

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

)	
In the Matter of the PowerForward)	Case No. 18-1595-EL-GRD
Collaborative.)	

COMMENTS OF DUKE ENERGY OHIO, INC.

I. Introduction

On October 24, 2018, the Public Utilities Commission of Ohio (Commission) issued an Entry that began the process of implementing the PowerForward Roadmap and established a PowerForward Collaborative as well as a Distribution System Planning Workgroup and a Data and Modern Grid Workgroup. Among other things, that Entry notes that each Electric Distribution Utility (EDU) should file an update of where that utility stands with its grid architecture in a grid architecture status report. The Entry specifically solicits comments on the proposed architecture status report discussing where each EDU stands in regards to the deployment of grid architecture and the proposed filing date of April 1, 2019. Following are the comments of Duke Energy Ohio, Inc. (Duke Energy Ohio).

II. Discussion

Duke Energy Ohio has engaged in smart grid deployment since 2009. The Company has deployed smart grid meters across its service territory in southwest Ohio and has gained a wealth of experience and knowledge in doing so. The Company is committed to continuing its grid modernization efforts and welcomes the opportunity to update the Commission on the status of its endeavors.

Duke Energy Ohio is interested and enthusiastic about collaborating with the Commission and the Staff of the Public Utilities Commission of Ohio (Staff) to effectively build out the distribution grid to meet customer's needs. The Company is currently in the early stages of preparing the requested Grid Architecture Status Report. The report will be written utilizing the guidance as set forth in the Commission's "Roadmap to Ohio's Electricity Future" and will be filed by the April 1, 2019 deadline.

Importantly however, Duke Energy looks forward to any additional guidance on the required filings produced as a result of the PowerForward Collaborative and Workgroup meetings. Of particular interest is guidance on the content of the upcoming Cybersecurity Plan filing due December 31, 2019. While Duke Energy Ohio understands the Commission's need to have regulatory oversight and information about the safety and security of customer information, the Company is concerned about providing cybersecurity information in a public forum. It is anticipated that the Commission will strive for consensus with respect to the content of such reports as soon as possible to allow for adequate time to appropriately and securely address the requirements.

III. Conclusion

Duke Energy Ohio looks forward to working with the Commission and interested stakeholders to advance a comprehensive grid modernization plan. This forum provides an excellent means by which to proactively advance regulatory policy to support and improve the customer experience in Ohio. Enhancing and improving the customer experience is consistent with Duke Energy Ohio's own corporate policy and commitment. Thus, Duke Energy Ohio looks forward to participation in this important project.

Respectfully submitted,

/s/ Elizabeth H. Watts

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Comments of Duke Energy Ohio, Inc. was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 4th day of December, 2018. The Commission's electronic filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ Elizabeth H. Watts

Elizabeth H. Watts

Associate General Counsel