

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke)	
Energy Ohio, Inc., for Authority to Adjust)	Case No. 19-1750-EL-UNC
its Power Forward Rider.)	

In the Matter of the Application of Duke)	
Energy Ohio, Inc., for Approval to Change)	Case No. 19-1751-GE-AAM
Accounting Methods.)	

**JOINT MOTION OF DUKE ENERGY OHIO, INC. AND INTERSTATE GAS SUPPLY,
LLC TO BIFURCATE SUPPLIER CONSOLIDATED BILLING ISSUES**

Now come Duke Energy Ohio, Inc. (Duke Energy Ohio) and Interstate Gas Supply, LLC (IGS) (collectively Joint Filers), by and through counsel, and hereby respectfully jointly move that any supplier consolidated billing issues in the instant proceeding be bifurcated, assigned a new docket number, and processed as a separate case (New Docket). Additionally, the Joint Filers respectfully request that the Commission take administrative notice of any testimony and comments on the supplier consolidated billing issue previously raised in the instant proceedings. Furthermore, the Joint Filers recommend that, if the Commission grants this Joint Motion, the Commission also order that other interested parties seek to intervene in the New Docket by filing a motion for intervention not later than thirty days after this Joint Motion is granted.

Respectfully submitted,
DUKE ENERGY OHIO, INC.

/s/ Larisa M. Vaysman
Rocco O. D'Ascenzo (0077651)
Deputy General Counsel
Jeanne W. Kingery (0012172)
Associate General Counsel
Larisa M. Vaysman (0090290)
Senior Counsel
Elyse H. Akhbari (0090701)
Senior Counsel
Duke Energy Business Services LLC
139 East Fourth Street, 1303-Main
Cincinnati, Ohio 45202
(513) 287-4320 (telephone)
(513) 287-4385 (fax)
Rocco.dascenzo@duke-energy.com
Jeanne.kingery@duke-energy.com
Larisa.vaysman@duke-energy.com
Elyse.akhbari@duke-energy.com

Willing to accept service via email

Attorneys for Duke Energy Ohio, Inc.

/s/ Stacie Cathcart
(via email authority 2/13/2023)
Stacie Cathcart (0095582)
stacie.cathcart@igs.com
Michael Nugent (0090408)
Michael.nugent@igs.com
Evan Betterton (0100089)
evan.betterton@igs.com
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
Telephone: 614.659.5000

Willing to accept service via email

Attorneys for IGS Energy

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke)	
Energy Ohio, Inc., for Authority to Adjust)	Case No. 19-1750-EL-UNC
its Power Forward Rider.)	

In the Matter of the Application of Duke)	
Energy Ohio, Inc., for Approval to Change)	Case No. 19-1751-GE-AAM
Accounting Methods.)	

MEMORANDUM IN SUPPORT

On December 14, 2022, the Public Utilities Commission of Ohio (Commission) issued an Opinion and Order in Case Nos. 21-887-EL-AIR, *et al.*, approving a Corrected Stipulation and Recommendation (2022 Stipulation) filed in those proceedings on September 19, 2022.¹ Among other things, the 2022 Stipulation provided that Duke Energy Ohio, Inc. (Duke Energy Ohio) and Interstate Gas Supply, LLC (IGS) (collectively Joint Filers) would, within 60 days of the 2022 Stipulation's approval, file a joint motion for an order bifurcating the supplier consolidated billing issues in the above-captioned proceedings, for consideration in a separate proceeding (New Docket).² Additionally, the Stipulation provided as follows:

¹ *In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Electric Distribution Rates*, Case Nos. 21-887-EL-AIR, *et al.*, Opinion and Order (Dec. 14, 2022); *In the Matter of the Application of Duke Energy Ohio, Inc., for an Increase in Electric Distribution Rates*, Case Nos. 21-887-EL-AIR, *et al.*, Corrected Stipulation and Recommendation (Sept. 19, 2022).

² 2022 Stipulation, pg. 18.

In the joint motion, Duke and IGS will request that the Commission take administrative notice of any testimony and comments on the supplier consolidated billing issue previously raised in [the instant proceedings]. In the joint motion, Duke Energy Ohio and IGS will further recommend that the Commission order that other interested parties seek to intervene in the New Docket by filing a motion for intervention not later than thirty days after the order sought in this paragraph is docketed by the Commission.³

Accordingly, Joint Filers make the instant Joint Motion to Bifurcate Supplier Consolidated Billing Issues, requesting that:

- any supplier consolidated billing issues in the instant proceeding be bifurcated, assigned a new docket number, and processed as a separate case (New Docket);
- the Commission take administrative notice of any testimony and comments on the supplier consolidated billing issue previously raised in the instant proceedings; and
- if the Commission grants this Joint Motion, the Commission also order that other interested parties seek to intervene in the New Docket by filing a motion for intervention not later than thirty days after this Motion is granted.

Respectfully, Joint Filers request that the Commission grant this Joint Motion to Bifurcate Supplier Consolidated Billing Issues, as described above and in accordance with the 2022 Stipulation.

³ *Id.*, pg. 18.

Respectfully submitted,
DUKE ENERGY OHIO, INC.

/s/ Larisa M. Vaysman
Rocco O. D'Ascenzo (0077651)
Deputy General Counsel
Jeanne W. Kingery (0012172)
Associate General Counsel
Larisa M. Vaysman (0090290)
Senior Counsel
Elyse H. Akhbari (0090701)
Senior Counsel
Duke Energy Business Services LLC
139 East Fourth Street, 1303-Main
Cincinnati, Ohio 45202
(513) 287-4320 (telephone)
(513) 287-4385 (fax)
Rocco.dascenzo@duke-energy.com
Jeanne.kingery@duke-energy.com
Larisa.vaysman@duke-energy.com
Elyse.akhbari@duke-energy.com

Willing to accept service via email

Attorneys for Duke Energy Ohio, Inc.

/s/ Stacie Cathcart
(via email authority 2/13/2023)
Stacie Cathcart (0095582)
stacie.cathcart@igs.com
Michael Nugent (0090408)
Michael.nugent@igs.com
Evan Betterton (0100089)
evan.betterton@igs.com
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
Telephone: 614.659.5000

Willing to accept service via email

Attorneys for IGS Energy

CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 13th day of February, 2023, upon the persons listed below.

/s/ Larisa M. Vaysman
Larisa M. Vaysman

John.jones@ohioAGO.gov
Thomas.lindgren@ohioAGO.gov
William.michael@occ.ohio.gov
mkurtz@bkllawfirm.com
jkylercohn@bkllawfirm.com
kboehm@bkllawfirm.com
dromig@armadapower.com
henry.eyman@armadapower.com
michael.nugent@igs.com
evan.betterton@igs.com
Stacie.cathcart@igs.com
DBorchers@bricker.com
kherrnstein@bricker.com
Dparram@bricker.com
dstinson@bricker.com
rmains@bricker.com
mmcdonnell@dickinsonwright.com
whitt@whitt-sturtevant.com
dproano@bakerlaw.com
ahaque@bakerlaw.com
eprouthy@bakerlaw.com
ctavenor@theoec.org
knordstrom@theoec.org
rdove@keglerbrown.com
paul@carpenterlipps.com
[wygonski@carpenterlipps.com](mailto>wygonski@carpenterlipps.com)
jweber@elpc.org
bojko@carpenterlipps.com
joe.halso@sierraclub.org

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

2/13/2023 11:49:49 AM

in

Case No(s). 19-1750-EL-UNC, 19-1751-GE-AAM

Summary: Motion Joint Motion of Duke Energy Ohio, Inc. and Interstate Gas Supply, LLC to Bifurcate Supplier Consolidated Billing Issues electronically filed by Mrs. Tammy M. Meyer on behalf of Duke Energy Ohio Inc. and D'Ascenzo, Rocco and Vaysman, Larisa and Kingery, Jeanne and Akhbari, Elyse Hanson