f: 614-222-1337



January 23, 2017

Ms. Barcy F. McNeal, Secretary Public Utilities Commission of Ohio 180 East Broad Street, 11<sup>th</sup> Floor Columbus, Ohio 43215

Re: In the Matter of the Application of Duke Energy Ohio, Inc., Concerning its Energy Efficiency and Peak Demand Reduction Programs and Portfolio Planning, Case No.16-576-EL-POR.

Dear Ms. McNeal:

Pursuant to a request from the Attorney Examiner in the above-captioned proceeding, Duke Energy Ohio, Inc., (Duke Energy Ohio) is providing a copy of its response to the Staff of the Public Utilities Commission of Ohio (Staff), letter dated January 22, 2017.

The Company anticipates that this information will be responsive to Staff's Data Request No.1. The Company notes that the Staff has now successfully delayed the filing of its testimony to the originally requested date of January 30, 2017.

Duke Energy Ohio respectfully requests that the Attorney Examiner issue an Entry indicating that the testimony is to be filed without further delay and that the hearing is to proceed as currently scheduled on February 21, 2017.

Respectfully submitted,

/s/ Elizabeth H. Watts

Amy B. Spiller
Deputy General Counsel
Elizabeth H. Watts
Associate General Counsel
Duke Energy Ohio, Inc.
139 E. Fourth Street
Cincinnati, Ohio 45201-0960

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was delivered by U.S. mail (postage prepaid), personal delivery, or electronic mail, on this 23rd day of January, 2017, to the following parties.

/s/ Elizabeth H. Watts
Elizabeth H. Watts

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1) Please answer letter (e) of Staff DR No. 1. As requested in Staff DR No. 1, the information Staff is seeking is actual energy savings from programs Duke administered *outside* of the plan and counted toward its energy efficiency mandates.

	2009	2010	2011	2012**	2013	2014	2015	Total
Non-	100,443	895,621	348,053	3,787,119	716,562	701,263	392,285	6,941,346
Portfolio								
Impacts*								

All the impacts (kWh) in the table are from low income programs

2) As requested in Staff DR No. 1, please provide the actual costs, projected kWh, and actual kWh, *individually* for *each* of the following program years: 2009, 2010, and 2011. Previously, Duke provided this information in cumulative numbers for the timeframe of 2009 through 2011.

The data is available in the updated chart.

3) We understand that Duke had a different portfolio plan and recovery mechanism called Rider save-a-watt (Rider DR-SAW) for 2009 through 2011, but please explain why Duke claims it did not have cost projections for this timeframe.

Data regarding projections for 2009 through 2011 were not filed in portfolio applications. Rather this data was submitted as part of Duke Energy Ohio's first electric security plan Case No.08-920-EL-SSO. Due to differences in the way the save-a-watt mechanism worked, the information was submitted as a three-year projection, and trued-up as a three-year plan. The 2012 forecast data was submitted within Duke Energy Ohio's second portfolio filing in Case No. 11-4393-EL-POR. Duke Energy Ohio has researched these older cases and is now providing this information in the following chart, although the Company does not agree that this information has any relevance to the current application for approval of a portfolio.

Please provide an explanation for why Duke claims it did not have cost projections for 2012.
 See above.

<sup>\*</sup>Energy savings claimed from program administered outside of the plan and counted toward its energy efficiency mandates.

<sup>\*\*</sup>Include impacts from low income weatherization not previously claimed in years 2010-2012.

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Year	Projected costs:	<b>Actual costs</b>	Projected MWh	Actual MWh
2009	\$20,121,175	\$12,271,772	104,753,903	292,333,194
2010	\$24,047,482	\$23,312,812	227,666,651	309,907,597
2011	\$28,217,932	\$25,226,982	364,481,170	215,291,129
2012	\$33,906,873	\$25,147,118	186,241,464	262,436,819
2013	\$25,747,957	\$22,130,677	115,117,713	144,101,736
2014	\$31,528,406	\$30,608,344	115,850,814	152,268,735
2015	\$36,786,357	\$31,531,908	137,756,583	164,010,308

2009 Actual MWh includes impacts of 206,669,685 kwh from 2006 – 2008

The above table was created from data contained in the following cases:

Case No. 08-920-EL-SSO

Case No. 11-4393-EL-POR

Case No. 12-857-EL-RDR

Case No. 13-753-EL-RDR

Case No. 14-457-EL-RDR

Case No. 15-534-EL-RDR

Case No. 16-664-EL-RDR