

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke :
Energy Ohio, Inc., for Authority to Defer : Case No. 16-1106-GA-AAM
Environmental Investigation and :
Remediation Costs. :

In the Matter of the Application Duke : Case No. 16-1107-GA-UNC
Energy Ohio, Inc., for Tariff Approval. :

**PUBLIC VERSION
COMMENTS**

SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO

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**On behalf of the Staff of
The Public Utilities Commission of Ohio**

November 23, 2016

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INTRODUCTION AND BACKGROUND

On May 16, 2016 Duke Energy Ohio, Inc. (Duke or Company) filed an application in the above captioned cases (Application) seeking authority to record a regulatory asset on its books in order to defer costs incurred after December 31, 2016 for investigating and remediating environmental contamination at the Company's East End former manufactured gas plant (MGP) site. In its November 13, 2013 Opinion and Order in Case No. 12-1685-GA-AIR, *et al.*, The Public Utilities Commission of Ohio (Commission) concluded that:

“...recovery of incurred costs [for environmental investigation and remediation] should be limited to a reasonable timeframe commencing with the event that triggered the

remediation efforts mandated by CERCLA¹ and ending at a point in time where remediation efforts should be reasonably concluded. We believe that such determination of said timeframe is essential and in the public interest, and will provide certainty that the remediation will be carried out in a responsible and expeditious manner by the Company and its shareholders, so that recovery through Rider MGP will be finite.”²

For the East End former MGP site, the Commission determined that “the CERCLA mandate for this site became prevalent in 2006; therefore, the termination date should be 10 years from January 1, 2006. However, since the deferral authority was granted commencing January 1, 2008, Duke may recover the prudently incurred remediation costs from January 1, 2008 through December 31, 2016.”³ The Commission went on to state:

“We believe that, absent exigent circumstances, this 10-year timeframe from the inception of the federal mandate to the closure of cost recovery is reasonable and necessary in order to protect the public interest and ensure the Company and its shareholders are held accountable.”⁴

Duke sought Commission reconsideration of the 10-year recovery period and clarification of the intent of the exigent circumstances language contained in the Commission’s Opinion and Order. In its January 8, 2014 Entry on Rehearing in the case, the Commission stated that it “reiterates its determination that it is essential that recovery from cus-

¹ Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC Chapter 103.

² *In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Gas Rates*, Case No. 12-1985-GA-AIR, *et al.* (Opinion and Order at 59) (Nov. 13, 2013) (Case No. 12-1685-GA-AIR Opinion and Order).

³ *Id.* at 72.

⁴ *Id.*

tomers of the costs incurred to remediate the MGP sites be limited to a reasonable timeframe of 10 years.”⁵ In addition, the Commission determined that reconsideration of the 10-year recovery period was unnecessary since its initial Opinion and Order already provided for potential extension of the period for “exigent circumstances,” which the Commission stated is “an event beyond control of the Company.”⁶ In its Application in this case, Duke maintains that it has experienced exigent circumstances that will prevent it from completing remediation of the East End site by the December 31, 2016 deadline. Therefore, it is seeking authority to defer future recovery remediation costs incurred at the East End site beyond the Commission’s deadline.

STAFF’S REVIEW

Staff has reviewed Duke’s Application in this case, prior Duke Gas Cost Recovery (GCR) cases concerning past use of the Company’s propane peaking facilities, and data and documents provided by Duke during the course of the Staff’s investigations of Case Nos. 14-375-GA-RDR, 15-452-GA-RDR, and 16-542-GA-RDR, *et al.* (collectively the “MGP Rider Cases”) concerning annual Duke applications to increase Rider MGP.⁷ Based on this review, it is Staff’s opinion that Duke’s Application fails to prove that the

⁵ *In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Gas Rates*, Case No. 12-1685-GA-AIR, *et al.* (Entry on Rehearing at 4) (Jan. 8, 2014) (Case No. 12-1685-GA-AIR Entry on Rehearing).

⁶ *Id.*

⁷ These cases are still pending before the Commission, involve active Staff investigations, and the documents provided are marked as being “confidential and proprietary.” Therefore, discussion of the documents will be redacted in the public version of these Comments.

Company experienced exigent circumstances that prevented it from completing remediation of the East End former MGP site within the recovery period established by the Commission. Therefore, Staff recommends that Duke's Application be denied. Further, Duke's Application also contains several other deficiencies that lead Staff to recommend that the Commission either deny Duke's Application or suspend consideration of the Application. Staff's reasoning and specific recommendations are set forth in the following comments and recommendations.

STAFF'S COMMENTS AND RECOMMENDATIONS

A. Duke must show that "exigent circumstances" exist, not "arduous conditions," in order for the MGP cost recovery period at East End to be extended.

As described above, the Commission's 12-1685-GA-AIR Opinion and Order and subsequent Entry on Rehearing state that Duke should complete environmental remediation of the East End former MGP site in an expeditious manner to serve the public interest. The Commission determined that Duke can only extend the original 10-year remediation recovery period that ends on December 31, 2016 if it proves that exigent circumstances exist. On page two of its Application, Duke states that "The recovery period, however, is not absolute. Indeed the Commission expressly recognized that arduous conditions could render such a ten-year period unreasonable." Staff disagrees with Duke's interpretation of the standard that it must meet in order to have the recovery period extended. "Arduous" means "difficult," whereas, as explained in greater detail below, "exigent circumstances" are urgent and/or emergency circumstances that are beyond the

Company's control. Arduous conditions are not exigent circumstances, and, in Staff's opinion as detailed below, Duke failed to demonstrate exigent circumstances in its Application, therefore the Application should be denied.

B. The circumstances described in Duke's Application are not unusual, are not outside of Duke's control, and are not emergency circumstances; therefore they are not exigent circumstances as required by the Commission.

Pursuant to the Commission's 12-1685-GA-AIR Opinion and Order, Duke must prove that exigent circumstances exist before it can be authorized to extend the 10-year recovery period for MGP remediation costs at the East End former MGP site. In Staff's opinion, the circumstances described in Duke's Application fall short of exigent circumstances. Webster's New World College Dictionary defines the term "exigent" to mean "calling for immediate action or attention; urgent; critical."⁸ Black's Law Dictionary defines "exigent circumstances" as "A situation that demands unusual or immediate action and that may allow people to circumvent usual procedures, as when a neighbor breaks through a window of a burning house to save someone inside."⁹ Black's further equates exigent circumstances to "emergency circumstances."¹⁰ The Commission's Case No. 12-1685-GA-AIR Entry on Rehearing provides that an exigent circumstance is "an

⁸ Online search of Webster's New World College Dictionary for the term "exigent."

⁹ Black's Law Dictionary (10th ed. 2014) via Westlaw search.

¹⁰ *Id.*

event beyond the control of the Company.” As explained below, the circumstances that Duke describes as exigent in its Application do not meet any of these definitions.

1. The circumstances described in Duke’s Application are not unusual, new, or unknown to the Commission when it established the 10-year recovery period for East End remediation costs that ends on December 31, 2016.

In essence, Duke’s arguments that it has experienced exigent circumstances that prevented it from completing environmental remediation at the East End former MGP site boil down to three related arguments. The first is that the Company’s natural gas operations at East End are heavily regulated by both federal and state agencies whose regulations require careful and deliberate environmental investigation and remediation activities around the propane peaking facility and related sensitive infrastructure. The second is that the unusually cold winters in 2013 and 2014 resulted in prolonged reliance on the propane peaking facility which depleted the propane reserves and necessitated replenishment and prevented excavation and in-situ solidification on the Middle and West of the West (WOW) Parcels. The third is that there is critical underground and other pipeline infrastructure at the site that is vibration-sensitive that slowed remediation activities on the Middle and WOW Parcels because of the need to avoid excessive vibration. These arguments do not raise any new or altered circumstances or conditions that were not in place in November 2013 when the Commission initially imposed the 10-year recovery period in the Case No. 12-1685-GA-AIR Opinion and Order.

That Duke, as a natural gas distribution company, is engaged in a business that is highly regulated was just as true back in mid-November 2013 when the Commission issued its Case No. 12-1685-GA-AIR Opinion and Order as it is today. Moreover, this fact was known to the Commission as one of the primary regulators of Duke's operations, both as the principal economic regulator and through adoption and enforcement of the federal government's Pipeline and Hazardous Materials Safety Administration's (PHMSA) Pipeline Safety Regulations. Duke's Application delay environmental investigation and remediation activities at the East End site or rise to the level of exigent circumstances. Similarly, the fact that there is critical underground and related pipeline infrastructure at the East End site that is sensitive to excessive vibrations and must be worked around carefully is also not new information that was unknown to the Commission when it issued established the 10-year recovery period. In fact, the record for Case No. 12-1685-GA-AIR is replete with references to the sensitive underground infrastructure and pipelines at the East End site.¹¹ The case record shows that the Commission went to great lengths to protect the location and detailed descriptions of the sensitive underground infrastructure due to its designation as "Critical Infrastructure" by the

¹¹ See for example *In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Gas Rates*, Case No. 12-1685-GA-AIR, *et al.* (Initial Direct Testimony of Jessica L. Bednarcik on Behalf of Duke Energy Ohio, Inc. at 12-13) (Jul. 20, 2012) (Case No. 12-1685-GA-AIR Initial Testimony of Jessica L. Bednarcik); *Id.* (Staff's Report of Investigation at 43) (Jan. 4, 2013); *Id.* (Supplemental Direct Testimony of Jessica L. Bednarcik on Behalf of Duke Energy Ohio, Inc. at 27-28) (Feb. 25, 2013); *Id.* (Supplemental Testimony of Jessica L. Bednarcik) (Feb. 25, 2013); *Id.* (Second Supplemental Direct Testimony of Gary J. Hebbeler on Behalf of Duke Energy Ohio, Inc. at 7-9) (Apr. 22, 2013); and numerous discussions included in the hearing transcript.

Department of Homeland Security. Similarly, the size, purpose, and location of the gas pipelines serving the East End site were discussed at length during the 12-1685-GA-AIR case. These facts demonstrate that the Commission was aware of the critical underground and pipeline infrastructure at the site and the need to protect it when it established the 10-year recovery period.

Lastly, the fact that Duke needed to employ the propane peaking equipment at the East End site during the winter months in 2013 and 2014 is also not unusual. The purpose of the peaking equipment is to stand ready to inject propane into Duke's gas distribution system when extra demands on the system due to cold weather necessitate additional gas volumes. There is nothing unusual about Duke using its propane injection facilities during the winter months. Staff reviewed independent consultant reports filed in annual Duke Gas Cost Recovery (GCR) proceedings which showed that Duke utilized its propane peaking facilities during the winter months in years 2002 through 2007 and 2009 through 2014 and that the Company sought recovery of the propane withdrawals in the annual CGR cases.¹² In addition, Duke's own Application in this case states that federal and state regulations "prevented, and continue to prevent, the Company from investigating or remediating the Middle Parcel during the winter heating months when propane facilities are integral to the provision of natural gas service."¹³ [REDACTED]

¹² Not all annual GCR cases involve an independent management report, therefore Staff could not determine if the propane peaking facilities were utilized 2008 or 2015.

¹³ *In the Matter of the Application of Duke Energy Ohio, Inc. for Authority to Defer Environmental Investigation and Remediation Costs*, Case No. 16-1106-GA-AAM, *et al.* (Application at 6) (May 16, 2016) (Case No. 16-1106-GA-AAM Duke Application).

[REDACTED]

[REDACTED]

[REDACTED] The facts that federal and state regulations do not allow remediation activities in proximity to the propane peaking facilities during the winter months and that remediation activities were and will continue to be suspended during the heating months is not new or unusual. Moreover, since such regulations prevented and continue to prevent the Company from performing remediation activities during the winter months, then unusually cold winters in 2013 and 2014 are irrelevant because remediation work was already not permitted and not scheduled during those months. Cold winters in Ohio and use of the propane peaking facility during the winter are not unusual events and are not exigent circumstances. Duke's Application should be denied.

2. Scheduling of environmental investigation remediation activities at the East End former MGP site was and remains entirely within Duke's control, and the Company's Application fails to point to any circumstances beyond its control.

Duke had and maintains sole control over the scheduling of environmental investigation and remediation activities at the East End site. The Company has dedicated personnel from both its corporate headquarters in Charlotte, NC and local offices that, in

consultation with a Duke-hired Ohio Environmental Protection Agency (OEPA) Certified Professional, plans and coordinates all remediation activities at the site. The Company exclusively issues requests for proposals and hires contractors to perform the remediation work, and it schedules, coordinates, and determines the sequence and pace of all activities. The Company had and has complete control over the remediation investigation and remediation activities at East End. Duke's Application does not raise any circumstances such as natural or man-made disasters or other calamities that caused it to lose control of the schedule or pace of the project. The Company's Application does not point to a flood, fire, tornado, or other natural disaster that delayed or prevented remediation activities. Similarly, the Application does not cite any strikes, riots, or other man-made hardships that interfered with the Company's ability to plan, schedule, and execute remediation activities. The Application only points to cold winters in 2013 and 2014 and the discovery of thick-walled concrete subsurface structures that added remediation planning time for the Middle and WOW Parcels. However, as Staff shows above, cold winters in Ohio are not unusual and not relevant, since remediation work wasn't scheduled or performed during the winter months anyway.

The existence of underground structures and equipment that are remnants of the former MGP plant at the Middle Parcel also is not new information that was not known when the Commission when it established the 10-year remediation recovery period. The Case No. 12-1685-GA-AIR case record is full of descriptions, references, and detailed engineering drawings that described and showed in great detail the location, composition,

and former purpose of the MGP remnants located on the Middle and other Parcels.¹⁵ The existence of these structures was well known to Duke at least as far back as mid-2012 (when it filed testimony describing in detail the former MGP sites and provided detailed engineering drawings in the 12-1685-GA-AIR case) and could not have reasonably caused the remediation scheduling delays that Duke claims. Rather, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] demonstrate that Duke was and remains the sole keeper of the remediation planning and scheduling activities at the East End site. The

¹⁵ For example, several Duke witnesses' testimonies described the former MGP sites and plant remnants in great detail. In addition, the Staff Report and related hearing exhibits provided several engineering drawings of the site detailing the location and purpose of former MGP equipment.

Company's Application in this case does not present any tenable circumstances that were beyond its control. Therefore, the Application does not meet the Commission's definition of exigent circumstances established in the Case No. 12-1685 Opinion and Order and subsequent Entry on Rehearing and should be denied.

3. Since Duke's Application fails to demonstrate any unusual circumstances or any circumstances beyond the Company's control, the Application is inconsistent with the definition of exigent circumstances as defined by Webster's New World College Dictionary or Black's Law Dictionary.

As noted above, Duke's Application fails to identify any natural or man-made calamities that prevented it from completing remediation of the East End former MGP site within the 10-year recovery period established by the Commission. The Company does not claim or provide any evidence that it experienced any catastrophic events that necessitated invoking force majeure clauses in its contracts with its remediation contractors. Similarly, Staff has shown that Duke has maintained exclusive control over the location, amount, schedule, and pace of the remediation work at the East End site and that the Company's Application does not point to any new or even unusual conditions that could have reasonably caused delays in completing the remediation. The circumstances described in the Company's Application definitely are not "urgent," "critical," or "emergency" circumstances, therefore they do not fit the definition of exigent circumstances and the Company's Application should be denied.

C. Duke’s Application does not address the Commission’s criteria for evaluating deferral applications, therefore the Application should be denied or consideration of the Application should be suspended until Duke demonstrates that it meets the criteria.

In Opinions and Orders issued in Case Nos. 15-1712-GA-AAM and 15-1741-GA-AAM¹⁶ concerning applications by the East Ohio Gas Company d/b/a Dominion East Ohio (Dominion) and Vectren Energy Delivery of Ohio, Inc. (Vectren) to create regulatory assets to defer for future recovery costs associated with certain gas pipeline safety initiatives, the Commission delineated the criteria that it uses to evaluate deferral applications. The Commission stated that it evaluates deferral applications based primarily on:

“a utility’s demonstration [Emphasis supplied] of the following factors: whether the utility’s current rates or revenues are sufficient to cover the costs associated with the requested deferral; whether the costs are material; whether the reason for requesting the deferral is outside the utility’s control; whether the expenses are atypical and infrequent; and whether the financial integrity of the utility will be significantly adversely affected, if the deferral is not granted.”

In the Case Nos. 15-1712-GA-AAM and 15-1741-GA-AAM Opinion and Orders, the Commission cites to several of its previous rulings as support for its summary of evaluation criteria for deferrals and states that a utility must demonstrate that it meets the cri-

¹⁶ *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval to Change Accounting Methods Associated with Its Pipeline Safety Management Program*, Case No. 15-1712-GA-AAM (Opinion and Order at 6) (Nov. 3, 2016) and *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval to Change Accounting Methods Associated with Its Distribution Accelerated Risk Reduction Program*, Case No. 15-1741-GA-AAM (Opinion and Order at 5-6) (Nov. 3, 2016).

teria in order to be granted a deferral. In this case, however, Duke's Application does not address the Commission's deferral evaluation criteria, except for claiming that the circumstances giving rise to its deferral Application are beyond the Company's control. Therefore, the Staff recommends that the Commission either deny Duke's Application or postpone ruling on the Application until Duke has fully demonstrated that it satisfies the Commission's deferral criteria.

D. Duke is planning to retire its propane peaking facilities and [REDACTED] the East End site. Therefore, the Company is seeking permission to extend the recovery period for MGP clean-up costs for a facility that may soon be closed and no longer provide any service to customers.

In an application filed in Case No. 16-253-GA-BTX (OPSB Application) before the Ohio Power Siting Board (OPSB) on September 13, 2016, Duke states that it plans to construct approximately 13 miles of new 20-inch diameter natural gas pipeline beginning at an existing high pressure 24-inch natural gas pipeline located near the intersection of Hamilton, Warren, and Butler Counties and ending at an existing 20-inch natural gas pipeline in the Fairfax or Norwood areas, depending on the route ultimately approved.¹⁷ The Company proposes that the new pipeline project will commence with starting preparation of the OPSB Application in mid-June 2016 and be complete with final restoration

¹⁷ *In the Matter of the Application of Duke energy Ohio, Inc. for a Certificate of Environmental Compatibility and Public Need for the C314V Central Corridor Pipeline Extension Project*, Case No. 16-253-GA-BTX (Application at 2.1 – 2.2) (Sep. 13, 2016) (16-253-GA-BTX Application).

of disturbed areas by mid-October 2018.¹⁸ Duke states that the purpose of the new pipeline project is to allow for the retirement of the two propane-air facilities on its system (one of which is located at the East End former MGP site), improve the north/south balance of gas in central Hamilton County, and support replacement of aging infrastructure.¹⁹ Presumably, once the new pipeline is operational in 2018, Duke will retire the propane facility at the East End site. In addition, [REDACTED]

[REDACTED]²⁰ If the Commission grants Duke's Application in this case and subsequently authorizes Duke to collect deferred MGP remediation costs incurred after the initial 10-year recovery period in customer rates, then customers will end up paying for the new pipeline that will permit retirement of the East End propane facility, the costs to retire the propane facility, and the costs to remediate the site of the propane plant even though it will no longer be providing them any service and despite the fact that the initial 10-year clean-up period will have elapsed. Therefore, the Commission should deny Duke's Application in this case.

CONCLUSION

As detailed above, in Staff's opinion Duke's Application in this case failed to prove that exigent circumstances existed and prevented the Company from completing

¹⁸ 16-253-GA-BTX Application, Figure 3-8 at 3.11.

¹⁹ *Id.* at 2.1-2.2.

²⁰ [REDACTED]

environmental investigation and remediation of its East End former MGP site within the 10-year recovery period established in the Commission's Opinion and Order in Case No. 12-1685-GA-AIR. Therefore, Staff recommends that the Commission deny Duke's Application. In addition, Staff recommends that the Commission either deny Duke's Application or delay ruling on the Application until Duke adequately demonstrates that its deferral request in this case complies with the Commission's evaluation criteria for granting deferrals.

Respectfully submitted,

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**On behalf of the Staff of
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PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Comments** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail upon the following Parties of Record, this 23rd day of November, 2016.

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