

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke)	
Energy Ohio, Inc. for Approval to)	Case No. 21-180-GA-RDR
Modify Rider FBS and Rider EFBS.)	
)	
In the Matter of the Application of)	
Duke Energy Ohio, Inc. for Approval)	Case No. 21-188-GA-ATA
to Modify its Tariff Regarding Rate)	
IMBS.)	

**REPLY COMMENTS
OF
STAFF OF THE PUBLIC UTILITIES COMMISSION OF OHIO**

August 2, 2021

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The Staff of the Public Utilities Commission of Ohio (Staff) files these reply comments on the application, as amended and clarified by Duke Energy of Ohio, Inc. (“Duke”), to change its balancing service tariffs. In short, Staff adopts as a Staff recommendation The Retail Energy Supply Association’s (RESA) proposal, in its initial comments, to equitably approve Duke’s request to increase rates.

Duke proposes, in part, to increase the rates for the Enhanced Firm Balancing Service (“Rider EFBS”), Firm Balancing Service (“Rider FBS”) and Interruptible Monthly Balancing Service (“Rider IMBS”) based on a proposal filed by Columbia Gas Transmission (“TCO”) at the Federal Energy Regulatory Commission (“FERC”). Given that TCO’s proposal is still pending at the FERC and may ultimately change,¹ Staff adopts RESA’s approach to reach an equitable result regarding the rate increase proposed by Duke. Namely, Staff recommends that

¹ *Columbia Gas Transmission, LLC*, Docket Nos. RP20-1060-000, RP20-1159-000 and RP21-351-000.

Duke's rate changes, as amended and clarified in these proceedings, be approved upon the condition that the Commission requires Duke to promptly file a new application in the event that TCO's rates (as ultimately set by FERC) are lower than those in this pending application. Such a condition would be easy to enforce since the Commission is a party to the subject FERC proceeding and will, thus, receive notice of FERC's decision.

Respectfully submitted,

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/s/ Robert Eubanks

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Reply Comments** was served by electronic mail upon the following parties of record, this 2nd day of August, 2021.

/s/ Robert Eubanks

Robert Eubanks

Assistant Attorney General

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Summary: Reply Comments of the Staff of the Public Utilities Commission of Ohio
electronically filed by Mrs. Kimberly M. Naeder on behalf of PUCO