

**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.)

**MOTION OF DUKE ENERGY OHIO, INC.
FOR LEAVE TO FILE SUR-SURREPLY COMMENTS**

Duke Energy Ohio, Inc., (Duke Energy Ohio or the Company) hereby moves the Public Utilities Commission of Ohio (Commission), in accordance with Rule 4901-1-12 Ohio Administrative Code (O.A.C.), for leave to file sur-surreply comments to clarify a few issues in response to the March 17 and March 18 filings made in this case in response to the Company's Proposed Surreply Comments.¹ Among other things, the Company's Proposed Sur-Surreply Comments, which accompany this Motion, offer additional factual information that would be helpful to the Commission's decision making.

This Motion is accompanied by a Memorandum in Support and also by a copy of the Proposed Sur-Surreply Comments, which the Company respectfully requests the Commission to consider.

¹ Surreply Comments of Duke Energy Ohio, Inc.(March 11, 2022)(Duke Energy Ohio Proposed Surreply Comments); Joint Motion of Retail Energy Supply Association and Interstate Gas Supply, Inc. for Leave to File *Instantly* a Joint Reply to Duke Energy Ohio, Inc.'s Sur-Reply Comments (March 17, 2022) (RESA and IGS Motion); Joint Motion 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 for Leave to File *Instantly* a Joint Response to Duke Energy Ohio, Inc.'s Sur-Reply Comments (March 18, 2022) (NRG Retail Companies Motion).

Respectfully submitted,

DUKE ENERGY OHIO, INC.

/s/ Larisa M. Vaysman

Rocco O. D'Ascenzo (0077651)

Deputy General Counsel

Larisa M. Vaysman (0090290)

Senior Counsel

Jeanne W. Kingery (0012172)

Associate General Counsel

139 E. Fourth Street, 1303-Main

Cincinnati, Ohio 45202

(513) 287-4320 (telephone)

(513) 287-4385 (facsimile)

Rocco.D'Ascenzo@duke-energy.com

Larisa.vaysman@duke-energy.com

Jeanne.Kingery@duke-energy.com

MEMORANDUM IN SUPPORT

In this proceeding, Duke Energy Ohio seeks a number of temporary waivers in order to facilitate the transition from its legacy customer information system (CIS) to its new CIS, Customer Connect. The Company's Application was filed on January 19, 2022. The Office of the Consumers' Counsel (OCC), Interstate Gas Supply, Inc. (IGS), SFE Energy, Inc. and StateWise Energy Ohio LLC (SFE Energy), Retail Energy Supply Association (RESA) and 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) filed their Initial Comments on February 25, 2022. Duke Energy Ohio, Staff of the Public Utilities Commission of Ohio (Staff), IGS, RESA, and NRG Companies filed their Joint Reply Comments on March 4, 2022. The NRG Retail Companies, and (jointly) IGS and RESA filed for Leave to File Instantly a Joint Reply to Duke Energy Ohio's Sur-reply Comments on March 17, 2022 and March 18, respectively.

Among other things, the most recent March 17 and March 18 filings raise the questions of (1) what is the Company's position on the appropriate duration of a grace period for working with legacy account numbers; (2) methods by which the Company should provide Choice Service IDs to customers; and (3) the manner in which the suspension of certain billing transactions will impact customers. The Company's accompanying Proposed Sur-Surreply Comments address these issues.

Accordingly, the Company respectfully requests that the Commission consider its Proposed Sur-Surreply Comments in this case.

Respectfully submitted,

DUKE ENERGY OHIO, INC.

/s/ Larisa M. Vaysman

Rocco O. D'Ascenzo (0077651)

Deputy General Counsel

Larisa M. Vaysman (0090290)

Senior Counsel

Jeanne W. Kingery (0012172)

Associate General Counsel

Duke Energy Business Services LLC

139 East Fourth Street 1303-Main

Cincinnati Ohio 45202

513-287-4320 (telephone)

513-287-4385 (facsimile)

Rocco.DAscenzo@duke-energy.com

Larisa.vaysman@duke-energy.com

Jeanne.Kingery@duke-energy.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served this 22nd day of March 2022, by U.S. mail, postage prepaid, or by electronic mail upon the parties listed below.

/s/ Larisa M. Vaysman

Larisa M. Vaysman

Thomas.lindgren@OhioAGO.gov

Sarah.feldkamp@OhioAGO.gov

joe.oliker@igs.com

michael.nugent@igs.com

Evan.betterton@igs.com

Amy.botschner-obrien@occ.ohio.gov

Ambrosia.wilson@occ.ohio.gov

dproano@bakerlaw.com

tathompson@bakerlaw.com

mjsettineri@vorys.com

gpetrucci@vorys.com

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

3/22/2022 4:18:12 PM

in

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

Summary: Motion Motion of Duke Energy Ohio, Inc. For Leave To File Sur-Surreply
Comments electronically filed by Mrs. Tammy M. Meyer on behalf of Duke Energy
Ohio Inc. and D'Ascenzo, Rocco and Vaysman, Larisa and Kingery, Jeanne W. and
Akhbari, Elyse Hanson