

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Electric Distribution Rates.)	
)	Case No. 17-32-EL-AIR
)	
In the Matter of the Application of Duke Energy Ohio, Inc. for Tariff Approval.)	
)	Case No. 17-33-EL-ATA
)	
In the Matter of the Application of Duke Energy Ohio, Inc. for Approval to Change Accounting Methods.)	
)	Case No. 17-34-EL-AAM
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Modify Rider PSR.)	
)	Case No. 17-872-EL-RDR
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Amend Rider PSR.)	
)	Case No. 17-873-EL-ATA
)	
In the Matter of the Application of Duke Energy Ohio Inc., for Approval to Change Accounting Methods.)	
)	Case No.17-874-EL-AAM
)	
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 Code, in the Form of an Electric Security Plan, Accounting Modifications and Tariffs for Generation Service.)	
)	Case No. 17-1263-EL-SSO
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Authority to Amend its Certified Supplier Tariff, P.U.C.O. No. 20.)	
)	Case No. 17-1264-EL-ATA
)	
In the Matter of the Application of Duke Energy Ohio, Inc. for Authority to Defer Vegetation Management Costs.)	
)	Case No.17-1265-EL-AAM
)	
In the Matter of the Application of Duke Energy Ohio, Inc., to Establish Minimum Reliability Performance Standards Pursuant to Chapter 4901:1-10, Ohio Admin. Code.)	
)	Case No. 16-1602-EL-ESS
)	

REPLY BRIEF OF PEOPLE WORKING COOPERATIVELY, INC.

In its initial brief, the Office of the Ohio Consumers' Counsel ("OCC") takes issue with the Stipulation provisions that provide funding for programs that serve low-income customers. OCC Initial Brief at pg. 140. Although OCC criticizes this benefit to low-income customers, OCC acknowledges that funding for low-income customers could be considered a benefit of an ESP by the Public Utilities Commission of Ohio ("Commission"). *Id.* In fact, in prior ESP cases, the Commission has recognized that funding to low-income customers can be considered as a benefit in the ESP vs. MRO analysis.¹

Further, the \$522,000 in weatherization funding for People Working Cooperatively, Inc. ("PWC") was previously determined to be reasonable in Duke's last distribution rate case.² This level of funding for PWC is merely a continuation of PWC's electric weatherization funding which is currently in base rates. PWC operates these programs for some of Duke's most vulnerable customers, and these customers continue to reap the benefits of the programs today. Further, while continuation of this funding constitutes a minor portion of overall base distribution rates, this funding provides a significant level of support for PWC's critical low-income programs which are necessary to help some of Duke's most at-risk customers. This funding is entirely consistent with the policy goal of R.C. 4928.02(L) of protecting at-risk populations.

¹ *In the Matter of the Application of FirstEnergy*, Case No. 14-1297-EL-SSO, et al., Opinion and Order at 96 (March 31, 2016); and *In the Matter of Dayton Power & Light Company*, Case No. 16-395-EL-SSO, et al., Opinion and Order at 42 (October 20, 2017).

² *In the Matter of the Application of Duke Energy Ohio, Inc.*, Case No. 12-1682-EL-AIR, et al., Opinion and Order at 9 (May 1, 2013).

As such, PWC respectfully requests that the Commission approve the Stipulation and approve the critical funding for PWC's low-income programs.

Respectfully submitted on behalf of
PEOPLE WORKING COOPERATIVELY, INC.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served upon the parties of record listed below this 2nd day of October 2018 *via* electronic mail.

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Summary: Reply Brief of People Working Cooperatively, Inc. electronically filed by Teresa Orahood on behalf of Akhbari, Alyse