

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke)
Energy Ohio, Inc. for Authority to Adjust) Case No. 19-1750-EL-UNC
its Power Forward Rider.)

In the Matter of the Application of Duke)
Energy Ohio, Inc. for Approval to) Case No. 19-1751-GE-AAM
Change Accounting Methods.)

INITIAL COMMENTS OF INTERSTATE GAS SUPPLY, INC.

I. INTRODUCTION

In Duke Energy Ohio, Inc.'s ("Duke") fourth Electric Security Plan ("ESP"), the Commission approved a Stipulation and Recommendation ("Stipulation") that established Duke's Rider PowerForward ("Rider PF") to recover the costs associated with "the continued evolution of the distribution grid and an enhanced customer experience."¹ Under the Stipulation, the third component of Rider PF provides for the recovery of costs for an infrastructure modernization plan, which would be filed in a separate proceeding and subject to hearing.² This plan will include a proposal to upgrade Duke's Customer Information System ("CIS").³

In the proceeding, IGS noted that because Duke intended on spending between

¹ *In re Application of Duke Energy Ohio, Inc., for an Increase in Electric Distribution Rates*, Case Nos. 17-32-EL-AIR, et al., *In re Application of Duke Energy Ohio, Inc., for Authority to Establish a Standard Service Offer*, Case Nos. 17-1263-EL-SSO, et al., *In re Application of Duke Energy Ohio, Inc., for Approval to Modify Rider PSR*, Case Nos. 17-872-EL-RDR, et al., and *In re Application of Duke Energy Ohio, Inc., to Establish Minimum Reliability Performance Standards*, 16-1602-EL-ESS ("Global Settlement Cases"). *Global Settlement Cases*, Stipulation and Recommendation (April 13, 2018) at 16.

² Stip. at 17.

³ *Id.*

\$45-50 million dollars implementing a new CIS and a majority of Duke's customers shop for their electricity, the new CIS should include certain billing capabilities for these customers.⁴ Thus, IGS recommended that Duke should be directed to include non-commodity billing capability for CRES providers in its CIS program design.⁵ IGS asserted that including this capability was important to ensure compliance with R.C. 4905.35(A), which prohibits a public utility from subjecting an entity to an undue or unreasonable prejudice or disadvantage.⁶ Similarly, IGS suggested that the Commission direct Duke to include a process that will enable supplier consolidated billing ("SCB").⁷

In response, the Commission noted that the stated purposed of Rider PF is to continue the "evolution of the distribution grid and an enhanced customer experience," agreed that non-commodity billing could serve that purpose.⁸ Yet the Commission did not require Duke to include this capability in its filing. However, the Commission was "persuaded that there are benefits associated with supplier consolidated billing" and directed Duke's CIS plan to accommodate this service.⁹

On September 24, 2019, Duke Energy Ohio, Inc. ("Duke") filed an application in the above captioned proceedings for approval of its initial infrastructure modernization plan ("Application" or "Infrastructure Modernization Plan"). As proposed by Duke, the

⁴ *Global Settlement Cases*, IGS Initial Brief (Sept. 18, 2018) at 33.

⁵ Order at ¶ 58, 235.

⁶ *Id.* ¶ 58.

⁷ *Id.* at ¶ 56.

⁸ *Id.* at ¶ 239, *citing* Stip. at 16.

⁹ Order at ¶ 239.

Infrastructure Modernization Plan includes four initiatives: Customer Connect, Duke's new Customer Information System ("CIS"); a new Land Mobile Radio Communication System; Smart Cities Infrastructure Acceleration Program; and an Electric Vehicle ("EV") Pilot Program.¹⁰ Interstate Gas Supply, Inc. ("IGS" or "IGS Energy") appreciates the opportunity to provide comments on Duke's application.

II. COMMENTS

1. Duke failed to accommodate Supplier Consolidated Billing in its new CIS as required by the Commission's Order.

As noted above, in the Consolidated Cases Order, the Commission found that there are benefits associated with SCB and ordered Duke to accommodate SCB in its CIS plan.¹¹

However, despite this direct order from the Commission, Duke did not accommodate SCB in its CIS. Duke did not make any attempt whatsoever to assess the effort and costs to implement SCB into the proposed CIS.¹² Duke did not review the design or structure of AEP Ohio's SCB Program.¹³ Duke did not explore whether any of the other 760 utilities already utilizing its CIS platform have implemented this function.¹⁴ Put simply, Duke failed to make include a proposal for supplier consolidated billing in direct contravention of a Commission order.

¹⁰ Application at 5.

¹¹ Global Settlement Order at ¶ 239. SCB is the inverse of the traditional utility billing model in that a customer's supplier, rather than the utility, issues a single bill that contains the customer's generation, supply, and distribution charges.

¹² IGS-INT-02-022

¹³ IGS-INT-02-024.

¹⁴ IGS-INT-02-018.

Instead, Duke claims that the “deployment and stabilization” of the new CIS is necessary in order to assess the implementation of SCB. When asked to explain why this is necessary, Duke states that “the resources needed to complete such an analysis are completely allocated to testing and preparing to deploy the final Customer Connect solution.”¹⁵ Duke’s decision to allocate resources to programs of its own choosing, such as non-commodity billing for Duke and its affiliates, was not a decision within its discretion.

Further, while Duke alleges that it lacked the resources to evaluate SCB, it took the time to present testimony in opposition of SCB.¹⁶ In that testimony, Duke tries to throw questions up against the wall to see what it can make stick to get the Commission reverse its prior determination. The time for such questioning, however, was a matter for an application for rehearing long ago.

Although Duke indicates that questions must be addressed, it failed to reach out to IGS or any other supplier regarding the answers it would need to move forward. While SCB may be a different process for Duke, it is not new. Suppliers already issue a consolidated bill for the utility in several other states, including Texas, Georgia, and Illinois. There is no reason why SCB cannot be incorporated into Duke’s new CIS. In fact, the best time to do so is during the design process. At a minimum, the Commission should direct Duke to undertake a collaborative process to obtain additional details to properly design an SCB program and submit that proposal in a formal docketed proceeding. As discussed below, in the interim, Duke should design its CIS to accommodate non-commodity billing.

2. Duke’s Application must be modified to include the capability for

¹⁵ See IGS-INT-02-001 and IGS-INT-02-023.

¹⁶ See Test. of Hunsicker at 20.

CRES and CRNGS Suppliers to include non-commodity charges on the Duke-issued utility bill.

Since the issuance of the Global Settlement Order, the Commission has issued a new rule regarding non-commodity billing.¹⁷ In that proceeding, the Commission recognized the concerns raised by IGS regarding unreasonable preferences and competitive advantages that have been provided by some of the EDUs with regards to access to the utility-issued bills.¹⁸ Thus, to promote competition and fairness between all parties, the Commission amended Ohio Adm.Code 4901:1-10-33 so that “[t]he EDU must allow the customer’s CRES provider, on an open and nondiscriminatory basis, access to the consolidated bill to list the newly termed, ‘non-jurisdictional services’ charges.”¹⁹

As proposed, Duke’s new CIS would have the technological capability for Duke and its affiliates to place charges for non-jurisdictional services on electric and natural gas bills issued by Duke.²⁰ But it would not provide the same capability for CRES and CRNGS Suppliers for its customers.²¹ This is discriminatory and in violation of the new rule. Therefore, the Commission should direct to Duke to modify its Infrastructure

¹⁷ *In re Comm.’s Review of Chapter 4901:1-10 of the Ohio Administrative Code*, Case No. 17-1842-EL-ORD, Finding and Order (Feb. 26, 2020) at ¶¶ 213, 242. Non-commodity billing refers to the placement of charges related to products and services other than retail electric service on the utility consolidated bill. Non-commodity products and services, also now referred to as “non-jurisdictional charges,” include, but are not limited to, smart thermostats, home protection, and other load control products that enable customers to use electricity more efficiently, reduce energy costs, and enhance electric reliability on the grid.

¹⁸ *Id.*

¹⁹ *Id.* Ohio Adm.Code 4901:1-10-33(A): This rule applies to an electric utility that issues customers a consolidated electric bill that includes both electric utility and competitive retail electric service (CRES) provider charges for electric services. Nothing in this rule affects the obligations of the electric utility to provide disconnection notices. An electric utility cannot discriminate or unduly restrict a customer’s CRES provider from including non-jurisdictional charges on a consolidated electric bill.

²⁰ IGS-INT-02-014 and IGS-INT-02-015.

²¹ IGS-INT-02-012 and IGS-INT-02-013.

Modernization Plan to include this capability. Through this change, the Commission can somewhat ameliorate Duke's failure to include a plan for SCB in the application.

R.C. 4905.35(A) prohibits a public utility from giving "any undue or unreasonable preference or advantage to any person, firm, corporation, or locality, or subject any person, firm, corporation, or locality to any undue or unreasonable prejudice or disadvantage." As IGS noted in its comments regarding the new non-commodity billing rule, recently, when applying a similar statute,²² the Pennsylvania Public Utilities Commission ("PPUC") held that Columbia Gas of Pennsylvania ("COPA") was unreasonably discriminating against suppliers by only allowing former COPA affiliates to utilize the utility bill for non-commodity billing.²³

Like Pennsylvania, Ohio's discrimination prohibition is broad: utilities are prohibited from providing *any* unreasonable preference to *any* corporation.²⁴ In a similar vein, Ohio law prohibits an EDU from extending an "undue preference or competitive advantage" with respect to, among other things, "billing and mailing systems" to an affiliate or internal business unit engaged in the business of providing non-electric services.²⁵ And now, the Commission has promulgated a rule prohibiting an EDU from discriminating or unduly

²² 66 Pa.C.S. § 1502. ("No public utility shall, as to service, make or grant any unreasonable preference or advantage to any person, corporation, or municipal corporation, or subject any person, corporation, or municipal corporation to any unreasonable prejudice or disadvantage. No public utility shall establish or maintain any unreasonable difference as to service, either as between localities or as between classes of service, but this section does not prohibit the establishment of reasonable classifications of service.").

²³ *In re Columbia Gas of Pennsylvania*, Docket No. R-2018-2647577, Opinion and Order (Dec. 6, 2018). The former affiliates provide "items such as warranty services covering HVAC systems and gas, water, and/or sewer line protection services. *Id.* at 35.

²⁴ R.C. 4905.35(A).

²⁵ R.C. 4928.17(B) & (C).

restricting a customer's CRES provider from including non-jurisdictional charges on a consolidated electric bill.²⁶

Here, Duke is extending a preference and advantage to itself and its affiliates by designing a billing system that only allows those entities to include charges for non-jurisdictional services on the Duke-issue utility bill.

Further, as Duke will be implementing this capability through its new CIS, prior concerns regarding Duke's technological inability to separate commodity and non-jurisdictional services Duke's Purchase of Accounts Receivable ("PAR") Program no longer exist.²⁷ Additionally, as noted in the Global Settlement Order, Duke's PAR Agreement dictates the charges that may be included in the PAR Program.²⁸ Thus, concerns that non-commodity charges from CRES and CRNGS Suppliers could be recovered through the PAR Program should be dismissed. Indeed, audits of the PAR Program, such as the one ordered in the Global Settlement Order, will further ensure only the appropriate commodity-based charges are being included in Duke's PAR Program.²⁹

Therefore, Duke must modify its Application to extend the same non-jurisdictional services billing capability to CRES and CRNGS Suppliers. Failure to do so would be contrary to Ohio law, including a newly amended rule. Thus, IGS urges the Commission to require Duke to include this capability into its proposed CIS.

3. The costs recovered through Rider PF must pertain to distribution

²⁶ *In re Commission's Review of Chapter 4901:1-10 of the Ohio Administrative Code*, Case No. 17-1842-EL-ORD, Finding and Order (Feb. 26, 2020).

²⁷ See Global Settlement Order at ¶ 237.

²⁸ *Id.* at ¶ 38.

²⁹ See *Id.* at ¶ 38, 244.

infrastructure.

Ohio law permits an EDU to file an infrastructure modernization plan to support distribution investment.³⁰ In the Global Settlement Cases, Rider PF was established to recover the costs of the programs, modifications, and offerings related to the continued evolution of the distribution grid, including an infrastructure modernization plan.³¹

While the Commission authorized Rider PF and permitted Duke to file an infrastructure modernization plan, it did not authorize the recovery of any costs, rather, the Commission simply authorized the establishment of a placeholder mechanism.³² As noted by the Commission on rehearing, the legal basis and any recovery through Rider PF must be established and authorized by the Commission in a separate proceeding.³³ The EDU bears the burden of proof for any application submitted to the Commission for consideration.³⁴ Therefore, Duke is required to demonstrate that costs proposed for recovery in the application relate to distribution service.

Despite the limited scope of this proceeding, Duke has proposed cost recovery through Rider PF for investments that do not provide distribution service. Specifically, within the proposed EV Pilot Program, Duke proposes to recover costs associated with

³⁰ See R.C. 4928.143(B)(2)(h).

³¹ Stip. at 16.

³² *In re AEP Ohio*, Case Nos. 11-346-EL-SSO, et al., (“*AEP ESP II*”) Opinion and Order (Dec. 14, 2011) at 56; *AEP ESP II*, Opinion and Order (Aug. 8, 2012) at 24-25.

³³ *Global Settlement Case*, Entry on Rehearing (July 17, 2019) at ¶ 26. See *AEP ESP II*, Opinion and Order (Dec. 14, 2011) at 56; *AEP ESP II*, Opinion and Order (Aug. 8, 2012) at 49 (noting the EDU maintains the burden set forth in R.C. 4928.143 when seeking recovery through the placeholder rider).

³⁴ *In re Filing of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company of a Grid Modernization Business Plan*, Case Nos. 16-481-EL-UNC, et al., Opinion and Order (July 17, 2019) at ¶ 106.

its ownership and maintenance of certain charging stations and the deployment of up to ten electric school buses. Because Duke has failed to establish that these costs are eligible for recovery through Rider PF, the Commission should reject these portions of Duke's proposal.

As part of its EV Fast Charge Program, Duke proposes the ability to request to install, own, and maintain up to 25 DCFC locations, if the initial phase of the Pilot is not fully subscribed.³⁵ Duke claims this would ensure that all stations are completely installed in the "make-ready" incentive is not fully subscribed within the first eighteen months.³⁶

As noted above, Duke is required to establish in this proceeding that the costs it seeks to recover are eligible for recovery through Rider PF. Rider PF was approved as part of Duke's ESP 4 as a rider regarding distribution service, thus, the costs must be related to distribution service. Charging stations, however, do not relate to distribution service.

Duke also proposes to fund the procurement, delivery, and installation of up to 10 EV School Buses for public school transportation systems.³⁷ Initially, IGS notes that it is not challenging the recovery of costs included in this Pilot associated with the utility-owned distribution infrastructure necessary to bring service to the EV charging stations. However, IGS is concerned with the recovery of costs for a school bus through a rider authorized to recover the regarding a utility's distribution service.

³⁵ Test. of Reynolds at 13.

³⁶ *Id.*

³⁷ Test. of Reynolds at 16-17.

Finally, IGS notes that Duke has also proposed Smart Cities Infrastructure Acceleration Program in its Infrastructure Modernization Program. It is not clear why Duke cannot provide this functionality with its existing street lighting infrastructure.

4. Duke should be prohibited from utilizing customers' granular energy usage data for marketing purposes.

Throughout Duke's Application, Duke makes references to the ability to target customer that will be provided by the CIS, such as the ability to make "personalized recommendations for products and services."³⁸ Rider PF is a distribution rider applicable to all customers. It should not provide funding to support Duke's marketing efforts for competitive products and services. All marketing associated with competitive services should be bypassable for customers that shop.

Moreover, it is noteworthy that there are strict customers safeguards currently in place regarding access to granular customer usage data for CRES and CRNGS Suppliers. Thus, Duke should not be able to use its position as a regulated distribution utility to unilaterally sift through customers' granular usage data (without permission) to gain unique and preferential advantages in marketing campaigns.

5. IGS supports the inclusion of seamless move capability in the new CIS.

Included in Duke's Application is the implementation of seamless move capability for both its electric and natural gas customers.³⁹ Duke notes that specific design for

³⁸ See e.g. App. at 7 ("This data, in turn, can create personalized opportunities for customers according to their preferences, whether in the form of rate options or other usage-related services."); IGS-INT-02-002 Attachment.

³⁹ Test. of Hunsicker at 20-21; IGS-INT-02-011.

implementation is detailed in its operational plan filed in a separate proceeding.⁴⁰

IGS supports the inclusion of seamless move capability for Duke's electric and natural gas customers in its Infrastructure Modernization Plan.

6. The Residential Electric Vehicle Charging Rebate Program is unreasonable and unnecessary.

As part of its EV Pilot Programs, Duke proposes a three-year incentive program for residential customers.⁴¹ Under the proposal, customers would receive a \$500 incentive for the installation of a Level II charging station at their home and up to an additional \$500 for participating in "monthly load management events" during the second and third year of the program.⁴² In the Application, Duke asserts it "will collect characteristics of EV charging behavior, better understand potential grid and utility impacts from EV charging, and implement utility-managed charging."⁴³

Although Duke states it will be implementing "utility-managing charging," by its own definition, that is incorrect.⁴⁴ Duke will have no ability to control, change, or manage the charging behavior of participating customers.⁴⁵ Instead, Duke will simply be providing a ratepayer funded subsidy to those customers that do not use their EV charging station during the hours selected by Duke.

⁴⁰ *In re Application of Duke Energy Ohio, Inc. for Approval of an Operational Plan for Seamless Move*, Case No. 19-2151-EL-EDI, Application (Dec. 13, 2019).

⁴¹ Test. of Reynolds at 19-21.

⁴² *Id.*

⁴³ *Id.*

⁴⁴ IGS-INT-02-004.

⁴⁵ *Id.*

Further, IGS questions the value of the data provided by the program. The comparison between the first year and second and third years will only be relevant if the program continues unchanged. As customers participating in time-of-use (“TOU”) rates are excluded from participating in this program and the continuation of the program is dependent on a ratepayer funded incentive, this seems unreasonable and unlikely.⁴⁶ Therefore, IGS recommends that the Commission reject this proposal.

7. Duke should establish a Grid Modernization Collaborative.

Additionally, IGS recommends the establishment of a Grid Modernization Collaborative to provide status updates and promote transparency during the implementation process. For example, under the second component of Rider PF, Duke committed to completing a series of five phases of data access enhancements, to be completed by December 2020.⁴⁷ A Grid Modernization Collaborative could be used to discuss the progress of these commitments to ensure they are completed in a timely manner.

8. The Commission should amend the procedural schedule.

The Global Settlement Order contemplated that matters related to Rider PF would be determined following a hearing.⁴⁸ While the COVID-19 crisis presents certain challenges to normal Commission processes—which are inherently in conflict with concepts of social distancing—parties should be given an opportunity for due process in this case. Therefore, IGS recommends that the Attorney Examiner hold a procedural

⁴⁶ IGS-INT-02-004.

⁴⁷ Stip. at Att. F.

⁴⁸ See Global Settlement Order at ¶ 239; Stip. at 17.

status conference to discuss potential steps forward that strike the right balance between safety, due process, and expediency.

For example, IGS is willing to entertain the possibility of a “paper hearing” whereby parties submit expert testimony. Parties could be given the opportunity to conduct discovery and conduct depositions without disrespecting rules related to social distancing. Depositions could be submitted into the record in lieu of live cross-examination.

In the alternative, the Commission could establish a procedural schedule that provides for rebuttal and sur-rebuttal testimony. In IGS’ experience in other states that utilize this process, the need for cross-examination is typically waived. Consequently, parties may receive due process and develop the record without the need for a hearing.

During an informal procedural conference, IGS welcomes additional suggestions that may help expedite matters in this case.

III. CONCLUSION

For the reasons set forth above, IGS respectfully requests the Commission adopt IGS’ recommendations regarding Duke’s proposed Infrastructure Modernization Rider.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that this *Initial Comments of Interstate Gas Supply, Inc.* was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on April 15, 2020. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties. Additionally, notice of this filing as been sent to the following parties:

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/s/ Bethany Allen
Bethany Allen

REQUEST:

Please explain all barriers and complications that preclude the production of a cost estimate for supplier consolidated billing prior to 2023 as provided on Page 20 of the testimony of Ms. Retha Hunsicker?

RESPONSE:

As noted in the testimony of Ms. Hunsicker, there are a number of questions regarding supplier consolidated billing that must be resolved in order for the Company to understand the specific requirements needed to implement this capability. Additionally, even if the requirements were fully understood, the resources needed to complete such an analysis are completely allocated to testing and preparing to deploy the final Customer Connect solution. Any project to assess the required costs to implement supplier consolidated billing cannot begin until late 2023, after the deployment and stabilization of Customer Connect.

PERSON RESPONSIBLE: Retha Hunsicker

REQUEST:

Please provide a list and explanation of all “out-of-the-box” capabilities that will be available through Customer Connect that are not available under the current CIS System.

RESPONSE:

The Customer Connect program team prepared a matrix to compare the capabilities of the current customer information system, CMS, with those of the Customer Connect platform, leveraging the specific capabilities and requirements the Company provided in its robust request for proposal (RFP) process conducted in 2016 as a basis for comparing the two platforms. For each capability that Customer Connect will provide out-of-the-box or with routine configuration, the team assessed whether the current CMS software provides similar capabilities. Scores were calculated at a summary capability area level for CMS, expressed from 0-100 to represent the approximate percentage of the total future-state capabilities that CMS is capable of today. The scores were augmented with example capability gaps that negatively impact the customer experience with a brief explanation of how those gaps will be addressed with the Customer Connect platform, thus improving the customer experience. Additionally, a comparison matrix to compare key, specific customer capabilities between CMS and Customer Connect is also provided. Please refer to IGS-INT-02-002 Attachment.pdf.

PERSON RESPONSIBLE: Retha Hunsicker

Customer Connect – Current CMS vs. Customer Connect Platform

Capability Comparison

Capability Area	CMS Score
Customer Management	30
Customer Service	50
Customer Self-Service	40
Start / Stop / Transfer	70
Multi-Company	80
Billing	70
Payments	60
Credit & Collections	90
Field Service	100
Meter Reading	90
Accounting	70
Inventory	50
Reporting	100
Contracts & Lighting	0
Mobility	0
TOTAL ALL AREAS	50

All CMS scores vs. future state Customer Connect score of 100

Top 5 New Customer Connect Features & Their Customer Experience Implications

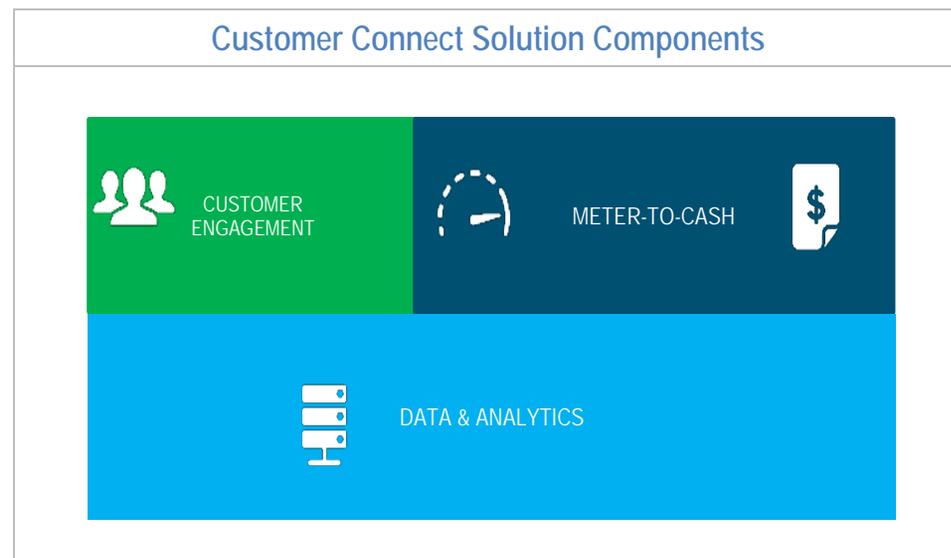
New Feature	What It Means for Customers
Customer Data Model	Our current state system was designed as a premise-based system. It was developed to communicate with the meter attached to a premise, without regard to who may be consuming the services provided through the meter or how they may be consuming those services. Customer Connect will have a customer-centric data model to enable a “one customer” view across Duke Energy, enabling us to know the customer better and provide a more streamlined, personalized experience.
360° View Customer Profile	In current state, systems merely store basic customer information – name, phone, address, premise and historical usage, billing and payment information – preventing us from knowing our customers beyond these basic “ratepayer” attributes. Customer Connect will store all of that same information but much more. The new platform will gather all of the relevant touchpoints that customers are having with Duke Energy in real time – web visits, phone calls, power outages, outbound communications, product and service participation, etc. – to build out a 360 degree view of customers that can be leveraged to better serve them and personalize their experiences.
Integrated Analytics	This customer profile data is then leveraged by the integrated analytics capabilities of the new platform to personalize experiences and better serve customers through every channel. For example, the new platform will predict the intent of customers when they call Duke Energy, improving their experience in the IVR and routing them to the customer care representative best suited to meet their needs. This same capability can be leveraged to prioritize what information and when it is communicated to customers via web, email and other channels to ensure it is timely, relevant and valuable to them. These are just two examples of the nearly limitless opportunities to leverage real-time analytics to improve our customers’ everyday experience with Duke Energy.
Multi-Company	In current state, customers exist as separate entities across jurisdictions. When a customer moves from one jurisdiction to another all information about that customer is lost – account numbers, communications preferences, payment and credit history, product and service participation, etc. Customers do not understand why this happens and are frustrated by the experience. In the future, these types of account attributes remain at the customer level throughout their experience with Duke Energy as they move between locations and jurisdictions.
Modern, Configurable Billing Engine	In current state, many new rates are not practical or are very time consuming to implement due to the architecture of the system and the complexity of coding and testing the rates. In the future, rates are configurable and much simpler to implement, greatly improving our responsiveness to regulatory or market changes. Also, many modern rate structures (e.g. net metering, time-of-use, etc.) are pre-built into the system because of the software’s experience being leveraged in European or other markets.

Additional Feature Comparison

Knowing the Customer		
Feature	CMS	Cust Conn
Interaction history tracking		10
Customer sentiment analysis		10
History of inbound and outbound communications		10
Preferred communication channels	5	10
Effective dates for communications, addresses		10
Social media and mobile app integration	5	10
Targeted customer communications		10
Knowing all customers in a household or premise		10

Making It Easier for Customers		
Feature	CMS	Cust Conn
Online requests for new service	5	10
Switch between channels during requests		10
Online shopping for products and services	5	10
Transfer account preferences and prod./svcs. when moving	5	10
Real-time status updates for service orders	5	10
High bill/Usage alerts	5	10
Payment alerts	5	10
Universal, customer-friendly bill format		10

Giving Customers More Options		
Feature	CMS	Cust Conn
Personalized recommendations for prod. and svcs.		10
New rate and pricing structures	5	10
Summary/Collective billing	5	10
Usage tracking and billing for net metering	5	10
Customer portals for landlords, builders, agencies	5	10
Online rate analysis and comparison tools		10
Flexible payment options	5	10
Delegation of authority for account information & transactions		10



Legend: <Blank> No capabilities in this area | 5 Partially meets future state capability expectations | 10 Fully meets future state capability expectations

REQUEST:

Regarding the proposed Residential EV Charging Rebate Program:

- a. What is “utility-managed charging” as used in Mr. Reynold’s testimony?
- b. Will Duke have the ability to control a participant’s charging station?
- c. About how many peak charging sessions per month will Duke communicate to participants?
- d. How did Duke determine the number of participants in this program?
- e. Will residential customers that shop for their electricity be able to participate in this program?
- f. Will any residential customers be unable to participate in the program due to a lack of proper distribution infrastructure technology, such as the proper advanced meter?

RESPONSE:

- a. “Utility-managed charging” as described in Mr. Reynolds’ direct testimony on pages 19 and 20 refers to the ability of the utility to change the time, duration, and/or capacity demands of residential customer EV charging when compared to baseline or unmanaged behavior.
- b. The Company will not have the ability to directly control a residential participant’s charging station.
- c. Referencing Reynolds’ Direct, page 20, lines 8-14, the Company plans to set one morning and one afternoon time frame during all non-holiday weekdays during which residential participants must avoid charging in order to receive the incentive. Participants may opt to charge during these peak periods up to twice each month, while a third time will trigger loss of the participation incentive for that month.
- d. Attachment LWR-2 – Duke Energy Ohio -EV Forecast Study illustrates that at the time of pilot development in early 2019, there were an estimated 2,942 registered light duty EVs in Duke Energy Ohio service territory. The current registration count is estimated at over 4,100 and DEO expects close to 5,000 EVs by the end of 2020. The 1,000 residential rebate number was selected to be large enough to provide a

robust data set of charging behavior while not being so large as to be unrealistic given the number of registered EVs within DEO territory.

- e. Yes, per Reynolds' direct testimony, page 20 line 2 and 3, any usage will be billed under the customer's existing residential rate. Customers who buy energy from a CRES provider are eligible to participate in the Residential Program, unless they take service on a Time-of-Use rate. To collect a valid sample of EV charging data within both the "baseline" and "load management" periods of the Pilot unbiased by other price signals, customers taking service on a Time-of-Use rate such as DEO's Rate TD or a comparable CRES Time-of-Use rate are not eligible to participate in the Residential Program.
- f. The only technological requirement related to distribution infrastructure currently proposed by the Company is that customers must have an AMI meter to be eligible for the program.

PERSON RESPONSIBLE: Lang Reynolds

**Duke Energy Ohio
Case No. 19-1750-EL-UNC
IGS Second Set of Interrogatories
Date Received: March 25, 2020
IGS-INT-02-011**

REQUEST:

Will seamless move be available to Duke's natural gas customers when the Customer Connect Program is fully implemented?

RESPONSE:

Yes, seamless move will be available to natural gas customers who are enrolled with a gas supplier that utilizes electronic data interchange (EDI) transactions.

PERSON RESPONSIBLE: Retha Hunsicker

Duke Energy Ohio
Case No. 19-1750-EL-UNC
IGS Second Set of Interrogatories
Date Received: March 25, 2020
IGS-INT-02-012

REQUEST:

As proposed, does the Customer Connect Program include the technological capability for a CRES Provider to place charges for non-jurisdictional services on a consolidated bill issued by Duke to the CRES Supplier's customer? For purposes of this question, "non-jurisdictional services" means services which do not meet the definition of "retail electric service" under R.C. 4928.01(A)(27).

RESPONSE:

No.

PERSON RESPONSIBLE: Retha Hunsicker

**Duke Energy Ohio
Case No. 19-1750-EL-UNC
IGS Second Set of Interrogatories
Date Received: March 25, 2020**

IGS-INT-02-013

REQUEST:

As proposed, does the Customer Connect Program include the technological capability for a CRNGS Supplier to place charges for non-jurisdictional services on a consolidated bill issued by Duke to the CRNGS Supplier's customer? For purposes of this question, "non-jurisdictional services" means services which do not meet the definition of "retail natural gas service" under R.C. 4929.01(A)(J).

RESPONSE:

No.

PERSON RESPONSIBLE: Retha Hunsicker

**Duke Energy Ohio
Case No. 19-1750-EL-UNC
IGS Second Set of Interrogatories
Date Received: March 25, 2020**

IGS-INT-02-014

REQUEST:

As proposed, does the Customer Connect Program include the technological capability for Duke or any affiliate to place charges for non-jurisdictional services on an electric bill issued by Duke? For purposes of this question, “non-jurisdictional services” means services which do not meet the definition of “retail electric service” under R.C. 4928.01(A)(27).

RESPONSE:

Yes.

PERSON RESPONSIBLE: Retha Hunsicker

**Duke Energy Ohio
Case No. 19-1750-EL-UNC
IGS Second Set of Interrogatories
Date Received: March 25, 2020**

IGS-INT-02-015

REQUEST:

As proposed, does the Customer Connect Program include the technological capability for Duke or any affiliate to place charges for non-jurisdictional services on a natural gas bill issued by Duke? For purposes of this question, “non-jurisdictional services” means services which do not meet the definition of “retail natural gas service” under R.C. 4929.01(A)(J).

RESPONSE:

Yes.

PERSON RESPONSIBLE: Retha Hunsicker

REQUEST:

Page 11 of Ms. Hunsicker’s testimony notes that the platform proposed by Duke has been implemented by more than 760 utilities.

- a. Did Duke determine if any of the 760 utilities that utilize the platform have implemented the functionality to provide supplier consolidated billing into the platform?
- b. If not, why?

RESPONSE:

- a. Objection. This Interrogatory is overly broad, given that it seeks information that is neither relevant to this proceeding nor likely to lead to the discovery of admissible evidence in this proceeding. The Company’s knowledge of functionalities implemented by other utilities, many of which may be operating in jurisdictions where “supplier consolidated billing” is not even applicable, is not relevant to Duke Energy Ohio’s application for approval of programs under the Power Forward Rider. Without waiving said objection, to the extent discoverable, and in the spirit of discovery: No.
- b. Objection. This Interrogatory is overly broad, given that it seeks information that is neither relevant to this proceeding nor likely to lead to the discovery of admissible evidence in this proceeding. The Company’s knowledge of functionalities implemented by other utilities, many of which may be in jurisdictions where “supplier consolidated billing” is not even an applicable functionality, is not relevant to Duke Energy Ohio’s application for approval of programs under the Power Forward Rider. Without waiving said objection, to the extent discoverable, and in the spirit of discovery:

As noted in Ms. Hunsicker’s testimony, there are a number of questions to be addressed for the Company to know the specific requirements to implement supplier consolidated billing; therefore, the Company did not contact any other utilities to understand if or how they are providing this functionality. The Company has selected a product that is used by utilities worldwide and believes once specific requirements are known it will be able to accommodate, as needed.

PERSON RESPONSIBLE:

As to objections - Legal

As to responses - Retha Hunsicker

REQUEST:

Has Duke made any attempts to assess the effort and cost to implement supplier consolidated billing in the Customer Connect platform?

RESPONSE:

No, the Company does not yet know all of the necessary requirements to implement supplier consolidated billing and therefore cannot assess the effort and cost. See direct testimony of Retha Hunsicker, at pages 19-20.

PERSON RESPONSIBLE: Retha Hunsicker

Duke Energy Ohio
Case No. 19-1750-EL-UNC
IGS Second Set of Interrogatories
Date Received: March 25, 2020
IGS-INT-02-023

REQUEST:

Is the deployment and stabilization of Customer Connect necessary in order to assess the effort and cost to implement supplier consolidated billing? If so, please explain.

RESPONSE:

Yes, as noted in the testimony of Ms. Hunsicker, deployment and stabilization of Customer Connect is needed before the Company can begin a project to assess the effort and cost to implement supplier consolidated billing. Please refer to IGS-INT-02-001.

PERSON RESPONSIBLE: Retha Hunsicker

**Duke Energy Ohio
Case No. 19-1750-EL-UNC
IGS Second Set of Interrogatories
Date Received: March 25, 2020
IGS-INT-02-024**

REQUEST:

Did Duke review the design and structure of AEP Ohio's Supplier Consolidated Billing Program? If not, why?

RESPONSE:

No. Please refer to the Company's response to IGS-INT-02-018.

PERSON RESPONSIBLE: Retha Hunsicker

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Case No(s). 19-1750-EL-UNC, 19-1751-GE-AAM

Summary: Comments Initial Comments of Interstate Gas Supply, Inc. electronically filed by Bethany Allen on behalf of Interstate Gas Supply, Inc.