

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc., for Authority to Adjust its Power Future Initiatives Rider.	:	Case No. 21-0012-EL-RDR
	:	
	:	

COMMENTS OF THE OHIO ENERGY GROUP

The Ohio Energy Group (“OEG”) submits the following Comments on Duke Energy Ohio, Inc.’s (“Duke” or “Company”) Application to recover costs associated with “*Component Two*” Phases III and V.B through the Company’s Power Future Initiatives Rider (“Rider PF”).

OEG was a party to the Stipulation and Recommendation in Case No. 20-0666-EL-RDR, which the Public Utilities Commission of Ohio (“Commission”) approved on November 17, 2021 (the “Rider PF Stipulation”). The Rider PF Stipulation specified the methodology by which all of Duke’s “*Component Two*” investments should be recovered from customers. Under that Commission-approved methodology, all “*Component Two*” costs should be allocated to customer classes based upon each class’ percentage of base distribution revenues as approved in Duke’s last base rate case (17-0032-EL-AIR) and then billed to both residential and non-residential customers using a fixed monthly distribution charge.

Duke’s Application in this proceeding was filed on March 31, 2021 – prior to Commission approval of the Rider PF Stipulation – and included a proposed billing methodology (percentage of base distribution revenue) that differed from the approved fixed monthly charge methodology to which Duke subsequently agreed in the Rider PF Stipulation. Staff explains this difference in its February 7, 2022 Report and recommends that rather than Duke’s initially proposed approach, the Commission should adopt the fixed monthly charged methodology in this

proceeding consistent with its November 17, 2021 Order in Case No. 20-0666-EL-RDR. OEG supports Staff's recommended billing methodology.

Respectfully submitted,

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: mkurtz@BKLawfirm.com

kboehm@BKLawfirm.com

jkylercohn@BKLawfirm.com

April 1, 2022

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 1st day of April, 2022 to the following:

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

DUKE ENERGY OHIO INC
LARISA M VAYSMAN, SR. COUNSEL
139 E FOURTH ST 1303 MAIN
CINCINNATI OH 45202

*KINGERY, JEANNE W.
DUKE ENERGY
155 E BROAD ST 20TH FLOOR
COLUMBUS OH 43215

D'ASCENZO, ROCCO O
DUKE ENERGY OHIO
139 EAST FOURTH ST 1303-MAIN
CINCINNATI OH 45202

*BINGHAM, DEB J. MS.
AMY BOTSCHNER-O'BRIEN
OFFICE OF OCC
65 EAST STATE STREET, 7TH FLOOR
COLUMBUS OH 43215-4203

*CAHILL, VALERIE A. MS.
WHITT-STURTEVANT
88 E. BROAD ST. #1590
COLUMBUS OH 43215

*BETTERTON, EVAN F. MR.
IGS ENERGY
6100 EMERALD PARKWAY
DUBLIN OH 43016

*KUHNELL, DIANNE
DUKE ENERGY BUSINESS SERVICES
139 E. FOURTH STREET
CINCINNATI OH 45202

*KING, KELLI C.
PUCO
180 E. BROAD ST.
COLUMBUS OH 43215

*SCHWEITZER, JAMES W
PUCO
180 EAST BROAD ST.
COLUMBUS OH 43215

*WHITT, MARK A.
WHITT STURTEVANT LLP
KEY BANK BLDG, 88 E BROAD ST STE 1590
COLUMBUS OH 43215

DIRECT ENERGY BUSINESS LLC
RYAN HARWELL
910 LOUISIANA ST
HOUSTON TX 77002

*FYKES, LUCAS A. MR.
WHITT STURTEVANT LLP
88 E. BROAD STREET, STE 1590
COLUMBUS OH 43215

*ALLEN, BETHANY
IGS ENERGY
6100 EMERALD PARKWAY
DUBLIN OH 43016

JOSEPH E. OLIVER
6100 EMERALD PARKWAY
DUBLIN OH 43016

*NUGENT, MICHAEL A. MR.
IGS ENERGY
6100 EMERALD PARKWAY
DUBLIN OH 43016

AMBROSIA WILSON
65 EAST STATE STREET, 7TH FL.
COLUMBUS OH 43215

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

4/1/2022 4:25:23 PM

in

Case No(s). 21-0012-EL-RDR

Summary: Comments Ohio Energy Group (OEG) Comments electronically filed by
Mr. Michael L. Kurtz on behalf of Ohio Energy Group