

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)	
Duke Energy Ohio, Inc., for an)	Case No. 21-887-EL-AIR
Increase in Electric Distribution Rates.)	
In the Matter of the Application of)	
Duke Energy Ohio, Inc., for Tariff)	Case No. 21-888-EL-ATA
Approval.)	
In the Matter of the Application of)	
Duke Energy Ohio, Inc., for Approval)	Case No. 21-889-EL-AAM
to Change Accounting Methods.)	

VOLUME 11

SCHEDULE S-4.2 PART 3

October 1, 2021

**DUKE ENERGY CORPORATION
DUKE ENERGY OHIO, INC.
SUMMARY OF MANAGEMENT POLICIES, PRACTICES AND ORGANIZATION*
SCHEDULE S-4.2**

PART 3 of 3

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Three Functional Areas Required by Staff

Reliability of the Distribution System	1
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How does the Company ensure the reliability of the distribution system?

Duke Energy Ohio operates the electric distribution facilities it owns in accordance with good utility practice. Duke Energy Ohio continuously runs the system with a workforce that provides customer service 24 hours per day, 7 days per week, 365 days per year, and includes trouble response crews. The Company monitors outages with various systems, such as Supervisory Control and Data Acquisition, Distribution Outage Management System, and the Distribution Management System.

Duke Energy Ohio maintains its electric distribution infrastructure in accordance with good utility practice by adhering to inspections, monitoring, testing, and periodic maintenance programs. Examples of these existing programs include, but are not limited to, the following: (1) substation inspection program; (2) line inspection program; (3) ground-line inspection and treatment program; (4) vegetation management program; (5) underground cable replacement program; (6) capacitor maintenance program; and (7) dissolved gas analysis.

Duke Energy Ohio also uses various reliability indices to measure the effectiveness of its maintenance programs and system reliability. The Company follows the Public Utilities Commission of Ohio's (Commission) Electric Service and Safety Standards, as set forth in O.A.C. Chapter 4901:1-10. The Company also uses various indices to measure the effectiveness of its maintenance programs and system reliability.

Duke Energy Ohio's electric distribution capital investments are helping to usher in the grid of the future in Ohio. These investments at a base level are focused on safety - minimizing equipment failures, and the associated dangers for employees, customers and the general public; reliability – limiting frequency and duration of service interruptions and other power quality issues; and resilience – preventing or withstanding damage from major disruptive events, such as storms and improved restoration times. Since its last electric distribution base rate case, the Company has made significant investments in its electric distribution infrastructure including: underground cable replacement, circuit sectionalization, deteriorated conductor, and pole replacement programs, to name a few. These proactive efforts have resulted in measurable improvements in reliability and customer minutes interrupted for our customers.

Duke Energy Ohio has been and will continue to invest in programs that improve the overall reliability of the grid. These reliability improvements are designed to proactively reduce the number of outages, minimize the number of customers affected by an outage, improve outage response, as well as, expedite service restoration, all of which contribute to a reduction in the total number of customer minutes interrupted. Examples of these investments include self-optimizing grid, targeted undergrounding, circuit sectionalization, and 4 kV conversion.

- a. Provide policies and procedures of field personnel with respect to maintenance and operations, equipment replacement, and outage restoration.

FUNCTIONAL AREA ONE

Duke Energy Ohio, Case No. 21-887-EL-AIR

Company Response – Reliability

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Operations field personnel use Duke Energy's work methods and standards to maintain equipment and respond to equipment failures, repairs, and replacements as necessary. The work methods establish best practices for common procedures related to distribution line work.

b. Detail the role that automated technology such as AMI meters, reclosers, and sectionalization has had on reliability.

The self-optimizing grid, also known as the smart-thinking grid, redesigns key portions of the distribution system and transforms it into a dynamic self-healing network that ensures issues on the grid can be isolated and customer impacts are limited. These grid capabilities are enabled by installing automated switching devices to divide circuits into switchable segments that will serve to isolate faults and automatically reroute power around trouble areas which call for expanding line and substation capacity to allow for two-way power flow and creating tie points between circuits. Self-optimizing grid investments:

- 1) increase system "connectivity" by building more circuit ties that allow for more flexibility in restoration options. By tying more circuits together, the system will shift from a radial design to more of a "spider web" design.

- 2) increase "capacity" by installing larger wires, transformers and system banks to be able to handle dynamic switching and increased two-way power flow from adjacent circuits and renewable generation.

- 3) increase "control" through additional system automation and intelligence. Increased automation and intelligence are becoming a necessary requirement to manage an increasingly dynamic system.

With increased connectivity, capacity, and control, the Company has an increasingly more resilient distribution system with greater flexibility in restoration options. Instead of having circuit pairs that can back each other up, the network allows for multiple options to re-energize circuit segments. Self-optimizing grid also provides the foundation for the two-way power flows needed to support rooftop solar, battery storage, electric vehicles, and microgrids – technologies that will increasingly power the lives of customers in Ohio.

Circuit sectionalization is a systematic approach whereby additional fuses and protection devices are added to an existing circuit. This reduces the number of customers affected by an outage. Currently, a single set of fuses protect upstream customers from experiencing an outage, but with circuit sectionalization several additional protective devices are installed. This fuse coordinated approach keeps one circuit segment issue at the end of the circuit from affecting more customers upstream. This program also reduces outage duration because the length of the line that requires troubleshooting is reduced allowing for a more accurate and timely pinpointing

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of the outage and more efficient restoration. Circuit sectionalization is vital to reliability targets as the Company continues to invest in programs to reduce customer minutes interrupted.

AMI metering systems have the capability to interrogate individual smart meters to determine if customers have power. This allows pinging during outages to determine specific customer impacts. The capability of interrogating individual meters can tell the Company when a customer's power has already been restored, saving a truck roll to confirm power has been restored.

c. If the Company has implemented any operational changes related to reliability within the last five years, please explain.

Within the last five years, the Company has incorporated the following:

- The Company's Emergency Preparedness department was created in recent years to lead the Company in the Incident Command System (ICS), which is a proactive strategy to create a structure and process to efficiently manage potential crises or events.
- In an effort to respond to customer outages safely, promptly, and efficiently, the Company has identified Operations personnel to remain on the system on the off-hours in the event there are outages, especially predicted due to weather.
- As part of the Company's reliability best practices, its Asset Management team leads a series of meetings to review long duration outages to identify root causes and/or trends.

d. Explain the Company's approach to vegetation management and the impact upon reliability.

The primary objective of the Duke Energy's Vegetation Integrated Management (IVM) Program is to control the growth of incompatible vegetation along its electric lines in order to help provide safe and reliable service to our customers. This is accomplished by using qualified personnel to monitor the condition of the utility rights-of-way and by initiating various vegetation control practices to reduce, manage or eliminate incompatible growth. This integrated vegetation management program is essential in providing safe and reliable electric service by ensuring that trees and brush near or within rights-of-way are periodically trimmed or removed to help reduce potential outages and hazards near our facilities.

Duke Energy works consistently to balance aesthetics with our goal to provide safe, reliable power to the households and businesses that depend on us. It is our responsibility to ensure power lines are free of trees and other obstructions that could disrupt electric service. Trees that are close to power lines must be trimmed or cut down to ensure they don't cause power outages, and Duke Energy does much of this work proactively. The necessary crews use a variety of methods to manage vegetation growth along distribution circuits and transmission power line rights of way, including vegetation pruning, felling (cutting down) and herbicides. These methods

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are based on widely accepted standards developed by the tree care industry. All work is performed in conformance with Duke Energy Ohio's vegetation management requirements, OSHA regulations, American National Standards Institute (ANSI) A300, ANSI Z133, Tree Care Industry Association's (formerly the National Arborist Association) standards, Dr. Shigo's Field Guide for Qualified Line Clearance Tree Workers, National Electrical Safety Code (NESC), International Society of Arboriculture Best Management Practices, and all federal, state, county, and municipal laws, statutes, ordinances and regulations applicable to said work. Duke Energy Ohio has approximately 8,207 overhead primary distribution circuit miles. In a typical year, the Company performs vegetation for approximately 20% of the distribution lines to maintain safe, reliable electric service by limiting contact between vegetation and power lines.

Hazard Trees found within or adjacent to the right-of way that are dead, structurally unsound, diseased, shallow-rooted, leaning or otherwise defective that could strike electrical lines or equipment are targeted to be taken down.

e. How does the Company balance resources to ensure that each of the areas above are appropriately addressed?

From a planning perspective, electric system studies are performed annually to determine where and when system modifications are needed to ensure load is adequately served. When these needs are identified, multiple solutions are developed, addressing not only the capacity need, but potential opportunities to maintain or improve reliability and operating flexibility. Recommendations are made and discussed with the operations staff to ensure that a balanced, workable plan has been developed.

In the course of maintaining and operating the electric distribution system, Duke Energy Ohio identifies equipment and hardware that requires repair or replacement. Blanket budgets have been established to cover small items, but specific projects are developed for larger expenditure items. These items are triggered as a result of operating issues, new load growth, or the various inspections, monitoring, and testing programs I described above.

The Company protects customer information by:

1. The Company takes the appropriate steps to store customer information in such a manner as to limit access to those persons permitted to receive it based on a clear and established business need and requires all persons with access to such information to protect its confidentiality. Additionally, the Company maintain administrative, technical and physical safeguards designed to protect customer information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.
2. Workers are subject to pre-employment screening and background checks.
3. Workers determined to mishandle, or misuse customer information are subject to corrective action, up to and including termination.
4. Customer information is not released to an affiliate or third party unless the customer has provided their explicit and informed consent.
5. Periodic scheduled audits are performed to review access to customer information.
6. Periodic scheduled training for workers with access to customer information, including the annual Data Privacy and Customer information training is deployed to workers with access to customer information.

The policies and procedures related to customer information are:

1. Data Privacy Policy (Exhibit IT - 1)
2. IT 201 Information Management Standard (Exhibit IT - 2) (Confidential)
3. IT 505 Third Party Service Provider Standard (Exhibit IT - 3) (Confidential)

Applicability	<i>Enterprise</i>
Originator	<i>Corporate Compliance</i>
Approval Authority	<i>Chief Ethics & Compliance Officer</i>
Effective Date	<i>09/15/2019</i>
Revision Date	<i>09/15/2019</i>
Requirement	<i>Internal Company Policy</i>
Point of Contact	

Statement of Purpose and Philosophy:

Duke Energy intends to comply with applicable federal, state, and local laws, regulations, ordinances, and internal policies, including, but not limited to, the Code of Business Ethics and those that protect information regarding an individual from unlawful disclosure or transmission (all collectively referred to as "Rules"). Failure to do so may result in legal penalties, adverse regulatory action, restriction or prohibition from conducting business with certain countries, and irreparable damage to Duke Energy's brand.

Scope:

This policy is applicable to the entire workforce of Duke Energy.

Policy Expectations

This policy establishes requirements regarding the protection of information about an individual in a manner consistent with the applicable Rules. This policy is designed to support Duke Energy's business functions while positioning Duke Energy to be a leader in considering and addressing data privacy-related concerns of individuals.

Roles and Responsibilities

Chief Ethics & Compliance Officer is responsible for:

- Establishing and providing oversight for the Data Privacy Program to ensure adequate policies and standards are implemented to reasonably ensure compliance with Rules that are applicable to Duke Energy regarding information about individuals.

Functional/business units are responsible for:

- Ensuring that the requirements of this policy and data privacy-related standards are achieved for their respective function/business unit and that the applicable processes or mechanisms are sustained.
- Consulting with the Corporate Compliance and Legal Departments to ensure awareness of jurisdiction-specific requirements for collecting, using, disclosing, etc. information about individuals.

The workforce is responsible for:

- Ensuring their daily practices comply with this policy and privacy-related standards.
- Considering and addressing data privacy-related concerns associated with any information about an individual within their possession and/or control.
- Reporting other data privacy-related concerns appropriately and in a timely manner.

Definitions/Key Terms

Data Privacy Program: Duke Energy's governance model that ensures proper control, reasonable to the size and complexity of the function/business, regarding the protection of information pertaining to an individual which is



Exhibit IT-1 Data Privacy Policy

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Exhibit IT-1

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collected through normal business operations. The Program is established by this policy. The Data Privacy and Identity Theft Protection Standard is the supplemental document that explains the requirements of the Program.



IT 201

Information Management Standard

Version 5.0
February 2019

The IT 201 Standard is designed to support the IT 200 Information Technology Asset Management Policy and is part of the IT 200 Series.

The IT 200 Series documents are the property of Duke Energy. Reproduction, distribution or unauthorized use is strictly prohibited without the expressed written consent of Duke Energy. Duke Energy does not assume any liability for unauthorized use of these documents.

Applicability:	Applies to the Enterprise
Originator:	Director IT - Enterprise Data Management
Approval:	VP – Enterprise Data Analytics



IT 201 Company Information Management Standard

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IT 201 Company Information Management Standard

1. Purpose



2. Applicability

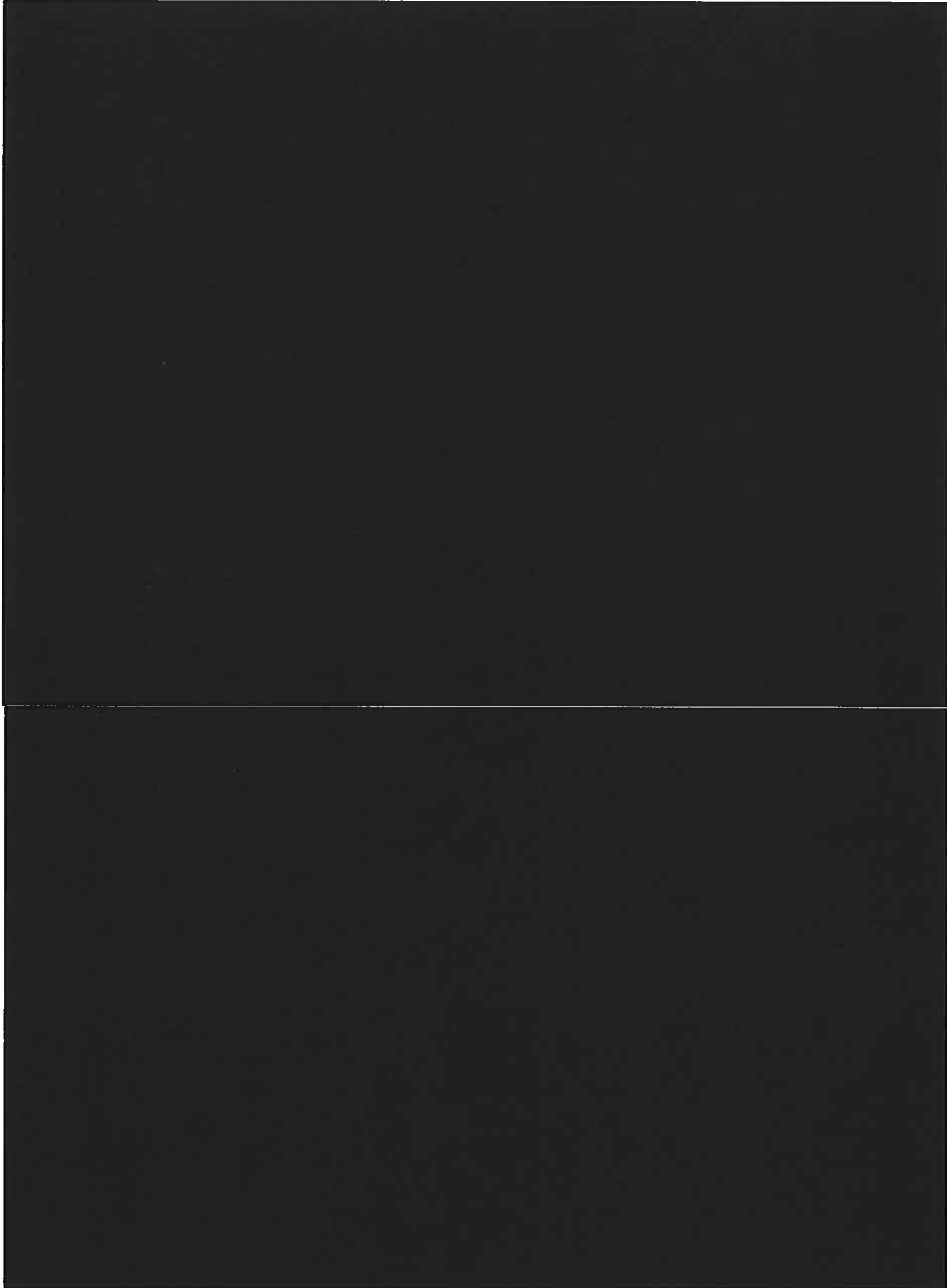


3. Information Lifecycle Management





IT 201 Company Information Management Standard



IT 201 Company Information Management Standard**4. Roles and Responsibilities**



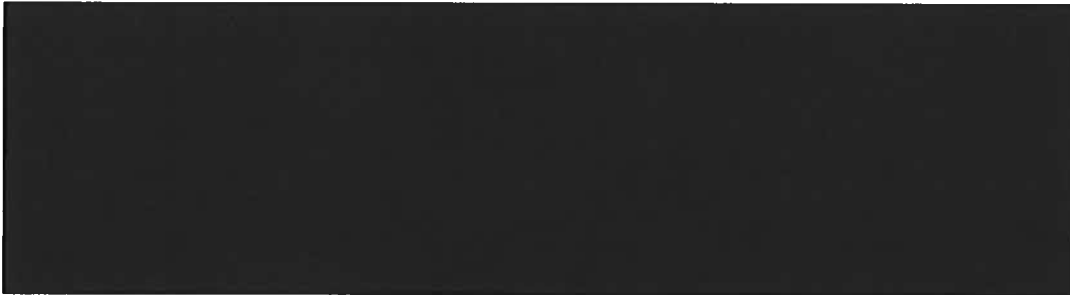
IT 201 Company Information Management Standard



5. Terms and Definitions



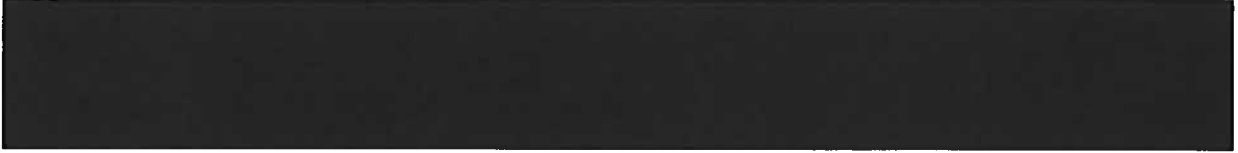
6. Related Documents





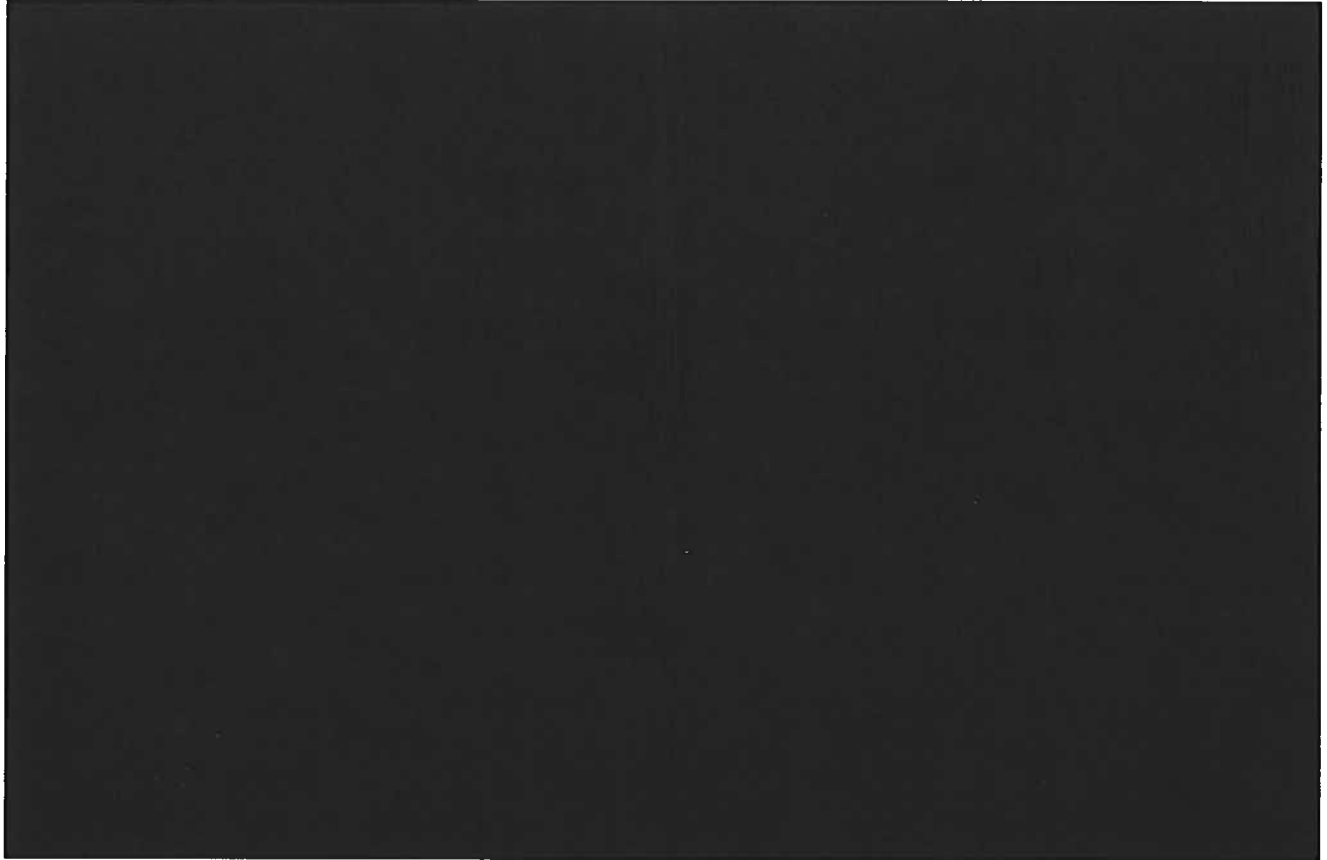
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7. Appendix



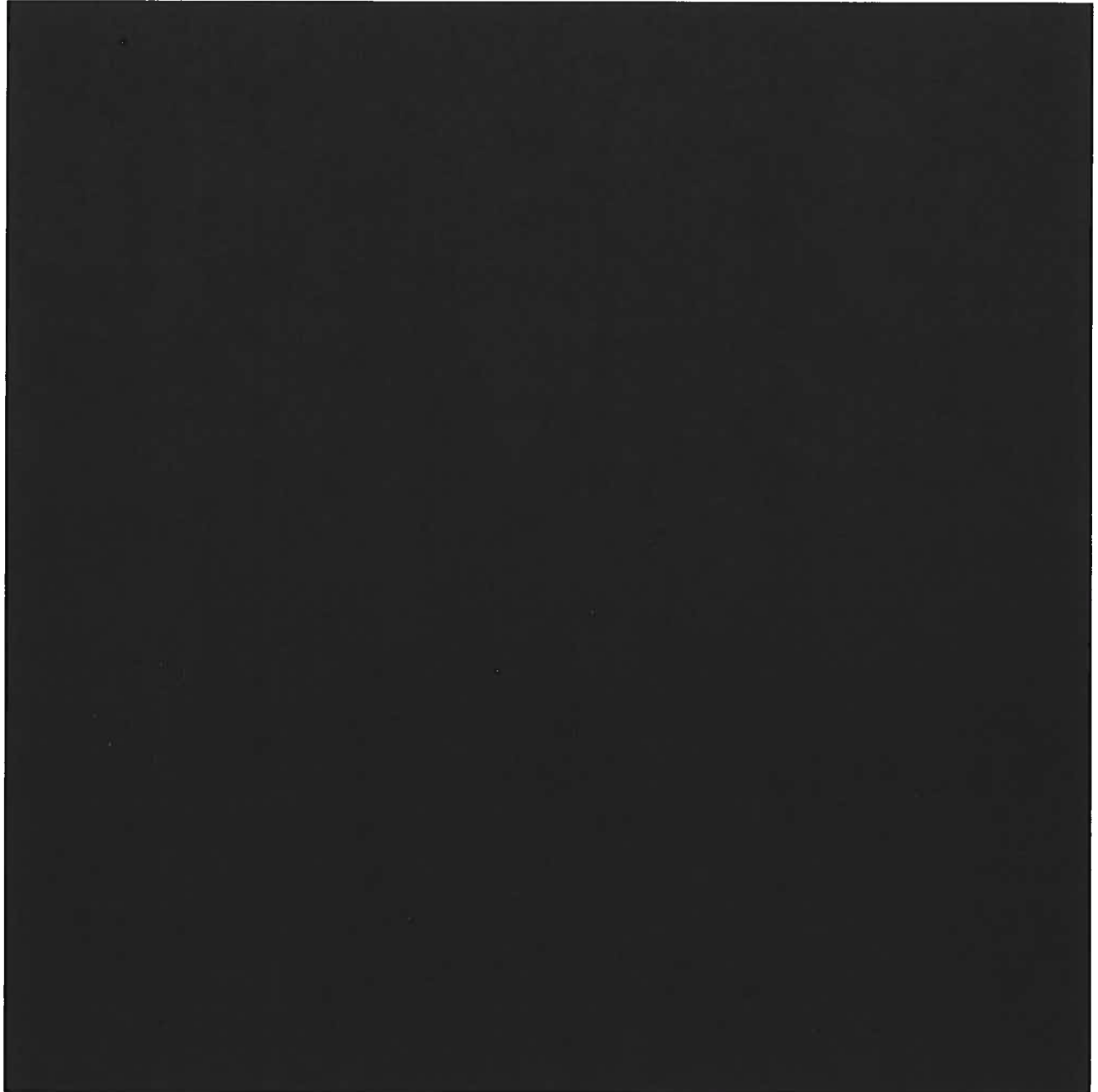


IT 201 Company Information Management Standard



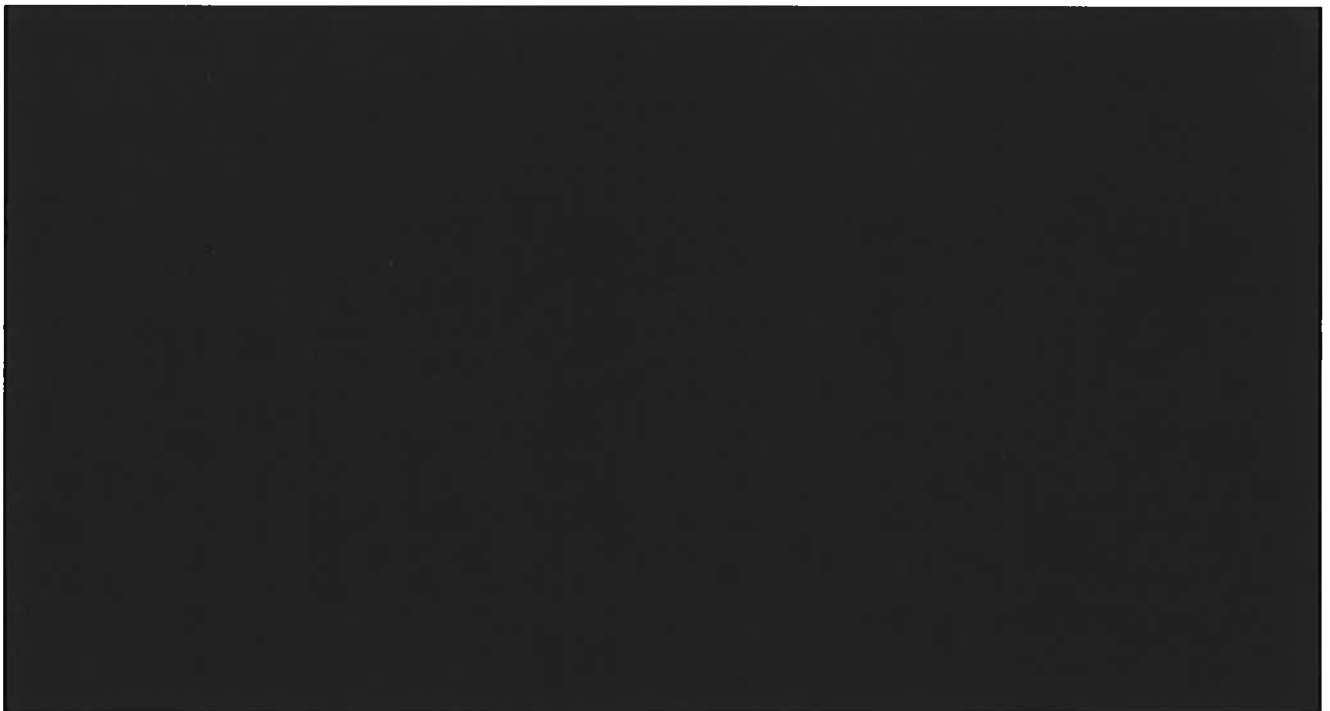


IT 201 Company Information Management Standard



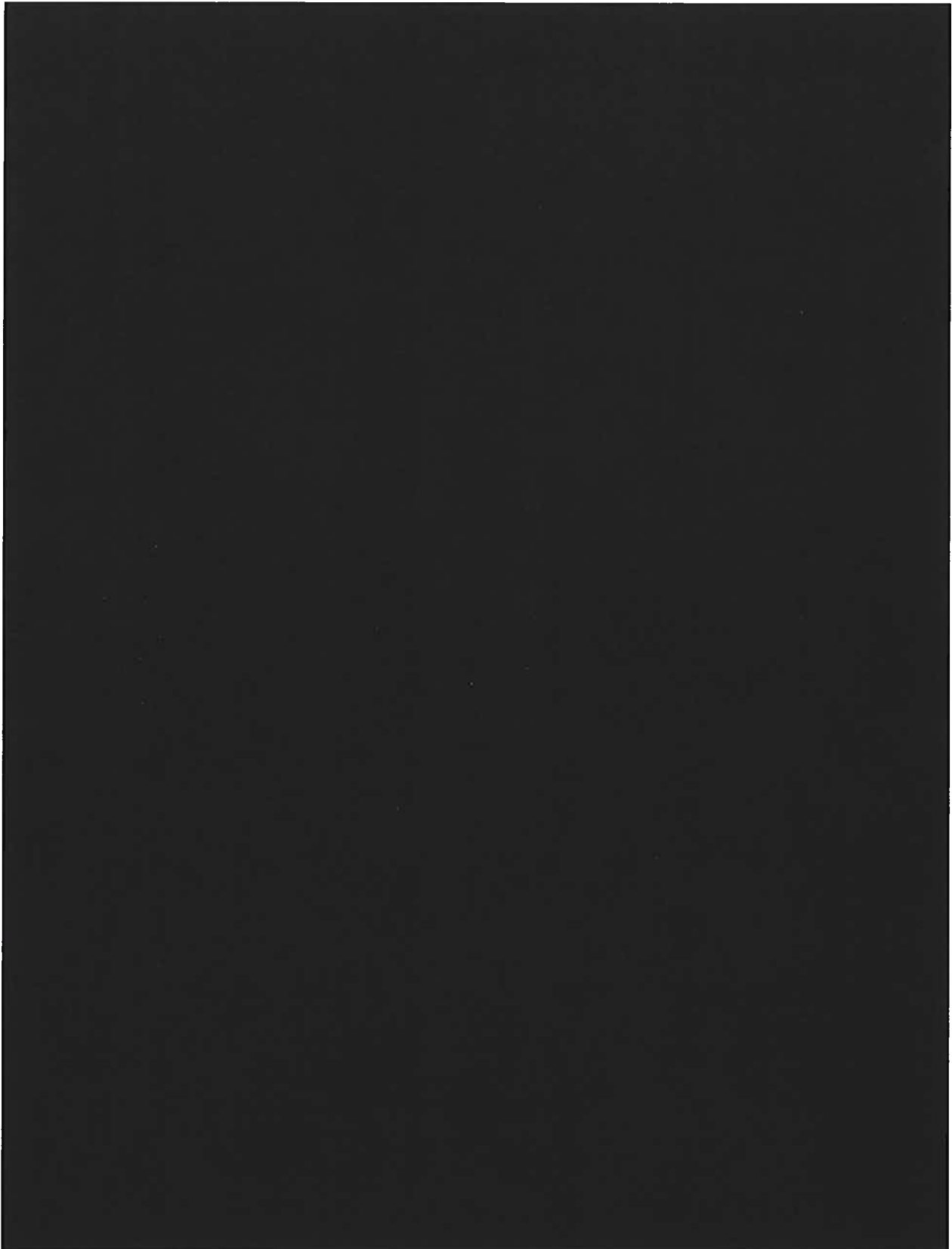


IT 201 Company Information Management Standard





IT 201 Company Information Management Standard





IT 201 Company Information Management Standard



Exhibit IT-3

IT 505

Third Party Service Provider Standard

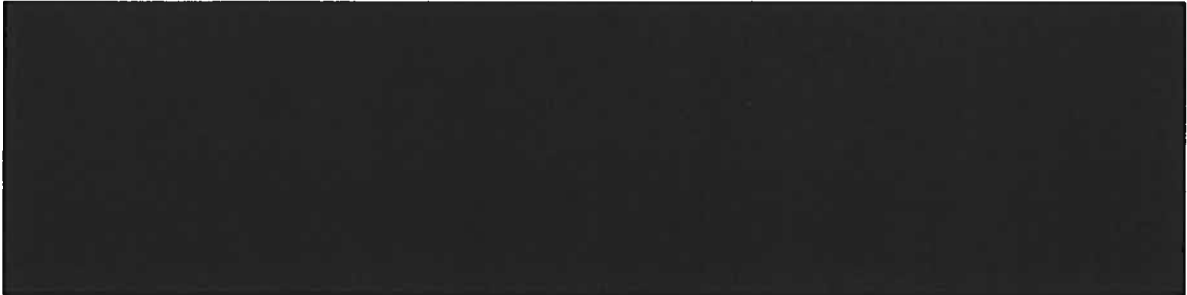
Version 2.4
October 2019

The IT 505 Standard is designed to support the IT 500 Cyber Security Policy and is part of the IT 505 Series.

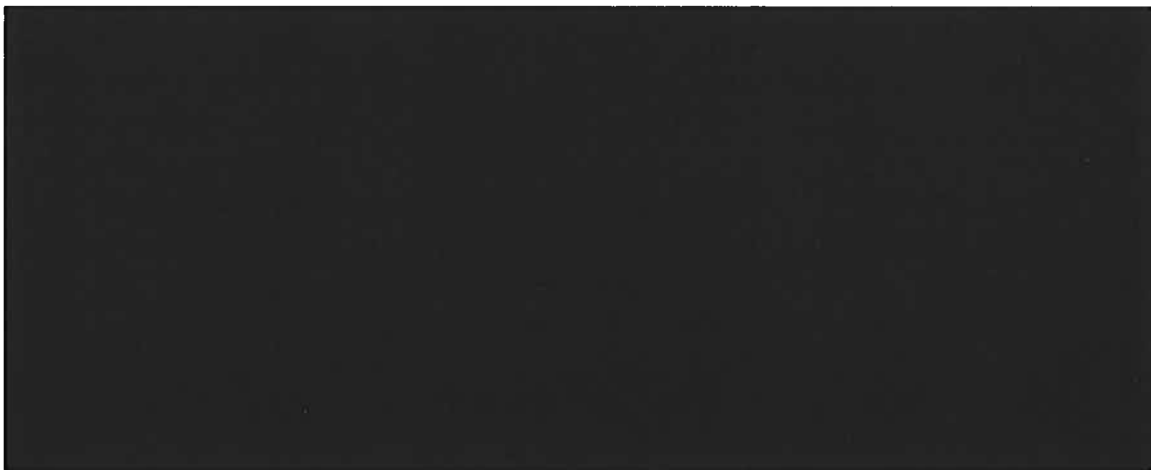
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Applicability:	Applies to the Enterprise
Originator:	Director - Cybersecurity Architecture and Assessment
Approval:	Managing Director - Cybersecurity

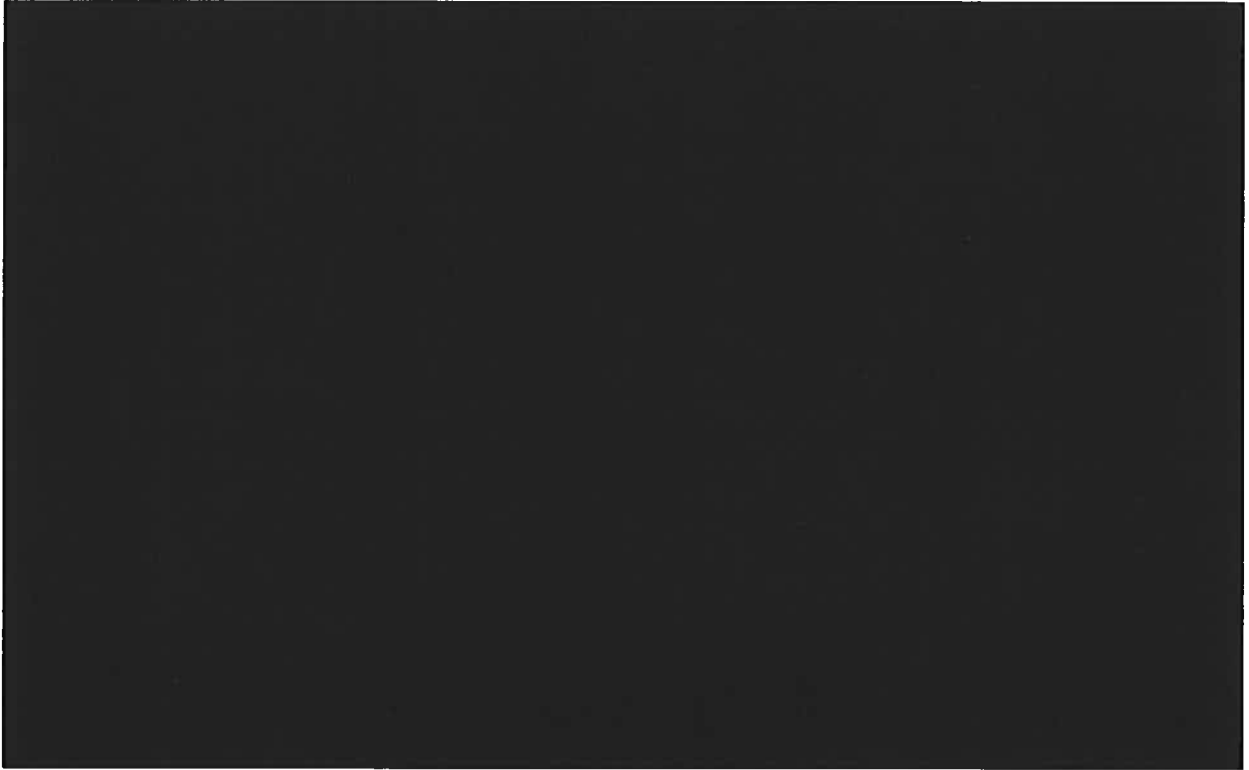
1. Purpose



2. Applicability



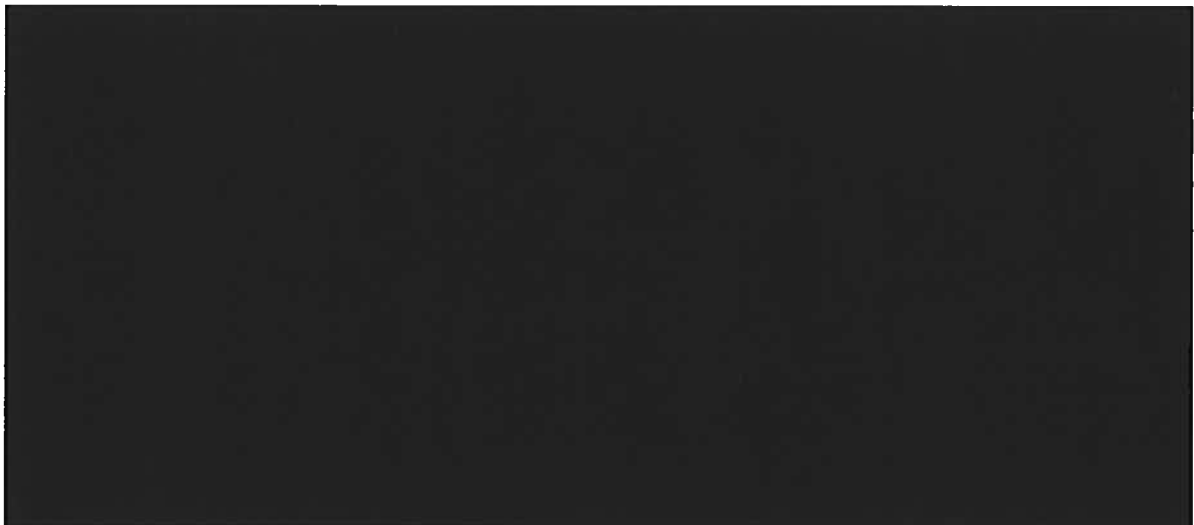
3. Service Delivery Contracts

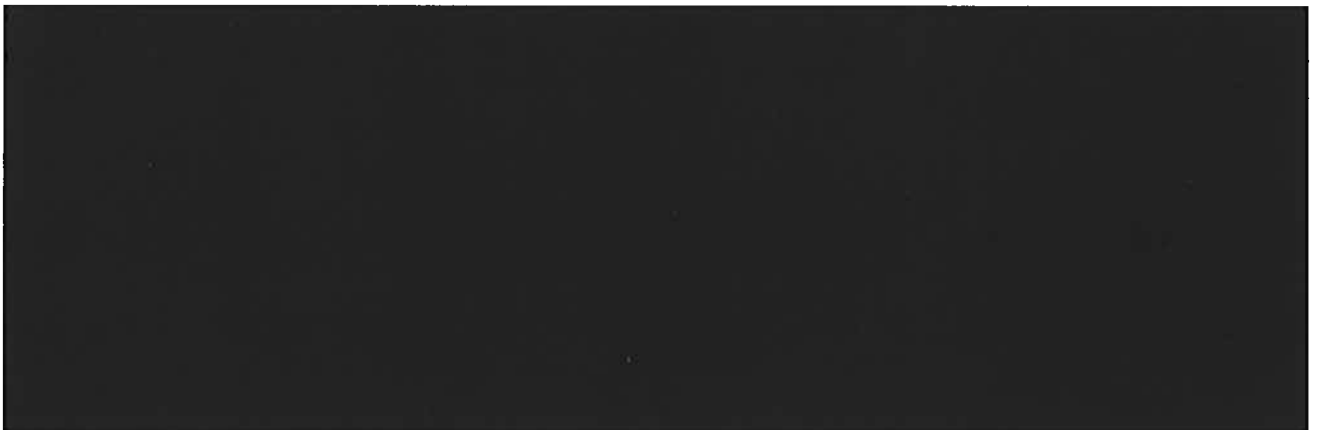


4. Ownership of Third Party Relationship and Risk



5. Review of Third Party Cyber Security and Connections





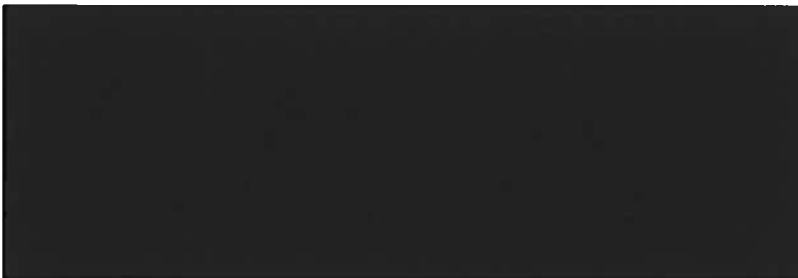
6. Roles and Responsibilities



7. Terms and Definitions



8. Related Documents



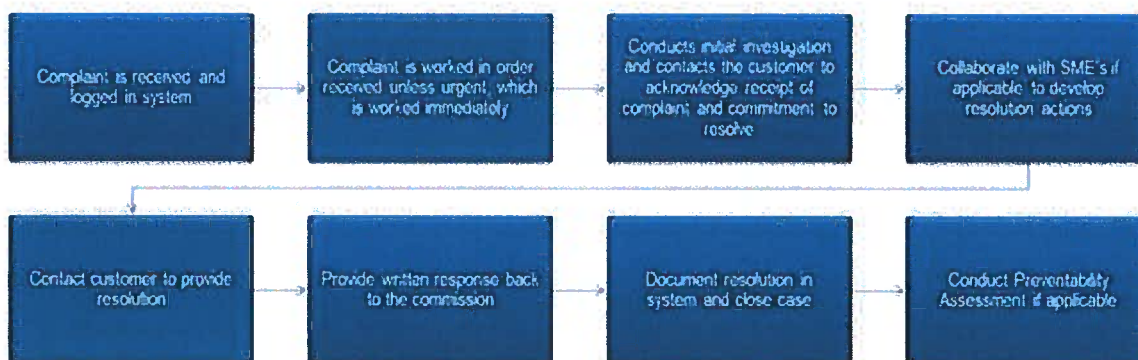


How does the Company utilize customer inquiries/complaints to ensure that customers' needs and expectations are being met?

Response:

Duke Energy works each day to meet customer needs and expectations; however, the Company recognizes that customer inquiries/complaints can occur. Customer inquiries/complaints are received through the Consumer Affairs Division and each case is tracked. The below image is the Lifecycle of a Case to provide further insight into the company's handling process.

Lifecycle of a Case



The company uses complaints as opportunities to improve the customer experience. As noted in the image above, the company logs each complaint. Tracking each complaint allows the company to determine if a type of complaint becomes a trend, as well as, provides a chance to analyze if a complaint may be preventable in the future. Additionally, the analysis of complaint data seeks to pinpoint areas for improvements in the Company's business processes, whether more employee trainings are necessary, or who may need one-on-one coaching. To enhance the preventability effort, the Company has an internal team that focuses on complaints deemed potentially preventable. The team is comprised of subject matter experts across multiple business units and meets monthly to review the complaints that may have been preventable and then discusses possible actions to mitigate future occurrences.

- **Provide policies and procedures with respect to the role of customer services representatives**

Response:

Customer Service Representatives (CSR) follow processes and procedures documented in the knowledge management system, which is an on-line help facility referred to internally as The Source. The Source provides them with the ability to reference instructions on how to process a customer's request. An example of what specialist can access in the knowledge management system is shared below using "High Bill Inquiries," (Exhibit CS-1) (Confidential). Additionally, if a customer inquiry requires escalation, the CSR follows an escalation process, which is completed in an internal escalation tool. The instructions for addressing an "Escalated Call Process" (Exhibit CS-2) (Confidential).

- **Detail any analysis the Company conducts on call data, including but not limited to, wait time and customer issues, such as voltage concerns, billing inaccuracies, and Company policies.**

Response:

The Company continuously monitors and analyzes call data to serve the needs of customers calling the company. Some of this data such as call queues and Service Levels are monitored on a real-time basis throughout business hours. Numerous other reporting and analysis is conducted either daily, weekly, or monthly that closely reviews call volume, Average Handle Time, Average Speed to Answer as well as numerous agent performance related metrics. This analysis is conducted to improve our ability to handle call volumes in an efficient manner to serve customers. Ultimately, the analysis is used to determine the appropriate staffing decisions are made to handle call volume and meet Service Levels.

The company also pays special attention to what may be causing issues or concerns with customers. These issues or concerns may be a result of company policies, processes, service delivery issues, technology functionality or anything else that the Company has some control over. To identify and remedy these, the company has numerous processes in place. Firstly, and as described above, the Consumer Affairs team will collect and handle customer escalations and complaints as well as uncover trends. Additionally, the Customer Experience Organization conducts monthly analysis and report outs to review the survey results from our numerous customer surveys (i.e. Customer Experience Monitor, Fast Track, and Reflect) where the Company asks customers for input on their experiences with the company including but not limited to Power Quality, Reliability and Integrity, billing and payment, Call Center, Outage, Gas Leak, Lighting Repair, Tree Trimming, Start / Transfer Service and several more. The Company has dedicated teams that review these surveys to identify customer pain points and they work back with the business to remediate these.



Exhibit CS-1 High Bill Inquiries

Introduction



Objectives





Exhibit CS-1 High Bill Inquiries

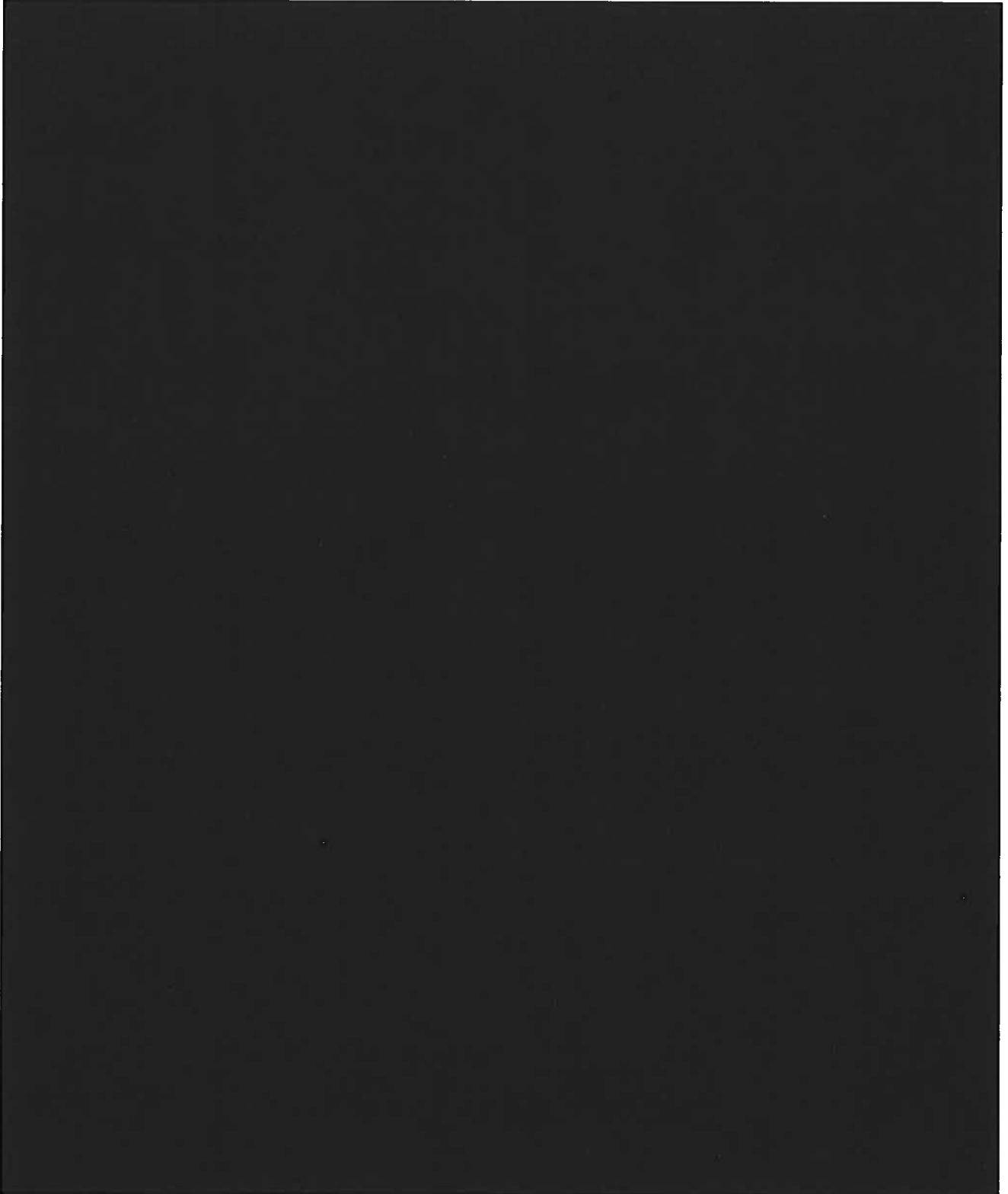




Exhibit CS-1 High Bill Inquiries

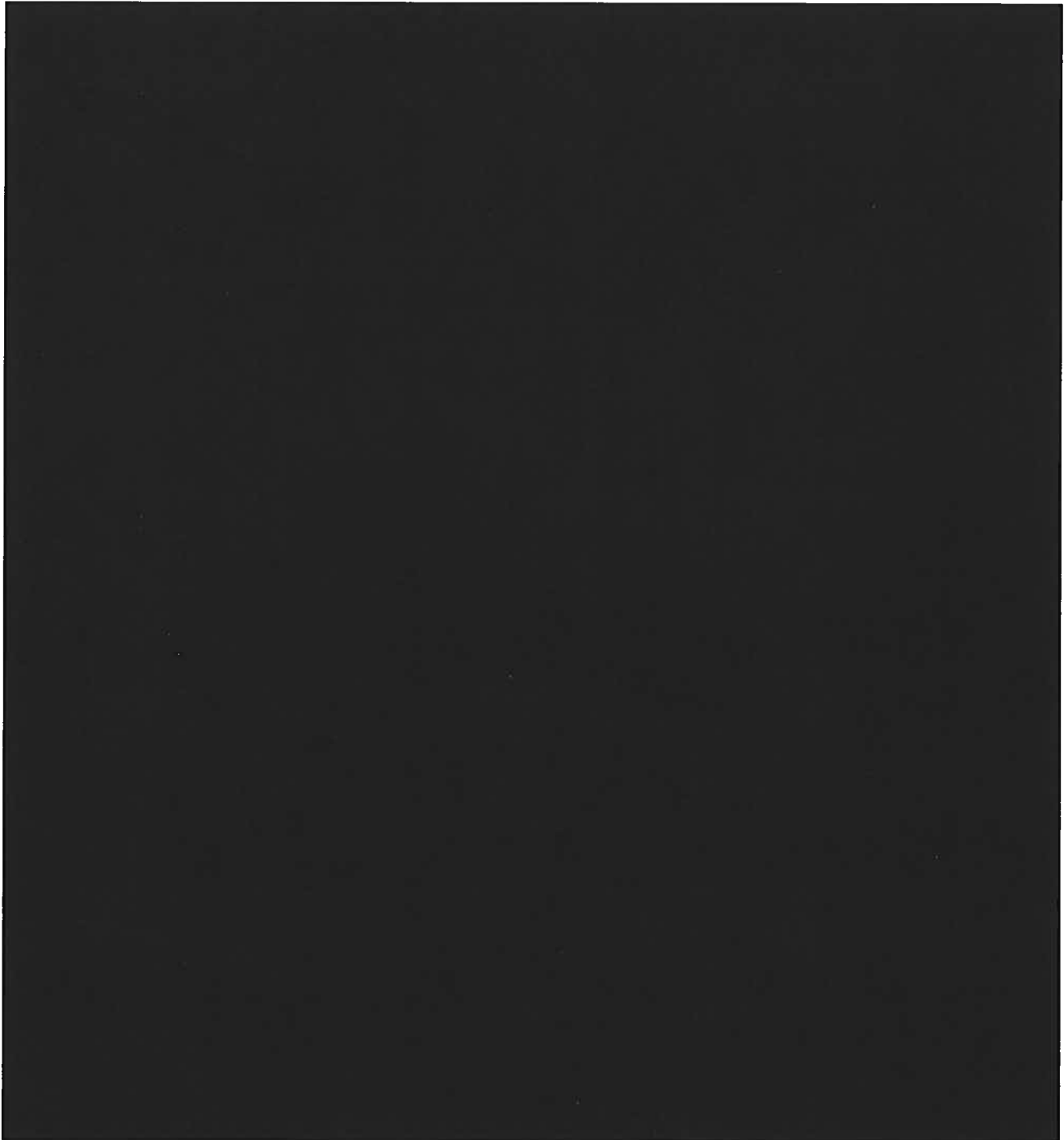




Exhibit CS-1 High Bill Inquiries





Exhibit CS-1 High Bill Inquiries





Exhibit CS-1 High Bill Inquiries

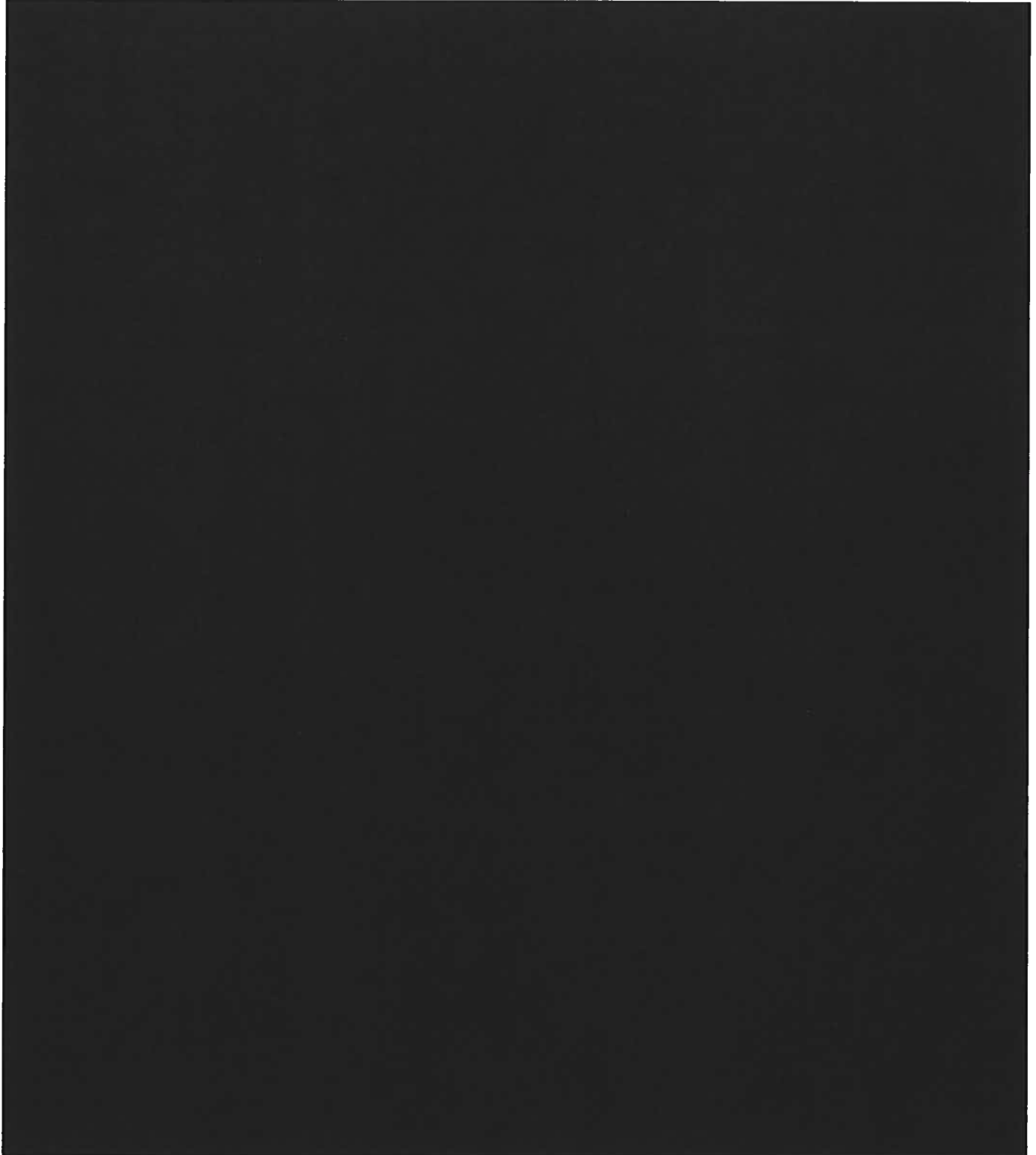
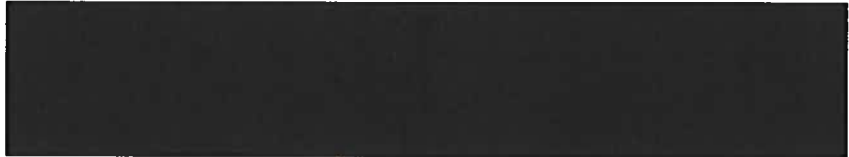




Exhibit CS-2 DEMW Escalated Call Process

Introduction



Objectives

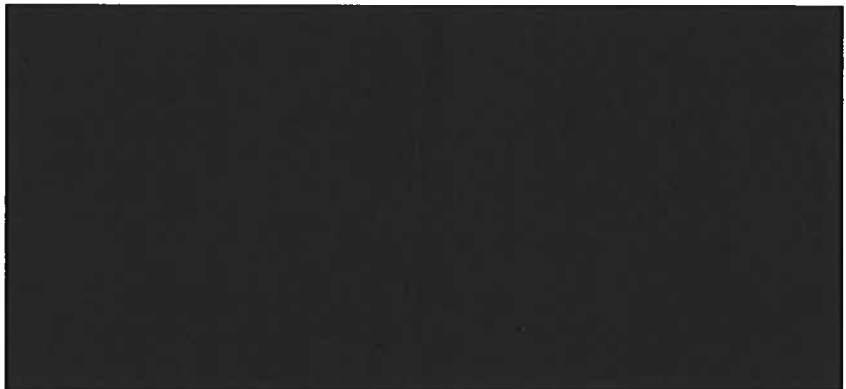




Exhibit CS-2 Escalated Call Process

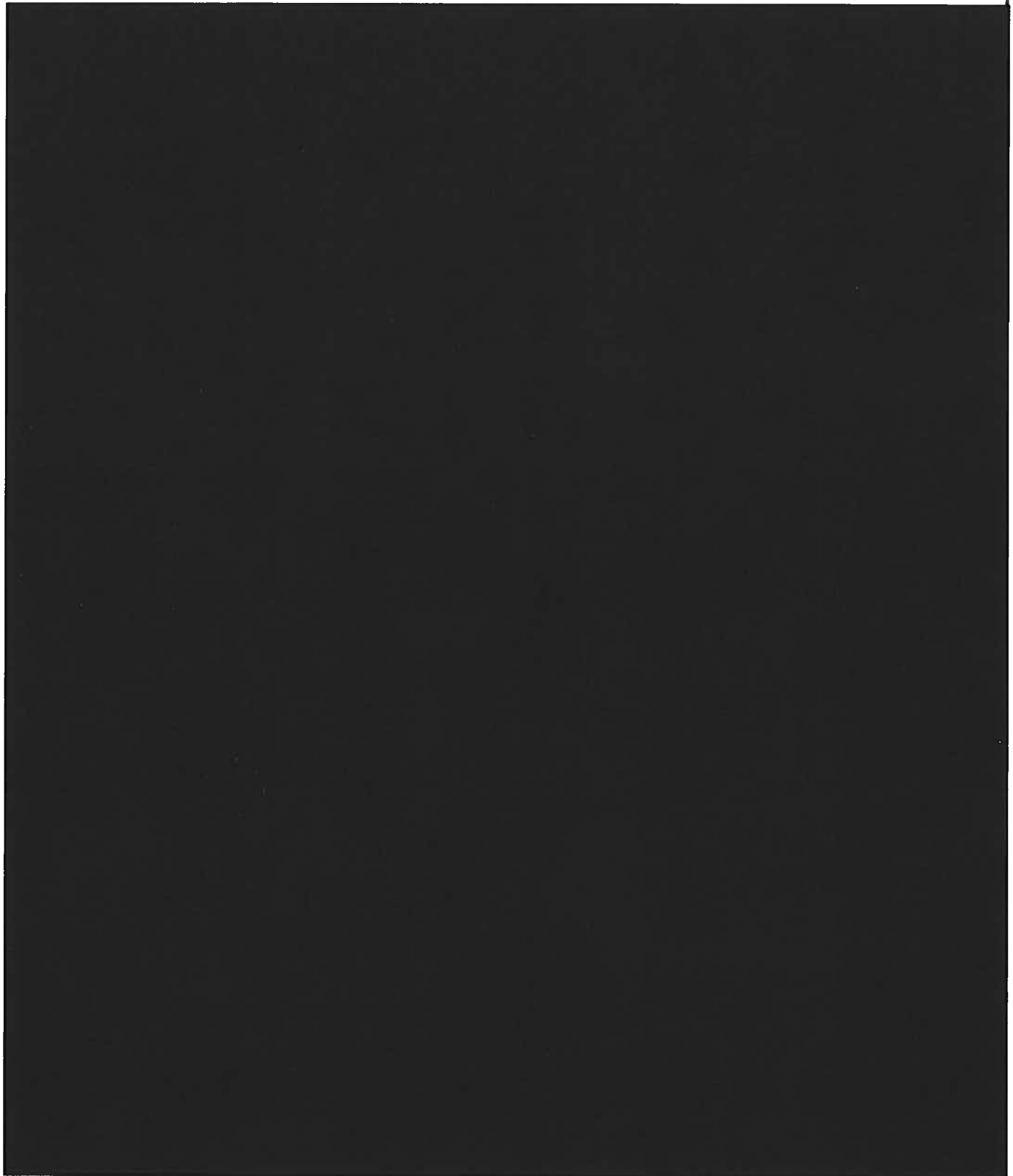
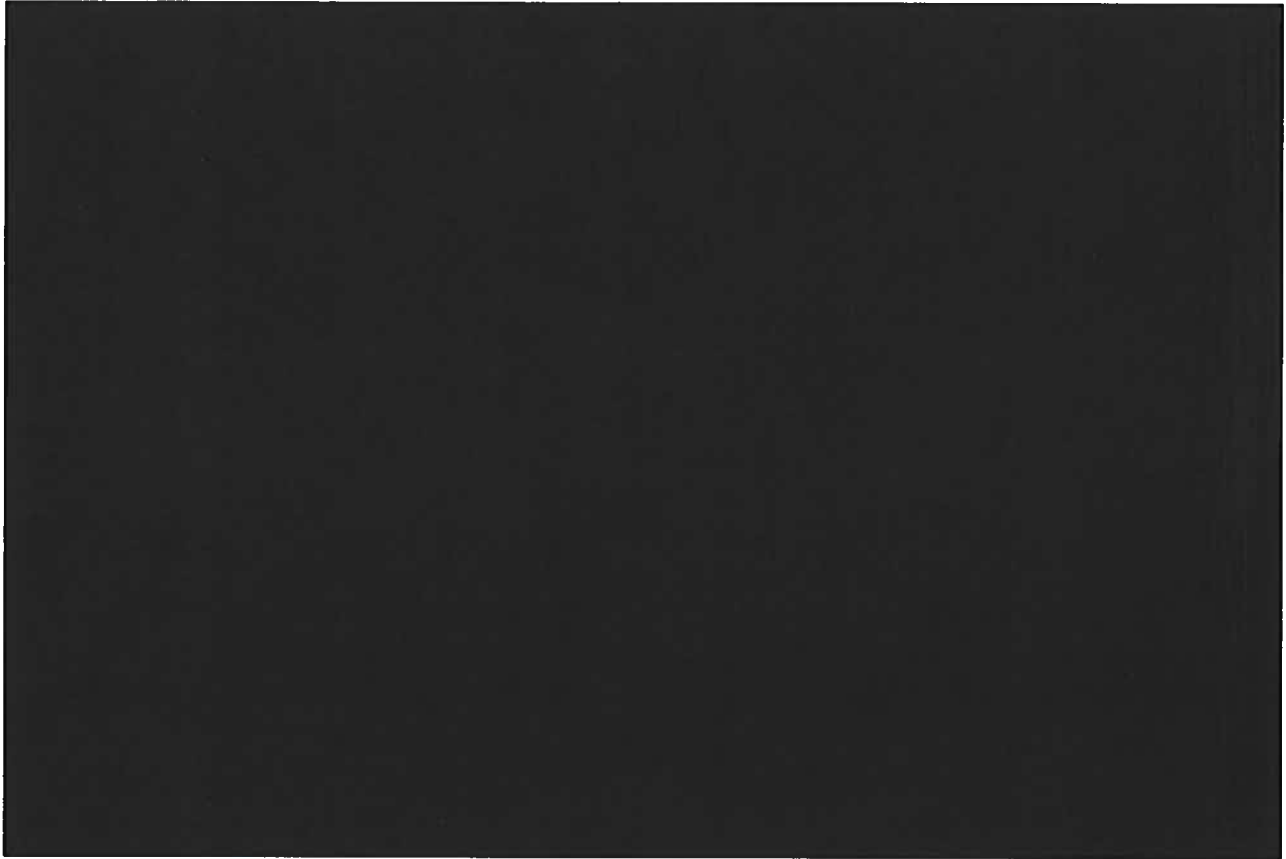




Exhibit CS-2 Escalated Call Process



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Case No(s). 21-0887-EL-AIR, 21-0888-EL-ATA, 21-0889-EL-AAM

Summary: Application Volume 11 of 11

Schedules S-4.2 Part 3 electronically filed by Mrs. Debbie L. Gates on behalf of Duke Energy Ohio Inc. and D'Ascenzo, Rocco O. Mr. and Kingery, Jeanne W and Brama, Elizabeth M. Ms.