

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke    )  
Energy Ohio, Inc., for a Waiver of Specific    )    Case No. 22-0043-GE-WVR  
Sections of the Ohio Administrative Code.        )

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**REPLY COMMENTS OF DUKE ENERGY OHIO, INC.**

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**I.     INTRODUCTION**

Pursuant to the February 11, 2022, Entry in this proceeding, Duke Energy Ohio, Inc., (Duke Energy Ohio or the Company) respectfully submits the below Reply Comments in response to initial comments made in this proceeding by the Office of the Ohio Consumers' Counsel (OCC), SFE Energy Ohio, Inc. and Statewide Energy Ohio, Inc. (SFE Energy), Direct Energy Business LLC, Direct Energy Services LLC, Direct Energy Business Marketing LLC, Energy Plus Holdings LLC, Energy Plus Natural Gas LLC, Reliant Energy Northeast LLC, Stream Ohio Gas & Electric, LLC, and Xoom Energy Ohio, LLC (collectively NRG Retail Companies), Retail Energy Supply Association (RESA), and Interstate Gas Supply, Inc. (IGS) on February 25, 2022.<sup>1</sup>

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<sup>1</sup> Consumer Protection Comments by Office of the Ohio Consumers' Counsel (February 25, 2022), Initial Comments of Interstate Gas Supply, Inc. (February 25, 2022), Initial Comments of The Retail Energy Supply Association (February 25, 2022), Comments of SFE Energy Ohio, Inc. and Statewide Energy Ohio, LLC (February 25, 2022) and Joint Initial Comments of Direct Energy Business LLC, Direct Energy Services LLC, Direct Energy Business Marketing LLC, Energy Plus Holdings LLC, Energy Plus Natural Gas LLC, Reliant Energy Northeast LLC, Stream Ohio Gas & Electric, LLC, Xoom Energy Ohio LLC (February 25, 2022).

## II. REPLY COMMENTS

### A. The Company's Current Conversion Plan Protects Customers And Minimizes Disruptions And Confusion For Them.

1. *Customers need not lose out on any protections or entitlements under the Special Winter Reconnection Order or under related aid programs as a result of the Conversion.*

OCC expresses concern that the planned conversion might “prevent customers from fully utilizing the Special Winter Reconnection Order and other consumer protection programs” that provide the one-time \$175 required for reconnection.<sup>2</sup> However, the benefits offered under the Special Winter Reconnection Order can continue to be available to customers during the conversion, including funds for the for which \$175 the customer otherwise qualifies. Customers may continue to pay \$175 to establish, or re-establish service during the conversion and cutover period, provided they have not used this benefit within the current winter season.

Insofar as the Special Winter Reconnection Order requires customers to enroll in a payment plan or PIPP Plus to benefit from the special reconnection procedures, the Company plans to follow the Commission's directive to “err on the side of maintaining service when there is a doubt as to the applicability or the interpretation of a rule.”<sup>3</sup> In this unusual circumstance, the Company will proceed to utilize the special reconnection procedures, to apply the available \$175 (if applicable) for customers, and then to enroll said customers in a payment plan or PIPP Plus as soon as possible after conversion. Thus, the Company believes that customers will not be prejudiced with regard to their privileges under the Special Winter Reconnection Order.

2. *The Company will not be able to maintain completely uninterrupted access to new enrollments in budget billing, payment plans, and PIPP Plus, but has measures in place to mitigate the interruption.*

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<sup>2</sup> OCC Comments, pg. 3.

<sup>3</sup> In The Matter Of The Commission's Consideration Of Solutions Concerning The Disconnection Of Gas And Electric Service In Winter Emergencies For The 2021-2022 Winter Heating Season, Case No. 21-750-GE-UNC, Finding and Order, pg. 3 (September 8, 2021).

OCC comments that customers should maintain “uninterrupted access to budget billing, extended payment plans and PIPP,”<sup>4</sup> but this is simply impossible. It is technically impossible to “operat[e] the legacy systems involving customer payment agreements in parallel with the new CIS as it is being installed,”<sup>5</sup> because the legacy CIS must be frozen and converted at a certain point in time to preserve all existing information accurately. The Company will not be able to maintain **completely** uninterrupted access to new enrollments in budget billing, payment plans, and PIPP Plus, but has measures in place to mitigate the interruption. The Company will continue to receive calls from customers throughout the conversion and cutover period and will offer customers the option of a call-back after conversion and stabilization are complete regarding enrollment in any of these programs. The suspension of new enrollments in these programs should not prejudice any customers.

3. *The Company does not intend to provide disconnection notices prior to June 1, 2022, but will be able to verify the status and/or delinquency (where applicable) of a customer’s account throughout the transition period.*

OCC expresses concern that some low-income customers may miss out on bill payment assistance during the Company’s suspension of DNPs because they will not have disconnection notices on their bills and some programs require disconnection notices to provide assistance.<sup>6</sup> However, agencies will be able to call the company to verify the status of a customer’s account if they need to verify a customer’s delinquency to release available aid. The Company has met with both the Ohio Department of Development and a number of representatives from the Community Action Agency (CAA) to inform CAA regarding its upcoming conversion and make CAA aware of what functions will be available during the transition. Additionally, agencies may call the

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<sup>4</sup> OCC Comments, pg. 4.

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

Company to inquire about a customer's balance at any time, regardless of whether they have a DNP notice. Finally, the Company accepts pledges toward customer account balances, whether or not the customer has received a notice of disconnection for non-payment.

4. *OCC's request to suspend DNP immediately is moot and the Company's contingency processes will assure that service reconnections requested between March 31 and April 6—as long as no new installation is required—will occur timely notwithstanding the suspension of payment posting.*

OCC requests that DNPs be suspended immediately and expresses concern that if payments are made on or after March 31<sup>st</sup>, previously disconnected customers might have to wait until after April 6 to be reconnected.<sup>7</sup> The first request is moot because the Company has already suspended DNPs as of March 1. Regarding the second part of OCC's concern, suspending DNPs March 1 allows time for customers who were previously disconnected to have service restored before the legacy system is no longer available. Additionally, the Company has contingency processes in place to ensure that reconnections that do not require new installations proceed timely throughout the cutover period of March 31 to April 6. The Company will leverage electronic contingency processes to create and route these requests to field personnel as needed.

5. *The Company is not opposed to publicly filing a plan in this proceeding for the resumption of DNP after conversion.*

OCC requests that the Commission require the Company to publicly file a “more comprehensive plan and details” for resuming disconnections on July 1, 2022, similar to what the Company filed in Case No. 20-599-GE-UNC.<sup>8</sup> OCC states that “[t]he types of topics appropriate for that plan included the number of consumers eligible for disconnection, arrearages, communications with affected consumers, disconnection notices and timelines, criteria for prioritizing disconnections, options to avoid disconnection including separation of services,

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<sup>7</sup> *Id.*, pg. 5.

<sup>8</sup> *Id.*, pg. 6.

protection of at-risk consumers including PIPP consumers, specialized payment plans, and available financial assistance.”<sup>9</sup>

The Company is not opposed to making a public informational filing in this proceeding to describe its plan to transition to the resumption of DNPs, which would include the following items:

- Planned dates for the resumption of late payment charges, disconnection notices, and disconnections;
- A bullet-point outline of its communications plan with customers;
- Plans pertaining to enrollment of customers in payment plans and/or PIPP Plus prior to the resumption of DNPs; and
- Steps to be taken to collaborate with agencies to facilitate the flow of aid to qualified customers and thereby help minimize the number of customers facing DNP.

Additionally, the Company would be willing to update its informational filing if the planned dates changed. However, the Company would find it burdensome to have to gather data regarding the number of customers and arrearages and does not believe that this data would add value. Furthermore, the Company believes its filing should be informational only and not a submission requiring the Commission’s review and approval.

6. *The Company has updated its Choice webpage to inform customers that they will experience delays in enrollments during the conversion.*

OCC, RESA, and IGS request that the Commission impose additional requirements on the Company pertaining to customer communications regarding the temporary unavailability of certain choice transactions, including enrollments and drops, that will occur as part of the

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<sup>9</sup> *Id.*, pg. 6-7.

conversion process.<sup>10</sup> The requests include specific deadlines for customer communications, as well as to specify the content of such communications.<sup>11</sup> The Company believes that its current plans for customer communications pertaining to choice transactions strike the optimal balance between providing customers with information while avoiding unnecessary and superfluous confusion and consternation for customers who will not be impacted in this regard. The Company is not opposed to describing its communications (see below in this section), but opposes the requests that such communications be submitted for Commission review and approval. This would be inefficient and burdensome, and could delay the conversion unnecessarily.

In regard to choice transactions, the Company is in the process of placing a banner message on its Choice webpage that should be visible by March 6:

*Enrollments in the Ohio Choice program will be unavailable 3/19 – 4/6 as we transition to a new billing and technology system. Please make note of these important dates so you can plan for what’s ahead.*

This banner will be visible to all those who visit the Company’s Choice webpage at <https://www.duke-energy.com/home/products/ohio-customer-choice>. Additionally, a banner message explaining the addition of Choice Service IDs will be placed on the same webpage on April 6 and remain until approximately mid-May. Furthermore, the Company also plans to add a bill message to customer bills in April, to run for two months, stating: “If you choose a Certified Supplier to provide your electric or natural gas supply, make sure to share the 22-digit Choice Service ID number located in the meter box section of your bill, so they can enroll you.” And finally, the Company will be sending an email to Ohio customers (for whom it has email contact

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<sup>10</sup> See OCC Comments, pg. 7; RESA Comments, pg. 8-9; IGS Comments, pg. 5-6.

<sup>11</sup> See, e.g., IGS Comments, pg. 5 (“IGS also recommends that the communications include, at a minimum, a detailed description of the planned changes, their associated impacts on shopping and non-shopping customers, as well as the telephone number. . .”).

information) that will provide information about changes in the bill format and also about the new account numbers and Choice Service IDs.

The Company believes that sending communications to all of its customers regarding the temporary unavailability of enrollments and drops would do more harm than good because the vast majority of customers at any given time are not in the process of contemplating a switch in suppliers and will not be impacted by a 2.5 week period of unavailability for such transactions. Sending them a message that certain functions are being suspended will only cause them to be worried unnecessarily. Those customers who are interested in making a switch will be able to see the pertinent information on the Choice website as described above. For these reasons, the Company is opposed to any additional requirements for communication with customers regarding choice transactions.

Regarding customer communications about the conversion in general, the Company has a plan in place designed to minimize customer confusion. Among other things, the plan is designed not to give customers information that may confuse or frustrate them. The Company's overall communications plan launched in early February with general awareness about changes that were coming. Later in February and continuing through March, more targeted communications are being sent to make customers aware of specific changes to billing or payment program, and new digital experiences (e.g., Agency Portal). Furthermore, notice of temporarily unavailable services will be in place during the cutover period.

RESA takes issue with the customers receiving their new Choice Service IDs for the first time on the first post-conversion bill,<sup>12</sup> but this will actually minimize customer confusion rather than cause it. Providing this information in a standalone communication would be confusing for

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<sup>12</sup> RESA Comments, pg. 8.

customers because no action would be required of them or available to them. The bill will be the first touchpoint the Company will have with most customers after conversion and at that point customers will be able to transact with their new information.

For these reasons, while the Company is willing to be transparent about its communications plans, the Company opposes the imposition of requirements for Commission review and approval of its communications with customers.

**B. The Company's Current Conversion Plan, With Minor Additions Described Below, Strikes The Correct Balance Between Short Term Impacts On Suppliers And The Long-Term Stability And Integrity Of The New System Post-Conversion.**

- 1. The Company will not be able to alter the cutover period, shorten the suspension period for enrollment and drop requests, accept and hold enrollment or drop requests, and will not be able to backdate such requests.*

RESA, the NRG Retail Companies, IGS, and SFE Energy all seek, in one form or another, to require the Company to either reduce or eliminate entirely the unavailability of certain choice transactions—including but not limited to enrollments, drops, rate changes, and billing—during the conversion process. The requests include:

- Continuing to accept enrollment requests throughout the entire conversion period;<sup>13</sup>
- Shortening the unavailability period for billing data and offer unspecified “interim measures”;<sup>14</sup>
- Apply contract rate changes and terminations as usual throughout the conversion period;<sup>15</sup>
- Shorten the cutover period to April 1 to 4;<sup>16</sup> and

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<sup>13</sup> RESA Comments, pg. 10.

<sup>14</sup> RESA Comments, pg. 10-11.

<sup>15</sup> RESA Comments, pg. 11.

<sup>16</sup> NRG Retail Companies, pg. 3-4.



- Collect enrollments and drops throughout the conversion period<sup>17</sup>

The Company cannot meet these demands.

Shortening suspension periods would compromise the integrity of data and introduce unacceptable risks into the conversion process. At a certain point in time, the legacy (current) system must be “frozen” in order to commence the conversion. At the time of the “freeze,” it is essential that there be no pending transactions in the system or else data may be lost and other errors may occur. The conversion process requires data to be extracted and transformed to the new data model and then loaded to the new system. This is a very cumbersome process with millions of rows of data. Additionally, it would take longer to get cross-reference lists for legacy account numbers; the lists would not be available until after the new system went live. Thus, certain functions simply must be temporarily suspended in order to complete the transition to Customer Connect responsibly. The time periods of the suspensions have been carefully considered and recommended by the Company’s third party system integrator who has had extensive experience with similar conversions.

Continuing to collect and store choice transactions is also not an option. Supplier transactions are completely automated, and the systems that receive and process them are being taken down. For the same reason, there is no way to prevent a suspension of billing (bill-ready and rate-ready) transactions. Contrary to IGS’s suggestion, the inbound choice transactions are not comparable to customer requests that come into the call center regarding budget billing or payment arrangements.<sup>18</sup> The Company is not planning to “collect” enrollments in budget billing and payment plans, as IGS claims, but only to continue to receive customers telephone calls and to offer customers the option of receiving a return call after the conversion. Such return calls are

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<sup>17</sup> IGS Comments, pg. 3-4.

<sup>18</sup> IGS Comments, pg. 3-4.

not equivalent to enrollments at the time of the first call; they may or may not result in an enrollment and certainly will not result in a backdated enrollment. Supplier inbound transactions come through via EDI or secured file transfer protocol (SFTP) flat file and there is no way to “catch” and store them for the interim.

With regard to contract administration,<sup>19</sup> Suppliers have the option of submitting contract rate changes and terminations prior to the suspensions. The Company encourages Suppliers to review existing contracts and submit terminations that fall within the suspension period prior to March 18. If they do this, the termination will take effect on the designated date. Likewise, rate changes submitted by March 30 will take effect on the customer’s next billing cycle. The Company will not be able to implement these during the transition unless they are submitted ahead of time.

Finally, SFE Energy’s request for the Commission to simply deny the Company’s waiver request in favor of a “revised implementation plan”<sup>20</sup> is not only impractical and costly, but will not gain anything in terms of an improved transition process. It would merely delay conversion unnecessarily and if the revisions included shortened suspension periods, it would also likely introduce errors into the new system that would cause more and longer-lasting problems than the short-term temporary suspensions that it sought to avoid.

For these reasons, it is crucial that the Company make its conversion with the requested suspension periods—suspensions in every sense, without substitute processes in place for those brief periods—and that Suppliers be prepared for them.

2. *It would be unduly burdensome to make the Company’s communications with Suppliers—which have been voluntarily extensive and comprehensive thus far—subject to Commission review and approval.*

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<sup>19</sup> RESA Comments, pg. 11.

<sup>20</sup> SFE Energy, pg. 12.

RESA requests that the Commission place a number of requirements on the Company to communicate with suppliers throughout the conversion, regarding the new Supplier Portal, and regarding post-conversion issues.<sup>21</sup> In light of the Company's track record of collaboration and communication thus far and ongoing plans to provide support and information to suppliers, Commission oversight and Commission-imposed requirements around such communications and collaboration would be unduly burdensome and inefficient.

The Company has already been working in good faith with suppliers for nearly two years on this conversion. The Company conducted its first Supplier Information sessions in May 2020 to provide an overview of the Customer Connect program and expected impacts to Suppliers. A number of questions resulted from the sessions and the Company provided a Frequently Asked Questions document in July 2020, which it updated two more times in August 2020. In September 2020, initial versions of the Supplier Integration Handbooks for electric EDI and gas flat files were provided to suppliers. The Company continued to update the Supplier Integration Handbooks and provided notifications to suppliers each time, with the most up-to-date versions being made available August 2021. Testing with suppliers began in November 2020 and continued through February 2022 and has included connectivity and the ability to receive and process the cross-reference file that will be provided to suppliers.

Most recently, the Company also hosted both a technical conference as well as additional Supplier Information Sessions in February 2022 to answer questions related to conversion and cutover and provided an additional extensive Frequently Asked Questions document afterward. In addition to the information sessions, testing, and conference, already described, the Company has provided examples of multiple Choice Service IDs on an account as early as September 2020.

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<sup>21</sup> RESA Comments, pg. 7-9, 11-12.

Furthermore, the Company has contacts regularly available to suppliers by telephone and email for technical questions.

Micro-management of this process by Commission order would be burdensome and inefficient. For example, RESA asks the Commission to require “[t]raining opportunities and communications related to the new supplier portal,”<sup>22</sup> and, indeed, the Company already has supplier information sessions scheduled this month regarding the portal, has already sent out communications, and has additional communications planned. Where there is a need for training and discussion, the Company creates the appropriate communications and/or sessions. And the Company will have a robust Hypercare team with staff specifically dedicated to choice issues and several Company contacts for post-conversion questions and issues. But imposing requirements for meeting with the entire pool of suppliers regularly throughout the conversion, as requested by RESA,<sup>23</sup> would take crucial resources away from where they are needed most.

The Company has shown itself to be proactive, communicative, and responsive to date. Imposing a layer of oversight by the Commission—which meets twice a month and has a busy docket—would hamper the Company’s ability to operate efficiently and nimbly, as well as to react quickly as issues arise. Thus, while the Company will continue to be open and communicative, the Company opposes the imposition of requirements for its meetings and communications with suppliers.

3. *The Company cannot provide its cross-reference lists any earlier than planned; however, with appropriate authorization from the Commission, the Company would not be opposed to providing suppliers with Choice Service IDs in exchange for a legacy account number for a 90-day grace period.*

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<sup>22</sup> RESA Comments, pg. 8.

<sup>23</sup> RESA Comments, pg. 7-8.

RESA, the NRG Retail Companies, and IGS express concerns regarding the Company's plans to provide cross-reference lists to Suppliers that contain their existing customers' legacy account numbers and new Choice Service IDs, and also request to be able to continue to transact with legacy account numbers for some period during and after conversion.<sup>24</sup> The Company is not able to provide cross-reference lists to Suppliers earlier than the planned date of April 5 and will not be able to permit automated transactions with legacy account numbers for a "grace period" after conversion.

The NRG Retail Companies request that Duke Energy Ohio be required "to provide the cross-reference list to suppliers 5 business days prior to the date in which the new CIS goes live."<sup>25</sup> This is simply impossible because the new Choice Service IDs will not even exist until April 5 because the new account numbers, and thus the Choice Service IDs, cannot be generated until the data conversion process is complete from the legacy system to the new system.

IGS's request that the Company provide "an additional cross-reference list that includes, at a minimum, the customer's legacy account number and new Choice Service ID"<sup>26</sup> appears to be consistent with the Company's already-existing plan to provide such a cross-reference list. Insofar as IGS would also like to see additional identifying information on the list, such as the customer's name, address, and meter number,<sup>27</sup> the Company plans to include the service address and meter number in the cross-reference list already. The Company does not plan to include the customer name at this time.

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<sup>24</sup> RESA Comments, pg. 10; NRG Retail Companies Comments, pg. 7; IGS, pg. 4-5.

<sup>25</sup> NRG Retail Companies Comments, pg. 7.

<sup>26</sup> IGS Comments, pg. 4.

<sup>27</sup> *Id.*

While the Company will not be able to automatically transact with legacy account numbers after conversion<sup>28</sup> simply because the functionality has not been developed and tested to do so, the Company is open to a manual form of cross-referencing under the right conditions. If the Commission is willing to authorize a temporary limited waiver of the consent requirements that prohibit disclosing a customer's account number without customer consent, the Company would be willing to provide a grace period during which the Company would work with Suppliers to cross-reference individual customers manually. In other words, the Company would provide, via email, the Choice Service ID(s) for a given customer to a Supplier after the Supplier emails the Company that customer's legacy account number without a formal letter of authorization as normally required by 4901:1-10-24(E)(1) and (4), as well as 4901:1-13-12(D)(1) and (3). To be clear, the Company is not affirmatively requesting such a waiver. It is simply stating that, if the Commission grants such a waiver in response to intervenors' comments, the Company would not oppose facilitating this sort of manual cross-referencing exchange for up to 90 days after conversion.

4. *The use of Choice Service IDs is an integral aspect of the new system and has been discussed with Suppliers since as early as June 2020.*

IGS questions the wisdom of Choice Service IDs and suggests that their role in the new system was revealed for the first time in December 2021.<sup>29</sup> However, Choice Service IDs are a necessary and integral part of the design, and the Company has been discussing them with Suppliers for much longer, since as early as June 2020, as evidenced by Attachment A to these Reply Comments, which is a presentation that was distributed to Suppliers in June of 2020.<sup>30</sup> Among other things, Attachment A explains that "Customer Account Number will change, will

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<sup>28</sup> RESA Comments, pg. 10; NRG Retail Companies Comments, pg. 7.

<sup>29</sup> See IGS Comments, pg. 6-8.

<sup>30</sup> See Attachment A, slides 12, 13, 15, and 16,

include Point of Delivery ID,” “Enrollments and other transactions will be processed at the Installation level - therefore, separate transactions will be required for each Installation (Point of Delivery) at a premise, such as metered and unmetered installations,” “[s]eparate transactions are required for each Installation (Point of Delivery),” and that “[o]ne account number may convert with multiple Point of Delivery IDs.”<sup>31</sup> These aspects of Choice Service IDs were not a December 2021 revelation.

Duke Energy Ohio, as a combination utility, provides both gas and electric service to its customers, and is the only utility in Ohio that does so. In current state, gas suppliers send transactions to the Company using a “flat file” with no option to leverage automated electronic data interchange (EDI) processes to submit transactions. Conversely, electric suppliers submit their transactions by EDI. Today, when suppliers submit transactions for a specific account or only one commodity on the account, that commodity is easily identified based on the transaction type, *e.g.*, flat file for gas transactions and EDI transaction for electric transactions. Once Customer Connect/SAP is deployed in April, gas suppliers will also have the option to leverage the more robust EDI processes for transactions. Since the Company knew it would sometimes receive enrollments from different suppliers for the same account but different commodities, it needed a way to distinguish the service type – gas or electric. This is accomplished using multiple Choice Service IDs which provide the specific point of delivery (POD). The Company simply cannot provide a “one-to-one relationship between the customer’s account number and the premises served”<sup>32</sup> because there may very well be more than one commodity at the premise, on the same account.

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<sup>31</sup> See Attachment A, slides 12-15.

<sup>32</sup> IGS Comments, pg. 7.

IGS also states that Duke Energy requires a supplier to submit separate enrollment transactions for each POD on the account,<sup>33</sup> but the Company has updated its process since the February supplier information session and clarified this in its FAQ. Each service for the specific commodity on the account (i.e., all gas service or all electric service) must be enrolled with the Supplier, and if the supplier fails to submit a transaction for all Choice Service IDs for said commodity on the account, the Company will enroll the missing Choice Service IDs and notify the Supplier. Thus, Supplier failure to submit a complete set of Choice Service IDs will not prevent enrollment as long as at least one Choice Service ID is valid and the transaction is otherwise acceptable.

### **III. CONCLUSION**

The Company respectfully requests that the Commission approve its Application in this case consistently with these Reply Comments.

Respectfully submitted,

/s/ Larisa M. Vaysman

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<sup>33</sup> *Id.*, pg. 6.



### **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Reply Comments of Duke Energy Ohio, Inc. was served on the following parties this 4<sup>th</sup> day of March 2022 by regular U. S. Mail, overnight delivery or electronic delivery.

/s/ Larisa M. Vaysman

Larisa M. Vaysman

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# Duke Energy Ohio Customer Information System Changes

## *Overview of Program and Impacts*

Information Session

May 2020

### **Disclaimer:**

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This publication was last updated in June 2020. Depending on testing and system updates rolled out by Duke Energy since that time, some features may have evolved or changed. We encourage you to contact us for the latest updates.

A green triangle with a white border and a smaller blue triangle inside.

## SAFETYFirst

- ▷ PERSONAL ACCOUNTABILITY
- ▷ ACTIVE CARING
- ▷ HAZARD RECOGNITION



## Create a Safe Learning Experience

- ✓ Choose a Safe & Quiet Location
- ✓ Identify Emergency Exits
- ✓ Remove Clutter & Tripping Hazards
- ✓ Adjust Your Chair & Computer as Needed
- ✓ Use a Headset or Speakerphone



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Lead*



**Jill White**

*Lead CSS Business Analyst*

## Online Conference Etiquette

*To ensure a positive experience  
for all attendees, please:*

- ✓ Eliminate distractions
- ✓ Please mute your phones

- [Program Overview](#)
  - Program Overview
  - Program and Supplier Timeline
- [Change Impacts](#)
  - Definitions
  - High Level Change Impacts
  - Detailed Change Impacts
- [Planning and Next Steps](#)
  - Design, Build, & Validate (DBV)
  - Supplier Integration Testing Windows
  - Our Ask of You
  - Next Steps
  - Contact Us
- [Appendix A](#)
  - Changes Sorted by Estimated Impact

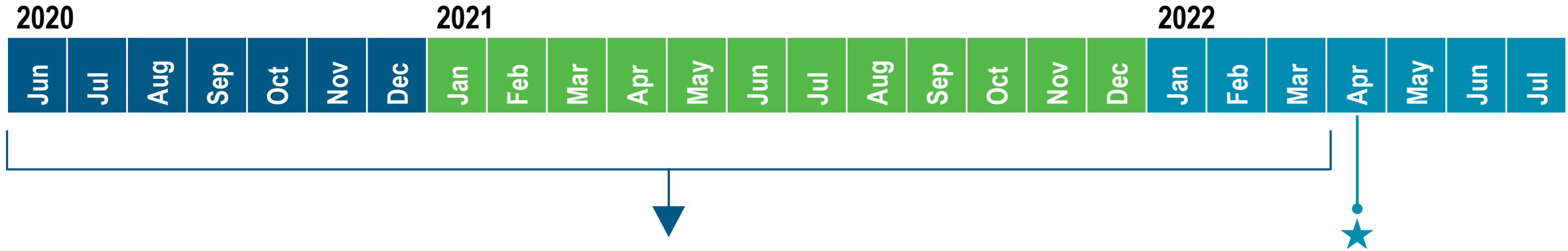
# Program Overview

## Duke Energy is finding new ways to enhance our customers' experience.

- Our Customer Connect program is a multi-year initiative to replace our existing customer information systems (CIS) with one SAP platform that will modernize and transform how we serve customers
- Benefits include:
  - Providing customers with the easy, personalized experience they expect from service providers
  - Providing additional customer and account information to Certified Suppliers for our mutual customers
  - Updating the Certified Supplier Portal to provide you with more information in a more modern format
  - Giving Certified Gas Suppliers the option to provide your logo – in color – on the customer bill
  - Implementation of “Seamless Move” functionality for residential electric customers, pending regulatory approval of Operational Plan
  - Option for Gas Suppliers to adopt EDI transaction format, allowing access to enhancements such as bill-ready billing

# Program and Supplier Timeline\*

\*Subject to change



**!** A detailed timeline is being defined to determine exact timing for the following activities:

- Communications, Design, Build, & Validate<sup>1</sup> (DBV) – (Getting system ready)
- Early Product Testing<sup>2</sup> with a few Suppliers
- Product Testing with all remaining Suppliers divided into monthly test windows
- Regression testing (as needed) to ensure “No Damage” due to changes
- Final Operational Readiness Testing<sup>3</sup> and Final Deployment Planning activities

1 – Validation during DBV is unit testing within your Company

2 – Product Testing is joint functional testing with Duke Energy (or other third party) to ensure systems work as planned

3 – Operational Readiness Testing tests the production environment’s readiness to handle the new system as well as final deployment steps

**4/4 – Go-Live in Ohio**



# Change Impacts

- **Premise** – Physical location for customer's service
- **Installation** – Service type / service point, equivalent to Point of Delivery
- **Point of Delivery (POD) ID** – Number appended to customer's account number to identify the target Installation for each transaction, equivalent to Installation
- **Supply Scenario** – Utility Consolidated Billing or Dual Billing
- **Bill Option** – Bill-Ready, Rate-Ready or Dual Billing
- **Aggregation Code** – Code provided by Duke Energy to uniquely identify a Governmental Aggregation
- **Rate Category** – Billing class and rate code
- **Invoice** – Formatted document detailing amount due, formerly known as "bill"

**For our Ohio Certified Gas and/or Electric Suppliers, changes will need to be made for integrations to continue to work.**

High-level impacts for both Gas and Electric Suppliers are as follows:

- Customer Account Numbers will change and will include Point of Delivery (POD) ID for total length of 22 characters. The active Supplier(s) will inherit all Points of Delivery for electric / gas service for an account
- Customer and Settlement transactions will be processed at the Installation level rather than Premise level
- There will be 20 billing cycles per month instead of 21, and customers' billing cycle may change as a result
- Identifiers will be assigned to Government Aggregations and must be returned with associated enrollments
- Seamless Move functionality for Residential electric customers will be available via EDI transaction upon regulatory approval of the Operational Plan
- Gas Suppliers will have the option to take advantage of additional EDI flexibility
- Additional data fields will be populated in EDI and Flat File formats
- Certified Suppliers may need to process data conversions in their systems
- Certified Supplier Portal will be modernized, with Gas Suppliers also able to access

# Detailed Change Impacts – General



Suppliers	Impact	Level of Impact
All	A Production Freeze period will be implemented shortly before the go-live date where all transactions will be held and processed once the new system is implemented. Details of the freeze are not yet finalized	High
All	A cross-reference file of old-to-new customer account numbers will be provided to each supplier but will not be available until conversion time. One account number may convert with multiple Point of Delivery IDs	High
All	Separate transactions must be processed for each installation	High
Gas	Gas suppliers selecting EDI transaction format can take advantage of extended functionality (e.g., Bill-Ready Billing, additional customer contact information)	High
All	An identifying code will be assigned to Government aggregations. The provided code must be included on all enrollments for each aggregation, or submitted with a Change transaction.	Medium
All EDI	Envelope and header transaction numbers will be reset to a new starting point.	Medium
All	The primary identification method for Certified Supplier transactions will be your DUNS number. Electric Suppliers are accustomed to providing this identifier on transactions, but Gas Suppliers are not.	Low
All EDI	Utility Company Name will change to “DUKE ENERGY OHIO” or “DUKE ENERGY OHIO – GAS”	Low

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# Detailed Change Impacts – Data



Suppliers	Category	Impact	Level of Impact
All	Data	Customer Account Number will change, will include Point of Delivery ID, and length will be 22 characters total. A cross-reference file will be sent to active Certified Suppliers. Legacy customer account numbers will be included in EDI transactions sent by Duke Energy	High
All	Data	Enrollments and other transactions will be processed at the Installation level - therefore, separate transactions will be required for each Installation (Point of Delivery) at a premise, such as metered and unmetered installations	High
Gas	Data	Gas Suppliers electing Flat File format must use their 9- or 13-digit Supplier DUNS number instead of the 3-digit identification number previously provided by Duke Energy	Medium
Electric	Data	The “Customer Category” type on Synch List reports used by Electric Suppliers will change from "R, C, L" to the rate category (OHER, OHEC, OHEI, OHEO). Loss Factors and PLC / NSPL values on customer records may also change.	Low
Electric	Data	Transaction Numbers, Invoice Numbers and other Cross-Reference Numbers will use different number ranges than today	Low
All	Data	Customer Bill Cycles and Meter Read Cycles will change for many customers as the number of cycles is reduced from 21 to 20	Low
All	Data	Customer Rate Class and Rate Category values will change to a new naming scheme (e.g., OHER, OHGC)	Low

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# Detailed Change Impacts – EDI



Suppliers	Category	Impact	Level of Impact
Gas	EDI	Current Gas Suppliers may adopt EDI transaction format, allowing access to enhancements such as bill-ready billing. Guidelines have been developed and will be shared with those suppliers opting to use EDI	High
Gas	EDI	Certified Gas Suppliers who register after the new system is implemented will be required to use the EDI transaction format	Medium
All	EDI	Separate transactions are required for each Installation (Point of Delivery)	Medium
All	EDI	Customer address and contact information will be provided in response transactions	Medium
All	EDI	Customer eligibility check will be "as of today" for account status. Code 008 returned if account is no longer active, and 021 if account is pending inactive (future-dated).	Low
Gas	EDI	For Gas EDI transactions only, the Duke Energy DUNS number will be the regular 9-digit number with "000G" appended, for a 13-digit DUNS+4	Low

*Electric EDI guideline documents will be updated through the standard Change Control process*

# Detailed Change Impacts – Gas Flat File



Suppliers	Category	Impact	Level of Impact
Gas	Flat File	Reason codes will be updated, including changes to rejection codes. Mapping will be provided	High
Gas	Flat File	Separate enrollment transactions are needed for each customer Installation associated with an account. Duke Energy may manually enroll installations that are omitted	High
Gas	Flat File	Historical monthly usage can be requested with enrollment or as a stand-alone transaction – with appropriate customer authorization – but no longer with a Change/Modify request	Medium
Gas	Flat File	Tenant field will be removed. Account Number field will contain Account Number + POD	Medium
Gas	Flat File	Duke Energy will begin assigning an identifier to each aggregation, and this value will have to be returned on each enrollment for that aggregation. Code will be in new "aggregation code" field on flat file	Medium
Gas	Flat File	Monthly data files will be generated for the calendar month, to aid reconciliation	Medium
Gas	Flat File	Enrollments received for an account with a pending move-out will be rejected regardless of move-out date and the effective date of enrollment	Medium
Gas	Flat File	Rate code field will be blank (instead of "NONE") for Dual Billing enrollments	Medium
Gas	Flat File	Historical monthly usage requested with an enrollment will be returned on a separate response file from the enrollment confirmation	Low

*Updated Gas Flat File Layout documents will be provided*

# Detailed Change Impacts – Enrollments

Suppliers	Category	Impact	Level of Impact
All	Enrollment	Utility Account Number will change, will include Point of Delivery ID, and length will be 22 characters total. Customers will see the full “Choice Service ID” on their invoice	High
All	Enrollment	Separate enrollment transactions are needed for each customer Installation associated with an account. Duke Energy may manually enroll installations that are omitted	High
All	Enrollment	New Process Code recommended for Supplier Transfer (Purchase of Book of Accounts)	Medium
Electric	Enrollment	REF*KY segment will be included when appropriate to identify a net-meter account	Medium
All	Enrollment	Enrollments received for an account with a pending move-out will be rejected regardless of move-out date and the effective date of enrollment	Medium
All	Enrollment	Previous Utility Account Number (legacy system account number) will be populated in the REF*45 segment	Low
All	Enrollment	Utility Budget Billing status flag will be provided in outbound transactions	Low
All	Enrollment	Monthly budget billing amount will be included in response for Non-PAR enrollments	Low
All	Enrollment	Utility Rate Class and Utility Revenue Class values will change	Low
All	Enrollment	Billing and Meter Reading Cycle values may change as customers are assigned to new cycles	Low
Electric	Enrollment	Utility Company name change to Duke Energy Ohio	Low

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# Detailed Change Impacts – Miscellaneous



Suppliers	Category	Impact	Level of Impact
Electric	Seamless Move	Residential Electric Customer may keep their current Supplier contract when they move within Duke Energy territory, subject to certain conditions outlined in the Seamless Move Operational Plan and pending regulatory approval. New 814M EDI transaction proposed.	High
All	Pre-Enrollment Lists	Pre-Enrollment List account identifier is changing. Change in Account ID will mean that previous pre-enrollment lists cannot be used in the new system. New lists will be generated after conversion.	High
Electric	PJM Settlement	PLC and NSPL values will be calculated at the Installation level, not Premise. Overall obligation will not change but will be split across all installations in a Premise.	Medium
All	Supplier Rates	Rate Code naming convention will change, therefore Supplier rate codes will not be restricted to only 4 characters. Existing rate codes will be converted into the new system.	Medium

# Detailed Change Impacts – Services Invoice



Suppliers	Category	Impact	Level of Impact
Gas	Invoice	Gas Suppliers will begin receiving a separate invoice for tariff fees and settlement / balancing	High
All	Invoice	Supplier invoices will be archived for viewing on the Certified Supplier Portal	Medium
Gas	Invoice	Gas Suppliers will be able to receive their Certified Supplier invoice by email	Low
All	Invoice	The Supplier invoice format will change and will display a due date, previous balance and payment, and any late payment charges or messages as needed.	Low

# Detailed Change Impacts – EDI Change Transaction

Suppliers	Category	Impact	Level of Impact
All	EDI 814C	814 Change transactions from Duke Energy will communicate Customer Name changes, including a change to a customer's Doing Business As (DBA) name. Tax ID changes will continue to require a new enrollment	Medium
All	EDI 814C	814 Change transactions from Duke Energy will communicate changes to customer contact information if another change (e.g., meter, bill cycle) is also being communicated	Medium
Electric	EDI 814C	814 Change transactions from Duke Energy will include the REF*KY segment when appropriate to identify a net-meter account	Medium
All	EDI 814C	Rate Subclass values will mirror the Utility Rate Class values	Low

# Detailed Change Impacts – EDI Billing Transactions

Suppliers	Category	Impact	Level of Impact
Electric	EDI 867	Values for both Generation and Consumption registers will be sent for net-meter customers. The usage Summary will indicate whether the net amount is Additive (A) or Subtractive (S)	Medium
Electric	EDI 867	REF*KY segment will be sent on HI and HU to identify net-meter accounts	Medium
All	EDI 867	Number of billing cycles in a month changing from 21 to 20	Low
All	EDI 867	Invoice / Transaction Numbers - valid number ranges will change	Low
Electric	EDI 810	Suppliers may send negative charge amounts and totals in bill-ready 810 transactions	Medium
Electric	EDI 810	Invoice / Transaction Numbers - valid number ranges will change	Low
Electric	EDI 810	Utility Bill Cycle - data may change as customers are assigned to new cycles	Low

# Detailed Change Impacts – Certified Supplier Portal

Suppliers	Category	Impact	Level of Impact
Gas	Supplier Portal	Gas Suppliers will have access to the Certified Supplier Portal	Medium
All	Supplier Portal	One (or more) user(s) from each Certified Supplier will be designated as Administrator and can manage permissions for other users at that Supplier	Medium
All	Supplier Portal	Invoices (generated after implementation of the new system) will be available in History	Medium
Electric	Supplier Portal	Supplier Portal format will change for Electric Suppliers	Low
All	Supplier Portal	Color logos will be used on end-use customer invoices and can be uploaded via the Certified Supplier Portal – for both Electric and Gas Suppliers	Low
All	Supplier Portal	Each Supplier Portal user will have individual login credentials	Low
Electric	Supplier Portal	New rates can be requested for all standard rate types	Low
Gas	Supplier Portal	Pre-Enrollment lists can be downloaded from the new Certified Supplier Portal	Low

# Selected Items that Will Not Change from Current State

Suppliers	Category	Impact
Electric	EDI 810	867 Cancel will continue to automatically cancel the supplier's 810
Electric	EDI 867	Duke Energy Ohio (DEO) will continue to accept an 810 Reissue at any time providing the 810 Reversal is received prior to the 810 Reissue
Electric	EDI 867	DEO may continue to send a cancel/re-bill to supplier even if they're no longer the current supplier of record for the customer. Bill option in effect during the original billing will be used, as well as the original Usage ID.
Gas	Flat File	Daily and monthly output files will continue
All	EDI	Reject reason for wrong commodity (A91) will be used for Electric enrollment submitted on Gas installation and vice versa

# Planning & Next Steps

**Our target date to complete DBV is September 30, 2020** *(no later than December 31, 2020)*

- This will give us ample time to:
  - Prepare for Product Testing starting in January 2021
    - Joint Test Planning
    - Test Script Development
    - Test environment setup and test data preparation
    - Resource allocation
  - Complete early testing with 5-10 Suppliers (4<sup>th</sup> quarter 2020)
  - Work through any unforeseen issues



# Supplier Integration Testing Windows\*

\*Subject to change



**Due to the large number of Suppliers, testing must be spread over several months and be coordinated with our other project activities.**

- Testing will be divided into month-long test windows. The length of time for test execution will depend on:
  - Complexity of the testing for each Supplier
  - Number of defects we encounter
  - The amount of changes a Supplier may need to make within their systems
- Each Supplier will need to select a primary and secondary test window as their preferred Product Test timing.
  - *We cannot guarantee a particular test window, but will try to accommodate as best we can.*
  - Identify “blackout” windows where we cannot test together (e.g. upgrades occurring that would prevent testing)

2020	2021
Oct	Jan
Nov	Feb
Dec	Mar
	Apr
	May
	Jun
	Jul
	Aug
	Sept
	Oct
	Nov
	Dec



*The testing window for 2021 may be condensed due to the accelerated program timeline. Please consider this when choosing your primary and secondary test windows.*

## We need information to understand the level of effort so that we can jointly plan and track to a schedule for successful completion for all Suppliers

- Please review the change impacts to estimate the work necessary to accomplish the changes
  - Design, Build, and Validation within your organization including any conversions that must occur
  - Regression testing you may need to execute
- **By July 1<sup>st</sup>, please provide the following to Duke Energy:**
  - Your high-level DBV effort (in hours) and DBV target date for completion.
  - Your first and second choice for testing windows for our joint Product Testing.
  - Any blackout dates for when we cannot schedule our joint Product Testing.
  - Primary project contacts for the work, including a Test Lead to assist with joint test planning.

- Duke Energy may schedule deep dive sessions on specific topics for Q&A to clarify requirements, as needed
- We will create a “Frequently Asked Questions” document and share as needed
  - If you have questions, please email us at: [CCChoice@duke-energy.com](mailto:CCChoice@duke-energy.com)
- Finally, you will receive a copy of this presentation via email



## Customer Information System (CIS): Project Communications

CIS Project: <i>General/Functional/Testing</i>	CIS Project: <i>Issues/Risks/Concerns</i>	Day-to-Day Operations
<p>This email address will be used for project communications moving forward.</p> <ul style="list-style-type: none"><li>• Functional or technical questions about the changes needed</li><li>• Testing coordination or scheduling; requests to be included in early testing</li><li>• Request general information from or send requested information to our program</li></ul>	<ul style="list-style-type: none"><li>• Please escalate any immediate issues, risks or concerns related to this project to Renee Tillett.</li></ul>	<ul style="list-style-type: none"><li>• Any questions related to normal business operations should continue to be directed to the CSBC team.</li></ul>
<a href="mailto:CCChoice@duke-energy.com">CCChoice@duke-energy.com</a>	<a href="mailto:Renee.Tillett@duke-energy.com">Renee.Tillett@duke-energy.com</a>	<a href="mailto:CSBCreps@duke-energy.com">CSBCreps@duke-energy.com</a>

# Questions



# THANK YOU



*BUILDING A **SMARTER** ENERGY FUTURE®*

Changes Sorted by Estimated Impact

## Appendix A

# High Impact Changes



Suppliers	Category	High Impacts
All	General	A Production Freeze period will be implemented shortly before the go-live date where all transactions will be held and processed once the new system is implemented. Details of the freeze are not yet finalized
All	General	A cross-reference file of old-to-new customer account numbers will be provided to each supplier but will not be available until conversion time. One account number may convert with multiple Point of Delivery IDs
All	General	Separate transactions must be processed for each installation
Gas	General	Gas suppliers selecting EDI transaction format can take advantage of extended functionality (e.g., Bill-Ready Billing, additional customer contact information)
All	Data	Customer Account Number will change, will include Point of Delivery ID, and length will be 22 characters total. A cross-reference file will be sent to active Certified Suppliers. Legacy customer account numbers will be included in EDI transactions sent by Duke Energy
All	Data	Enrollments and other transactions will be processed at the Installation level - therefore, separate transactions will be required for each Installation (Point of Delivery) at a premise, such as metered and unmetered installations
Gas	EDI	Current Gas Suppliers may adopt EDI transaction format, allowing access to enhancements such as bill-ready billing. Guidelines have been developed and will be shared with those suppliers opting to use EDI



# High Impact Changes (Cont.)



Suppliers	Category	High Impacts
All	Enrollment	Utility Account Number will change, will include Point of Delivery ID, and length will be 22 characters total. Customers will see the full "Choice Service ID" on their invoice
All	Enrollment	Separate enrollment transactions are needed for each customer Installation associated with an account. Duke Energy may manually enroll installations that are omitted
Gas	Flat File	Reason codes will be updated, including changes to rejection codes. Mapping will be provided
Gas	Flat File	Separate enrollment transactions are needed for each customer Installation associated with an account. Duke Energy may manually enroll installations that are omitted
Gas	Invoice	Gas Suppliers will begin receiving a separate invoice for tariff fees and settlement / balancing
All	Pre-Enrollment Lists	Pre-Enrollment List account identifier is changing. Change in Account ID will mean that previous pre-enrollment lists cannot be used in the new system. New lists will be generated after conversion.
Electric	Seamless Move	Residential Electric Customer may keep their current Supplier contract when they move within Duke Energy territory, subject to certain conditions outlined in the Seamless Move Operational Plan and pending regulatory approval. New 814M EDI transaction proposed.

# Medium Impact Changes



Suppliers	Category	Medium Impacts
Gas	Data	Gas Suppliers electing Flat File format must use their 9- or 13-digit Supplier DUNs number instead of the 3-digit identification number previously provided by Duke Energy
All	EDI	Separate transactions are required for each Installation (Point of Delivery)
All	EDI	Customer address and contact information will be provided in response transactions
Gas	EDI	Certified Gas Suppliers who register after the new system is implemented will be required to use the EDI transaction format
Electric	EDI 810	Suppliers may send negative charge amounts and totals in bill-ready 810 transactions
All	EDI 814C	814 Change transaction from Duke Energy will communicate Customer Name changes, including a change to a customer's Doing Business As (DBA) name. Tax ID changes will continue to require a new enrollment
All	EDI 814C	814 Change transaction from Duke Energy will communicate changes to customer contact information if another change (e.g., meter, bill cycle) is also being communicated
Electric	EDI 814C	814 Change transaction from Duke Energy will include the REF*KY segment when appropriate to identify a net-meter account
Electric	EDI 867	Values for both Generation and Consumption registers will be sent for net-meter customers. The usage Summary will indicate whether the net amount is Additive (A) or Subtractive (S)
Electric	EDI 867	REF*KY segment will be sent on HI and HU to identify net-meter accounts

# Medium Impact Changes (Cont.)



Suppliers	Category	Medium Impacts
All	Enrollments	New Process Code recommended for Supplier Transfer (Purchase of Book of Accounts)
All	Enrollments	Enrollments received for an account with a pending move-out will be rejected regardless of move-out date and the effective date of enrollment
Electric	Enrollments	REF*KY segment will be included when appropriate to identify a net-meter account
Gas	Flat File	Historical monthly usage can be requested with enrollment or as a stand-alone transaction – with appropriate customer authorization – but no longer with a Change/Modify request
Gas	Flat File	Tenant field will be removed. Account Number will be Account Number + POD
Gas	Flat File	Duke Energy will begin assigning an identifier to each aggregation, and this value will have to be returned on each enrollment for that aggregation. Code will be in new "aggregation code" field on flat file
Gas	Flat File	Monthly data files will be generated for the calendar month, to aid reconciliation
Gas	Flat File	Enrollments received for an account with a pending move-out will be rejected regardless of move-out date and the effective date of enrollment
Gas	Flat File	Rate code field will be blank (instead of "NONE") for Dual Billing enrollments

# Medium Impact Changes (Cont.)



Suppliers	Category	Medium Impacts
All	General	An identifying code will be assigned to Government aggregations. The provided code must be included on all enrollments for each aggregation, or submitted with a Change transaction.
All EDI	General	Envelope and header transaction numbers will be reset to a new starting point.
All	Invoice	Supplier invoices will be archived for viewing on the Certified Supplier Portal
Electric	PJM Settlement	PLC and NSPL values will be calculated at the Installation level, not Premise. Overall obligation will not change but will be split across all installations in a Premise.
All	Supplier Portal	Invoices (generated after implementation of the new system) will be available in History
Gas	Supplier Portal	Gas Suppliers will have access to the Certified Supplier Portal
All	Supplier Portal	One (or more) user(s) from each Certified Supplier will be designated as Administrator and can manage permissions for other users at that Supplier
All	Supplier Rates	Rate Code naming convention will change, therefore Supplier rate codes will not be restricted to only 4 characters. Existing rate codes will be converted into the new system.

# Low Impact Changes



Suppliers	Category	Low Impacts
All	General	The primary identification method for Certified Supplier transactions will be your DUNS number. Electric Suppliers are accustomed to providing this identifier on transactions, but Gas Suppliers are not.
All EDI	General	Utility Company Name will change to "DUKE ENERGY OHIO" or "DUKE ENERGY OHIO – GAS"
All	Data	Customer Bill Cycles and Meter Read Cycles will change for many customers as the number of cycles is reduced from 21 to 20
All	Data	Customer Rate Class and Rate Category values will change to a new naming scheme (e.g., OHER, OHGC)
Electric	Data	The "Customer Category" type on Synch List reports used by Electric Suppliers will change from "R, C, L" to the rate category (OHER, OHEC, OHEI, OHEO). Loss Factors and PLC / NSPL values on customer records may also change.
Electric	Data	Transaction Numbers, Invoice Numbers and other Cross-Reference Numbers will use different number ranges than today
All	EDI	Customer eligibility check will be "as of today" for account status. Code 008 returned if account is no longer active, and 021 if account is pending inactive (future-dated).
Gas	EDI	For Gas EDI transactions only, the Duke Energy DUNS number will be the regular 9-digit number with "000G" appended, for a 13-digit DUNS+4
Electric	EDI 810	Invoice / Transaction Numbers - valid number ranges will change
Electric	EDI 810	Utility Bill Cycle - data may change as customers are assigned to new cycles
All	EDI 814C	Rate Subclass values will mirror the Utility Rate Class values
All	EDI 867	Number of billing cycles in a month changing from 21 to 20
All	EDI 867	Invoice / Transaction Numbers - valid number ranges will change

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# Low Impact Changes (Cont.)



Suppliers	Category	Low Impacts
All	Enrollments	Previous Utility Account Number (legacy system account number) will be populated in the REF*45 segment
All	Enrollments	Utility Budget Billing status flag will be provided in outbound transactions
All	Enrollments	Monthly budget billing amount will be included in response for Non-PAR enrollments
All	Enrollments	Utility Rate Class and Utility Revenue Class values will change
All	Enrollments	Billing and Meter Reading Cycle values may change as customers are assigned to new cycles
Electric	Enrollments	Utility Company name change to Duke Energy Ohio
Gas	Flat File	Historical monthly usage requested with an enrollment will be returned on a separate response file from the enrollment confirmation
All	Invoice	The Supplier invoice format will change and will display a due date, previous balance and payment, and any late payment charges or messages as needed.
Gas	Invoice	Gas Suppliers will be able to receive their Certified Supplier invoice by email
All	Supplier Portal	Color logos will be used on end-use customer invoices and can be uploaded via the Certified Supplier Portal – for both Electric and Gas Suppliers
All	Supplier Portal	Each Supplier Portal user will have individual login credentials
Electric	Supplier Portal	Supplier Portal format will change for Electric Suppliers
Electric	Supplier Portal	New rates can be requested for all standard rate types
Gas	Supplier Portal	Pre-Enrollment lists can be downloaded from the new Certified Supplier Portal

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**Case No(s). 22-0043-GE-WVR**

Summary: Comments Reply Comments of Duke Energy Ohio, Inc. electronically  
filed by Mrs. Tammy M. Meyer on behalf of Duke Energy Ohio Inc. and D'Ascenzo,  
Rocco and Vaysman, Larisa and Akhbari, Elyse Hanson