



139 East Fourth Street-1303-Main
P.O. Box 960
Cincinnati, Ohio 45201-0960
Tel: 513-287-4359
Fax: 513-287-4385
Amy.Spiller@duke-energy.com

Amy B. Spiller
Deputy General Counsel

March 3, 2015

Patrick Donlon, Director
Rates & Analysis Department
Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, Ohio 43215-3793

Re: *In the Matter of the Application of Duke Energy Ohio, Inc., for Approval of an Alternative Rate Plan in the Form of an Accelerated Service Line Replacement Program*
Case No. 14-1622-GA-ATL

Dear Mr. Donlon:

Please accept this correspondence in response to your letter of February 20, 2015, wherein you indicate that Duke Energy Ohio, Inc.'s application filed in the referenced matter is in substantial compliance with Ohio Administrative Code (O.A.C.) Rule 4901:1-19-06.

In your February 20 correspondence, you identify three items to be provided before the application will be deemed to be in technical compliance with O.A.C. Rule 4901:1-19-06. These items have been addressed in Duke Energy Ohio's motion for waiver filed on February 17, 2015. Therein, and not intending to restate here the entire contents of the memorandum in support of its motion for waiver, Duke Energy Ohio discussed why testimony had not been filed with the application and further sought a waiver of the requirements of O.A.C. Rule 4901:1-19-06(B)(1) as the application is one that can be approved without a hearing and the commensurate need for witness testimony. Duke Energy Ohio further confirmed that it had provided a copy of its application to the Office of the Ohio Consumers' Counsel and all other parties to its last natural gas base rate case on February 16, 2015, seeking waiver of O.A.C. Rule 4901:1-19-06(B)(2) to the extent said rule requires service as of the date the application is filed. Finally, Duke Energy Ohio identified the person who would, if necessary, serve as the witness sponsoring the single attachment to its application, stating that such witness was not identified in the application because witness testimony may not be needed to approve the application.

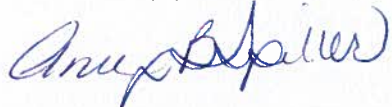
As stated in your February 20 correspondence, should the Public Utilities Commission of Ohio (Commission) grant the motion for waiver, Duke Energy Ohio's application will be in technical compliance with O.A.C. Rule 4901:1-19-06. As provided for in O.A.C. Rule 4901:1-19-07(A)(2), such a finding would render the application in technical compliance as of January 20, 2015, the date on which it was filed. Consistent therewith and assuming the Commission to grant

Patrick Donlon
March 3, 2015
Page Two

the motion for waiver, Duke Energy Ohio's response would similarly place the application in technical compliance as of January 20.

Please do not hesitate to contact me with any questions.

Very truly yours,



Amy B. Spiller

cc: Tamara Turkenton
Kerry Adkins
Jeanne Kingery

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/3/2015 2:28:10 PM

in

Case No(s). 14-1622-GA-ALT

Summary: Response Response to Patrick Donlon's, Director of Public Utilities Commission of Ohio, letter dated February 20, 2015 electronically filed by Brenda S. Carnahan on behalf of Duke Energy Ohio, Inc. and Spiller, Amy B.