

**Duke Energy Ohio
Case No. 14-2209-EL-ATA
Direct Energy First Set of Interrogatories
Date Received: February 12, 2015**

DE-INT-01-012

REQUEST:

Please describe how Duke calculates the peak load contribution (“PLC”) for customers taking service on a Distribution Voltage Service rate. Please explain how the calculation may differ for service between any of Tariff Sheets 40 through 49 (respectively).

- a. Please also indicate, if the PLC calculations for Distribution Voltage Service rate customers are assigned based on individual usage peaks, which customers on Distribution Voltage Service rate (by Tariff) are assigned these types of individual PLC calculations.

RESPONSE:

Objection. This Interrogatory is overly broad and unduly burdensome, given that it seeks information that is not reflective of the actual filing made by the Company and, thus, is neither relevant to this proceeding nor likely to lead to the discovery of admissible evidence in this proceeding. Objecting further, to the extent that this Interrogatory calls for the disclosure of documents that include or reference legal advice or that include or reference efforts to provide information needed to facilitate the rendition of legal advice, it impermissibly seeks information that, on the basis of attorney-client privilege and O.A.C. Rule 4901-1-16(B), is not subject to disclosure. 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, Duke Energy Ohio does not calculate PLCs at the rate class level, only at the account level.

The PLC value for any residential customer is calculated using the appropriate load profile segment assigned to the account and the five hourly coincident PJM peaks. The load profile segments assigned to the residential class are RS0 (default segment – new account or account without enough history to determine winter kWh), RS5 (winter month kWh less than 1,190 kWh), and RS6 (winter month kWh greater than or equal to 1,190 kWh). Duke Energy Ohio posts the annual hourly weather response functions on its customer choice website used to convert the annual kWh of monthly metered accounts to hourly usage on an annual basis. After determining the hourly usage of each account, Duke Energy Ohio determines the average of the five PJM coincident peak hours by account, inflates the average by the appropriate distribution and transmission losses, applies the appropriate unaccounted for energy (UFE), and adjusts the resulting value with a weather normalization factor. This calculation methodology results in the assignment of unique PLC values for each residential account.

The PLC value for any non-residential customer whose energy usage is not metered with a traditional Interval Data Recorder (IDR) is calculated using the appropriate load profile segment assigned to the account and the five hourly coincident PJM peaks. The load profile segments assigned to non-residential customers are DM0 (for all accounts billed on Rate DM), DS4 (demand less than 100 kW), and DS5 (demand greater than or equal to 100 kW). Duke Energy Ohio posts the annual hourly weather response functions on its customer choice website used to convert the annual kWh of these monthly metered accounts to hourly usage on an annual basis. After determining the hourly usage of the account, Duke Energy Ohio determines the average of the five PJM coincident peak hours by account, inflates the average by the appropriate distribution and transmission losses, applies the appropriate unaccounted for energy (UFE), and adjusts the resulting value with a weather normalization factor. This calculation methodology results in the assignment of unique PLC values for each non-residential account whose energy usage is not measured by a traditional IDR.

The PLC values for accounts with traditional IDRs (approximately 4,300 of the 700,000 accounts within Duke Energy Ohio) are calculated based on the actual hourly data as recorded by the meter. Duke Energy Ohio determines the average of the five PJM coincident peak hours for each account metered with a traditional IDR, inflates the average by the appropriate distribution and transmission losses, and adjusts the resulting value with a weather normalization factor. This calculation methodology, once again, results in the assignment of unique PLC values for each non-residential account having a traditional IDR.

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