

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Gas Rates.))	Case No. 12-1685-GA-AIR
In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval.))	Case No. 12-1686-GA-ATA
In the Matter of the Application of Duke Energy Ohio, Inc. for Approval of an Alternative Rate Plan for Gas Distribution Service.))	Case No. 12-1687-GA-ALT
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Change Accounting Methods.))	Case No. 12-1688-GA-AAM

**MOTION TO TAKE ADMINISTRATIVE NOTICE
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

The Office of the Ohio Consumers' Counsel ("OCC"), on behalf of the residential consumers of Duke Energy Ohio ("Duke" or "the Utility"), submits this Motion to take Administrative Notice of two documents from Duke's web site that contain information relevant and important to the upcoming decision on Duke's request to charge its customers \$63 million for manufactured gas plant ("MGP") cleanup costs.¹ The following document includes facts (admissions by Duke)² that are sought to be administratively noticed:

Attachment A: Frequently Asked Questions about the West End Gas Works Project and Frequently Asked Questions about the East End Gas Works Project

¹ OCC has incorporated this information into the Post Hearing Brief.

² See Ohio Rules of Evidence 801(D)(2)(a). (Admission by party-opponent).

As OCC explains in the attached Memorandum in Support, the admissions by Duke contained in Attachment A contradict some of the claims Duke has made throughout the hearing that the extensive and expensive remediation at the East End and West End sites was necessary to protect human health and the environment. The Frequently Asked Questions and Answers state that the two sites present no health risk to the community and that the Manufactured Gas Plant byproducts only pose a threat to human health if there is prolonged direct contact. In contrast, in this proceeding, Duke claimed that the extensive and very expensive remediation actions taken at the East End and West End sites were necessary to protect human health and the environment.³

There is good cause to grant this Motion because OCC only recently became aware of the Frequently Asked Questions documents. Ohio Adm. Code 4901-1-12 allows for Motions and 4901-1-14 allows for rulings on procedural matters. Accordingly, this Motion should be granted for reasons more fully explained in the attached Memorandum in Support.

³ For example, see Tr. Vol. I at 207, 213, 220, 234, 268; (Bednarcik) (April 29, 2013) and Tr. Vol. II at 296 (Bednarcik) (April 30, 2013).

Respectfully submitted,

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)	

MEMORANDUM IN SUPPORT

The PUCO has broad discretion to conduct its own hearings.⁴ The PUCO is not stringently confined to the rules of evidence,⁵ but is directed by statute to observe the practice and rules of evidence in civil proceedings.⁶

Under Rule 201 of the Ohio Rules of Evidence, judicial notice may be taken of any adjudicative fact that is not subject to reasonable dispute. This rule permits courts to fill gaps in the record. Accordingly, Courts have judicially noticed documents filed, testimony given, and orders or findings. Under subsection (F) of Rule 201, “Judicial notice may be taken at any stage of the proceeding.”

⁴ See, e.g., R.C. 4903.02, 4903.03, 4903.04; Ohio Adm. Code 4901-1-27.

⁵ See *Greater Cleveland Welfare Rights v. Pub. Util. Comm.* (1982), 2 Ohio St.3d 62.

⁶ R.C. 4903.22.

The Supreme Court of Ohio has held that while there is no absolute right for the taking of administrative notice, there is no prohibition against the Commission taking administrative notice of facts outside the record in a case.⁷ The PUCO itself has recognized that it may take administrative notice of adjudicative facts,⁸ cases,⁹ entries,¹⁰ expert opinion testimony, and briefs and other pleadings filed in separate proceedings.¹¹ The PUCO has also taken administrative notice of the entire record¹² and evidence presented in separate cases.¹³

⁷ See *Canton Storage and Transfer Co. v. Pub. Util. Comm.* (1995), 72 Ohio St.3d 1, 17-18 (citing to *Allen, D.B.A. J & M Trucking, et al., v. Pub. Util. Comm.* (1988), 40 Ohio St.3d 184, 185).

⁸ *In the Matter of the Review of the Interim Emergency and Temporary PIP Plan Riders Contained in the Approved Rate Schedules of Electric and Gas Companies*, Case No. 83-303-GE-COI, Entry at ¶6 (Feb. 22, 1989) (administrative notice taken of facts adduced at hearing in another investigation, information compiled by Staff from the 1980 Census Report, and customer information reported pursuant to the Ohio Administrative Code).

⁹ *In the Matter of the Amendment of Chapter 4901:1-13, Ohio Administrative Code, to Establish Minimum Gas Service Standards*, Case No. 05-602-GA-ORD, Entry on Rehearing at 33 (May 16, 2006) (administrative notice taken of case filed where utility presented problems with remote technology, and sought to discontinue new installation of remote meters).

¹⁰ *In the Matter of the Application of Ohio Edison Company for Authority to Change Certain of Its Filed Schedules Fixing Rates and Charges for Electric Service*, Case No. 89-1001-EL-AIR, Opinion and Order at 110 (Aug. 19, 1990) (administrative notice taken by the Attorney Examiner of entries and orders issued in an audit proceeding and an agreement filed in the audit docket).

¹¹ See *In the Matter of Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan*, Case No. 12-1230-EL-SSO, Opinion and Order at 18-21 (finding that the Court has placed no restrictions on taking administrative notice of expert opinion testimony, and that it declined to impose such restrictions); *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo Edison Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan*, Case No. 10-388-EL-SSO, Entry at ¶6 (Apr. 6, 2010), aff'd by Entry on Rehearing at ¶14 (May 13, 2010) (both Entries allowing the entire record of a prior proceeding to be administratively noticed in the ESP proceeding and ruling that all briefs and pleadings “may be used for any appropriate purposes”).

¹² Case No. 10-388-EL-SSO, Entry at ¶6 (Apr. 6, 2010), aff'd by Entry on Rehearing at ¶14 (May 13, 2010).

¹³ *Id.*; *In the Matter of the Application of The Cincinnati Gas & Electric Company for an Increase in Electric Rates in its Service Area*, Case No. 91-410-EL-AIR, Opinion and Order at 19 (May 12, 1992) (administrative notice taken of the record in the Zimmer restatement case and evidence presented in the case); *In the Matter of the Application of Columbus Southern Power Company for Authority to Amend its Filed Tariffs to Increase the Rates and Charges for Electric Service.*, Case No. 91-418-EL-AIR, Opinion and Order (taking administrative notice of entire record of Zimmer Restatement Case).

In this case, Duke would not be prejudiced by a taking of administrative notice because the Frequently Asked Questions were posted by Duke on its web site. It is Duke's own admissions— not hearsay ¹⁴— that OCC seeks to be administratively noticed. Thus the Utility cannot claim that it did not have prior knowledge of the information. Second, Duke will not be prejudiced because Duke will have ample opportunity to respond to the information contained in the 4 page Frequently Asked Questions in its Reply Brief which is not due until June 20, 2013, two weeks from now. It is noteworthy that such a two-week time period to respond is twice as long as the OCC and other parties had to review the 105 page Direct expert testimony (and attachments) of Shawn Fiore, which was filed on April 22, 2013, only one week before the start of the evidentiary hearing. Good cause therefore exists for granting OCC's Motion because OCC only recently became aware of Duke's admissions in the Frequently Asked Questions documents.

The attached document (Attachment A) is a copy of a Duke Frequently Asked Questions web page¹⁵ containing questions and answers about the East End and West End MGP remediation sites. Many identical questions and answers were listed for both East End and West End sites. The information included in these documents will be helpful to the decision-making process of the PUCO, by further filling the gap of information necessary to evaluate the prudence of the level of spending under Duke's remediation plan. Duke's admissions in the Frequently Asked Questions contradict

¹⁴ See Ohio Rules of Evidence 801(D)(2)(a). (Admission by party-opponent).

¹⁵ East End MGP site FAQs <http://www.duke-energy.com/EastEnd/> and West End MGP site FAQs <http://www.duke-energy.com/westend/>.

claims made by Duke in the hearing. For example, The Frequently Asked Questions states:

Q. Does the West End Site present a health risk to the community?

A. No. Investigative studies by environmental specialist and the Ohio Environmental Protection Agency (OEPA) shows that the West End site does not pose a health risk to neighboring properties, businesses or residents. And the OEPA is not requiring Duke Energy to perform any action at this site. Regardless, Duke Energy will complete the project in compliance with OEPA regulations.

Q. Does this site pose a risk to neighboring property?

A. No. Neighbors and their property will have no contact with the residual material or contaminates soil.

Q. Has this site been a threat to the neighborhood all along?

A. No. Environmental studies conducted at the West End site have shown that there is no threat to public health. (Emphasis added.)

Despite stating that there was no health risks to the Community from the contamination at the East End or West End sites, Duke has spent almost \$63 million in investigation and remediation efforts thus far. If there was truly no health risk as claimed by Duke through the Frequently Asked Questions, in this case, then there would have been no need to engage in such expensive remediation.

Duke took steps to assure the general public that there was no health risk to the Community (*see* Attachment A). However, under oath, Duke witness Jessica Bednarcik testified about the dangers at the sites, including oil oozing out of the ground.¹⁶ Duke cannot have it both ways.

¹⁶ Tr. Vol. II at 477 (Bednarcik) (April 30, 2013).

The Duke answers to its Frequently Asked Questions state that there is no health risk to the Community or to neighboring property. Such a claim might help explain why Duke took no steps to remediate either site for years after having some concerns about potential environmental contamination. However, it contradicts Duke's explanation that the investigation and remediation was necessary because of a change in the potential land use of adjacent properties. At the hearing, Ms. Bednarcik testified that changes in land use of the adjacent property caused the need for the investigation and eventual remediation.¹⁷

The Frequently Asked Questions also notes:

- Q. Are these byproducts considered a risk to health and the environment?
- A. Coal tar contains some chemical compounds, such as polycyclic aromatic hydrocarbons (PAHs). These compounds are a common component of asphalt products, including roadway materials, and are only a human health risk if people directly touch, eat or breathe them for a long period. **Asphalt, concrete and topsoil often serve as a protective barrier, limiting human contact with residues in the ground.** (Emphasis added.)

This Frequently Asked Question notes that asphalt, concrete and topsoil may serve as sufficient barriers to limit direct human contact with residue in the ground, thus protecting human health. Yet, when OCC witness Dr. Campbell similarly suggested that a combination of similar Engineering Controls in association with land use covenants and some limited remediation would have been sufficient to protect human health and the environment, Duke's witnesses were dismissive of this remediation alternative.¹⁸

¹⁷ Tr. Vol. II at 326, 333, 337, 344 (Bednarcik) (April 30, 2013); Duke Ex. No. 21 (Direct Testimony of Jessica Bednarcik) at 9-10 (July 20, 2013).

¹⁸ Duke Ex. No. 26 (Direct Testimony of Shawn Fiore) at 21-23 (April 22, 2013); Tr. Vol. III at 644-646 (Fiore) (May 1, 2013).

Duke's admission contained in these documents should be administratively noticed¹⁹ in this proceeding. The information will assist the PUCO in reviewing the prudence of Duke's expenditures (that it wants the PUCO to make consumers pay).

For the reasons stated above, OCC has established good cause for the Commission to administratively notice Duke's admissions contained in the documents from Duke's web site. Taking administrative notice will provide the Commission with relevant information for consideration in deciding whether customers will pay for Duke's \$63 million request and, if so, how much.

Respectfully submitted,

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¹⁹ Alternatively, the PUCO could admit the information as evidence by reopening the proceeding under Ohio Admin. Code 4901-1-34. The good cause addressed above would also apply as good cause for admitting the information under Ohio Admin. Code 4901-1-34.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Take Administrative Notice has been served electronically upon those persons listed below this 6th day of June 2013.

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513-612-3070

Media Inquiries only

800-559-DUKE (3853)

Ask the expert:

westend@duke-energy.com

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Frequently Asked Questions

Following are a number of most frequently asked questions. To submit your own question, please use the form at the bottom of the page.

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Q. Why is Duke Energy involved in the Brent Spence Bridge Replacement/Rehabilitation Project?

A. The National Bridge Inventory lists the Brent Spence Bridge as functionally obsolete due to the capacity, sight distance and safety concerns associated with its current configuration. Government entities are working on designs for a new Brent Spence Bridge. The preliminary plans call for the bridge to be built on a portion of Duke Energy's West End Substation property. Our work will ensure the site is safe for bridge construction.

Q. What is the West End Substation?

A. The 11-acre West End Substation supplies much of downtown Cincinnati and the Northern Kentucky riverfront with electricity. The property once housed a coal yard, power house, coal-fired plant and manufactured gas plant. It was converted to a substation in the mid-1970s.

Q. Why is Duke Energy conducting a remediation program for its West End Substation property?

A. Duke Energy's remediation activities at the site will provide an environmentally sound location for the new I-75 Brent Spence Bridge. The project will address impacts associated with previous operations at the site, including a former manufactured gas plant and a coal-fired plant.

Q. Does the West End site present a health risk to the community?

A. No. Investigative studies by environmental specialists and the Ohio Environmental Protection Agency (OEPA) show that the West End site does not pose a health risk to neighboring properties, businesses or residents. And the OEPA is not requiring Duke Energy to perform any action at this site. Regardless, Duke Energy will complete the project in compliance with OEPA regulations.

Q. What is a manufactured gas plant?

A. Between the mid-1800s and 1900s, manufactured gas was produced from coal and widely used as a fuel source for heating and lighting. According to some estimates, utilities owned or operated about 3,000 manufactured gas plants throughout the U.S. As natural gas became more available, utilities closed their manufactured gas plants and modified many sites for other uses.

Q. How can these sites impact the environment?

A. The old manufactured gas process produced byproducts, primarily coal tar. Management of these byproducts followed the standards and rules in place when the plants were in operation. Many of the byproducts were stored on site in

vessels until they were sold for such uses as roofing and roadway paving.

When these plants closed down, the remaining byproducts often remained on site in the storage vessels. And, depending on the quality of these vessels, tar and other residues may have seeped into the soil. Today, we have a better understanding of how these byproducts can impact the environment.

Q. Are these byproducts considered a risk to health and the environment?

A. Coal tar contains some chemical compounds, such as polycyclic aromatic hydrocarbons (PAHs). These compounds are a common component of asphalt products, including roadway material, and are only a human health risk if people directly touch, eat or breathe them over a long period. Asphalt, concrete and topsoil often serve as a protective barrier, limiting human contact with the residues in the ground.

Q. Why did manufactured gas plants fall out of favor?

A. As the country's natural gas distribution infrastructure grew, manufactured gas plants could no longer compete. A century and a half of technological innovation came to a close with the decommissioning of most manufactured gas sites by the mid-1950s. With thousands of plants dotting the landscape, it is not uncommon for highway and commercial construction to result in the discovery of a decommissioned site. Nationwide estimates of utility expenditures for manufactured gas plant cleanup range from \$100 to \$200 million per year.

Q. What actions have been taken and what are Duke Energy's next steps at West End?

A. Duke Energy began conducting environmental investigations at the site in 2010, sampling both the soil and the groundwater. Cleanup begins in early 2011. The detailed clean up and will most likely include a combination of excavation with off-site disposal, solidification with concrete in place and/or containment.

Q. Does this site pose a risk to neighboring property?

A. No. Neighbors and their property will have no contact with the residual material or contaminated soil.

Q. Has this site been a threat to the neighborhood all along?

A. No. Environmental studies conducted at the West End site have shown that there is no threat to public health.

Q. As the project proceeds, will "disturbed" contaminants become dangerous to the health of my family and neighborhood?

A. No. For risk to occur there must be exposure. Duke Energy carefully designs work plans around health and safety to minimize and manage any possibility of contact with workers and neighbors. We are committed to managing this project in a safe and responsible manner.

Q. Will I be in danger if I walk by the site?

A. No. Fencing will run along the site's perimeter to protect neighbors.

Q. What about the groundwater?

A. The plan is to remove the residuals in the ground that may have affected the groundwater. Once the materials are removed, the groundwater will naturally cleanse itself over time. Duke Energy will monitor the groundwater conditions after the cleanup is complete.

Q. If the site isn't dangerous, why remediate, or clean up, at all?

A. Duke Energy has an overall remediation plan for manufactured gas plant sites across its system. The plan makes sure an organized approach is used to prioritize projects. The West End plan has been accelerated due to the pending construction of the new Brent Spence Bridge.

Q. If it's so safe, why are workers wearing safety glasses, gloves and coveralls?

A. Like any construction project, workers are required to wear hard hats, safety vests and safety glasses. In addition, workers wear gloves when coming in direct contact with the impacted soil. Coveralls are provided to all workers to help keep their clothes clean, but wearing them is not required.

Q. How long will the project last?

A. The first phase of the cleanup begins in early 2011 and concludes sometime in 2013. A second phase of environmental construction activities will occur in 2016, with estimated completion in 2017. Environmental work may be temporarily stopped at times as bridge construction progresses.

Q. How much will the cleanup project cost, and will gas or electric rates be affected?

A. The costs associated with the cleanup at West End are currently being estimated. Gas rates may be affected, but electric rates will not. Duke Energy has received permission from the Ohio Public Service Commission to request reimbursement of cleanup costs in a future rate case.

The PUCO will determine the validity and prudence of the request, any amount of recovery and the length of time for recovery. Initial estimates for the cleanup are in the \$34 million range.

Q. What is your experience with manufactured gas site cleanup?

A. Duke Energy has completed remediation of three sites in South Carolina, six sites in North Carolina and twelve sites in Indiana. A portion of one Cincinnati site is currently being remediated. Additional sites in each state are in various stages of investigation and/or cleanup.

Q. Has the state required Duke Energy to clean up this site?

A. Duke Energy is voluntarily cleaning up the West End site. The Ohio EPA has not required Duke Energy to perform any action at this site, but as a responsible corporate citizen, Duke Energy is going ahead with this work. The Brent Spence Bridge expansion project is important to the community and, ultimately, cleanup is the right thing to do.

Q. What are Duke Energy's future plans for the site?

A. The majority of the site will remain an integral part of Duke Energy's power delivery system. The Ohio Department of Transportation will most likely acquire the portion of the site where the new bridge/highway system will be constructed.

Q. How are you going to keep this project from disrupting the neighboring businesses?

A. Duke Energy is committed to completing the cleanup of the West End site with as little inconvenience to the community as possible. Our project plan addresses community issues like truck scheduling, routing and cleaning, employee and public safety, odor and noise control, and daily/weekend work procedures. Information will be shared with the community through our Web page, www.duke-energy.com/WestEnd.

Q. Will there be odors from the site during excavation? What will they smell like? Will they be harmful?

A. There may be odors during some of the excavation operations that will smell similar to moth balls or fresh blacktop. The odor is not harmful, but may be noticeable at times. Duke Energy will have a plan in place to minimize the odors.

Q. What route will truck traffic take when entering or exiting the property?

A. The construction truck traffic route is still being determined.

Q. Where will you take the materials when you remove them from the West End location?

A. The materials will be taken to a properly licensed landfill.

Q. Are there other similar sites in the area?

A. Duke Energy is currently cleaning up a portion of our East End Gas Works facility, located on Riverside Drive. That project began in June 2010 and is scheduled to be completed in mid-2011.

Q. How many manufactured gas sites does Duke Energy have?

A. The West End site was home to one of 43 manufactured gas plants in Duke Energy's service territory, and cleanup has already been completed at 22 of these sites. We have developed a successful approach to restore these sites for future uses that benefit our company and the community. There are more than 1,500 manufactured gas sites across the U.S.

Q. Where can I get more information?

A. Visit www.duke-energy.com/WestEnd for the latest project information and updates.

If you have questions about our West End clean-up project, please e-mail our project team at westend@duke-energy.com or call 513-287-3278. Members of the media may call 800-559-DUKE (3853).

Ask the Expert!

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Frequently Asked Questions

Following are a number of most frequently asked questions. To submit your own question, please use the form at the bottom of the page.

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Q. What is a manufactured gas plant (MGP)?

A. Between the mid-nineteenth and twentieth centuries, manufactured gas was used throughout the U.S. in homes and businesses as a fuel source for heating and lighting. As natural gas became more available, the plants that produced manufactured gas were closed and the purpose of the sites was modified over time.

Q. How can these sites impact the environment?

A. The old manufactured gas process produced byproducts, primarily coal tar. Management of these byproducts followed the standards and rules in place when the plants were in operation, but today we have a better understanding of how these byproducts can impact the environment. When these plants were operating, many of the byproducts were stored on site in storage vessels until they were sold for such uses as roofing and roadway paving. Many times when these plants closed down, the remaining byproducts remained on site in the storage vessels. Depending on the quality of these vessels, the tar and other residues may have gotten into the soil.

Q. Are these byproducts considered a risk to health and the environment?

A. Coal tar contains some chemical compounds, such as polycyclic aromatic hydrocarbons, or PAHs. These compounds are a common component of asphalt products, including roadway material, and are only a human health risk if people directly touch, eat or breathe them in large quantity over a long period. Asphalt, concrete and topsoil often serve as a protective barrier, limiting human contact with the residues in the ground.

Q. What actions have been taken and what are Duke Energy's next steps at East End?

A. Duke Energy began conducting environmental investigations at the site in 2007, sampling both the soil and the groundwater. Cleanup began in 2010 and includes the removal of residual materials and soil, and the solidification of residual materials and soil in place. The project is progressing on schedule, with anticipated completion in mid-2011.

Q. As the project proceeds, will "disturbed" contaminants become dangerous to the health of my family and neighborhood?

A. No. For risk to occur there must be exposure. Duke Energy carefully designs work plans around health and safety for both the on-site workers and the neighbors. Duke Energy is committed to managing this project in a safe and responsible manner.

Q. Will I be in danger if I walk by the site?

A.

No.

Q. If the site isn't dangerous, why remediate, or clean up, at all?

A. Duke Energy has an overall remediation plan for MGP sites across its system. The plan makes sure an organized approach is used to prioritize projects like East End.

Q. If it's so safe, why are workers wearing safety glasses, gloves and coveralls?

A. Like any construction project, workers are required to wear hard hats, safety vests and safety glasses. In addition, workers wear gloves when coming in direct contact with the impacted soil. Coveralls are provided to all workers to help keep their clothes clean, but wearing them is not required.

Q. How long will the project last?

A. Currently, the cleanup efforts are expected to last until mid-2011.

Q. What is your experience with MGP site cleanup?

A. The East End site is just one of 43 manufactured gas plants in Duke Energy's service territory, and cleanup has already been completed at 22 of these sites.

Q. Has the state required Duke Energy to clean up this site?

A. No. Duke Energy is voluntarily cleaning up the site. The Ohio EPA has not required Duke Energy to perform any action at this site. As a responsible corporate citizen, Duke Energy is going ahead with this work at East End since the project is important to the community and the right thing to do.

Q. What are Duke Energy's future plans for the site?

A. The site will remain a fully operational Duke Energy Natural Gas Distribution Center. The areas remediated will be finished with grass and landscaping.

Q. How are you going to keep this project from disrupting the neighborhood?

A. Duke Energy is committed to completing the cleanup of the East End site with as little bother to the community as possible. Our project plan addresses community issues like truck scheduling, routing and cleaning, employee and public safety, odor and noise control, and daily/weekend work procedures. More information is available on our website, www.duke-energy.com/EastEnd.

Q. Will there be odors from the site during excavation and what will they smell like? Will they be harmful?

A. There may be odors during some of the excavation operations that will smell similar to moth balls or fresh blacktop. The odor is not harmful, but may be noticeable at times. Duke Energy has a plan in place to minimize the odors.

Q. What route will truck traffic take when entering or exiting the property?

A. Construction traffic will exit right out of 2801 Riverside Drive (Eastern Avenue) and travel east to Interstate 275. Construction traffic will not use Columbia Parkway or other downtown routes to travel to the work site.

Q. Where will you take the materials when you remove them from the East End location?

A. The materials will be taken to a solid waste landfill that has a permit to take this type of material.

Q. How will information be shared with the public?

A. Duke Energy is keeping the public updated through several channels, including our website, www.duke-energy.com/EastEnd. Questions can be submitted by using the "Ask the Expert" form below, by e-mailing

eastend@duke-energy.com or by calling 513-287-3278

For media inquiries only, call 1-800-559-3853.

Ask the Expert!

Send us your question. Some questions and answers may be posted to this page.

If you would like for us to contact you, please complete the following information.

Comments/Questions

* Subject

Comments

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* First & Last Name

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Summary: Motion Motion to Take Administrative Notice by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Sauer, Larry S.