

**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. 17-0032-EL-AIR
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval.)	Case No. 17-0033-EL-ATA
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Change Accounting Methods.)	Case No. 17-0034-EL-AAM
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Modify Rider PSR.)	Case No. 17-0872-EL-RDR
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Amend Rider PSR.)	Case No. 17-0873-EL-ATA
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Change Accounting Methods.)	Case No. 17-0874-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 Administrative Code.)	Case No. 16-1602-EL-ESS
)	

**DUKE ENERGY OHIO, INC.'S MOTION TO
ADJUST STANDARD SERVICE OFFER AUCTIONS**

On July 15, 2020, the Commission issued a Finding and Order in Case Nos. 16-776-EL-UNC, 17-957-EL-UNC, 17-2391-EL-UNC, and 18-6000-EL-UNC (Finding and Order) that, among other things, directed each electric distribution utility (EDU) to “submit a plan to change the current auction scheduled for Fall 2020 and Spring 2021 to substitute a 12-month product for the current planned products.”

Duke Energy Ohio, Inc. (Duke Energy Ohio or Company), in consultation with its auction manager, and pursuant to O.A.C. 4901-1-12, hereby conditionally proposes a change to the auctions currently scheduled for Fall 2020 and Spring 2021 to provide only for a 12-month product for each auction, as directed by the Commission’s Finding and Order. Such a modification is premised upon the fact that the Company’s fall 2020 auction is rapidly approaching, and bidders should be apprised of changes as far in advance as possible. Moreover, the Company’s proposed modification is limited at this time and conditional, insofar as it is without prejudice to the Company’s legal rights and remedies with respect to other directives in the Finding and Order. Duke Energy Ohio reserves its right to challenge the Finding and Order and/or request additional modifications to the standard service offer (SSO) auction process in the future. The attached memorandum in support more fully explains the proposal and related caveats and conditions.

Respectfully submitted,
DUKE ENERGY OHIO, INC.

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MEMORANDUM IN SUPPORT

The Commission's Finding and Order addresses the SSO auction process adopted by the Commission as part of Duke Energy Ohio's current electric security plan (ESP), as well as that of the other EDUs. Part "a." of Paragraph 35 directs the EDUs to substitute 12-month products for the current, planned products. This modification is consistent with previous modifications made by the Commission to the Company's auction construct within the term of its ESP,¹ as well as guidance previously requested by the Company as a result of uncertainty created by the Federal Energy Regulatory Commission (FERC) with respect to suspended capacity auctions in the PJM Interconnection LLC (PJM) markets.² With the existing Duke Energy Ohio proposed plan, only minor changes are necessary to modify the current product mix. The Company only needs to adjust the product term from a 36-month product, to a 12-month product in the upcoming September 22, 2020 auction and in its to-be-scheduled February 2021 auctions. The Company will continue to procure 17 tranches in each auction for the remaining load for the 2021-2022 PJM delivery year.

Duke Energy Ohio respectfully submits that this is the simplest plan for complying with and achieving the objectives in Part "a." of Paragraph 35 of the Finding and Order, as it eliminates uncertainty for bidders that participate in these auctions with respect to forward prices within the term of the current ESP and can occur independently of the other directives in the Commission's Finding and Order, particularly the dual auction process proposed in part "b." of Paragraph 35.³ But in order for the Company to commence its normal auction process without any doubt as to the structure and content of the Fall 2020 auction, the Commission would need to grant this motion before the end of August 2020. Absent a decision within that timeframe, the Company will proceed

¹ *In the Matter of the Application of Duke Energy Ohio, Inc., for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan, Accounting Modifications, and Tariffs for Generation Service*, Case No. 17-1263-EL-SSO, *et al.*, Entry (Feb. 13, 2020).

² *Id.*, Duke Energy Ohio Notice (January 23, 2020).

³ Again, Duke Energy Ohio's proposal herein is independent of and notwithstanding its position with respect to Part "b." of paragraph 35, which the Company reserves its legal rights to redress.

during the month of September with preliminary auction activities that presume approval of this filing – and would modify its course of action as needed after receiving a decision from the Commission.

CONCLUSION

For the foregoing reasons, Duke Energy Ohio respectfully requests that the Commission grant the motion for the reasons stated herein.

Respectfully submitted,
DUKE ENERGY OHIO, INC.

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion was served via electronic mail or ordinary mail on the following parties this 14th day of August 2020.

/s/ Rocco O. D'Ascenzo
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Summary: Motion Duke Energy Ohio, Inc.'s Motion to Adjust Standard Service Offer Auctions electronically filed by Mrs. Tammy M Meyer on behalf of Duke Energy Ohio Inc. and D'Ascenzo, Rocco and Kinergy, Jean and Vaysman, Larisa