

**REQUEST:**

Regarding Duke Energy Ohio's call center, identify:

- a. All Indirect costs;
- b. All direct costs
- c. Building infrastructure costs;
- d. Total number of employees;
- e. Total employee salaries and benefits for call center employees.

**RESPONSE:**

- a. During the test period of the rate case( April 1, 2016 through March 31, 2017) there was \$8.1M of call center costs allocated to Duke Energy Ohio. These costs include both gas and electric.
- b. See response to part 1.
- c. The Company does not keep separate records for building infrastructure by departments.
- d. The call center based in Ohio currently has 223 employees. These employees support both Ohio and Kentucky and both gas and electric operations.
- e. The majority of the costs are for employee salaries and benefits.

**PERSON RESPONSIBLE:** Peggy Laub

**IGS-INT-01-005**

**REQUEST:**

Regarding Duke Energy Ohio's call center:

- a. Identify how the cost to manage and operate Duke Energy Ohio's call center is proposed to be recovered through distribution rates.
- b. Identify the specific FERC accounts and subaccounts where the call center costs are proposed to be recovered through distribution rates.

**RESPONSE:**

- a. The O&M costs allocated to the Ohio electric business unit for the call center is included in the revenue requirement in this case.
- b. The call centers charges various FERC accounts including 408960,593000,903000,910100,921100,921200,921600,923000,926000 and 926600.

**PERSON RESPONSIBLE:** Peggy Laub

**IGS-INT-01-007 PUBLIC as to Attachments**

**REQUEST:**

Regarding the estimated costs for the Customer Information System ("CIS") improvement discussed in Retha Hunsicker testimony on page 8, lines 22-23.

- a. Does the \$45-50 million account only for improvements within the Ohio jurisdiction?
  - i. If yes, what is the total cost of the system for all the Duke territories?
  - ii. If no, what is the jurisdictional allocation to Duke Energy Ohio?
- b. Provide an itemized breakdown of the \$45-50 million cost presented in the testimony.
- c. Provide all documents and/or workpapers relied upon in your response to "a" and "b".
- d. How would Duke propose to recover the costs associated with the system upgrades?

**RESPONSE:**

- a. No, \$45-50 million represents the amount allocated to Duke Energy Ohio electric.
  - ii. The allocation to Duke Energy Ohio in total is 9.65%, with 6.05% allocated to Duke Energy Ohio electric and 3.60% allocated to Duke Energy Ohio gas.
- d. The Company would propose to recover the electric portion of these costs through Rider DCI if it is expanded to include general and intangible property. See direct testimony of Don Wathen in this case.

**CONFIDENTIAL PROPRIETARY TRADE SECRET as to Attachments (b)(c)**

These responses will be provided to all parties upon receipt of an executed confidentiality agreement in these proceedings.

**PERSON RESPONSIBLE:** Retha Hunsicker (a)  
Peggy Laub (d)

**IGS-INT-01-009**

**REQUEST:**

Does Duke Energy Ohio offer any Time-of-Use rates?

- a. If yes, identify the amount and manner in which the costs are recovered to supply the Time-of-Use rates including but not limited to IT programming costs, equipment costs, customer billings costs, etc.

**RESPONSE:**

Yes. The Company offers its Load Management Rider to non-residential customers served under Rates DS, DP, and TS. Residential customers can elect to take service under Rate TD, Optional Time-Of-Day Rate For Residential Service.

Accounts served under these tariffs are billed through the CMS billing system. The costs of administering these rates are embedded in the Company's base rates, and they are not readily identifiable.

**PERSON RESPONSIBLE:** James E. Ziolkowski

IGS-INT-02-001

**REQUEST:**

Duke Energy Ohio's Supplier Tariff's Rate CS, Certified Supplier Charges, sheet No. 52.4 identifies a charge of \$32 for 12 months of electronic interval meter data, per account. Regarding the charge identified above:

- a. Describe and provide calculations demonstrating how the charge of \$32 was derived.
- b. Identify all costs being recovered through the \$32 charge. Including but not limited to labor, software expenses, IT equipment, etc.
- c. Identify the origin or basis of this \$32 charge.
- d. Describe the entire process used to deliver the applicable data to parties who pay the \$32 under the current structure by which the data is delivered
- e. Is the data provided to suppliers through an EDI transaction?
- f. How much labor is required to provide each data request on a monthly basis?
- g. How often and with what delay is interval data delivered to suppliers who pay the \$32 charge under the current system?
- h. Identify the amount of interval data charges collected by Duke in 2016.
- i. Identify the amount of interval data charges collected by Duke during the test year.

**RESPONSE:**

- a. These charges were agreed to through a stipulated settlement in ESPII, Case No.14-841-EL-SSO, *et al.*
- b. See response to a.
- c. See response to a.
- d. Interval meter data is available either through the Secured Certified Supplier Information (Portal) or through EDI transactions. Data delivered via the Portal is provided after an account is entered into the Portal, and in the case of a residential customers an Authorization is required to be uploaded. After that, the interval data is provided within a few moments. Data delivered via EDI is provided after a Supplier requests the interval data through an EDI 814HI or thru an enrollment 814E (secondary request). Then the interval data is sent through and EDI 867HI the next day.
- e. See response to d.
- f. A study of this is not available.
- g. See response to d.
- h. \$556,560

i. \$561,192

**PERSON RESPONSIBLE:** Scott Nicholson

**Duke Energy Ohio**  
**Case No. 17-0032-EL-AIR**  
**IGS Second Set of Interrogatories**  
**Date Received: October 5, 2017**

**IGS-INT-02-002**

**REQUEST:**

Identify the following uncollectible expenses for 2016:

- a. Uncollected receivables for default service customers
- b. Uncollected receivables for customers of CRES providers
- c. Overhead costs for collection efforts for both utility and CRES receivables.
- d. Identify all workpapers to support your response to (a)-(c).

**RESPONSE:**

- a. Duke Energy Ohio's electric receivables for 2016 was \$3,013,637 for all non PAR customers.
- b. Duke Energy Ohio's electric receivables for 2016 was \$384,237 for all PAR customers.
- c. Not available.
- d.

	<b>Par</b>	<b>Non-Par</b>	<b>Total</b>
<b>Jan</b>	(33,086)	(296,437)	(329,523)
<b>Feb</b>	(56,089)	(472,964)	(529,053)
<b>Mar</b>	(41,621)	(362,656)	(404,277)
<b>Apr</b>	(36,315)	(286,517)	(322,832)
<b>May</b>	(22,766)	(186,681)	(209,447)
<b>Jun</b>	(26,534)	(160,395)	(186,928)
<b>Jul</b>	(22,147)	(166,940)	(189,086)
<b>Aug</b>	(25,313)	(186,313)	(211,626)
<b>Sep</b>	(24,435)	(153,737)	(178,172)
<b>Oct</b>	(25,027)	(210,802)	(235,829)
<b>Nov</b>	(35,393)	(279,764)	(315,157)
<b>Dec</b>	(35,511)	(250,432)	(285,943)
<b>YTD Total</b>	<b>(384,237)</b>	<b>(3,013,637)</b>	<b>(3,397,874)</b>

**PERSON RESPONSIBLE:** Jim Ziolkowski

**IGS-INT-02-007**

**REQUEST:**

Does Duke permit competitive retail electric service providers to include non-electric charges on the utility consolidated bill? If not, explain why.

**RESPONSE:**

No.

See PUCO 20 Certified Supplier tariff:

Sheet 39.5, 10.9, b.

Sheet 49.4, 19.1, g.

**PERSON RESPONSIBLE:** Scott Nicholson



**IGS-INT-02-010**

**REQUEST:**

In response to IGS INT-1-04, Duke identified \$8.1 million in call center expenses related to gas and electric customers. Regarding this response, identify which portion of these costs relate to Duke Energy Ohio electric customers—stated differently, what portion of this amount does Duke propose for recovery through its electric distribution rates.

**RESPONSE:**

Through our allocation process, \$5,107,749 of the amount was allocated to Ohio electric business units.

These costs represent actual costs for the twelve months ended March 31, 2017 and are mainly in FERC account 903. The Company proposed to include all these costs in this case.

**PERSON RESPONSIBLE:** Peggy Laub

**IGS-INT-01-016**

**REQUEST:**

Supplier Tariff page 52.4 lists a Customer Enrollment/Switching Fee of \$5.00/switch charged to the supplier. Regarding this provision:

- a. Are customers required to pay this fee when returning to SSO service?
- b. What is the total amount in switching fees that Duke collected in 2016?

**RESPONSE:**

- a. No.
- b. \$469,335

**PERSON RESPONSIBLE:** Scott Nicholson

**Duke Energy Ohio  
Case No. 17-1263-EL-SSO  
IGS First Set Interrogatories  
Date Received: August 29, 2017**

**IGS-INT-01-017**

**REQUEST:**

Supplier Tariff page 52.4 lists a Bill Ready Fee of \$0.056 per residential bill and \$0.268 per commercial bill. Regarding this provision:

- a. What is the total amount in bill ready billing fees that Duke collected in 2016 for all accounts and by customer class.

**RESPONSE:**

The total amount is \$87,470.02 and the amounts by class are: Industrial \$13,940.15, Commercial \$24,696.23, OPA \$3,722.88, Residential \$45,012.76.

**PERSON RESPONSIBLE:** Scott Nicholson

**REQUEST:**

At pages 4-5, lines 9-23 and 1-15, Witness Hunsicker describes Duke's billing process under the current CIS. Regarding the billing system under the proposed CIS:

- a. Please indicate whether the billing software and processes used in conjunction with the current CIS can list non-commodity charges as a separate line item on a billing statement for either a CRES provider or any other entity.
- b. Please identify whether Duke currently lists non-commodity charges as a separate line item on its customer billing statements for either a CRES provider or any other entity. Identify all entities for whom Duke provides this service.
- c. Please indicate whether the proposed CIS will utilize billing software and processes capable of listing non-commodity charges as a separate line item on customer billing statements for either a CRES provider or any other entity.
- d. Please indicate whether the proposed CIS will utilize billing software that will be configured to include certified retail energy suppliers' non-commodity products as a separate line item on the billing statement.

**RESPONSE:**

- a. Yes, the current CIS is capable of listing non-commodity charges on the billing statement.
- b. Duke Energy currently lists non-commodity items on customer billing statements for its affiliate, Duke Energy One.
- c. The Company fully expects to have this capability, as the software provider (SAP) is currently being utilized by other utilities that offer Customer Choice. The capabilities available versus those to be implemented will be determined during the project's Initiate (analyze) and Design phases, scheduled to begin in 2018.
- d. This information will not be known until the Design phase of the project is complete.

**PERSON RESPONSIBLE:** Retha Hunsicker

**REQUEST:**

Witness Hunsicker testifies at page 7, lines 17-18, and at page 8, line 4, that the proposed CIS will improve bill formatting and provide Duke Energy Ohio's customers with more opportunities for advanced billing options.

- a. Please describe in detail how the proposed CIS will improve bill formatting.
- b. Please describe in detail the advanced billing options that will be offered under the proposed CIS.
- c. Please indicate whether the advanced billing features would contain a limit on the number of characters or line items listed on a billing statement.
- d. Please indicate whether the proposed CIS will enable competitive retail electric suppliers to offer supplier consolidated billing.
- e. Please explain how Duke intends to recover all other costs associated with the development and implementation of these improvements?

**RESPONSE:**

- a. The Company expects to introduce a universal bill format to help customers more easily view and understand their bill and energy usage. The design of the new bill format will not be known until the Initiate (analyze) and Design phases for this deliverable are complete. This work is currently scheduled to begin in 2019.
- b. The Company wants to provide more opportunities for advanced pricing structures and billing options, a process that, due to limitations of the existing CIS, is complex, costly, and time consuming. The Company continues to review and analyze rate designs that offer customers the ability to respond to real time price signals to achieve a lower cost for service, and upgrading the current CIS will better support these types of designs. The new CIS will be much more configurable, reducing the amount of time needed to test and implement pricing changes and offerings for customers. More detailed information will not be known until after the Initiate (analyze) phase of the project is complete. This phase is currently scheduled to begin in 2018.
- c. This information will not be known until after the Initiate (analyze) and Design phase of the project is complete. This phases is currently scheduled to begin in 2018.

- d. This information will not be known until after the Initiate (analyze) and Design phase of the project is complete. This phases is currently scheduled to begin in 2018.
- e. The Company included an adjustment in its pending base distribution rate case (Case No. 17-32-EL-AIR, *et al.*) to recover the O&M portion of the project. For the capital-related costs, recovery will be via the Company's proposed Rider DCI, expanded to include distribution-related general, intangible, and common Plant.

**PERSON RESPONSIBLE:** a-d Retha Hunsicker  
e - Don Wathen