

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the)
Application of Duke Energy) Case No. 17-32-EL-AIR
Ohio, Inc., for an Increase in)
Electric Distribution Rates.)
)
In the Matter of the) Case No. 17-33-EL-ATA
Application of Duke Energy)
Ohio, Inc., for Tariff)
Approval.)
) Case No. 17-34-EL-AAM
)
In the Matter of the)
Application of Duke Energy)
Ohio, Inc., for Approval to)
Change Accounting)
Methods.)

**THE CINCINNATI CLEAN ENERGY FOUNDATION'S OBJECTIONS TO THE
STAFF'S REPORT OF INVESTIGATION**

The Cincinnati Clean Energy Foundation (CCEF) submits its Objections regarding the Public Utilities Commission of Ohio (PUCO) Staff's Report of Investigation (Staff Report), as filed in the above-captioned proceedings.

The absence of an objection in this filing to any aspect of the Staff Report is not intended to preclude CCEF from filing further pleadings or providing evidence, comments, or arguments in this docket. Nor does the absence of any such objection limit CCEF's cross-examination or introduction of evidence or argument regarding issues on which the PUCO Staff modifies its position on any issue contained in the Staff Report. CCEF also reserves the right to supplement or modify these Objections if the Staff makes additional findings or modifies its positions with respect to the Staff Report. CCEF further reserves the right to contest issues, including any issues that are newly raised, between the filing of the Staff Report and the closing of the record in these proceedings.

Objection To The Staff Report

CCEF objects to the Staff Report for failing to meaningfully account for clean energy development and clean energy education issues in its evaluation of Duke's rate application. In particular, CCEF objects to the Staff Report's conclusion battery storage

pilot project costs are unnecessary and not germane to the Delivery Capital Investment (DCI) Rider.¹ The Staff Report's finding is contrary to the record.

The project and its benefits are the subject of testimony previously submitted by Mr. Zachary Kuznar, Director of CHP Microgrids & Energy Storage Development. Mr. Kuznar testifies that: (1) energy storage provides significant value to the distribution grid, including "distribution upgrade deferral, integration of renewables, power quality improvement, and resiliency and reliability to critical loads;" (2) the proposed energy storage system may help stabilize the existing electrical grid in a manner that is more efficient than traditional fossil fuel resources; (3) the battery storage project could be used to provide power to certain customers and surrounding public infrastructure in the event of a power outage; and (4) clean energy, including the battery storage project, can benefit ratepayers by delaying the need for costly distribution investments or system upgrades. See Ex. 1, attached hereto.

Because electricity distribution infrastructure must be able to evolve with the increasing diversification of electricity generation, and battery storage technology is an important component of such evolution, the Commission should reject the Staff Report's conclusion that the project is not germane to the DCI Rider.

¹ Staff Report at 9.

Objection to Removal of Customer Education Funds

CCEF objects to the removal of customer education funds based on the Staff's conclusion that the funds were not expended during the test year.² In particular, CCEF objects to the extent that this conclusion will result in Duke Energy not expending future funds on needed customer education, especially as it relates to customer education regarding clean energy, energy efficiency, and conservation. Mr. James Henning, State President of Duke Energy Ohio, submitted written testimony (see Ex. 2, attached hereto) essentially describing a prospective customer education campaign. Nothing on the face of R.C. 4909.15 precludes the use of an estimate, projection, or forecast in the test period analysis.

Respectfully submitted,

/s/ Justin D. Newman

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² Staff Report at 16.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served this 26th Day of October 2017 via electronic service upon the individuals listed below.

/s/ Justin D. Newman

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EXHIBIT 1

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke)
Energy Ohio, Inc., for Authority to)
Establish a Standard Service Offer)
Pursuant to Section 4928.143, Revised) Case No. 17-1263-EL-SSO
Code, in the Form of an Electric Security)
Plan, Accounting Modifications and)
Tariffs for Generation Service.)

In the Matter of the Application of Duke)
Energy Ohio, Inc., for Authority to Amend) Case No. 17-1264-EL-ATA
its Certified Supplier Tariff, P.U.C.O. No.)
20.)

In the Matter of the Application of Duke)
Energy Ohio, Inc., for Authority to Defer) Case No. 17-1265-EL-AAM
Vegetation Management Costs.)

DIRECT TESTIMONY OF

ZACHARY KUZNAR

ON BEHALF OF

DUKE ENERGY OHIO, INC.

June 1, 2017

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I. INTRODUCTION

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Zachary Kuznar, and my business address is 400 South Tryon Street,
3 Charlotte, North Carolina, 28202.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am employed by Duke Energy Business Services LLC (DEBS) as the Director
6 of CHP Microgrids & Energy Storage Development. DEBS provides various
7 administrative and other services to Duke Energy Ohio, Inc., (Duke Energy Ohio
8 or the Company) and other affiliated companies of Duke Energy Corporation
9 (Duke Energy).

10 **Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATION AND**
11 **PROFESSIONAL EXPERIENCE.**

12 A. I received a bachelor's degree in Chemical Engineering from Purdue University
13 in 1999, a Master's Degree in Engineering and Applied Science from Yale
14 University in 2001 and PhD in Chemical Engineering from Yale University in
15 2005. I began my career with GE in 2005, and started with Duke Energy in 2008.
16 Previous roles at Duke Energy include various roles within Duke Energy's
17 Fossil/Hydro Generation group, Emerging Technology Organization and Business
18 Development in the Distributed Generation Group.

19 **Q. PLEASE BRIEFLY DESCRIBE YOUR DUTIES AS DIRECTOR OF CHP,**
20 **ENERGY STORAGE AND MICROGRID DEVELOPMENT.**

21 A. As Director of CHP, Energy Storage and Microgrid development, my primary
22 responsibility is to develop and execute business strategies to add distributed

1 resources to the asset mix within Duke Energy's six regulated, franchised
2 businesses located in Ohio, Kentucky, Indiana, North Carolina, South Carolina
3 and Florida.

4 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PUBLIC**
5 **UTILITIES COMMISSION OF OHIO?**

6 A. No.

7 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THESE**
8 **PROCEEDINGS?**

9 A. The purpose of my testimony is to discuss the Company's proposal for a pilot
10 distribution battery energy storage system as part of its proposed electric security
11 plan. While I will discuss the general parameters for this project, Duke Energy
12 Ohio witness William Don Wathen Jr. will discuss the proposed cost recovery
13 mechanism.

II. DISCUSSION

14 **Q. PLEASE IDENTIFY THE PROPOSED DISTRIBUTION BATTERY**
15 **ENERGY STORAGE SYSTEM.**

16 A. Duke Energy Ohio is proposing an approximate 10 megawatt (MW) distribution
17 battery energy storage system(s) to be located in its southwest Ohio service
18 territory.

19 **Q. WHAT IS THE DISTRIBUTION BATTERY TECHNOLOGY**
20 **INCORPORATED INTO THE COMPANY'S PROPOSAL?**

21 A. This system will incorporate lithium ion batteries, which are the preferred
22 technology. Specifically, lithium ion batteries are recognized as being reliable,

1 robust technology suitable for islanding and microgrid applications while
2 providing significant value to the local distribution system.

3 **Q. WHAT IS THE PURPOSE OF THIS PROJECT?**

4 A. Energy storage allows system operators operational flexibility to efficiently (or
5 cost effectively) operate the electric grid. Energy storage can provide significant
6 value to the distribution grid, including but not limited to, distribution upgrade
7 deferral, integration of renewables, power quality improvement, and resiliency
8 and reliability to critical loads. As costs continue to come down for energy
9 storage, Duke Energy Ohio anticipates energy storage could be deployed as a
10 cost-effective solution. Gaining the operational knowledge of how to own and
11 operate energy storage assets is important to successful, cost-effective integration
12 in the future. This specific project will allow Duke Energy Ohio to confirm the
13 value energy storage can provide to the electric grid and ultimately, Duke Energy
14 customers. The proposed battery energy storage system will provide certain
15 ancillary services to the PJM Interconnection, L.L.C., (PJM) market. Specifically,
16 the project is likely to provide frequency regulation, thereby helping to stabilize
17 the electric grid in a manner that is more efficient than traditional resources, such
18 as fossil generation.

19 **Q. YOU REFERENCED THE PJM MARKET FOR ANCILLARY SERVICES.
20 WILL DUKE ENERGY OHIO BE COMPENSATED FOR
21 PARTICIPATING IN THAT MARKET?**

22 A. Revenues, if any, realized by Duke Energy Ohio would offset the costs of the
23 project.

1 **Q. HAS THE COMPANY SELECTED A LOCATION FOR THE**
2 **INSTALLATION OF THE DISTRIBUTION BATTERY TECHNOLOGY?**

3 A. Yes. Duke Energy Ohio has identified an appropriate location for this project and
4 anticipates finalizing all details attendant to proceeding with the project at this
5 location as soon as practicable.

6 **Q. WHAT FACTORS WERE RELEVANT TO THE SELECTION OF THIS**
7 **LOCATION?**

8 A. Distributed assets such as energy storage will be used primarily to provide system
9 benefits. However, during grid outages, storage can also provide benefits to
10 certain customers in the form of backup power. The intended location of the
11 project is such that it enables surrounding public structures to potentially benefit
12 from backup power.

13 **Q. PLEASE DISCUSS THE INFORMATION THAT DUKE ENERGY OHIO**
14 **WILL OBTAIN UNDER THE PILOT.**

15 A. The benefits of this project will give Duke Energy Ohio critical insight going
16 forward with regard to energy storage. As technology continues to evolve in the
17 energy space, as assets continue to become more distributed, and as costs continue
18 to decline for technologies such as energy storage, quantifying the values it can
19 provide are important for the Company. This pilot project will allow Duke Energy
20 Ohio to confirm certain of the values to the electrical distribution system, such as
21 distribution asset deferral, resiliency, frequency regulation, integration of
22 renewables, and voltage support to name a few. It will also allow Duke Energy
23 Ohio to gain operational knowledge for these types of systems. The operational

1 experience and information obtained will be invaluable to future energy storage
2 deployments and economic modeling.

3 **Q. WHAT ARE THE ESTIMATED COSTS OF THE PILOT DISTRIBUTION**
4 **BATTERY ENERGY STORAGE SYSTEM?**

5 A. The anticipated cost of the project will be approximately \$20 million.

6 **Q. PLEASE EXPLAIN HOW DUKE ENERGY OHIO'S PROPOSED PILOT**
7 **ADVANCES STATE POLICY.**

8 A. Among others, it is the policy of the state of Ohio to “encourage innovation” and
9 “facilitate the state’s effectiveness in the global economy.”¹ The proposed
10 distribution battery energy storage system advances this goal by enabling the
11 deployment of modern-day technologies intended to benefit the bulk electric
12 system. Assets such as storage which can provide multiple values to the
13 distribution grid can be a cost effective and reliable solution for all Duke Energy
14 Ohio customers.

15 Additionally, the proposed project contributes to the provision of reliable,
16 efficient, and reasonably priced electric service.² Indeed, energy storage is cleaner
17 technology that may delay the need for costly distribution investments or system
18 upgrades, which impact overall distribution rates. The proposed location for the
19 project could also provide resiliency to nearby, critical public infrastructure.

III. CONCLUSION

20 **Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

21 A. Yes.

¹ R.C. 4928.02(D) and (N).

² R.C. 4928.02(A).

EXHIBIT 2

1 customer information system (CIS). Historically, a CIS enabled only premises-
2 based communication. Specifically, the CIS's primary function, when designed,
3 was to use the aggregated usage data for billing purposes. And this is
4 understandable given the historic function of meters, which supplied the needed
5 information for a CIS.

6 The industry, however, is not now limited to such simplistic forms of
7 communication. Electric meters and associated components have the capability of
8 recording more granular data. This data, in turn, can create personalized
9 opportunities for customers according to their preferences, whether in the form of
10 rate options or other usage-related services. Through the proposals in these
11 proceedings, we intend to continue transforming our electric distribution company
12 in order to position our customers to have more control, convenience, and
13 information.

14 **Q. PLEASE BRIEFLY DISCUSS HOW THE COMPANY INITIATED THE**
15 **TRANSITION AWAY FROM THE HISTORIC DISTRIBUTION GRID TO**
16 **A SMARTER GRID.**

17 **A.** Duke Energy Ohio was the first electric distribution utility in the state of Ohio to
18 deploy advanced meter technology. Our SmartGrid program was approved in
19 2008 pursuant to a stipulation that had near unanimous support.⁶ Because of the
20 pace with which the Company was able to embark on this program, our customers

⁶ *In the Matter of the Application of Duke Energy Ohio, Inc., for Approval of an Electric Security Plan*, Case No. 08-920-EL-SSO, *et al.*, Stipulation and Recommendation, at pp. 40-47 (October 27, 2008).

1 benefitted from a sizeable grant from the United States Department of Energy,⁷
2 which benefit most likely contributed favorably to our local economy at a time
3 when it was otherwise trending downward.

4 After the Commission's thorough and independent review of our
5 SmartGrid program, which was initiated in 2010, Duke Energy Ohio continued to
6 move forward with deployment. And we did so with agreement of a variety of
7 stakeholders, including the Commission Staff and the Office of the Ohio
8 Consumers' Counsel, and with approval of the Commission.⁸ In 2015, we
9 completed the deployment of that technology initially described in 2008 and
10 reviewed again a few years later. As detailed by Duke Energy Ohio witness
11 Schneider, our SmartGrid program has resulted in substantial benefit to our
12 customers. But as Mr. Schneider further explains, external circumstances have
13 created technological challenges with respect to our current SmartGrid program.
14 Thus, consistent with Governor Kasich's 2018-2019 Budget objective of
15 "embracing the future of 'smart' technologies in public utilities,"⁹ and the
16 Commission's similar focus,¹⁰ Duke Energy Ohio is proposing here to cost-
17 effectively integrate programs necessary to enable the continued evolution of our

⁷ The grant was received under the American Recovery and Reinvestment Act of 2009, 111 P.L. 5, 123 Stat. 115.

⁸ *In the Matter of the Application of Duke Energy Ohio, Inc., to Adjust and Set Its Gas and Electric Recovery Rate for 2010 Smart Grid Costs*, Case No. 10-2326-GE-RDR, Stipulation and Recommendation, at pp. 19-20 (February 24, 2012) and Opinion and Order, at pg. 29 (June 13, 2012).

⁹ *Building For Ohio's Next Generation*, Budget of the State of Ohio - Fiscal Years 2018-2019, at pg. 2 (January 30, 2017).

¹⁰ *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 R.C. 4928.143 in the Form of an Electric Security Plan*, Case No. 14-1297-EL-SSO, Opinion and Order, Concurring Opinion of Commissioner Asim Z. Haque, at pg. 5 (March 31, 2016) and *In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider*, Case No. 14-1693-EL-RDR, *et al.*, Opinion and Order, Concurring Opinion of Commissioner Asim Z. Haque, at pg. 5 (March 31, 2016).

1 SmartGrid and related technologies. Such a progression will allow us to provide
2 additional benefits to our customers as well as the state. Importantly, our
3 customers will be afforded more control over, and information related to, their
4 individual usage and Duke Energy Ohio will be better positioned to integrate
5 advancements related to a more intelligent distribution network.

6 Significantly, the state cannot embrace “the future of ‘smart’ technologies
7 in public utilities”¹¹ without the necessary infrastructure. And the infrastructure
8 required for a modern distribution system is more than just the equipment
9 classified as poles, lines, and meters. A modern distribution system includes
10 communication equipment and information technology investment that is not
11 classified, for accounting purposes, as distribution plant. Nevertheless, investment
12 in this type of equipment is critical to modernizing the distribution system and
13 thus as important as investing in poles and wires. In order to continue the
14 important effort of modernizing our distribution system, we are proposing here to
15 extend our existing Rider DCI to continue to advance Duke Energy Ohio’s
16 distribution services for our customers. As explained by Company witness
17 William Don Wathen Jr., we are also proposing a modification, which the
18 Commission has previously approved,¹² that will enable the inclusion of plant
19 classified as general, common, and intangible plant that is distribution-related.
20 The Company’s proposal will mitigate the financial pressure resulting from

¹¹ *Building For Ohio’s Next Generation*, Budget of the State of Ohio - Fiscal Years 2018-2019, at pg. 2. (January 30, 2017).

¹² *See In the Matter of the Application 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 R.C. 4928.143 in the Form of an Electric Security Plan*, Case No. 14-1297-EL-SSO, Opinion and Order, at pg. 93 (March 31, 2016).

1 significant investment in plant necessary for continued enhancement of the
2 distribution system that does not to fall into FERC Accounts 360-374.

3 Additionally, we have recognized that our CIS, while appropriate for more
4 traditional interactions, is now impeding our ability to efficiently and effectively
5 communicate with our customers on an individual basis and to otherwise engage
6 with them. Duke Energy Ohio witness Retha Hunsicker provides further
7 testimony on the important initiative we are pursuing to remove this impediment.

8 Our focus on our customers is further reflected in our proposal for a
9 customer informational campaign. As we position our customers to assert more
10 control over their energy decisions and to receive more information, it is
11 imperative that they have access to accurate data and that they understand both
12 their rights and available opportunities. We are therefore proposing a public
13 information and education campaign that will address matters such as energy
14 conservation and customer choice. Additionally, because the well-being of our
15 customers and the public at large receives our daily attention, we will include
16 safety in this public information and education service campaign. The Company is
17 proposing to include \$2 million in annual revenue requirements to fund the
18 incremental costs for this public information and education service campaign and
19 commits to submitting periodic reporting as to the impact of this effort.

20 As directed by the Commission in 2013, we are also proposing a transition
21 to straight-fixed variable (SFV) rate design for residential customers. This rate
22 design, which has been in place for our natural gas customers for about a decade,
23 will help levelize customers' monthly bills and reduce volatility caused by

1 weather. Duke Energy Ohio witness James Riddle discusses this proposal.

2 Mr. Riddle also addresses our proposal for optional LED lighting tariff
3 that will provide more options for our customers, consistent with the growing
4 demand for such lighting.

5 The Company will be positioned to align customer-focused programs and
6 services with offering our customers greater convenience, control, and
7 transparency. Duke Energy Ohio witness Sasha J. Weintraub discusses this effort
8 in greater detail.

9 **Q. WERE THERE ANY OTHER FACTORS THAT INFLUENCED THE**
10 **COMPANY'S FILING IN THESE PROCEEDINGS?**

11 A. As explained above, our rate case includes components intended to incorporate
12 technological advancements and mitigate against limitations relevant to our
13 customers' energy consumption, needs, and preferences. These components,
14 therefore, are consistent with the Commission's Mission Statement, which
15 includes assuring "all residential and business consumers access to adequate, safe
16 and reliable utility services at fair prices, while facilitating an environment that
17 provides competitive choices."¹³

18 The Commission's Mission is achieved by, among other things,
19 "promoting utility infrastructure investment through appropriate regulatory
20 policies and structures" and "ensuring financial integrity and service reliability in
21 the Ohio utility industry."¹⁴

¹³ See PUCO Mission Statement at <https://www.puco.ohio.gov/puco/index.cfm/how-the-puco-works-for-you/mission-and-commitments/>.

¹⁴ *Id.*

Public Education & Information Campaign

Duke Energy Ohio | 2017 Electric Distribution Rate Case

OBJECTIVES

The main objectives of Duke Energy Ohio's public education and information campaign are to:

- Improve our customers' understanding of safety issues related to storms and general electric utility operations.
- Enhance customers' knowledge of Ohio Customer Choice and the makeup of their monthly electric bills.
- Inform customers about the growing number of illegal utility scams and the actions they should take if they suspect they're being targeted.
- Increase customers' awareness of free tools that can help them better manage their monthly electric bills and payments.
- Enhance customers' familiarity of the energy conservation opportunities available to them, including those for low-income customers.

AUDIENCE

The target audience of Duke Energy Ohio's public education and information campaign are all Duke Energy Ohio residential, commercial and industrial electric customers in southwest Ohio.

POTENTIAL TOPICS

Each year, Duke Energy Ohio will select different topics to emphasize as part of the public education and information campaign. To determine which topics to focus on and when to run each communications campaign, Duke Energy Ohio may assess customer research, surveys and focus groups; community and stakeholder feedback; input from PUCO staff; and other formal feedback.

Below are potential categories and topics that could serve as foundations for strategic communications programs.

- **Safety and well-being**
 - Stay safe before, during, and after a storm
 - Safety around power lines
 - Work zone safety
 - Call before you dig (8-1-1)

- **Rates, billing and customer conveniences**
 - Understanding Ohio Electric Customer Choice
 - How to choose a Competitive Retail Electric Service (CRES) provider
 - Understanding government aggregation and changes in supply contracts
 - Understanding your electric bill
 - High bill alerts
 - Budget billing
 - Paperless billing
- **Energy conservation**
 - Benefits of conserving electricity
- **Utility scams**
 - Ways to identify utility scams
 - What to do when you think you're the target of a utility scam
- **Power outages**
 - Proactive outage notifications
 - How Duke Energy restores electric service after a storm
 - Report a streetlight outage
 - What to do if you lose electric service
 - Why it's important to report a power outage

POTENTIAL CHANNELS

Each strategic communications program Duke Energy Ohio pursues as part of its public education and information campaign will undergo a formal development process by the company's Creative Communications team. The team members and an external advertising placement agency (when necessary) will identify the appropriate messages and communications mediums for each topic.

Below are communications channels that could be used as part of the public education and information campaign. Please note: Emerging and yet-to-exist mediums will be considered in addition to the ones listed below.

- Television advertising
- Radio advertising
- Display advertising (online banners/video)
- Search engine marketing (paid search)
- Print advertising
- Out-of-home (billboards, busses, theaters)

- Social media organic and promoted posts
- Direct mail
- Email marketing
- Media relations

ILLUSTRATIVE ANNUAL BUDGET

The following illustrative budget demonstrates how Duke Energy Ohio would, in theory, allocate campaign dollars each year. Depending on the topics chosen and length of each strategic communications program, the Creative Communications team may choose to emphasize certain communications tactics more than others from year to year.

Television	
Media Buys	\$ 384,000
Production & Talent	\$ 180,000
Radio	
Media Buys	\$ 149,410
Production & Talent	\$ 18,000
Online Video	
Production	\$ 40,000
Online Display Advertising	
Media Buys	\$ 90,000
Search Engine Marketing	\$ 36,000
Social Media Marketing	\$ 75,000
Print Advertising	
Media Buys	\$ 75,000
Out-of-Home Advertising	
Media Buys	\$ 125,000
Focus Groups	\$ 12,000
Bill Inserts	\$ 4,200
Direct Mail	
Postage	\$ 651,000
Printing	\$ 140,000
Photography	\$ 20,000
TOTAL	\$ 1,999,610

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Case No(s). 17-0032-EL-AIR, 17-0033-EL-ATA, 17-0034-EL-AAM

Summary: Objection to the Staff Report electronically filed by Mr. Justin Newman on behalf of Cincinnati Clean Energy Foundation