4 ***Q18. DID EXETER EXAMINE THE DIFFERENCE BETWEEN THE***  
5 ***COMMODITY COSTS DUKE'S GCR CUSTOMERS PAID COMPARED***  
6 ***TO MARKETER CUSTOMERS?***

7 ***A18.*** Not in this audit report. In the previous Duke GCR audit report Exeter found that  
8 GCR customers paid approximately \$7 million per year less than marketer  
9 customers.<sup>7</sup> I filed testimony regarding this topic. That testimony can be found as  
10 Attachment 2 to this testimony.

11

12 ***Q19. IN CONNECTION WITH THIS CASE, DID YOU EXAMINE THE COST***  
13 ***DIFFERENCE BETWEEN GCR AND MARKETER CUSTOMERS?***

14 ***A19.*** Yes, I did. Through discovery Duke provided 2018 information (although  
15 information from 2015-2018 was requested but not available) on residential GCR  
16 and marketer customer commodity costs. I took the total amount charged to  
17 marketer customers in 2018 and divided that by total volumes billed to marketer  
18 customers.

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<sup>7</sup> Report to the Public Utilities Commission of Ohio on the Management and Performance Audit of Gas Purchasing Practices and Policies of Duke Energy Ohio, Case No. 15-218-GA-GCR (December 9, 2015) at page 45. ("2015 Audit Report").

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1 This gave me the average price marketers in Duke's area charged customers. I did  
2 the same calculation with Duke's GCR customers. Below are the results that  
3 showed in the aggregate that Duke's GCR customers paid less for natural gas than  
4 marketer customers by \$11.3 million:

	<u>Marketer</u>	<u>GCR</u>
5		
6	<b>Volumes (Mcf)</b>	19,370,462 <sup>8</sup> 12,476,380 <sup>9</sup>
7	<b>Costs</b>	\$101,773,935 <sup>10</sup> \$58,245,730 <sup>11</sup>
8	<b>Average Cost</b>	\$5.25/Mcf \$4.67/Mcf
9	<b>Difference</b>	\$0.59/Mcf
10	<b>Total Cost Difference</b>	<b><u>\$11,343,321</u></b>

11  
12 **Q20. WHAT DOES YOUR ANALYSIS SHOW?**

13 **A20.** As shown above, in 2018 marketer customers paid about \$11 million more than  
14 Duke's GCR customers. That is even worse for consumers than in the previous  
15 audit period where marketer customers paid \$7 million above Duke's GCR. Part  
16 of this difference can be attributed to more customers shopping in 2018 than  
17 during the previous audit period. This one year equates to roughly \$48 per  
18 customer that shopped in 2018.<sup>12</sup>

<sup>8</sup> OCC Interrogatory OCC-INT-05-001 (attached herein as MPH-3).

<sup>9</sup> OCC Interrogatory OCC-INT-03-001 (attached herein as MPH-4).

<sup>10</sup> OCC Interrogatory OCC-INT-04-003 (attached herein as MPH-5).

<sup>11</sup> OCC Interrogatory OCC-INT-03-002 (attached herein as MPH-6).

<sup>12</sup> Based on an average of 236,000 customers being served by Choice suppliers as seen on the PUCO Choice statistics

(<https://app.powerbigov.us/view?r=eyJrIjoia0JOTA2MjYtNzMzNi00Y2RhLTljZjEtZTU3Zjg5ZDZhMDgyIiwidCI6IjUwZjhmY2M0LTk0ZDgtNGYwNy04NGViLTM2ZWQ1N2M3YzhhMiJ9>)

1    ***Q21. WHAT SHOULD BE DONE WITH THIS INFORMATION?***

2    ***A21.*** It is very concerning that the discrepancy between marketer and GCR customers  
3           has increased by 57% since the last audit period. This information should be  
4           provided to customers looking to shop for a supplier. The discrepancy in cost  
5           between marketers and GCR is easily calculated and provides customers  
6           information that would be helpful in choosing a supplier. This information  
7           demonstrates that most shopping (marketer) customers are paying more than if  
8           they were to stay with the GCR. The cost discrepancy could easily be placed on  
9           the PUCO's Apples to Apples page or as a line item on customers' bills. The  
10          PUCO currently has a docket open in Case No. 19-1429-GA-ORD concerning the  
11          Minimum Gas Service Standards ("MGSS") embodied in Ohio Adm. Code  
12          4901:1-13. These rules involve the minimum content of customer bills provided  
13          by natural gas utilities, including bill messages to consumers. This open docket  
14          affords the perfect opportunity a for the PUCO to address what information  
15          should be provided to consumers regarding comparison prices and savings gained  
16          or lost by customers participating in competitive choice programs.

17  
18    **IV. CONCLUSION**

19  
20    ***Q22. WHAT ARE YOUR RECOMMENDATIONS REGARDING THIS***  
21    ***SETTLEMENT?***

22    ***A22.*** The Settlement as written is not in the public interest and violates important  
23          regulatory practices and principles and should not be approved. Instead, the  
24          PUCO should amend the Settlement to order Duke to properly allocate the costs



1 associated with the use of the propane facilities also to marketer customers during  
2 the audit period and refund the costs to the GCR customers. Additionally, the  
3 Commission should amend the Settlement by hiring an independent consultant to  
4 examine Duke procuring its natural gas supply through a standard offer auction  
5 (and ending its hedging activities that it charges to customers). The findings from  
6 this process should be reported to the PUCO within nine months of the Order in  
7 this proceeding, with a timeline of 18 months for a transition to a competitive  
8 auction to replace Duke's GCR if it is demonstrated that Duke consumers would  
9 benefit from the competitively bid standard offer that all other major energy  
10 utilities use. Finally, the Settlement should contain a provision requiring Duke to  
11 place Duke's GCR price on customers' bills to inform customers of the potential  
12 that they may be paying additional costs above the GCR for their natural gas if  
13 provided by a marketer. The PUCO should also require Duke to provide  
14 aggregated shadow-billing data which calculates the amount marketer customers  
15 pay above or below the amount they would have paid for gas service on the  
16 Duke's standard offer (GCR). The shadow-billing should be similar that  
17 performed by Columbia Gas. (A recent example Columbia's shadow billing  
18 results are part of Attachment MPH-2.)

19  
20 ***Q23. DOES THIS CONCLUDE YOUR TESTIMONY?***

21 ***A23.*** Yes, however I reserve the right to incorporate new information that may  
22 subsequently become available, such as after testimony by the stipulating parties  
23 is available.

## **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing *Direct Testimony of Michael P. Haugh, on Behalf of the Office of the Ohio Consumers' Counsel* was served via electronic transmission upon the parties below this 3rd day of September 2019.

/s/ William J. Michael  
William J. Michael  
Assistant Consumers' Counsel

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

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**Public Utilities Commission of Ohio**

*Monongahela Power Company*, Case No. 04-1047-EL-ATA

*American Electric Power Company*, Case No. 05-376-EL-UNC

*Dayton Power and Light Company*, Case No. 05-276-EL-AIR

*Dominion East Ohio Company*, Case No. 05-474-EL-ATA

*Dominion East Ohio Company*, Case No. 05-219-GA-GCR

*Columbia Gas of Ohio*, Case No. 05-221-GA-GCR

*Duke Energy Ohio*, Case No. 03-93-EL-ATA

*American Electric Power*, Case No. 07-63-EL-UNC

*Eramet Marietta, Inc.*, Case No. 09-516-EL-AEC

*TimkenSteel Corporation*, Case No. 15-1857-EL-AEC

*American Electric Power Company*, Case No. 14-1693-EL-RDR

*Columbia Gas of Ohio*, Case No. 16-1309-GA-UNC

*American Electric Power*, Case No. 10-2929-EL-UNC

*Dayton Power and Light*, Case No. 16-395-EL-SSO

*American Electric Power*, Case No. 16-1852-EL-SSO

**Michigan Public Service Commission**

*Michigan Consolidated Gas Company*, Case No. U-17131

***OCC EXHIBIT NO.*** \_\_\_\_\_

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In the Matter of the Regulation of the                     )  
Purchased Gas Adjustment Clauses                     )  
Contained Within the Rate Schedules of                     ) Case No. 15-218-GA-GCR  
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**On Behalf of the  
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*10 West Broad Street, Suite 1800  
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***MARCH 21, 2016***

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PUCO Case No. 15-218-GA-GCR*

1   **I.       OVERVIEW**

2

3   ***Q1.   PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.***

4   ***A1.***   My name is Michael P. Haugh. I am employed as the Assistant Director of  
5           Analytical Services for the Office of the Ohio Consumers' Counsel ("OCC"). My  
6           business address is 10 West Broad Street, Suite 1800, Columbus, Ohio 43215.

7

8   ***Q2.   PLEASE BRIEFLY SUMMARIZE YOUR EDUCATION AND***  
9       ***PROFESSIONAL EXPERIENCE.***

10   ***A2.***   I have a Bachelor of Science in Business Administration from the Ohio State  
11           University with a major in Finance. I have also attended the Institute of Public  
12           Utilities Advanced Regulatory Studies at Michigan State University. I have over  
13           20 years working in the energy industry with experience in wholesale and retail  
14           energy trading, risk management, natural gas purchasing and scheduling, and  
15           regulatory affairs. I started with Enron Energy Services in 1995 as an Energy  
16           Trader and then moved on to American Electric Power Energy Services in 1998  
17           where I worked in Risk Management and Wholesale Energy Trading. In January  
18           2004 I went to work for MidAmerican Energy Services as a Senior Product  
19           Manager. In October of 2004 I began work as a Senior Regulatory Analyst with  
20           the OCC. I left the OCC in September 2007 and joined Integrys Energy Services  
21           as a Regulatory Affairs Analyst. I joined Just Energy in 2009 and held the  
22           position of Manager of Regulatory Affairs before becoming Manager of Market  
23           Relations in 2011. I was re-hired at the OCC in June 2014 in my current position.

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1   ***Q3. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN UTILITY CASES***  
2   ***BEFORE REGULATORY COMMISSIONS?***

3   ***A3.*** Yes, I have testified before the Public Utilities Commission of Ohio (“PUCO” or  
4   “Commission”) and the Michigan Public Service Commission. The complete list  
5   of cases in which I have testified is attached as Attachment MPH-1.

6  
7   ***II. PURPOSE OF TESTIMONY***

8  
9   ***Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS***  
10   ***PROCEEDING?***

11   ***A4.*** My testimony will include recommendations for fair outcomes for Ohio  
12   consumers, regarding the Stipulation in this case, under the PUCO’s three-  
13   pronged test for evaluating settlements. As background, on December 9, 2015,  
14   Exeter Associates, Inc. (“Exeter” or “Auditor”) filed a Management and  
15   Performance Audit (“Audit”) of the purchasing practices and policies of Duke  
16   Energy Ohio, Inc. (“Duke” or “Utility”). The Duke gas-purchasing practices that  
17   the Auditor evaluated relate, among other things, to the price for the natural gas  
18   that Duke purchases and sells to its Ohio customers. On January 29, 2016, Duke  
19   filed a Joint Stipulation and Recommendation (“Stipulation” or “Settlement”),  
20   between itself and the PUCO Staff, which is intended to resolve the issues in this  
21   case. The PUCO should find that the Settlement does not adequately resolve the  
22   issues for consumers and the PUCO should take action to protect consumers.

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1   ***Q5. PLEASE SUMMARIZE YOUR OPINIONS REGARDING THE***  
2   ***SETTLEMENT.***

3   ***A5.***   The Settlement does not meet the three-pronged test the PUCO uses to judge  
4           settlements. The Settlement accepts most of the findings of the Auditor, but fails  
5           to address two very important issues affecting consumers in the Audit Report.  
6           For the first issue, I recommend that the PUCO modify the Settlement to give  
7           consumers better information about the market for their natural gas choices.

8  
9           In the Audit Report, Exeter finds that since 2012, customers purchasing natural  
10          gas from Duke through Duke's Gas Cost Recovery Rate ("GCR") have saved on  
11          average approximately \$7 million per year in gas commodity costs over what the  
12          natural gas would have cost if purchased from those supplied through a Certified  
13          Retail Natural Gas Supplier ("marketer").<sup>1</sup> This statement by the Auditor means  
14          that customers who were supplied through Duke's GCR saved on average almost  
15          \$40 per year more than customers who chose a marketer.<sup>2</sup>

16  
17          This Auditor statement is a key and commendable part of the Audit. And Duke's  
18          apparent assistance with the calculation for the Auditor finding is appreciated as  
19          helpful for consumers. This helpful information about the markets should be a  
20          continuing calculation, made at least annually. The information should be

---

<sup>1</sup> Report to the Public Utilities Commission of Ohio on the Management and Performance Audit of Gas Purchasing Practices and Policies of Duke Energy Ohio, Case No. 15-218-GA-GCR (December 9, 2015) at page 45 (hereinafter "Audit Report").

<sup>2</sup> The September 2015 Customer Enrollment Levels from the PUCO's Natural Gas Choice Program Levels in Ohio Report shows 179,396 customers served by the GCR.



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1 provided to consumers to enable them to be fully informed when making  
2 decisions regarding the natural gas market. Accordingly, Duke should provide to  
3 its customers, at least annually, a comparison of the bill impacts of its GCR rate to  
4 the rates paid by customers who purchase their natural gas from a marketer.

5  
6 Duke could continue to provide this information the way it was done for the Audit  
7 Report. Alternatively, Duke could develop the comparison information similar to  
8 how Columbia Gas of Ohio began performing its shadow billing. This shadow  
9 billing was addressed in a settlement and a PUCO Order, but my reference here is  
10 to Columbia's original shadow-billing process which was developed long before  
11 the settlement was adopted in 2013.<sup>3</sup> Columbia's shadow-billing analysis  
12 compares the monthly billed costs of customers buying gas from a marketer to the  
13 applicable Columbia standard offer rate at which Columbia sells gas to  
14 consumers.

15  
16 At a minimum, the Stipulation should be modified to require Duke to provide the  
17 comparison of its GCR price to the weighted average marketers' prices for natural  
18 gas. The information for educating consumers should also include presentation of  
19 the aggregate savings or losses for customers who purchased gas from Duke or  
20 from a marketer.

---

<sup>3</sup> *In the Matter of the Joint Motion to Modify the December 2, 2009 Opinion and Order and the September 7, 2011 Second Opinion and Order in Case No. 08-1344-GA-EXM; Case No. 12-1637-GA-EXM; Amended Joint Motion to Modify Orders Granting Exception, Joint Exhibit 2 at page 12 and adopted and approved on January 9, 2013.*

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1 My second issue for modifying the Settlement relates to the Auditor  
2 recommendation that Duke file a report with the PUCO identifying the estimated  
3 increase in costs of the expected KO transmission rate case at FERC.<sup>4</sup> This  
4 Auditor recommendation was not agreed to in the Settlement. This information is  
5 important because the cost increases arising from that FERC case could be passed  
6 on to the GCR customers of Duke<sup>5</sup>. The Stipulation should be modified to require  
7 this report be filed with the PUCO.  
8

9 ***Q6. WHAT ARE THE PUCO'S STANDARDS OF REVIEW FOR EVALUATING***  
10 ***PROPOSED SETTLEMENTS?***

11 ***A6.*** The PUCO uses these criteria for evaluating the reasonableness of a proposed  
12 settlement:

- 13 1. Is the settlement a product of serious bargaining among  
14 capable, knowledgeable parties, where there is diversity of  
15 interests among the stipulating parties?
- 16 2. Does the settlement, as a package, benefit customers and  
17 the public interest?
- 18 3. Does the settlement package violate any important  
19 regulatory principle or practice?<sup>6</sup>

---

<sup>4</sup> Audit Report at page 19.

<sup>5</sup> It also should be noted the capacity from this pipeline would be passed to marketers serving Choice customers and the marketer could pass through the higher capacity costs.

<sup>6</sup> *Consumers' Counsel v. Pub.Util. Comm.*, 64 Ohio St 3d 123, 125(1992), citing *Akron v. Pub.Util. Comm.*, 55 Ohio St. 2d 155, 157 (1978).

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1 It should be noted the PUCO in a previous ruling has stated the primary  
2 concern in reviewing a settlement is that the stipulation is in the public  
3 interest.<sup>7</sup>  
4

5 **III. EVALUATION OF THE PROPOSED STIPULATION**  
6

7 ***Q7. DOES THE SETTLEMENT MEET THE FIRST PRONG OF THE***  
8 ***STANDARD?***

9 ***A7.*** No. There is a lack of diversity in that residential customers are not represented  
10 by the signatory parties to the Settlement.  
11

12 ***Q8. DOES THE SETTLEMENT, AS A PACKAGE, BENEFIT CUSTOMERS AND***  
13 ***THE PUBLIC INTEREST?***

14 ***A8.*** No. The Settlement is lacking a benefit for customers and the public interest  
15 regarding market information that the PUCO Auditor brought to light in the Audit  
16 Report. The Settlement should be modified to provide market information to  
17 customers. The benefit should be provided to consumers by continuing to make  
18 available to the public the educational information in the Audit Report about  
19 whether consumers save or lose money with their choices for a natural gas  
20 supplier in the marketplace.

---

<sup>7</sup> *In the Matter of the Application of the Cincinnati Gas & Electric Company for an Increase in Electric Rates in its Service Area* Case No. 91-410-EL-AIR Order on Remand at page 6 (April 14, 1994).

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1 The Gas Choice program allows marketers to offer natural gas to consumers as an  
2 alternative to consumers purchasing Duke's natural gas service. The program is  
3 about providing consumers with a real opportunity to benefit from retail natural  
4 gas competition. Ohio's energy policy includes promoting "reasonably priced  
5 natural gas services..." per Revised Code 4929.02(A)(1). Toward that end,  
6 consumers need tools such as the information on customer savings or costs shown  
7 in the Audit Report, to assess for themselves the best option among what can be  
8 difficult alternatives to analyze for natural gas. In the absence of sufficient  
9 information for consumers to make informed and wise choices about natural gas  
10 offers, natural gas choice may simply not work for consumers. My  
11 recommendations should be adopted toward helping to make the natural gas  
12 market work for Ohio consumers.

13  
14 ***Q9. IS THE INFORMATION YOU RECOMMEND TO BE PROVIDED TO***  
15 ***CONSUMERS CONSISTENT WITH INFORMATION THE PUCO***  
16 ***PREVIOUSLY NOTED AS BEING PROVIDED TO CONSUMERS IN PRICE***  
17 ***COMPARISON CHARTS?***

18 ***A9.*** Yes. In 1998, Duke, Dominion East Ohio and Columbia Gas of Ohio, Inc. were  
19 all proposing to expand their choice programs from a pilot to an option for all  
20 customers in their service territory. The PUCO opened a docket for each utility to  
21 investigate that proposed expansion. In the PUCO's Finding and Order in Case  
22 No. 98-593-GA-COI, et al., there was included a discussion of the information the  
23 PUCO Staff included in its Apples to Apples Price Comparison Chart. The

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1 PUCO noted that its Staff was informing consumers with a comparison of the  
2 costs of marketer offers versus the utility's GCR rate for the past twelve months:

3 The staff published the first "Apples to Apples" price comparison  
4 chart of suppliers' offers in March 1997, initially for the Columbia  
5 program. The chart was created to address the complex issue of  
6 price comparison. For example, supplier offers in Toledo included  
7 12 month fixed rate offers, fixed rates for the winter season and  
8 variable rates in the summer, percent discounts off the entire bill,  
9 and rebates from gas costs.  
10

11 *The charts developed by the staff compared what the different*  
12 *marketers' offers would mean annually, based on an average*  
13 *usage during the past twelve months. The final product was a*  
14 *side-by-side estimate of each marketer's annual price, compared*  
15 *to the annual price under the past twelve months' GCR. In*  
16 *addition, the staff's Apples to Apples charts provided other*  
17 *program details such as contract terms and lengths, suppliers'*  
18 *offer, estimated annual costs, supplier phone numbers.*<sup>8</sup>  
19

20 The information that the Auditor has developed can be adopted as an approach to  
21 informing consumers, similar to the discussion in the above Finding and Order, as  
22 to how much money Duke's GCR rate would have saved consumers annually  
23 over what the natural gas would have cost if purchased from a marketer.  
24

25 ***Q10. PLEASE ELABORATE ON WHY THE INFORMATION IN THE AUDIT***  
26 ***REPORT ABOUT OUTCOMES OF CONSUMER CHOICES IS USEFUL TO***  
27 ***CONSUMERS IN THE MARKET.***

28 ***A10.*** In my experience, which includes work in government and industry, the majority  
29 of customers who look to shop (change their natural gas supplier) are trying to

---

<sup>8</sup> *In the Matter of the Commission's Investigation of the Customer Choice Program of Columbia Gas of Ohio, Inc.. Case No. 98-593-GA-COI, et al., Finding and Order at 10 (June 18, 1998). (Emphasis added.)*

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1        save money. The type of information in the Audit Report is a key gauge to show  
2        consumers if marketer offers could actually save them money. If marketer offers  
3        cannot save money for consumers, then consumers should be aware of that  
4        information before they make a purchasing decision.

5  
6        The information in the Audit Report shows that consumers are making choices in  
7        the market to leave Duke's natural gas service even though Duke's service may  
8        provide them with a lower monthly bill than an alternative. That raises a concern  
9        about whether information about the market is sufficiently available and  
10       understandable for consumers.

11  
12       I am aware, from other Ohio data, that this information in the Audit Report--about  
13       consumers saving money by buying natural gas from Duke--is unlikely to be an  
14       anomaly. For example, Columbia Gas of Ohio ("Columbia") for many years has  
15       been performing what is known as "shadow billing" with regard to its Customer  
16       Choice program. Columbia's current shadow-billing analysis (attached as MPH  
17       Exhibit 1) provides data showing how much consumers would have saved by  
18       purchasing their natural gas through Columbia instead of choosing a marketer.<sup>9</sup>

---

<sup>9</sup> The Ohio Consumers' Counsel currently has access to the Columbia shadow-billing information, per a settlement. Columbia performed the shadow billing for years before that settlement, and access to the shadow-billing information was available through discovery. Columbia's shadow-billing program analyzes a Choice customer's account information that includes calculations of the final bill amount based upon the customer's applicable taxes and the contracted rate. In addition, each Choice customer's information includes a "shadow" page, in which Columbia calculates what the Choice customer's final billing amount would have been if his or her gas supply was provided by Columbia. The individual customer's billing differences are accumulated each month reflecting Columbia's total for all Choice customers' savings or losses since the inception of the Choice program.

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1 According to Columbia's recent shadow-billing data, Columbia consumers who  
2 shopped with a marketer paid \$1.358 billion more than the cost of the Columbia-  
3 provided gas service, from 1997 to 2016. (See attached MPH Exhibit 1.) I  
4 commend Columbia Gas of Ohio for its shadow-billing process that shows  
5 outcomes for consumer choices in the market.

6  
7 ***Q11. IS YOUR RECOMMENDATION FOR PROVIDING CONSUMERS WITH***  
8 ***MORE INFORMATION ABOUT THEIR CHOICES IN THE NATURAL GAS***  
9 ***MARKET SUPPORTED BY ANYTHING ELSE?***

10 ***A11.*** Yes. I understand that the New York Public Service Commission ("NYPSC"), in  
11 seeking to improve retail energy markets for residential and small commercial  
12 customers, ordered marketers to file historic pricing information for dissemination  
13 to the public.<sup>10</sup> The NYPSC concluded retail customers should have ready access  
14 to this information "to empower them to make more informed decisions."<sup>11</sup> The  
15 NYPSC concluded the information will enhance price transparency and sharpen  
16 competition for the benefit of energy consumers. The historic bill information  
17 was required to be made available through a bill calculator with historic  
18 information on each of the utilities' websites.

---

<sup>10</sup> Before the State of New York Public Service Commission *Proceeding on Motion of the Commission to Assess Certain Aspects of the Residential and Small Non-Residential Retail Energy Markets in New York State*, Case 12-M-01476, Order taking Actions to Improve the Residential and Small Non-Residential Retail Access Markets at 12-19 (February 25, 2014).

<sup>11</sup> *Id.* at 13.

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1 In addition the NYPSC recently issued an Order that requires all marketers who  
2 wish to sign-up electric customers to meet one of the following two conditions:

- 3 1. The contract must guarantee that the customer will pay no more than  
4 if the customer were supplied by the utility; or  
5 2. The electricity must be sourced from at least 30% renewable sources.<sup>12</sup>  
6

7 In its Order, the NYPSC was responding to its concern that mass market  
8 (residential and small commercial) customers were not receiving value from the  
9 retail energy markets. The NYPSC's first condition reflects a concern similar to  
10 my concern about the prevalence of outcomes where consumers lose money in the  
11 natural gas market.  
12

13 ***Q12. DOES DUKE'S SETTLEMENT INCLUDE ALL THE***  
14 ***RECOMMENDATIONS SUGGESTED BY THE INDEPENDENT***  
15 ***AUDITOR?***

16 ***A12.*** No. The Auditor recommended that Duke "should file a report with the PUCO  
17 Staff identifying the estimated increase that may result for the Company  
18 [Duke]"<sup>13</sup> from the KO Transmission rate case at the Federal Energy Regulatory

---

<sup>12</sup> Before the State of New York Public Service Commission, *In the Matter of Eligibility Criteria for Energy Service Companies*, Case No. 15-M-0127, Order at 14 (February 23, 2016). This Order has not been implemented (despite the ten calendar day implementation date) because a temporary restraining order was issued by the New York Supreme Court (Albany County). A hearing on the restraining order is set for April. In this regard, the NYPSC has requested a bond to repay customers for the estimated \$50-99 million (\$30 per customer per month) in overcharges by marketers if the Court rules in its favor.

<sup>13</sup> Audit Report at 19.



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Commission ("FERC"). The Stipulation should be modified to require Duke to file a report.

***Q13. WHY SHOULD DUKE FILE A REPORT ABOUT THE KO TRANSMISSION RATE CASE?***

***A13.*** Filing such a report would provide information relevant for consumer protection. As stated in the Audit Report, Gas Resources performs the majority of gas procurement activities for Duke. These duties include FERC regulatory activities. It appears that KO Transmission, with which Duke currently reserves 184,000 Dth per day of firm capacity, will be filing a rate case at FERC to pay for upgrades to the KO Transmission line. The Audit Report estimates that the costs for such upgrades – and, in all likelihood, charges to consumers -- could increase current costs by a factor of nine.<sup>14</sup> This could be a significant development for Duke's consumers.

The PUCO should require Duke to file a report in this docket. In the report Duke should identify the estimated cost increase that could impact consumers. The report should also show how the Company managed its role in the FERC rate case. This report would enable the PUCO Staff and OCC to protect consumers by ensuring Duke is providing reliable service at optimal prices and consistent with the Duke's long-term strategic supply plan.

---

<sup>14</sup> Audit Report at page 18.

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1 ***Q14. DOES THE SETTLEMENT PACKAGE VIOLATE ANY IMPORTANT***  
2 ***REGULATORY PRINCIPLE OR PRACTICE?***

3 ***A14.*** Yes. Ohio Revised Code 4929.02(A)(3) states that the policy of the State is to  
4 “[p]romote diversity of natural gas supplies and suppliers, by giving consumers  
5 effective choices over the selection of those supplies and suppliers.” Ohio  
6 Revised Code 4929.02(A)(5) reflects that the policy of the State is also to  
7 “[e]ncourage cost-effective and efficient access to information regarding the  
8 operation of the distribution systems of natural gas companies in order to promote  
9 effective customer choice of natural gas services.”

10

11 These two sections show that the policy of the State of Ohio is to enable markets  
12 to function by providing customers with as much information as possible so they  
13 can make informed decisions when choosing their gas supplier. Also, my  
14 testimony above (on the second settlement prong) about the settlement not  
15 meeting the state policy for “reasonably priced” natural gas service also applies to  
16 the third prong not being met. Similarly, my testimony above about the definition  
17 of competitive markets including an emphasis on information applies also to the  
18 third prong of the settlement standard not being met. In sum, the Audit Report’s  
19 comparison between gas rates that shoppers paid and the gas rates non-shoppers  
20 paid should be continued with updating on an annual basis for the public’s  
21 information about these complex markets.

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1 As I explained under the second prong, the information calculated by the Auditor  
2 is consistent with information that the Staff formerly included in its Apples to  
3 Apples Price Comparison Charts to assist consumers to address the complex issue  
4 of price comparison by choice participants.<sup>15</sup> The issue of price comparisons has  
5 not gotten any less complex over the years. But as demonstrated by the PUCO  
6 Auditor and reflected by Columbia's shadow-billing information, an unwise  
7 and/or uninformed decision can carry costly consequences for consumers.  
8 Therefore, the PUCO should provide more information to assist Ohioans.

9  
10 ***Q15. HOW WOULD YOU RECOMMEND DUKE PUBLICLY RELEASE THIS***  
11 ***INFORMATION ABOUT THE BILL IMPACTS OF CONSUMERS'***  
12 ***CHOICES IN THE MARKET?***

13 ***A15.*** The information should be displayed so that a person shopping for natural gas  
14 could easily access the information. Logical placements would include but not be  
15 limited to Duke's website and the PUCO's Energy Choice Ohio website (formerly  
16 known as the "Apples to Apples" website). The PUCO's website has information  
17 (mainly rates) for customers looking to shop and would give the customers  
18 pertinent information about the benefits or detriments of shopping.

19  
20 It should be noted that some rates can change often (even monthly), which makes  
21 it difficult for consumers to make purchasing decisions. In this regard, the

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<sup>15</sup> *In the Matter of the Commission's Investigation of the Customer Choice Program of Columbia Gas of Ohio, Inc.*, Case No. 98-593-GA-COI, et al., Finding and Order at 10 (June 18, 1998).

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1 information in the Audit Report regarding outcomes of consumer purchasing  
2 decisions offers a different perspective for customers to consider when deciding  
3 on where to purchase their gas in the market. Thus, consumers should have this  
4 information available in an easily accessed forum, for making wise and informed  
5 choices when they participate in the natural gas marketplace. To that end, this  
6 type of information should be made available, on the websites of the PUCO and  
7 gas utilities, for Ohioans in every service area where there is customer choice for  
8 natural gas suppliers.

9  
10 **IV. CONCLUSION**

11  
12 ***Q16. DOES THIS CONCLUDE YOUR TESTIMONY?***

13 ***A16.*** Yes, however, I reserve the right to incorporate new information that may  
14 subsequently become available, such as after testimony by the stipulating parties  
15 is available.

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing *Direct Testimony of Michael P. Haugh, on Behalf of the Office of the Ohio Consumers' Counsel* was served via electronic transmission upon the parties below this 21<sup>st</sup> day of March 2016.

/s/ William Michael  
William Michael  
Assistant Consumers' Counsel

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**Attachment MPH-1**

**Public Utilities Commission of Ohio**

*Monongahela Power Company*, Case No. 04-1047-EL-ATA

*American Electric Power Company*, Case No. 05-376-EL-UNC

*Dayton Power and Light Company*, Case No. 05-276-EL-AIR

*Dominion East Ohio Company*, Case No. 05-474-EL-ATA

*Dominion East Ohio Company*, Case No. 05-219-GA-GCR

*Columbia Gas of Ohio*, Case No. 05-221-GA-GCR

*Duke Energy Ohio*, Case No. 03-93-EL-ATA

*American Electric Power*, Case No. 07-63-EL-UNC

*Eramet Marietta, Inc.*, Case No. 09-516-EL-AEC

*TimkenSteel Corporation*, Case No. 15-1857-EL-AEC

*American Electric Power*, Case No. 14-1693-EL-RDR

**Michigan Public Service Commission**

*Michigan Consolidated Gas Company*, Case No. U-17131

## MPH Exhibit 1

Columbia Gas Shadow Billing Program

PUCO Case No. 12-1637-GA-EXM

February-2016

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Apr-97	\$425,351	\$43,275	\$0			\$468,626	\$335,000	\$803,626	\$335,000	\$803,626	\$468,626
May-97	\$342,846	\$39,215	\$0			\$382,061	\$305,627	\$687,688	\$640,627	\$1,491,314	\$850,687
Jun-97	\$195,327	\$28,158	\$0			\$223,485	\$59,826	\$283,311	\$700,453	\$1,774,625	\$1,074,172
Jul-97	\$87,295	\$19,242	\$0			\$106,537	\$57,698	\$164,235	\$758,151	\$1,938,860	\$1,180,709
Aug-97	\$76,251	\$11,529	\$0			\$87,780	\$49,657	\$137,437	\$807,808	\$2,076,297	\$1,268,489
Sep-97	\$83,182	\$12,863	\$0			\$96,045	\$47,863	\$143,908	\$855,671	\$2,220,205	\$1,364,534
Oct-97	\$128,462	\$13,284	\$0			\$141,746	\$68,492	\$210,238	\$924,163	\$2,430,443	\$1,506,280
Nov-97	\$395,185	\$39,517	\$0			\$434,702	\$238,592	\$673,294	\$1,162,755	\$3,103,737	\$1,940,982
Dec-97	\$579,381	\$123,876	\$0			\$703,257	\$351,824	\$1,055,081	\$1,514,579	\$4,158,818	\$2,644,239
Jan-98	\$824,159	\$263,876	\$0			\$1,088,035	\$488,246	\$1,576,281	\$2,002,825	\$5,735,099	\$3,732,274
Feb-98	\$682,159	\$154,769	\$0			\$836,928	\$539,537	\$1,376,465	\$2,542,362	\$7,111,564	\$4,569,202
Mar-98	\$595,217	\$114,732	\$0			\$709,949	\$516,279	\$1,226,228	\$3,058,641	\$8,337,792	\$5,279,151
Apr-98	\$462,581	\$80,935	\$0			\$543,516	\$405,279	\$948,795	\$3,463,920	\$9,286,587	\$5,822,667
May-98	\$374,279	\$43,982	\$0			\$418,261	\$269,582	\$687,843	\$3,733,502	\$9,974,430	\$6,240,928
Jun-98	\$197,956	\$20,984	\$0			\$218,940	\$125,985	\$344,925	\$3,859,487	\$10,319,355	\$6,459,868
Jul-98	\$93,579	\$14,839	\$0			\$108,418	\$89,153	\$197,571	\$3,948,640	\$10,516,926	\$6,568,286
Aug-98	\$86,279	\$9,524	\$0			\$95,803	\$58,426	\$154,229	\$4,007,066	\$10,671,155	\$6,664,089
Sep-98	\$83,279	\$16,842	\$0			\$100,121	\$67,518	\$167,639	\$4,074,584	\$10,838,794	\$6,764,210
Oct-98	\$154,283	\$123,849	\$0			\$278,132	\$84,159	\$362,291	\$4,158,743	\$11,201,085	\$7,042,342
Nov-98	\$786,924	\$459,627	\$0			\$1,246,551	\$241,897	\$1,488,448	\$4,400,640	\$12,689,533	\$8,288,893
Dec-98	\$1,248,953	\$815,476	\$0			\$2,064,429	\$386,295	\$2,450,724	\$4,786,935	\$15,140,257	\$10,353,322
Jan-99	\$2,841,953	\$1,524,869	\$0			\$4,366,822	\$595,015	\$4,961,837	\$5,381,950	\$20,102,094	\$14,720,144
Feb-99	\$2,692,746	\$1,362,745	\$0			\$4,055,491	\$428,931	\$4,484,422	\$5,810,881	\$24,586,516	\$18,775,635
Mar-99	\$1,792,549	\$1,198,257	\$0			\$2,990,806	\$491,930	\$3,482,736	\$6,302,810	\$28,069,251	\$21,766,441
Apr-99	\$1,295,736	\$992,843	\$0			\$2,288,579	\$420,001	\$2,708,580	\$6,722,811	\$30,777,831	\$24,055,020
May-99	\$35,928	\$305,672	\$0			\$341,600	\$171,237	\$512,837	\$6,894,048	\$31,290,668	\$24,396,620
Jun-99	-\$6,482	\$274,958	\$0			\$268,476	\$94,756	\$363,232	\$6,988,804	\$31,653,900	\$24,665,096
Jul-99	-\$5,169	\$128,965	\$0			\$123,796	\$67,171	\$190,967	\$7,055,974	\$31,844,866	\$24,788,892
Aug-99	\$323,859	\$216,852	\$0			\$540,711	\$62,777	\$603,488	\$7,118,752	\$32,448,355	\$25,329,603
Sep-99	\$301,528	\$287,495	\$0			\$589,023	\$55,638	\$644,661	\$7,174,390	\$33,093,016	\$25,918,626
Oct-99	\$547,523	\$437,053	\$0			\$984,576	\$113,827	\$1,098,403	\$7,288,217	\$34,191,419	\$26,903,202
Nov-99	\$2,924,475	\$1,350,835	\$0			\$4,275,310	\$269,173	\$4,544,483	\$7,557,390	\$38,735,902	\$31,178,512
Dec-99	\$4,287,950	\$2,184,202	\$0			\$6,472,152	\$438,838	\$6,910,990	\$7,996,228	\$45,646,892	\$37,650,664
Jan-00	\$5,411,314	\$2,833,574	\$24,986			\$8,269,874	\$696,339	\$8,966,213	\$8,692,566	\$54,613,105	\$45,920,538
Feb-00	\$2,147,364	\$1,606,382	\$0			\$3,753,746	\$699,457	\$4,453,203	\$9,392,023	\$59,066,307	\$49,674,284
Mar-00	\$2,227,071	\$1,501,788	\$0			\$3,728,859	\$457,115	\$4,185,974	\$9,849,138	\$63,252,281	\$53,403,143
Apr-00	\$1,650,460	\$866,914	\$11,678			\$2,529,053	\$120,373	\$2,649,425	\$9,969,510	\$65,901,706	\$55,932,196
May-00	\$2,044,089	\$1,000,117	\$13,276			\$3,057,481	\$150,316	\$3,207,797	\$10,119,826	\$69,109,503	\$58,989,677
Jun-00	\$1,004,800	\$554,738	\$14,060			\$1,573,599	\$68,996	\$1,642,595	\$10,188,822	\$70,752,098	\$60,563,276
Jul-00	\$710,130	\$432,868	\$11,315			\$1,154,313	\$46,821	\$1,201,134	\$10,235,643	\$71,953,232	\$61,717,589
Aug-00	\$1,567,967	\$623,002	\$20,452			\$2,211,421	\$58,508	\$2,269,929	\$10,294,151	\$74,223,161	\$63,929,009
Sep-00	\$1,549,256	\$748,851	\$17,637			\$2,315,744	\$51,350	\$2,367,095	\$10,345,502	\$76,590,255	\$66,244,753
Oct-00	\$2,706,833	\$1,056,352	\$13,042			\$3,776,227	\$121,841	\$3,898,068	\$10,467,343	\$80,488,323	\$70,020,980
Nov-00	\$6,178,117	\$2,092,866	\$38,268			\$8,309,251	\$208,106	\$8,517,357	\$10,675,449	\$89,005,680	\$78,330,231
Dec-00	\$13,810,672	\$4,534,145	\$45,946			\$18,390,763	\$538,633	\$18,929,396	\$11,214,082	\$107,935,076	\$96,720,994
Jan-01	\$14,432,877	\$3,812,320	\$0			\$18,245,197	\$752,288	\$18,997,484	\$11,966,369	\$126,932,560	\$114,966,191
Feb-01	\$17,203,007	\$4,588,353	\$0			\$21,791,360	\$120,373	\$22,514,541	\$12,689,551	\$149,447,101	\$136,757,550
Mar-01	\$14,710,273	\$4,050,611	\$0			\$18,760,884	\$693,255	\$19,454,138	\$13,382,805	\$168,901,239	\$155,518,434
Apr-01	\$9,859,471	\$2,860,423	\$0			\$12,719,894	\$571,992	\$13,291,885	\$13,954,797	\$182,193,125	\$168,238,328
May-01	\$3,855,778	\$1,247,301	\$18,417			\$5,121,496	\$155,768	\$5,277,264	\$14,110,565	\$187,470,389	\$173,359,824
Jun-01	\$2,754,276	\$997,069	\$9,968			\$3,761,313	\$114,641	\$3,875,954	\$14,225,206	\$191,346,342	\$177,121,136
Jul-01	\$1,598,501	\$603,386	\$8,469			\$2,210,356	\$69,621	\$2,279,976	\$14,294,827	\$193,626,319	\$179,331,492
Aug-01	-\$387,396	-\$36,966	\$3,322			-\$421,041	\$48,501	-\$372,539	\$14,343,328	\$193,253,779	\$178,910,452
Sep-01	-\$541,007	-\$101,867	\$214			-\$642,660	\$44,301	-\$598,359	\$14,387,629	\$192,655,420	\$178,267,791
Oct-01	-\$903,224	-\$246,449	\$1,115			-\$1,148,558	\$95,536	-\$1,053,022	\$14,483,165	\$191,602,398	\$177,119,233
Nov-01	-\$4,785,389	-\$1,519,422	\$0			-\$6,304,811	\$166,584	-\$6,138,228	\$14,649,748	\$185,464,170	\$170,814,422
Dec-01	-\$6,417,765	-\$2,190,879	\$0			-\$8,608,644	\$241,333	-\$8,367,311	\$14,891,081	\$177,096,859	\$162,205,778
Jan-02	-\$11,213,067	-\$4,009,360	-\$24,850			-\$15,247,278	\$456,852	-\$14,790,425	\$15,347,933	\$162,306,434	\$146,958,501
Feb-02	-\$8,931,637	-\$3,242,954	-\$16,811			-\$12,191,402	\$342,231	-\$11,849,171	\$15,690,165	\$150,457,263	\$134,767,098
Mar-02	-\$6,934,816	-\$2,364,856	-\$15,592			-\$9,315,264	\$355,597	-\$8,959,667	\$16,045,761	\$141,497,566	\$125,451,834
Apr-02	-\$5,332,798	-\$1,839,321	\$0			-\$7,172,119	\$295,298	-\$6,876,821	\$16,341,060	\$134,620,775	\$118,279,715
May-02	-\$3,351,622	-\$1,404,541	-\$8,027			-\$4,764,190	\$158,107	-\$4,606,083	\$16,499,167	\$130,014,691	\$113,515,525
Jun-02	-\$2,013,498	-\$738,132	-\$5,322			-\$2,756,952	\$94,387	-\$2,662,565	\$16,593,553	\$127,352,126	\$110,758,573
Jul-02	-\$1,101,529	-\$456,628	-\$3,312			-\$1,561,469	\$50,750	-\$1,510,718	\$16,644,304	\$125,841,408	\$109,197,104
Aug-02	\$236,023	\$130,777	\$675			\$367,475	\$44,089	\$411,564	\$16,688,393	\$126,252,972	\$109,564,579
Sep-02	\$135,406	\$121,064	-\$9			\$256,461	\$41,585	\$298,046	\$16,729,978	\$126,551,017	\$109,821,040
Oct-02	\$156,437	\$113,894	-\$197			\$270,134	\$62,349	\$332,483	\$16,792,327	\$126,883,501	\$110,091,174
Nov-02	\$771,332	\$309,783	\$1,902			\$1,083,017	\$217,814	\$1,300,831	\$17,010,141	\$128,184,332	\$111,174,191
Dec-02	\$726,676	-\$6,217	\$1,461			\$721,920	\$392,134	\$1,114,055	\$17,402,276	\$129,298,386	\$111,896,111
Jan-03	\$1,102,780	-\$1,000,067	\$0			\$102,713	\$519,274	\$621,987	\$17,921,549	\$129,920,374	\$111,998,824
Feb-03	\$5,523,850	\$1,167,509	\$8,870			\$6,700,229	\$655,759	\$7,355,988	\$18,577,309	\$137,276,361	\$118,699,053
Mar-03	\$4,199,337	\$509,070	\$2,948			\$4,711,356	\$601,685	\$5,313,041	\$19,178,994	\$142,589,403	\$123,410,409
Apr-03	\$5,673,189	\$1,770,099	\$7,841			\$7,451,129	\$236,472	\$7,687,601	\$19,415,466	\$150,277,004	\$130,861,538
May-03	\$4,007,475	\$1,296,707	\$8,797			\$5,312,980	\$124,194	\$5,437,173	\$19,539,660	\$155,714,177	\$136,174,517
Jun-03	\$2,563,180	\$1,013,374	\$5,887			\$3,582,441	\$84,048	\$3,666,490	\$19,623,708	\$159,380,667	\$139,756,959
Jul-03	\$1,385,724	\$674,473	\$3,314			\$2,063,510	\$44,755	\$2,108,266	\$19,668,464	\$161,488,933	\$141,820,469
Aug-03	-\$199,255	-\$82,351	-\$218			-\$281,823	\$38,953	-\$242,870	\$19,707,417	\$161,246,063	\$141,538,646
Sep-03	-\$122,424	\$3,139	-\$212			-\$119,498	\$38,189	-\$81,310	\$19,745,605	\$161,164,753	\$141,419,148
Oct-03	-\$192,077	\$100,989	-\$697			-\$91,785	\$87,000	-\$4,785	\$19,832,605	\$161,159,968	\$141,327,363
Nov-03	-\$2,676,204	-\$786,416	-\$9,233			-\$3,471,853	\$130,215	-\$3,341,638	\$19,962,820	\$157,818,330	\$137,855,510
Dec-03	-\$5,412,084	-\$2,327,899	-\$14,949			-\$7,754,932	\$251,134	-\$7,503,798	\$20,213,955	\$150,514,533	\$130,100,578
Jan-04	-\$11,732,403	-\$4,826,612	-\$27,265			-\$16,586,279	\$369,962	-\$16,216,317	\$20,583,916	\$134,098,215	\$113,514,299
Feb-04	-\$10,668,507	-\$4,004,885	-\$17,696			-\$14,691,088	\$447,855	-\$14,243,234	\$21,031,771	\$119,854,982	\$98,823,211
Mar-04	-\$7,356,309	-\$2,355,718	-\$10,959			-\$9,722,986	\$334,371	-\$9,388,615	\$21,366,142	\$110,466,366	\$89,100,225
Apr-04	-\$5,408,848	-\$1,596,368	-\$7,561			-\$7,012,777	\$0	-\$7,012,777	\$21,366,142	\$103,453,590	\$82,087,448
May-04	-\$1,849,168	-\$361,959	-\$2,501			-\$2,213,629	\$0	-\$2,213,629	\$21,366,142	\$101,239,961	

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Jun-04	-\$973,902	-\$145,292	-\$1,036			-\$1,120,230	\$0	-\$1,120,230	\$21,366,142	\$100,119,732	\$78,753,590
Jul-04	-\$913,368	-\$223,736	-\$114,560			-\$1,251,664	\$0	-\$1,251,664	\$21,366,142	\$98,868,068	\$77,501,926
Aug-04	-\$116,386	\$54,895	\$0			-\$61,491	\$0	-\$61,491	\$21,366,142	\$98,806,577	\$77,440,435
Sep-04	\$10,843	\$67,262	\$1,170			\$79,275	\$0	\$79,275	\$21,366,142	\$98,885,852	\$77,519,710
Oct-04	-\$42,681	\$137,841	\$1,460			\$96,620	\$0	\$96,620	\$21,366,142	\$98,982,472	\$77,616,330
Nov-04	-\$1,538,128	-\$436,246	-\$3,391			-\$1,977,765	\$0	-\$1,977,765	\$21,366,142	\$97,004,707	\$75,638,565
Dec-04	-\$1,502,379	-\$806,935	-\$4,559			-\$2,313,873	\$0	-\$2,313,873	\$21,366,142	\$94,690,834	\$73,324,692
Jan-05	-\$1,578,126	-\$1,005,151	-\$2,823			-\$2,586,099	\$0	-\$2,586,099	\$21,366,142	\$92,104,734	\$70,738,593
Feb-05	-\$7,501,073	-\$2,234,889	-\$14,464			-\$9,750,426	\$0	-\$9,750,426	\$21,366,142	\$82,354,308	\$60,988,166
Mar-05	-\$7,712,573	-\$2,518,040	-\$18,620			-\$10,249,233	\$0	-\$10,249,233	\$21,366,142	\$72,105,075	\$50,738,933
Apr-05	-\$1,844,632	-\$704,283	-\$5,848			-\$2,554,763	\$0	-\$2,554,763	\$21,366,142	\$69,550,312	\$48,184,170
May-05	-\$1,616,796	-\$210,553	-\$2,467			-\$1,829,816	\$0	-\$1,829,816	\$21,366,142	\$67,720,496	\$46,354,354
Jun-05	-\$845,291	-\$44,472	-\$4,230			-\$893,993	\$0	-\$893,993	\$21,366,142	\$66,826,503	\$45,460,361
Jul-05	-\$739,294	-\$31,196	-\$621			-\$771,110	\$0	-\$771,110	\$21,366,142	\$66,055,392	\$44,689,251
Aug-05	-\$78,266	\$70,916	\$0			-\$7,350	\$0	-\$7,350	\$21,366,142	\$66,048,042	\$44,681,901
Sep-05	\$210,761	\$100,586	\$1,038			\$312,384	\$0	\$312,384	\$21,366,142	\$66,360,427	\$44,994,285
Oct-05	\$847,001	-\$135,534	\$4,638			\$716,106	\$0	\$716,106	\$21,366,142	\$67,076,533	\$45,710,391
Nov-05	\$184,914	-\$1,283,433	\$10,074			-\$1,088,445	\$0	-\$1,088,445	\$21,366,142	\$65,988,088	\$44,621,946
Dec-05	\$185,165	-\$1,358,303	\$1,942			-\$1,171,195	\$0	-\$1,171,195	\$21,366,142	\$64,816,892	\$43,450,750
Jan-06	-\$961,598	-\$2,941,083	-\$150,058			-\$4,052,738	\$0	-\$4,052,738	\$21,366,142	\$60,764,154	\$39,398,012
Feb-06	-\$5,604,909	-\$3,093,449	-\$32,232			-\$8,730,590	\$0	-\$8,730,590	\$21,366,142	\$52,033,564	\$30,667,422
Mar-06	-\$11,177,508	-\$4,065,279	-\$42,318			-\$15,285,104	\$0	-\$15,285,104	\$21,366,142	\$36,748,459	\$15,382,317
Apr-06	-\$7,293,950	-\$2,287,715	-\$24,904			-\$9,606,569	\$53,181	-\$9,553,388	\$21,419,323	\$27,195,071	\$5,775,748
May-06	-\$3,926,951	-\$1,116,790	-\$12,355			-\$5,056,099	\$26,802	-\$5,029,294	\$21,446,125	\$22,165,777	\$719,652
Jun-06	-\$2,704,723	-\$598,065	-\$9,368			-\$3,312,155	\$14,795	-\$3,297,361	\$21,460,920	\$18,868,417	-\$2,592,503
Jul-06	-\$1,975,016	-\$494,379	-\$8,324			-\$2,477,718	\$8,309	-\$2,469,409	\$21,469,229	\$16,399,008	-\$5,070,221
Aug-06	-\$2,101,535	-\$420,782	-\$11,119			-\$2,533,436	\$8,075	-\$2,525,361	\$21,477,304	\$13,873,646	-\$7,603,658
Sep-06	-\$1,571,928	-\$516,412	-\$12,047			-\$2,100,387	\$8,066	-\$2,092,321	\$21,485,370	\$11,781,325	-\$9,704,045
Oct-06	-\$5,152,570	-\$1,734,363	-\$33,089			-\$6,920,021	\$17,003	-\$6,903,018	\$21,502,373	\$4,878,307	-\$16,624,066
Nov-06	-\$9,020,018	-\$2,654,434	-\$49,911			-\$11,724,363	\$40,939	-\$11,683,424	\$21,543,312	-\$6,805,117	-\$28,348,429
Dec-06	-\$12,714,226	-\$3,707,906	-\$75,247			-\$16,497,380	\$59,733	-\$16,437,647	\$21,603,046	-\$23,242,764	-\$44,845,809
Jan-07	-\$14,772,242	-\$5,844,496	-\$82,866			-\$20,699,603	\$71,970	-\$20,627,633	\$21,675,016	-\$43,870,396	-\$65,545,412
Feb-07	-\$21,638,440	-\$6,425,648	-\$62,487			-\$28,126,575	\$105,900	-\$28,020,675	\$21,780,916	-\$71,891,071	-\$93,671,988
Mar-07	-\$15,335,851	-\$5,020,217	-\$41,454			-\$20,397,523	\$91,869	-\$20,305,654	\$21,872,785	-\$92,196,725	-\$114,069,510
Apr-07	-\$13,730,839	-\$4,746,463	-\$38,360			-\$18,515,663	\$77,960	-\$18,437,702	\$21,950,745	-\$110,634,428	-\$132,585,173
May-07	-\$4,045,124	-\$1,461,868	-\$24,204			-\$5,531,196	\$41,549	-\$5,489,647	\$21,992,294	-\$116,124,075	-\$138,116,369
Jun-07	-\$1,824,264	-\$756,525	-\$6,479			-\$2,587,269	\$18,743	-\$2,568,525	\$22,011,037	-\$118,692,601	-\$140,703,638
Jul-07	-\$1,575,114	-\$666,103	-\$11,375			-\$2,252,592	\$13,759	-\$2,238,833	\$22,024,796	-\$120,931,434	-\$142,956,230
Aug-07	-\$1,548,150	-\$648,202	-\$9,630			-\$2,205,982	\$11,085	-\$2,194,897	\$22,035,882	-\$123,126,330	-\$145,162,212
Sep-07	-\$1,483,832	-\$600,649	-\$7,762			-\$2,092,243	\$11,445	-\$2,080,798	\$22,047,327	-\$125,207,128	-\$147,254,455
Oct-07	-\$2,044,185	-\$731,511	-\$6,280			-\$2,781,976	\$14,771	-\$2,767,205	\$22,062,098	-\$127,974,333	-\$150,036,431
Nov-07	-\$4,561,749	-\$1,277,436	-\$4,391			-\$5,843,575	\$49,773	-\$5,793,803	\$22,111,871	-\$133,768,135	-\$155,880,006
Dec-07	-\$8,568,268	-\$2,599,283	-\$27,095			-\$11,194,646	\$104,032	-\$11,090,614	\$22,215,903	-\$144,858,749	-\$167,074,653
Jan-08	-\$10,096,120	-\$2,931,314	-\$24,470			-\$13,051,903	\$131,676	-\$12,920,228	\$22,347,579	-\$157,778,977	-\$180,126,556
Feb-08	-\$7,024,941	-\$1,824,434	-\$10,632			-\$8,860,007	\$141,785	-\$8,718,221	\$22,489,365	-\$166,497,198	-\$188,986,563
Mar-08	-\$7,533,256	-\$2,519,223	-\$13,759			-\$10,066,238	\$142,920	-\$9,923,318	\$22,632,284	-\$176,420,516	-\$199,052,801
Apr-08	-\$2,506,939	-\$950,180	\$2,713			-\$3,454,406	\$73,436	-\$3,380,970	\$22,705,720	-\$179,801,486	-\$202,507,206
May-08	-\$1,179,307	-\$749,652	\$856			-\$1,928,103	\$31,482	-\$1,896,621	\$22,737,202	-\$181,698,107	-\$204,435,310
Jun-08	-\$603,512	-\$565,362	-\$1,217			-\$1,170,091	\$20,328	-\$1,149,763	\$22,757,530	-\$182,847,870	-\$205,605,401
Jul-08	-\$121,880	-\$668,469	\$304			-\$790,044	\$11,537	-\$778,508	\$22,769,066	-\$183,626,378	-\$206,395,445
Aug-08	-\$920,216	-\$692,303	-\$1,841			-\$1,614,359	\$9,710	-\$1,604,649	\$22,778,777	-\$185,231,027	-\$208,009,805
Sep-08	-\$1,587,392	-\$1,011,676	-\$3,722			-\$2,602,790	\$8,792	-\$2,593,998	\$22,787,569	-\$187,825,025	-\$210,612,595
Oct-08	-\$2,969,271	-\$977,128	-\$6,760			-\$3,953,159	\$14,224	-\$3,938,935	\$22,801,793	-\$191,763,960	-\$214,565,754
Nov-08	-\$4,157,953	-\$925,308	\$4,846			-\$5,078,415	\$43,070	-\$5,035,346	\$22,844,862	-\$196,799,305	-\$219,644,169
Dec-08	-\$3,814,931	\$332,636	\$22,238			-\$3,460,056	\$92,916	-\$3,367,141	\$22,937,778	-\$200,166,446	-\$223,104,225
Jan-09	-\$28,681,170	-\$9,070,920	-\$72,169			-\$37,824,259	\$124,409	-\$37,699,849	\$23,062,188	-\$237,866,295	-\$260,928,484
Feb-09	-\$22,216,722	-\$6,779,101	-\$58,538			-\$29,054,361	\$125,729	-\$28,928,632	\$23,187,917	-\$266,794,927	-\$289,982,845
Mar-09	-\$14,231,242	-\$3,873,959	-\$28,150			-\$18,133,351	\$95,546	-\$18,037,806	\$23,283,463	-\$284,832,732	-\$308,116,196
Apr-09	-\$14,866,518	-\$4,294,526	-\$35,204			-\$19,196,248	\$14,350	-\$19,181,898	\$23,297,813	-\$304,014,630	-\$327,312,444
May-09	-\$8,101,872	-\$2,856,819	-\$18,422			-\$10,977,112	\$6,975	-\$10,970,138	\$23,304,788	-\$314,984,768	-\$338,289,557
Jun-09	-\$3,431,341	-\$1,247,366	-\$6,467			-\$4,685,174	\$3,592	-\$4,681,582	\$23,308,381	-\$319,666,350	-\$342,974,731
Jul-09	-\$2,737,380	-\$1,060,690	-\$5,052			-\$3,803,121	\$2,223	-\$3,800,898	\$23,310,604	-\$323,467,248	-\$346,777,852
Aug-09	-\$3,552,993	-\$1,512,985	-\$20,633			-\$5,086,611	\$2,092	-\$5,084,519	\$23,312,696	-\$328,551,766	-\$351,864,463
Sep-09	-\$3,368,242	-\$1,428,350	-\$19,836			-\$4,816,429	\$1,949	-\$4,814,479	\$23,314,646	-\$336,366,245	-\$356,680,892
Oct-09	-\$7,246,610	-\$2,384,038	-\$36,028			-\$9,666,676	\$4,560	-\$9,662,116	\$23,319,206	-\$343,028,362	-\$366,347,568
Nov-09	-\$11,737,467	-\$4,226,695	-\$54,205			-\$16,018,366	\$8,603	-\$16,009,764	\$23,327,808	-\$359,038,125	-\$382,365,935
Dec-09	-\$21,782,094	-\$7,865,117	-\$109,853			-\$29,757,064	\$14,783	-\$29,742,282	\$23,342,591	-\$388,780,407	-\$412,122,999
Jan-10	-\$40,572,070	-\$17,771,809	-\$190,682			-\$58,534,561	\$25,333	-\$58,509,229	\$23,367,923	-\$447,289,636	-\$470,657,560
Feb-10	-\$37,456,299	-\$17,263,379	-\$166,964			-\$54,886,642	\$23,999	-\$54,862,644	\$23,391,922	-\$502,152,279	-\$525,544,202
Mar-10	-\$29,544,799	-\$12,895,726	-\$125,155			-\$42,565,680	\$20,305	-\$42,545,375	\$23,412,227	-\$544,697,654	-\$568,109,882
Apr-10	-\$10,205,850	-\$5,302,857	-\$44,161			-\$15,552,868	\$0	-\$15,552,868	\$23,412,227	-\$560,250,522	-\$583,662,750
May-10	-\$5,030,596	-\$1,850,366	-\$11,344			-\$6,892,306	\$0	-\$6,892,306	\$23,412,227	-\$567,142,828	-\$590,555,056
Jun-10	-\$3,111,808	-\$1,367,655	-\$10,126			-\$4,489,589	\$0	-\$4,489,589	\$23,412,227	-\$571,632,417	-\$595,044,645
Jul-10	-\$2,355,905	-\$929,182	-\$4,453			-\$3,289,540	\$0	-\$3,289,540	\$23,412,227	-\$574,921,957	-\$598,334,185
Aug-10	-\$1,906,242	-\$750,001	-\$3,512			-\$2,659,755	\$0	-\$2,659,755	\$23,412,227	-\$577,581,712	-\$600,993,940
Sep-10	-\$2,515,082	-\$1,055,284	-\$11,219			-\$3,581,584	\$0	-\$3,581,584	\$23,412,227	-\$581,163,296	-\$604,575,524
Oct-10	-\$3,682,710	-\$1,296,045	-\$13,255			-\$4,992,010	\$0	-\$4,992,010	\$23,412,227	-\$586,155,306	-\$609,567,534
Nov-10	-\$8,929,195	-\$2,980,686	-\$36,259			-\$11,946,139	\$0	-\$11,946,139	\$23,412,227	-\$598,101,446	-\$621,513,674
Dec-10	-\$14,247,734	-\$4,376,832	-\$31,214			-\$18,655,779	\$0	-\$18,655,779	\$23,412,227	-\$616,757,225	-\$640,169,453
Jan-11	-\$20,178,145	-\$7,226,845	-\$66,450			-\$27,471,440	\$0	-\$27,471,440	\$23,412,227	-\$644,228,665	-\$667,640,894
Feb-11	-\$17,503,090	-\$6,663,572	-\$57,222			-\$24,223,884	\$0	-\$24,223,884	\$23,412,227	-\$668,452,549	-\$691,864,778
Mar-11	-\$15,140,570	-\$5,431,256	-\$49,063			-\$20,620,889	\$0	-\$20,620,889	\$23,412,227	-\$689,073,439	-\$712,485,



Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIFF Savings	Monthly Savings Including PIFF	Cumulative PIFF Savings	Cumulative Savings (Incl PIFF)	Cumulative Savings (Excl PIFF)
Feb-12	-\$20,382,726	-\$6,813,519	-\$80,778			-\$27,277,024	\$0	-\$27,277,024	\$23,412,227	-\$801,531,201	-\$824,943,429
Mar-12	-\$16,793,300	-\$5,589,328	-\$60,396			-\$22,443,024	\$0	-\$22,443,024	\$23,412,227	-\$823,974,225	-\$847,386,453
Apr-12	-\$9,349,064	-\$3,600,962	-\$45,096			-\$12,995,122	\$0	-\$12,995,122	\$23,412,227	-\$836,969,347	-\$860,381,575
May-12	-\$7,406,658	-\$2,572,108	-\$29,530			-\$10,008,296	\$0	-\$10,008,296	\$23,412,227	-\$846,977,643	-\$870,389,871
Jun-12	-\$3,202,658	-\$1,327,809	-\$13,942			-\$4,544,409	\$0	-\$4,544,409	\$23,412,227	-\$851,522,052	-\$874,934,280
Jul-12	-\$2,380,923	-\$1,043,505	-\$7,700			-\$3,432,128	\$0	-\$3,432,128	\$23,412,227	-\$854,954,180	-\$878,366,408
Aug-12	-\$1,986,608	-\$848,902	-\$8,092			-\$2,843,602	\$0	-\$2,843,602	\$23,412,227	-\$857,797,782	-\$881,210,010
Sep-12	-\$2,321,318	-\$1,044,077	-\$11,926			-\$3,377,321	\$0	-\$3,377,321	\$23,412,227	-\$861,175,104	-\$884,587,332
Oct-12	-\$3,653,559	-\$1,102,057	-\$11,358			-\$4,766,974	\$0	-\$4,766,974	\$23,412,227	-\$865,942,077	-\$889,354,306
Nov-12	-\$7,303,123	-\$2,016,031	-\$30,021			-\$9,349,175	\$0	-\$9,349,175	\$23,412,227	-\$875,291,253	-\$898,703,481
Dec-12	-\$10,718,224	-\$3,009,674	-\$34,951			-\$13,762,849	\$0	-\$13,762,849	\$23,412,227	-\$889,054,102	-\$912,466,330
Jan-13	-\$17,561,829	-\$5,237,632	-\$51,727			-\$22,851,187	\$0	-\$22,851,187	\$23,412,227	-\$911,905,289	-\$935,317,517
Feb-13	-\$18,925,582	-\$5,598,939	-\$45,406			-\$24,569,927	\$0	-\$24,569,927	\$23,412,227	-\$936,475,216	-\$959,887,444
Mar-13	-\$16,218,739	-\$4,350,721	-\$28,889			-\$20,598,350	\$0	-\$20,598,350	\$23,412,227	-\$957,073,565	-\$980,485,793
Apr-13	-\$9,824,400	-\$2,408,704	-\$10,098			-\$12,243,202	\$0	-\$12,243,202	\$23,412,227	-\$969,316,767	-\$992,728,995
May-13	-\$3,969,390	-\$1,005,427	-\$8,133			-\$4,982,951	\$0	-\$4,982,951	\$23,412,227	-\$974,299,717	-\$997,711,946
Jun-13	-\$2,415,361	-\$657,077	-\$4,765			-\$3,077,203	\$0	-\$3,077,203	\$23,412,227	-\$977,376,921	-\$1,000,789,149
Jul-13	-\$2,215,582	-\$723,016	-\$6,497			-\$2,945,095	\$0	-\$2,945,095	\$23,412,227	-\$980,322,016	-\$1,003,734,244
Aug-13	-\$2,138,758	-\$765,977	-\$8,254			-\$2,912,988	\$0	-\$2,912,988	\$23,412,227	-\$983,235,004	-\$1,006,647,232
Sep-13	-\$2,047,364	-\$639,512	-\$6,073			-\$2,692,950	\$0	-\$2,692,950	\$23,412,227	-\$985,927,954	-\$1,009,340,182
Oct-13	-\$2,815,864	-\$818,831	-\$16,192			-\$3,650,886	\$0	-\$3,650,886	\$23,412,227	-\$989,578,840	-\$1,012,991,068
Nov-13	-\$7,562,682	-\$2,155,379	-\$62,083			-\$9,780,144	\$0	-\$9,780,144	\$23,412,227	-\$999,358,984	-\$1,022,771,212
Dec-13	-\$13,763,019	-\$3,797,676	-\$51,496			-\$17,612,191	\$0	-\$17,612,191	\$23,412,227	-\$1,016,971,175	-\$1,040,383,403
Jan-14	-\$15,981,935	-\$4,344,835	-\$46,431			-\$20,373,200	\$0	-\$20,373,200	\$23,412,227	-\$1,037,344,376	-\$1,060,756,604
Feb-14	-\$8,748,912	-\$792,898	\$6,411			-\$9,535,399	\$0	-\$9,535,399	\$23,412,227	-\$1,046,879,775	-\$1,070,292,003
Mar-14	-\$15,113,887	-\$4,423,825	-\$45,744			-\$19,583,455	\$0	-\$19,583,455	\$23,412,227	-\$1,066,463,230	-\$1,089,875,458
Apr-14	-\$9,661,541	-\$2,203,349	-\$20,533			-\$11,885,423	\$0	-\$11,885,423	\$23,412,227	-\$1,078,348,653	-\$1,101,760,881
May-14	-\$4,308,980	-\$879,750	-\$7,338	\$38,047	\$34,335	-\$5,123,687	\$0	-\$5,123,687	\$23,412,227	-\$1,083,472,340	-\$1,106,884,568
Jun-14	-\$2,499,474	-\$638,593	-\$5,820	-\$5,630	\$61,031	-\$3,088,486	\$0	-\$3,088,486	\$23,412,227	-\$1,086,560,826	-\$1,109,973,054
Jul-14	-\$2,327,035	-\$625,615	-\$6,631	-\$42,096	\$59,117	-\$2,942,259	\$0	-\$2,942,259	\$23,412,227	-\$1,089,503,084	-\$1,112,915,312
Aug-14	-\$2,581,985	-\$750,265	-\$8,389	-\$63,833	\$77,033	-\$3,327,439	\$0	-\$3,327,439	\$23,412,227	-\$1,092,830,524	-\$1,116,242,752
Sep-14	-\$2,569,170	-\$632,911	-\$6,336	-\$17,212	\$67,644	-\$3,157,984	\$0	-\$3,157,984	\$23,412,227	-\$1,095,988,508	-\$1,119,400,736
Oct-14	-\$3,731,082	-\$814,930	-\$12,555	\$37,077	\$73,254	-\$4,448,236	\$0	-\$4,448,236	\$23,412,227	-\$1,100,436,744	-\$1,123,848,972
Nov-14	-\$8,519,324	-\$1,952,682	-\$35,137	\$30,825	\$67,232	-\$10,409,087	\$0	-\$10,409,087	\$23,412,227	-\$1,110,845,831	-\$1,134,258,059
Dec-14	-\$12,884,435	-\$3,090,609	-\$61,504	\$47,032	\$48,796	-\$15,940,721	\$0	-\$15,940,721	\$23,412,227	-\$1,126,786,552	-\$1,150,198,780
Jan-15	-\$24,103,802	-\$6,731,228	-\$96,765	\$101,261	\$40,306	-\$30,790,227	\$0	-\$30,790,227	\$23,412,227	-\$1,157,576,779	-\$1,180,989,007
Feb-15	-\$27,342,772	-\$7,357,262	-\$106,216	\$169,688	\$18,540	-\$34,618,022	\$0	-\$34,618,022	\$23,412,227	-\$1,192,194,801	-\$1,215,607,029
Mar-15	-\$23,346,881	-\$6,432,525	-\$96,751	\$245,073	\$25,336	-\$29,605,747	\$0	-\$29,605,747	\$23,412,227	-\$1,221,800,548	-\$1,245,212,776
Apr-15	-\$13,206,425	-\$3,819,985	-\$60,265	\$73,304	\$18,404	-\$16,994,968	\$0	-\$16,994,968	\$23,412,227	-\$1,238,795,516	-\$1,262,207,744
May-15	-\$5,874,990	-\$1,659,536	-\$24,504	\$63,709	\$19,577	-\$7,475,743	\$0	-\$7,475,743	\$23,412,227	-\$1,246,271,259	-\$1,269,683,488
Jun-15	-\$3,022,034	-\$953,870	-\$14,081	\$6,185	\$31,353	-\$3,952,446	\$0	-\$3,952,446	\$23,412,227	-\$1,250,223,705	-\$1,273,635,933
Jul-15	-\$2,517,799	-\$838,616	-\$11,460	\$13,055	\$35,924	-\$3,318,895	\$0	-\$3,318,895	\$23,412,227	-\$1,253,542,601	-\$1,276,954,829
Aug-15	-\$2,236,562	-\$706,709	-\$12,089	-\$34,315	\$82,867	-\$2,906,808	\$0	-\$2,906,808	\$23,412,227	-\$1,256,449,408	-\$1,279,861,636
Sep-15	-\$2,421,039	-\$776,506	-\$12,446	\$3,354	\$49,646	-\$3,156,991	\$0	-\$3,156,991	\$23,412,227	-\$1,259,606,399	-\$1,283,018,627
Oct-15	-\$3,143,346	-\$990,394	-\$20,122	\$11,751	\$64,692	-\$4,077,419	\$0	-\$4,077,419	\$23,412,227	-\$1,263,683,818	-\$1,287,096,046
Nov-15	-\$6,647,549	-\$2,120,236	-\$42,765	\$32,806	\$78,831	-\$8,698,913	\$0	-\$8,698,913	\$23,412,227	-\$1,272,382,731	-\$1,295,794,959
Dec-15	-\$11,434,927	-\$3,771,764	-\$60,957	\$8,563	\$72,641	-\$15,186,444	\$0	-\$15,186,444	\$23,412,227	-\$1,287,569,175	-\$1,310,981,403
Jan-16	-\$16,112,731	-\$5,678,615	-\$94,065	-\$34,989	\$9,775	-\$21,910,625	\$0	-\$21,910,625	\$23,412,227	-\$1,309,479,800	-\$1,332,892,028
Feb-16	-\$18,597,905	-\$6,753,189	-\$119,339	-\$1,951	\$18,368	-\$25,454,015	\$0	-\$25,454,015	\$23,412,227	-\$1,334,933,815	-\$1,358,346,043

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**3/21/2016 5:00:18 PM**

**in**

**Case No(s). 15-0218-GA-GCR**

Summary: Testimony Direct Testimony of Michael P. Haugh on behalf of the Office of the Ohio Consumers' Office electronically filed by Ms. Gina L Brigner on behalf of Michael, William J. Mr.

**Duke Energy Ohio  
Case No. 18-0218-GA-GCR  
OCC Fifth Set Interrogatories  
Date Received: August 5, 2019**

**OCC-INT-05-001**

**REQUEST:**

On an annual basis between 2015 and 2018 what were the total volumes billed, in ccf, to residential customers that were billed CRNG supplier charges on a consolidated basis on bills rendered by Duke?

**RESPONSE:**

The table below shows the total volumes billed, in ccf to residential customers that purchased gas from a CRNG supplier.

2015	144,773,520
2016	131,313,300
2017	142,279,060
2018	193,704,620

The volumes that were billed on a consolidated or dual billing basis are not available.

**PERSON RESPONSIBLE:** James E. Ziolkowski

**Duke Energy Ohio  
Case No. 18-0218-GA-GCR  
OCC's Third Set Production of Documents  
Date Received: April 3, 2019**

**OCC-POD-03-001**

**REQUEST:**

Please provide all documents supporting your response to INT-3-1.

**RESPONSE:**

See the following attachments:

OCC-POD-03-001 attachment 1 for 2015 and 2016 billed residential customer usage.

OCC-POD-03-001 attachment 2 for 2017 and 2018 billed residential customer usage.

**PERSON RESPONSIBLE:** Lisa Steinkuhl

## Gas (MCF) Sales &amp; Statistics for Duke Energy Ohio

OCC-POB-03-001 Attach 1

Page 1 of 1

For the periods: Jan 2016 through Dec 2016

(In MCF except number of customers.)

Gas (MCF)	Actual				Plan			Average # of Customers
	Jan-Dec 2016	Jan-Dec 2015	Over/(Under)	% Over/(Under)	Jan-Dec 2016	Over/(Under)	% Over/(Under)	
<b>FULL SERVICE</b>								
<b>RESIDENTIAL</b>								
BILLED	12,063,098	14,805,274	(2,742,176)	(18.52%)	15,707,340	(3,644,242)	(23.20%)	
UNBILLED	760,199	(3,749)	763,948	20377.38%	652	759,547	116494.94%	
	12,823,297	14,801,525	(1,978,228)	(13.37%)	15,707,992	(2,884,695)	(18.36%)	194,500
<b>COMMERCIAL</b>								
BILLED	4,142,159	5,160,020	(1,017,862)	(19.73%)	4,979,082	(836,923)	(16.81%)	
UNBILLED	182,688	(149,643)	332,331	222.08%	(35,014)	217,702	621.76%	
	4,324,847	5,010,377	(685,531)	(13.68%)	4,944,068	(619,221)	(12.52%)	12,976
<b>INDUSTRIAL</b>								
BILLED	629,981	837,090	(207,110)	(24.74%)	720,063	(90,083)	(12.51%)	
UNBILLED	13,596	1,887	11,709	620.51%	(12,882)	26,478	205.54%	
	643,577	838,977	(195,401)	(23.29%)	707,181	(63,605)	(8.99%)	497
<b>STREET LIGHTING</b>								
BILLED	4,448	4,449	(1)	(0.02%)	4,434	14	0.32%	
	4,448	4,449	(1)	(0.02%)	4,434	14	0.32%	5
<b>OTHER PUBLIC AUTHORITY</b>								
BILLED	359,638	466,675	(107,037)	(22.94%)	467,290	(107,652)	(23.04%)	
UNBILLED	15,697	(4,438)	20,135	453.70%	1,012	14,685	1451.09%	
	375,335	462,237	(86,902)	(18.80%)	468,302	(92,967)	(19.85%)	403
<b>INTERDEPARTMENTAL</b>								
BILLED	28,299	340,978	(312,679)	(91.70%)	269,645	(241,346)	(89.51%)	
	28,299	340,978	(312,679)	(91.70%)	269,645	(241,346)	(89.51%)	0
<b>TOTAL FULL SERVICE</b>								
BILLED	17,227,622	21,614,486	(4,386,865)	(20.30%)	22,147,854	(4,920,231)	(22.22%)	
UNBILLED	972,180	(155,943)	1,128,123	723.42%	(46,232)	1,018,412	2202.83%	
	18,199,802	21,458,544	(3,258,742)	(15.19%)	22,101,622	(3,901,820)	(17.65%)	208,381
<b>TRANSPORTATION</b>								
<b>RESIDENTIAL</b>								
BILLED	13,131,329	14,477,351	(1,346,021)	(9.30%)	14,743,076	(1,611,747)	(10.93%)	
UNBILLED	939,274	(185,207)	1,124,481	607.15%	611	938,663	153627.33%	
	14,070,603	14,292,144	(221,540)	(1.55%)	14,743,687	(673,084)	(4.57%)	193,239
<b>COMMERCIAL</b>								
BILLED	10,800,210	11,446,193	(645,983)	(5.64%)	11,995,061	(1,194,851)	(9.96%)	
UNBILLED	607,556	(334,038)	941,594	281.88%	(84,350)	691,906	820.28%	
	11,407,766	11,112,155	295,611	2.66%	11,910,711	(502,945)	(4.22%)	21,244
<b>INDUSTRIAL</b>								
BILLED	4,298,716	4,475,071	(176,355)	(3.94%)	4,392,807	(94,091)	(2.14%)	
UNBILLED	164,383	22,619	141,764	626.75%	(78,586)	242,969	309.18%	
	4,463,099	4,497,690	(34,591)	(0.77%)	4,314,221	148,878	3.45%	868
<b>STREET LIGHTING</b>								
BILLED	24,445	26,790	(2,345)	(8.75%)	26,507	(2,062)	(7.78%)	
	24,445	26,790	(2,345)	(8.75%)	26,507	(2,062)	(7.78%)	2
<b>OTHER PUBLIC AUTHORITY</b>								
BILLED	1,505,148	1,726,336	(221,187)	(12.81%)	1,775,708	(270,560)	(15.24%)	
UNBILLED	77,381	(22,750)	100,131	440.14%	3,849	73,532	1910.42%	
	1,582,529	1,703,586	(121,056)	(7.11%)	1,779,557	(197,028)	(11.07%)	945
<b>OTHER END USERS</b>								
BILLED	19,701,780	18,321,971	1,379,808	7.53%	18,729,002	972,778	5.19%	
	19,701,780	18,321,971	1,379,808	7.53%	18,729,002	972,778	5.19%	113
<b>TOTAL TRANSPORTATION</b>								
BILLED	49,461,628	50,473,711	(1,012,083)	(2.01%)	51,662,161	(2,200,533)	(4.26%)	
UNBILLED	1,788,594	(519,376)	2,307,970	444.37%	(158,476)	1,947,070	1228.62%	
	51,250,222	49,954,335	1,295,886	2.59%	51,503,685	(253,464)	(0.49%)	216,411
<b>TOTAL RETAIL MCF SALES</b>								
BILLED	66,689,250	72,088,197	(5,398,948)	(7.49%)	73,810,015	(7,120,764)	(9.65%)	
UNBILLED	2,760,774	(675,319)	3,436,093	508.81%	(204,708)	2,965,482	1448.64%	
	69,450,024	71,412,879	(1,962,855)	(2.75%)	73,605,307	(4,155,283)	(5.65%)	424,793

## Gas (MCF) Sales &amp; Statistics for Duke Energy Ohio

OCC-POD-03-001 Attach 2

For the periods: Jan 2018 through Dec 2018

Page 1 of 1

(In MCF except number of customers.)

Gas (MCF)	Actual				Plan			Average # of Customers
	Jan-Dec 2018	Jan-Dec 2017	Over/(Under)	% Over/(Under)	Jan-Dec 2018	Over/(Under)	% Over/(Under)	
<b>FULL SERVICE</b>								
<b>RESIDENTIAL</b>								
BILLED	12,476,380	11,314,750	1,161,630	10.27%	12,063,024	413,356	3.43%	
UNBILLED	(674,522)	242,350	(916,872)	(378.33%)	452,523	(1,127,045)	(249.06%)	
	11,801,858	11,557,100	244,758	2.12%	12,515,547	(713,689)	(5.70%)	164,962
<b>COMMERCIAL</b>								
BILLED	4,810,952	4,040,927	770,025	19.06%	4,552,644	258,308	5.67%	
UNBILLED	(178,842)	52,084	(230,926)	(443.37%)	33,882	(212,724)	(627.84%)	
	4,632,110	4,093,011	539,099	13.17%	4,586,526	45,584	0.99%	12,053
<b>INDUSTRIAL</b>								
BILLED	671,702	623,947	47,754	7.65%	663,911	7,791	1.17%	
UNBILLED	(17,087)	(2,003)	(15,084)	(753.07%)	1,027	(18,114)	(1763.78%)	
	654,615	621,944	32,670	5.25%	664,938	(10,323)	(1.55%)	439
<b>STREET LIGHTING</b>								
BILLED	4,460	4,407	54	1.22%	4,337	123	2.84%	
	4,460	4,407	54	1.22%	4,337	123	2.84%	5
<b>OTHER PUBLIC AUTHORITY</b>								
BILLED	344,889	311,731	33,159	10.64%	429,804	(84,915)	(19.76%)	
UNBILLED	(13,037)	3,357	(16,394)	(488.35%)	8,585	(21,622)	(251.86%)	
	331,852	315,088	16,765	5.32%	438,389	(106,537)	(24.30%)	324
<b>INTERDEPARTMENTAL</b>								
BILLED	35,517	30,805	4,712	15.30%	85,926	(50,409)	(58.67%)	
	35,517	30,805	4,712	15.30%	85,926	(50,409)	(58.67%)	0
<b>TOTAL FULL SERVICE</b>								
BILLED	18,343,900	16,326,567	2,017,333	12.36%	17,799,646	544,254	3.06%	
UNBILLED	(883,488)	295,788	(1,179,276)	(398.69%)	496,017	(1,379,505)	(278.12%)	
	17,460,412	16,622,355	838,057	5.04%	18,295,663	(835,251)	(4.57%)	177,782
<b>TRANSPORTATION</b>								
<b>RESIDENTIAL</b>								
BILLED	19,370,462	14,227,907	5,142,555	36.14%	13,149,949	6,220,513	47.30%	
UNBILLED	(396,779)	403,992	(800,771)	(198.21%)	351,855	(748,634)	(212.77%)	
	18,973,683	14,631,899	4,341,784	29.67%	13,501,804	5,471,879	40.53%	229,433
<b>COMMERCIAL</b>								
BILLED	14,161,965	11,683,539	2,478,427	21.21%	11,968,227	2,193,738	18.33%	
UNBILLED	(453,440)	217,022	(670,462)	(308.94%)	211,457	(664,897)	(314.44%)	
	13,708,525	11,900,561	1,807,965	15.19%	12,179,684	1,528,841	12.55%	22,426
<b>INDUSTRIAL</b>								
BILLED	4,922,030	4,324,060	597,970	13.83%	4,650,404	271,626	5.84%	
UNBILLED	(103,935)	(19,078)	(84,857)	(444.79%)	64,913	(168,848)	(260.11%)	
	4,818,095	4,304,982	513,113	11.92%	4,715,317	102,778	2.18%	909
<b>STREET LIGHTING</b>								
BILLED	27,033	28,492	(1,458)	(5.12%)	26,894	139	0.52%	
	27,033	28,492	(1,458)	(5.12%)	26,894	139	0.52%	2
<b>OTHER PUBLIC AUTHORITY</b>								
BILLED	1,890,790	1,567,538	323,252	20.62%	1,688,275	202,515	12.00%	
UNBILLED	(50,504)	46,307	(96,811)	(209.06%)	25,298	(75,802)	(299.64%)	
	1,840,286	1,613,845	226,441	14.03%	1,713,573	126,713	7.39%	1,006
<b>OTHER END USERS</b>								
BILLED	19,712,571	19,604,124	108,446	0.55%	19,249,772	462,799	2.40%	
	19,712,571	19,604,124	108,446	0.55%	19,249,772	462,799	2.40%	107
<b>TOTAL TRANSPORTATION</b>								
BILLED	60,084,851	51,435,660	8,649,191	16.82%	50,733,521	9,351,329	18.43%	
UNBILLED	(1,004,658)	648,243	(1,652,901)	(254.98%)	653,523	(1,658,181)	(253.73%)	
	59,080,193	52,083,902	6,996,291	13.43%	51,387,044	7,693,149	14.97%	253,883
<b>TOTAL RETAIL MCF SALES</b>								
BILLED	78,428,751	67,762,227	10,666,524	15.74%	68,533,167	9,895,583	14.44%	
UNBILLED	(1,888,146)	944,031	(2,832,177)	(300.01%)	1,149,540	(3,037,686)	(264.25%)	
	76,540,605	68,706,257	7,834,348	11.40%	69,682,707	6,857,898	9.84%	431,666

**Duke Energy Ohio  
Case No. 18-0218-GA-GCR  
OCC Fourth Set Interrogatories  
Date Received: May 7, 2019**

**OCC-INT-04-003**

**REQUEST:**

Referring to the Company response to OCC-INT-03-004, on an annual basis between 2015 and 2018 what was the total amount of dollars that was billed to residential customers in natural gas costs by Duke on a consolidated billing basis on behalf of CRNGS suppliers?

**RESPONSE:**

2015 – not available

2016 – not available

2017 – not available

2018 - \$101,773,935

**PERSON RESPONSIBLE:** Dan Jones

PUCO Case No. 18-218-GA-GCR  
OCC-POD-03-002 Attachment  
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Standard Report

## DUKE ENERGY MIDWEST - OHIO

## MW\_RAC\_044\_Revenue\_Realization\_Missing Product MCF - Revenue By Component

## Dec 2016 YTD - Duke Energy Ohio - Duke Energy Ohio Gas - ALL

	Retail Revenue Group					Transportation Revenue Group							Total
	Residential	Commercial	Industrial	Street Lighting	OPA	Residential	Commercial	Industrial	Street Lighting	OPA	Other End Users		
CurrentYearActual													
Total Revenue	163,616,780	47,947,084	5,259,094	44,569	3,253,967	107,682,723	52,110,093	8,916,496	99,163	5,025,837	17,516,638	411,472,444	
Unbilled Revenue	5,353,436	1,414,071	121,930	0	123,637	833,374	888,337	224,367	0	111,544	0	9,070,716	
Billed Revenue	158,263,344	46,533,013	5,137,164	44,569	3,130,330	106,849,349	51,221,756	8,692,109	99,163	4,914,293	17,516,638	402,401,728	
Rider Accel Main Replacement Progr	8,332,028	4,392,759	190,647	2,005	162,067	8,260,565	6,274,537	356,112	767	384,877	2,247,727	30,604,051	
Rider Advanced Utility	3,068,751	206,543	7,632	80	6,151	3,115,662	343,728	14,247	31	15,124	1,923	6,779,873	
Rider Fixed Customer Charge	77,092,185	15,930,066	703,697	0	571,459	76,592,078	23,436,668	1,230,289	0	1,338,796	813,049	197,708,287	
Rider Gas Cost Adjustment Clause	51,147,575	17,613,073	2,689,570	19,231	1,519,946	(593)	16	0	0	0	0	72,988,816	
Rider Gas Surcredit	(42)	(11)	0	0	0	(479,617)	(393,016)	(155,518)	(933)	(54,603)	(241,950)	(1,325,688)	
Rider Manufactured Gas Plant nder	3,813,829	1,097,959	90,812	202	72,689	3,784,936	2,012,363	203,931	78	212,128	225,127	11,514,053	
Rider Ohio Excise Tax Liability	4,991,831	1,355,683	105,031	11,230	63,730	5,003,176	2,406,343	408,199	62,222	224,228	805,023	15,436,698	
Rider Percent of Income Payment Plan	2,671,530	917,362	139,517	939	79,622	2,940,352	2,352,576	919,748	5,344	330,221	0	10,357,212	
Rider State Tax Rider	1,920,772	555,997	65,909	709	35,681	2,090,994	1,304,291	294,661	3,896	150,499	774,032	7,197,461	
Rider Uncollectible Expense Gas	622,312	214,278	32,621	250	18,535	668,893	569,441	231,122	1,341	78,078	0	2,436,871	
Base Revenue	4,602,574	4,249,303	1,111,727	9,922	600,448	4,872,902	12,914,809	5,189,298	26,417	2,234,945	12,891,706	48,704,051	
BILLED USAGE	12,063,098	4,142,159	629,981	4,448	359,638	13,131,329	10,800,210	4,298,716	24,445	1,505,148	19,701,780	66,660,951	
UNBILLED USAGE	760,199	182,688	13,596	0	15,697	939,274	607,556	164,383	0	77,381	0	2,760,774	
Total Usage	12,823,297	4,324,847	643,577	4,448	375,335	14,070,603	11,407,766	4,463,099	24,445	1,582,529	19,701,780	69,421,725	
Avg Realization	0.38154165	1.02586674	1.76470035	2.23049411	1.66959167	0.37108976	1.19579245	1.20717400	1.08065346	1.48466684	0.65434223	0.73062341	
PriorYearActual													
Total Revenue	190,310,127	57,395,188	7,318,611	46,858	4,335,938	99,767,139	50,482,711	9,120,238	108,712	5,223,587	16,344,920	440,454,028	
Unbilled Revenue	(949,000)	(1,473,000)	(35,000)	0	(62,000)	(304,000)	(320,000)	55,000	0	2,000	0	(3,086,000)	
Billed Revenue	191,259,127	58,868,188	7,353,611	46,858	4,397,938	100,071,139	50,802,711	9,065,238	108,712	5,221,587	16,344,920	443,540,028	
Rider Accel Main Replacement Progr	6,616,679	3,751,257	165,448	1,622	143,514	5,828,553	4,871,460	280,078	649	303,185	1,690,910	23,653,356	
Rider Advanced Utility	3,508,233	242,991	8,830	87	7,314	3,132,728	352,687	14,936	35	15,905	2,057	7,285,803	
Rider Fixed Customer Charge	81,261,842	17,051,303	747,147	0	623,764	71,572,971	22,475,889	1,197,584	0	1,300,777	820,821	197,082,098	
Rider Gas Cost Adjustment Clause	78,082,343	27,220,167	4,402,820	21,680	2,448,093	462	(457)	0	0	(150)	0	112,174,957	
Rider Gas Surcredit	3	(19)	(141)	0	(23)	(621,013)	(485,039)	(185,846)	(1,102)	(73,489)	(227,846)	(1,594,515)	
Rider Manufactured Gas Plant nder	3,867,849	1,197,260	102,626	202	81,089	3,392,421	2,005,345	205,561	81	211,729	207,370	11,271,532	
Rider Ohio Excise Tax Liability	5,274,043	1,481,577	129,273	11,220	79,019	4,694,482	2,393,805	430,265	67,393	239,269	757,126	15,557,471	

Totals may not foot due to rounding  
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OCC-POD-03-002 Attachment  
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Standard Report

DUKE ENERGY MIDWEST - OHIO  
MW\_RAC\_044\_Revenue\_Realization MCF - Revenue By Component  
Dec 2018 YTD - Duke Energy Ohio - Duke Energy Ohio Gas - ALL

	Retail Revenue Group					Transportation Revenue Group					Other End Users	Total
	Residential	Commercial	Industrial	Street Lighting	OPA	Residential	Commercial	Industrial	Street Lighting	OPA		
<b>CurrentYearActual</b>												
Total Revenue	142,973,897	48,098,427	5,241,717	(23,453)	2,785,807	129,266,378	54,164,450	8,676,354	(324,367)	5,127,536	17,141,320	413,128,065
Unbilled Revenue	(4,670,043)	(1,283,049)	(135,025)	0	(103,844)	(378,974)	(653,008)	(146,975)	0	(85,693)	0	(7,456,611)
Billed Revenue	147,643,940	49,381,476	5,376,742	(23,453)	2,889,651	129,645,352	54,817,458	8,823,329	(324,367)	5,213,229	17,141,320	420,584,676
Rider: Accel Main Replacement Progr	6,869,814	4,033,160	166,335	1,936	126,508	9,593,176	6,466,183	360,103	774	396,363	2,075,826	30,090,178
Rider: Advanced Utility	1,520,487	112,989	3,979	47	2,832	2,151,720	211,479	8,661	19	9,431	1,066	4,022,806
Rider: Fixed Customer Charge	65,384,239	14,931,655	621,875	0	460,945	90,937,899	24,862,102	1,287,789	0	1,423,806	767,016	200,677,337
Rider: Gas Cost Adjustment Clause	58,245,730	22,476,179	3,131,397	21,044	1,602,593	4,667,554	14,781	0	0	0	0	90,159,376
Rider: Gas Surcredit	(102)	(25)	0	0	0	(798,870)	(617,220)	(188,747)	(1,133)	(77,736)	(246,059)	(1,629,893)
Rider: Manufactured Gas Plant nder	3,232,217	939,083	73,658	202	49,516	4,495,944	2,023,552	198,007	81	209,607	212,761	11,434,629
Rider: Ohio Excise Tax Liability	4,165,727	1,255,148	95,930	2,410	50,728	5,863,938	2,584,739	419,949	12,818	234,386	804,300	15,490,075
Rider: Percent of Income Payment Plan	676,506	261,229	36,358	251	18,687	1,049,251	773,007	271,561	1,521	102,865	0	3,191,237
Rider: State Tax Rider	1,985,036	632,607	69,277	710	33,113	3,083,782	1,655,117	346,418	4,312	183,673	777,285	8,771,332
Rider: Uncollectible Expense Gas	917,248	353,676	49,270	333	25,394	1,424,098	1,045,492	364,979	1,996	139,235	0	4,321,720
Base Revenue	4,647,035	4,385,766	1,128,663	(50,386)	519,134	7,176,961	15,798,225	5,754,608	(344,756)	2,591,597	12,749,126	54,355,874
BILLED USAGE	12,476,380	4,810,952	671,702	4,460	344,889	19,370,462	14,161,965	4,922,030	27,033	1,890,790	19,712,571	78,383,234
UNBILLED USAGE	(674,522)	(178,842)	(17,087)	0	(13,037)	(396,779)	(453,440)	(103,935)	0	(50,504)	0	(1,888,146)
Total Usage	11,801,858	4,632,110	654,615	4,460	331,852	18,973,683	13,708,525	4,818,095	27,033	1,840,286	19,712,571	76,505,088
Avg Realization	0.37246664	0.91162117	1.68030380	(11.29659216)	1.50522011	0.37050540	1.11553903	1.16915327	(12.75295708)	1.37064267	0.64675108	0.69337455
<b>PriorYearActual</b>												
Total Revenue	152,347,651	47,814,611	5,374,980	47,061	2,926,616	119,143,436	52,064,105	8,157,004	112,352	4,943,877	17,433,024	410,364,718
Unbilled Revenue	898,968	161,389	(29,711)	0	9,957	159,218	128,920	(64,948)	0	51,031	0	1,314,824
Billed Revenue	151,448,683	47,653,222	5,404,691	47,061	2,916,659	118,984,218	51,935,186	8,221,952	112,352	4,892,846	17,433,024	409,049,894
Rider: Accel Main Replacement Progr	7,942,138	4,442,559	165,391	2,096	149,082	9,832,725	6,820,005	379,408	873	418,683	2,324,791	32,497,751
Rider: Advanced Utility	2,116,289	152,443	5,424	61	4,147	2,624,737	268,971	10,997	26	11,975	1,440	5,196,510
Rider: Fixed Customer Charge	69,334,528	15,271,793	641,120	0	499,790	85,606,394	24,270,496	1,252,487	0	1,395,824	785,549	199,057,961
Rider: Gas Cost Adjustment Clause	56,162,101	20,572,202	3,166,910	22,174	1,573,395	1,535,152	9,796	0	0	0	0	83,041,731
Rider: Gas Surcredit	(49)	(5)	0	0	0	(415,341)	(346,708)	(125,969)	(850)	(40,574)	(246,419)	(1,177,315)
Rider: Manufactured Gas Plant nder	3,425,558	973,141	78,900	202	56,388	4,232,687	1,948,361	188,896	84	207,685	217,734	11,329,637
Rider: Ohio Excise Tax Liability	4,440,032	1,269,530	95,982	11,212	52,090	5,495,367	2,438,000	389,077	72,267	221,718	819,961	15,305,236

Totals may not foot due to rounding  
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**in**

**Case No(s). 18-0218-GA-GCR, 18-0318-GA-UEX, 18-0418-GA-PIP**

Summary: Testimony Direct Testimony of Michael P. Haugh on Behalf of The Office of The Ohio Consumers' Counsel electronically filed by Mrs. Tracy J Greene on behalf of Michael, William J.