

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke )  
Energy Ohio, Inc. for Approval of its ) Case No. 20-599-GE-UNC  
Temporary Plan and Waiver of Tariffs and )  
Rules Related to the COVID-19 State of )  
Emergency.

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**MOTION OF DUKE ENERGY OHIO, INC., FOR AN EXTENSION OF DEADLINE  
AND REQUEST FOR EXPEDITED TREATMENT**

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Comes now Duke Energy Ohio, Inc., (Duke Energy Ohio or Company) and, pursuant to O.A.C. 4901-1-12, hereby respectfully requests an order for an extension of the August 7, 2020 deadline to file a notice of how the Percentage of Income Payment Plan (PIPP) and Graduate PIPP programs will resume operations.<sup>1</sup> The Company has reached out to the Ohio Development Services Agency (ODSA) to discuss timelines for resuming the PIPP and Graduated PIPP programs. The Company has proposed a timeline that is still under consideration by the ODSA. The Company respectfully requests additional time, until September 1, 2020, to submit its plan.

In accordance with O.A.C. 4901-1-12(C), Duke Energy Ohio reached out to all parties to this proceeding via email dated August 6, 2020 inquiring whether any party objects to expedited treatment of the Company’s Motion.<sup>2</sup> As of the time this Motion was filed, no party had indicated an objection.

Duke Energy Ohio sets forth, in the attached Memorandum in Support, the reasons why such deadlines should be so extended, on an expedited basis.

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<sup>1</sup> July 29, 2020 Order, pg. 7.

<sup>2</sup> Due to an email address error in its initial email, Duke Energy Ohio counsel did not reach out to the counsel of Pro Seniors Inc. (Pro Seniors) until the afternoon of August 7. However, Pro Seniors has not filed a motion to intervene in this case, but only appeared on another party’s brief. Thus, Pro Seniors should not be considered a party for purposes of this motion.

Respectfully submitted,  
DUKE ENERGY OHIO, INC.

/s/ Jeanne W. Kingery

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**Attorneys for Duke Energy Ohio, Inc.**

## MEMORANDUM IN SUPPORT

On June 26, 2020, Duke Energy Ohio, in response to a Finding and Order issued on June 17, 2020 (June 17 Order), submitted its plan to return to Pre-COVID-19 activities and operations (Plan).<sup>3</sup> Within that Plan, among other things, the Company stated that if approved, it would coordinate with the ODSA to resume the PIPP Program and Graduate PIPP Program as these programs were in place prior to the COVID-19 Pandemic. On July 29, 2020, the Public Utilities Commission of Ohio (Commission) issued a Supplemental Finding and Order in the above-captioned proceeding, approving the Company's Plan (July 29 Order).<sup>4</sup> Among other things, the July 29<sup>th</sup> Order directed the Company to file a notice of how the PIPP and Graduate PIPP programs will resume operations by August 7, 2020.<sup>5</sup>

Following receipt of the Commission's July 29 Order approving the Plan, the Company began developing a proposal to submit to the ODSA for resuming the PIPP and Graduated PIPP programs. Duke Energy Ohio then reached out to its contacts at ODSA to discuss its Plan and coordinate how the PIPP and Graduate PIPP programs will resume. However, as of the date of this filing, ODSA is still evaluating the Company's proposal. Duke Energy Ohio respectfully submits that nine days is insufficient to properly coordinate with ODSA, obtain its feedback and then submit the Company's notice to the Commission. Accordingly, Duke Energy Ohio respectfully requests an extension of time, until September 1, 2020, to effectively coordinate with ODSA and file the resulting notice. The current deadline does not allow the Company and ODSA sufficient time to complete the necessary conversations.

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<sup>3</sup> Duke Energy Ohio's Transition Plan, pp. 6-10.

<sup>4</sup> July 29 Order, pg. 7.

<sup>5</sup> *Id.*

Therefore, Duke Energy Ohio respectfully requests that the Commission extend the deadline for the Company's filing of a notice regarding resuming its PIPP and Graduated PIPP programs to pre-COVID-19 status until September 1, 2020.

Respectfully submitted,

DUKE ENERGY OHIO, INC.

/s/ Jeanne W. Kingery

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**Attorneys for Duke Energy Ohio, Inc.**

## CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the Commission's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion of Duke Energy Ohio, Inc., for an Extension of Deadline and Request for Expedited Treatment* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 7<sup>th</sup> day of August, 2020 via electronic transmission.

/s/ Jeanne W. Kingery  
Jeanne W. Kingery

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