

**Duke Energy Ohio
Case No. 14-1051-GE-RDR
IGS First Set of Interrogatories
Date Received: September 17, 2014**

IGS-INT-01-001

REQUEST:

Identify whether Duke is capable of transferring customer interval data to competitive retail electric service ("CRES") providers.

RESPONSE:

Duke Energy Ohio is capable of transferring interval data to competitive retail electric service (CRES) providers for approximately 4,000 traditional Interval Data Recorders (IDRs) associated with larger commercial and industrial customers.

PERSON RESPONSIBLE: Daniel L. Jones

**Duke Energy Ohio
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IGS-INT-01-002

REQUEST:

Identify whether Duke is currently transmitting customer interval data to CRES providers.

RESPONSE:

Duke Energy Ohio is currently transmitting both monthly interval billing usage and historical interval usage to suppliers who request it for the 4,000 traditional IDRs described in IGS-INT-01-001.

PERSON RESPONSIBLE: Daniel L. Jones

**Duke Energy Ohio
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IGS-INT-01-003

REQUEST:

Identify all possible processes (electronic data interchange, flat file (excel file), etc.) through which Duke is capable of transferring customer interval data to CRES providers.

RESPONSE:

Duke Energy Ohio makes this data available for traditional IDRs on its web portal and in its EDI transactions.

PERSON RESPONSIBLE: Daniel L. Jones

**Duke Energy Ohio
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IGS-INT-01-004

REQUEST:

In Case Number 13-1141-GE-RDR, Duke indicated that it would have a web portal available to transfer customer interval data by June 1, 2014. Identify whether Duke has launched a web portal to provide for transfer customer interval data to CRES providers?

RESPONSE:

Duke Energy Ohio made Interval data available for the previously mentioned traditional IDRs on its web portal as of May 19, 2014.

PERSON RESPONSIBLE: Daniel L. Jones

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IGS-INT-01-005

REQUEST:

If the answer to Interrogatory 1.4 is no, identify why not and what actions Duke has taken to make a web portal available to transmit customer interval data to CRES providers.

RESPONSE:

N/A

PERSON RESPONSIBLE: Daniel L. Jones

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IGS-INT-01-006

REQUEST:

Identify all measures or actions that Duke has undertaken to create a web portal that would allow CRES providers to receive customer interval data.

RESPONSE:

See response to IGS-INT-01-004.

PERSON RESPONSIBLE: Daniel L. Jones

**Duke Energy Ohio
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IGS-INT-01-007

REQUEST:

In Case No. 13-1141-GE-RDR, Duke indicated that it had limited ability to provide billing-quality, hourly-interval, customer interval data to CRES providers. Identify Duke's current capability of providing this information to CRES providers.

RESPONSE:

See response to IGS-INT-01-004.

PERSON RESPONSIBLE: Daniel L. Jones

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IGS-INT-01-008

REQUEST:

Identify the level of granularity (15 minute, 30 minute, 60 minute) that Duke is capable of transferring customer interval data to CRES providers.

RESPONSE:

For the previously mentioned traditional IDRs, Duke Energy Ohio provides 15-minute interval data in its EDI transactions and hourly interval data on its web portal.

PERSON RESPONSIBLE: Daniel L. Jones

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IGS-INT-01-009

REQUEST:

The Commission's Opinion and Order in Case No. 13-1141-GE-RDR notes that Duke has considered "EDI enhancements that have not been internally approved. However, if Duke's EDI enhancements are internally approved and, if cost recovery is provided, Duke may be able to provide billing quality, hourly-interval, customer-usage AMI data to CRES providers, via EDI, for AMI meters that have been processed through VEE." Has Duke approved the EDI enhancements referenced in the Commission's Opinion and Order?

RESPONSE:

No.

PERSON RESPONSIBLE: Daniel L. Jones

IGS-INT-01-010

REQUEST:

If Duke's answer to 1.9 is yes, identify and describe all enhancements that Duke has approved.

RESPONSE:

N/A

PERSON RESPONSIBLE: Daniel L. Jones

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IGS-INT-01-011

REQUEST:

If the answer to 1.9 is no, identify why.

RESPONSE:

Objection. This Interrogatory is overly broad and unduly burdensome, given that it seeks information that is unlimited as to time and that is neither relevant to this proceeding nor likely to lead to the discovery of admissible evidence in this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, please see Case No. 13-1411-GE-RDR, Initial Post Hearing Brief of Duke Energy Ohio, Inc. (March 3, 2014)

PERSON RESPONSIBLE: Legal

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IGS-INT-01-011a

REQUEST:

Duke currently stated in Case No. 13-1141 that it does not have the capability to “migrate data from the first generation [Meter Data Management] MDM system to the second generation MDM.” Does Duke now have the ability to migrate data from the first generation MDM to the second generation MDM?

RESPONSE:

Objection. This Interrogatory is overly broad and unduly burdensome, given that it seeks information that is unlimited as to time and that is neither relevant to this proceeding nor likely to lead to the discovery of admissible evidence in this proceeding. The question is susceptible to different interpretations and Duke Energy Ohio would have to engage in speculation or conjecture to ascertain the intended meaning of this request. Answering further, Duke Energy Ohio states that the Interrogatory seeks to elicit a narrative response and is thus properly suited for deposition. See generally, *Penn Central Transportation Co. v. Armco Steel Corp.*, 27 Ohio Misc. 76 (Montgomery Cty. 1971). Objecting further, this Interrogatory impermissibly calls for the disclosure of information that is proprietary, trade secret information. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, the assertion prefacing this question is false.

PERSON RESPONSIBLE: Legal

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IGS-INT-01-012

REQUEST:

If the answer to 1.11 is no, identify why.

RESPONSE:

See response to IGS-INT-01-011.

PERSON RESPONSIBLE: Legal

IGS-INT-01-012a

REQUEST:

Describe all efforts that Duke has undertaken to upgrade its IT systems to facilitate the transfer of customer interval data to CRES providers.

RESPONSE:

Objection. This Interrogatory is overly broad and unduly burdensome, given that it seeks information that is unlimited as to time and that is neither relevant to this proceeding nor likely to lead to the discovery of admissible evidence in this proceeding. Without waiving said objection, to the extent discoverable, and in the spirit of discovery, the web portal enhancement that became operational on May 19, 2014, is an upgrade providing CRES providers more flexibility in obtaining customer interval data for traditional IDRs.

PERSON RESPONSIBLE: As to objection - Legal
As to response - Daniel L. Jones