

**Duke Energy Ohio
Case No. 20-53-GA-RDR
IGS Third Set of Requests For Admission
Date Received: November 2, 2021
IGS-RFA-03-001**

REQUEST:

Admit that the document attached and labeled as Attachment A is a true and accurate copy of the Reply Comments of Duke Energy Ohio, Inc. filed in Case No. 19-1429-GA-ORD.

RESPONSE:

Admit.

PERSON RESPONSIBLE: Legal

Duke Energy Ohio
Case No. 20-53-GA-RDR
IGS Third Set of Requests For Admission
Date Received: November 2, 2021
IGS-RFA-03-002

REQUEST:

Admit that the document attached and labeled as Attachment B is a true and accurate copy of the Post Hearing Brief of Duke Energy Ohio, Inc. filed in Case Nos. 18-218-GA-GCR, *et al.*

RESPONSE:

Admit.

PERSON RESPONSIBLE: Legal

Duke Energy Ohio
Case No. 20-53-GA-RDR
IGS Third Set of Requests For Admission
Date Received: November 2, 2021
IGS-RFA-03-003

REQUEST:

Admit that the document attached and labeled as Attachment C is a true and accurate copy of the Reply Brief of Duke Energy Ohio, Inc. filed in Case Nos. 18-218-GA-GCR, *et al.*

RESPONSE:

Admit.

PERSON RESPONSIBLE: Legal

Duke Energy Ohio
Case No. 20-53-GA-RDR
IGS Third Set of Requests For Admission
Date Received: November 2, 2021
IGS-RFA-03-004

REQUEST:

Admit that the document attached and labeled as Attachment D is a true and accurate copy of the Reply Brief of Duke Energy Ohio, Inc. filed in Case Nos. 15-218-GA-GCR, *et al.*

RESPONSE:

Admit.

PERSON RESPONSIBLE: Legal

REQUESTS FOR ADMISSIONS

RFA 1-1. Admit that Duke Energy can submit an application to the Public Utilities Commission of Ohio for a standard service offer independent of the approval of the stipulation in this proceeding.

RESPONSE: Admit

RFA 1-2. Admit that the only parties subject to the terms and conditions of the stipulation are Staff of the PUCO, Duke Energy, the Ohio Energy Group and OCC.

RESPONSE: Objection. OCC objects on the grounds that the phrase “subject to the terms and conditions” is vague and ambiguous. Without waiving any objections, OCC responds as follows: Deny

RFA 1-3. Admit that none of the signatory parties to the stipulation directly represent the interests of competitive retail natural gas suppliers.

RESPONSE: Admit

RFA 1-4. Admit that the stipulation negotiations did not include any competitive retail natural gas suppliers.

RESPONSE: Admit

RFA 1-5. Admit that OCC did not invite any competitive retail natural gas suppliers to participate in the stipulation negotiations.

RESPONSE: Admit

REQUESTS FOR ADMISSIONS

RFA 1-1. Admit that Duke Energy can submit an application to the Public Utilities Commission of Ohio for a standard service offer independent of the approval of the stipulation in this proceeding.

RESPONSE: Admit

RFA 1-2. Admit that the only parties subject to the terms and conditions of the stipulation are Staff of the PUCO, Duke Energy, the Ohio Energy Group and OCC.

RESPONSE: Objection. OCC objects on the grounds that the phrase “subject to the terms and conditions” is vague and ambiguous. Without waiving any objections, OCC responds as follows: Deny

RFA 1-3. Admit that none of the signatory parties to the stipulation directly represent the interests of competitive retail natural gas suppliers.

RESPONSE: Admit

RFA 1-4. Admit that the stipulation negotiations did not include any competitive retail natural gas suppliers.

RESPONSE: Admit

RFA 1-5. Admit that OCC did not invite any competitive retail natural gas suppliers to participate in the stipulation negotiations.

RESPONSE: Admit

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

11/22/2021 10:39:47 AM

in

**Case No(s). 14-0375-GA-RDR, 14-0376-GA-ATA, 15-0452-GA-RDR, 15-0453-
GA-ATA, 16-0542-GA-RDR, 16-0543-GA-ATA, 17-0596-GA-RDR, 17-0597-GA-
ATA, 18-0283-GA-RDR, 18-0284-GA-ATA, 18-1830-GA-UNC, 18-1831-GA-ATA,
19-0174-GA-RDR, 19-0175-GA-ATA, 19-1085-GA-AAM, 19-1086-GA-UNC, 20-
0053-GA-RDR, 20-0054-GA-ATA**

**Summary: Exhibit IGS Exhibits 28-31, 34, 35 electronically filed by Mr. Ken
Spencer on behalf of Armstrong & Okey, Inc. and Gibson, Karen Sue Mrs.**