

From: vwelage@fuse.net
To: [Puco Docketing](#)
Cc: [vwelage](#)
Subject: Re: Duke Energy Ohio - Rate Case 21 Opposition
Date: Friday, August 19, 2022 12:11:51 PM
Attachments: [VWelage_PUCO_Letter.pdf](#)

Hello,

See attached letter and support documentation for opposition to the Duke Energy \$55 million annual rate increase in consumers' monthly bills for electricity distribution rates. I sent mail-in letter w/documents on 8/15 to PUCO office at Broad St. address, but the information as yet to be posted under public comments on the DIS.

Regards,

Vince Welage
Cincinnati, OH 45218
Duke Energy Residential Customer

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August 15, 2022

To: Public Utilities Commission of Ohio (PUCO)

Subject: Duke Energy Ohio – Rate Case 21 Opposition

This letter is written in opposition to the proposed **Duke Energy Rate Increase, PUCO Case Records 21-887-EL-AIR, 21-888-EL-ATA, and 21-889-EL-AAM**. I am a Duke Energy Ohio residential customer and a board member of SWORT (SW Ohio for Responsible Technology).

The Ohio Consumers' Council (OCC) has analyzed Duke Energy's proposal and thinks the company can maintain a reliable power grid while lowering rates instead of raising them. Duke's request has bad timing for an electric distribution rate increase given soaring energy prices and rising inflation. OCC recommends that PUCO approve a *rate decrease* (not an increase) of at least \$1.4 million for Duke's consumers.

The outgrowth from the changeover from "traditional" Analog meters to AMI Smart meters has resulted in a high volume of collections, disconnects, and legal actions against consumers. The utility bills that a growing number of residents can't afford to pay are higher because of these Smart Meter home installations. In 2009, Duke Energy started to replace Analog meters in Southwest Ohio with 2-way wireless AMI Smart Meters which allow for remote management of in-field devices. Analog meters don't transmit data; they can only be read manually. Duke Energy has a well documented history of enforcing the highest number of utility shutoffs and collections among Ohio energy utilities. Many of the shutoffs include "hardship" households that use retail supplier companies. In 2017, shutoffs were reported at 15%.

Duke's higher disconnection rate continues to come to light each time that the utility asks PUCO to approve increased distribution rates on its customers to cover the cost of energy grid upgrades including Smart Meter home installations. Some analysts with the Office of the Ohio Consumers' Counsel have speculated in the past that the high number of disconnections may be due, at least in part, to the remote disconnect capability of Duke's Smart Meters, but this has been disputed by Duke Energy citing established final notice requirements. Ohio law doesn't define what "final notice" means and PUCO has no official definition either.

Many complaints from SW Ohio Duke Energy consumers about overcharges prompted a recently completed study using comparative data from residents' utility bills. The study is a panel study which consists of a group of residential customers who submitted monthly bills covering the period 2018-2022. As author of the attached study, I concentrated on the hidden cost items on the bills which are the delivery riders (tariffs) for both gas and electric usage.

The delivery riders are derived from customer usage-based distribution charges. Many customers don't realize that the electric delivery rider is a combination of calculated usage-based rate codes and fixed rate codes. Some codes are Distribution related and others are Cost

Recovery related. There is no indication on the monthly bill which rate codes comprise the delivery rider total charges calculated for that month. Some of these delivery riders include their own kWh usage calculation methodology connected to Smart Meter distribution. There are at least 2 riders specific to AMI Smart Meters: DCI - Distribution Capital Investment Rider and PF - Power Futures Initiative Rider.

Energy efficient homes can't realize actual cost savings by reducing usage when combined with high fixed charges. Currently, up to 85% of the usage-based Distribution Charges amount on the monthly bill is listed as a separate group line item for Delivery Riders. **Transparency is long overdue to require Duke to itemize the individual rate codes in the electric details section of the monthly bill.** Also, panel study results indicated that tariff charges on single monthly kWh usage can range from \$22 @ 1000 kWh usage to \$65 @ 2500 kWh usage which further adds to the billing overcharges.

Thus far, Ohio elected officials neglected to propose a path to review the harmful effects from any wireless devices including these Smart Meters. In 2017, a letter dated February 3, 2017 and signed by 3 doctors was submitted to PUCO Duke Energy Smart Meter Opt Out case record, 14-1160-EL-UNC, asking that there be no Smart Meter opt-out fees approved for Duke Energy and all other Ohio utility customers because of adverse health impacts from Smart Meters. Currently, Duke Energy Ohio customers who have chosen to opt-out are charged \$100 for the replacement and a \$30/month opt-out fee defined as AMO – Advanced Meter Opt-Out on the electric tariff list.

Thank you for your consideration.

Sincerely,

Vincent Welage
92 Julep Lane
Cincinnati, OH 45218-1204
Duke Energy Ohio Customer
SWORT Board Member

Vince Welage

Applications Analyst
Cincinnati, OH 45218
vwelage@fuse.net

Duke Energy Billing Study

Monthly Statements 225

Time Period 2018-2022

Customer Accounts 16

Home Square Ft 1230 – 3520

Energy Usage Qualifiers

Gas – Min Average monthly usage - 60 Ccf

Electric – Min Average monthly usage - 400 kWh

Gas & Electric or Electric Only Service

Zip Code Areas - 9

45056 Oxford

45140 Loveland

45150 Milford

45202 Cincinnati

45204 Cincinnati

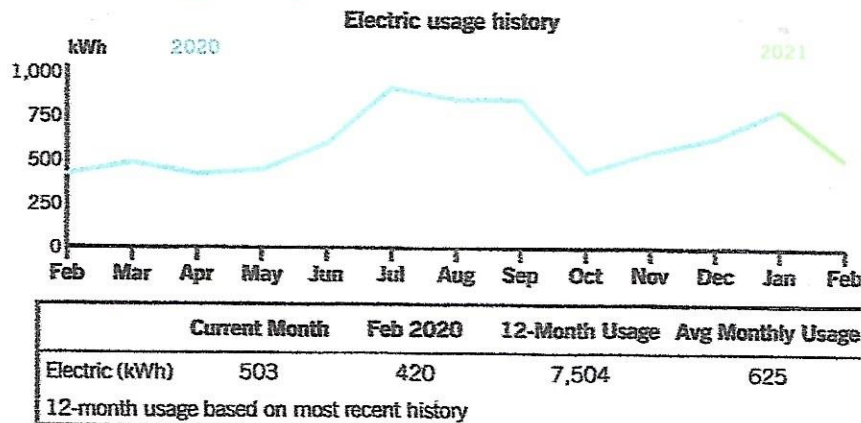
45218 Greenhills

45226 East End

45241 Blue Ash

45251 Colerain Twp

Your usage snapshot



Gas & Electric Monthly Fees

Efficient Home

- 84% (190 of 225) total cost > \$75.
- 54% (122 of 225) total cost > \$90.
- 19% (42 of 225) total cost > \$100.
- 31% (70 of 225) (400-750) kWh efficiency total cost > \$80.
- Non-heat 5 month average gas cost up to 10 times supply cost.

Overall Findings

Panel study electric usage - kWh/monthly average – 628 (median)

Panel study gas usage - Ccf/monthly average – 76 (median)

2020 U. S. electric kWh/monthly average - 893*; Ohio - 903*

Energy efficient homes can't realize actual cost savings when combined with high fixed charges and delivery rider subsidies.

*Energy Information Administration (EIA)

Email SWORT at swo4responsibletech@fuse.net

Duke Energy Ohio Gas Tariff

PIPP, Percentage of Income Payment Plan Rider 63

ETR, Ohio Excise Tax Liability Rider 64 (4.890%)

AMRP, Accelerated Main Replacement Program Rider 65 (\$2.82/month)

UE-G, Uncollectible Expense Rider 67

STR, State Tax Rider 68

MGP, Manufactured Gas Plant Rider 69

GCR, Gas Cost Recovery Rider 70

GCRR, Gas Cost Recovery Rate Rider 71

CCCR, Contract Commitment Cost Recovery Rider 76

CEP, Capital Expenditure Program Rider 84 (\$3.69/month)

Duke Energy Ohio Electric Tariff

ETCJA, Electric Tax Cuts and Jobs Act Rider 77

ESRR, Electric Service Reliability Rider 80 (2.18% x Distribution Charges)

OET, Ohio Excise Tax Rider 83

PF, Power Future Rider 84

USR, Universal Service Fund Rider 86

UE-GEN, Uncollectable Expense, Electric Generation Rider 88

BTR, Base Transmission Rider 89

RTO, Regional Transmission Organization Rider 97

DSR, Distribution Storm Rider 101

DCI, Distribution Capital Investment Rider 103 (22.763% x Distribution Charges)

DR-IM, Infrastructure Modernization Rider 104

DR-ECF, Economic Competitive Fund Rider 105 (0.60% x Distribution Charges)

UE-ED, Uncollectible Expense, Electric Distribution Rider 108

AER-R, Alternative Energy Recovery Rider 110

RC, Retail Capacity Rider 111

RE, Retail Energy Rider 112

SCR, Supplier Cost Reconciliation Rider 115

EE-PDRR, Energy Efficiency/Peak Demand Response Recovery Rider 119

DDR, Distribution Decoupling Rider 122

PSR, Price Stabilization Rider 126

AMO, Advanced Meter Opt-Out – Res 127 (\$100 one-time + \$30/month)

Delivery riders are derived from Distribution Charges. Up to 85% of the Distribution Charges consist of tariff charges listed as the delivery riders.

Duke Energy Monthly Charges
2018-2021

Residential

Acct#	Zip	Home SqFt	Date	Unit Ccf	Gas Supply Total	Gas Delivery Rider #	Total Gas	Unit kWh	Elec Supply Total	Elec Delivery Rider #	Elec Cost Total	SM Opt Out	Monthly Fees Total	% Fees Cost	Total Usage Charges
4	45218	1688	2020/01	135	\$101.12	\$9.44	\$148.01	* 483	\$47.24	\$11.07	\$79.52	\$44	\$103.54	45.5%	\$227.52
2	45218	1570	2021/08	13	\$4.52	\$8.78	\$46.76	* 999	\$55.40	\$24.22	\$117.07	\$30	\$102.03	62.3%	\$163.83
4	45218	1688	2019/12	132	\$98.87	\$9.34	\$145.56	* 565	\$55.26	\$12.59	\$91.64	\$40	\$100.96	42.6%	\$237.20
1	45218	1910	2021/05	40	\$13.91	\$9.61	\$57.86	* 891	\$48.47	\$21.70	\$104.22	\$30	\$100.34	61.9%	\$162.08
4	45218	1688	2019/11	159	\$119.09	\$10.88	\$168.20	* 468	\$45.77	\$10.07	\$76.57	\$40	\$99.98	40.8%	\$244.77
1	45218	1910	2020/01	185	\$65.92	\$11.14	\$115.14	* 942	\$51.53	\$19.57	\$106.76	\$30	\$99.74	44.7%	\$222.89
1	45218	1910	2020/02	202	\$71.97	\$11.71	\$123.32	* 878	\$48.03	\$18.96	\$100.63	\$30	\$99.70	44.5%	\$223.95
1	45218	1910	2021/09	19	\$6.61	\$8.91	\$49.17	* 943	\$52.43	\$21.34	\$109.46	\$30	\$99.28	62.6%	\$158.63
2	45218	1570	2021/07	13	\$4.52	\$8.78	\$46.76	* 860	\$47.64	\$21.16	\$102.50	\$30	\$98.97	66.3%	\$149.27
3	45218	1878	2020/07	12	\$3.83	\$5.06	\$2.31	* 986	\$48.51	\$21.20	\$106.75	\$33	\$98.29	65.9%	\$149.06
3	45218	1878	2020/08	9	\$2.87	\$4.99	\$1.18	* 736	\$36.21	\$16.45	\$81.83	\$37	\$97.47	79.2%	\$123.01
2	45218	1570	2021/05	36	\$12.52	\$9.48	\$56.21	* 765	\$41.62	\$18.92	\$90.62	\$30	\$97.43	66.4%	\$146.83
1	45218	1910	2021/04	72	\$25.04	\$10.53	\$70.96	* 711	\$38.11	\$17.76	\$84.25	\$30	\$97.32	62.7%	\$155.21
2	45218	1570	2018/08	13	\$5.05	\$7.97	\$46.48	* 816	\$44.64	\$20.21	\$91.53	\$30	\$97.21	70.4%	\$138.01
6	45241	3460	2020/03	94	\$23.16	\$8.05	\$67.32	* 920	\$54.19	\$20.03	\$109.18	\$30	\$97.11	55.0%	\$176.50
2	45218	1570	2020/12	196	\$68.17	\$10.39	\$118.00	* 694	\$37.06	\$17.69	\$82.60	\$30	\$97.11	48.4%	\$200.60
1	45218	1910	2021/03	109	\$37.91	\$7.88	\$82.39	* 804	\$43.09	\$19.81	\$94.21	\$30	\$96.72	54.8%	\$176.60
1	45218	1910	2020/10	78	\$27.13	\$6.97	\$69.68	* 888	\$46.71	\$20.35	\$101.02	\$30	\$96.35	56.4%	\$170.70
7	45056	1694	2021/01	153	\$52.86	\$9.15	\$100.05	* 689	\$36.79	\$17.58	\$82.06	\$30	\$95.76	52.6%	\$182.11
7	45056	1694	2020/12	139	\$48.01	\$8.74	\$94.33	* 704	\$37.59	\$17.93	\$83.68	\$30	\$95.70	53.8%	\$178.01
2	45218	1570	2018/05	22	\$7.87	\$8.23	\$49.85	* 678	\$37.09	\$18.19	\$78.47	\$30	\$95.45	74.4%	\$128.31
2	45218	1570	2018/07	14	\$5.16	\$8.00	\$46.65	* 823	\$45.02	\$18.36	\$90.24	\$30	\$95.39	69.7%	\$136.89
2	45218	1570	2018/06	7	\$2.76	\$7.76	\$43.78	* 682	\$37.31	\$18.55	\$79.14	\$30	\$95.34	77.6%	\$122.91
2	45218	1570	2021/02	210	\$73.04	\$10.81	\$123.75	* 608	\$32.47	\$15.48	\$73.09	\$30	\$95.32	48.4%	\$196.84
1	45218	1910	2020/09	22	\$7.65	\$5.35	\$46.75	* 901	\$47.39	\$20.88	\$102.64	\$30	\$95.26	63.8%	\$149.39

#Gas Fixed Delivery \$33.03

#Elec Fixed Delivery \$6

#SM Opt Out \$30-\$44

Distribution Rates (USB)

Gas - \$.032728/Ccf ; Elec - \$.031482/kWh

#Fee Cost Items

Duke Energy Monthly Charges
2018-2021

Residential

Acct#	Zip Code	Home SqFt	Date	Unit kWh	Elec Supply per kWh	Elec Supply Total	Elec Delivery Rider #	Elec USB Cost	Elec Cost Total	SM Opt Out #	Monthly Fees Total	% Fees Cost	Total Usage Charges
10	45251	2245	2021/01	1883	\$0.0499	\$93.96	\$44.41	\$59.28	\$203.65	\$33	\$83.41	41.0%	\$203.65
10	45251	2245	2021/04	1788	\$0.0499	\$89.22	\$41.52	\$56.29	\$193.03	\$33	\$80.52	41.7%	\$193.03
9	45226	3520	2020/10	1894	\$0.0409	\$77.46	\$40.94	\$59.63	\$184.03	\$30	\$76.94	41.8%	\$184.03
8	45204	1230	2021/02	1754	\$0.0446	\$78.23	\$40.78	\$55.22	\$180.23	\$0	\$46.78	26.0%	\$180.23
6	45241	3460	2020/08	1989	\$0.0546	\$108.60	\$40.17	\$62.62	\$217.39	\$30	\$114.42	43.8%	\$261.06
6	45241	3460	2020/06	1986	\$0.0546	\$108.44	\$39.14	\$62.52	\$216.10	\$30	\$113.57	43.5%	\$260.91
1	45218	1910	2018/12	1735	\$0.0547	\$94.90	\$38.72	\$45.84	\$185.46	\$0	\$91.01	27.5%	\$330.94
8	45204	1230	2020/11	1778	\$0.0437	\$77.70	\$38.55	\$55.97	\$178.22	\$0	\$44.55	25.0%	\$178.22
6	45241	3460	2020/09	1871	\$0.0546	\$102.16	\$37.94	\$58.90	\$205.00	\$30	\$112.61	44.1%	\$255.50
1	45218	1910	2020/12	1543	\$0.0462	\$71.29	\$36.77	\$48.58	\$162.64	\$30	\$117.16	39.8%	\$294.16
10	45251	2245	2020/10	1632	\$0.0499	\$81.44	\$35.57	\$51.38	\$174.39	\$33	\$74.57	42.8%	\$174.39
1	45218	1910	2018/08	1540	\$0.0547	\$84.24	\$33.66	\$39.03	\$162.93	\$0	\$80.53	38.8%	\$207.59
6	45241	3460	2020/12	1520	\$0.0456	\$69.31	\$33.30	\$47.85	\$156.46	\$30	\$114.19	38.3%	\$298.16
9	45226	3520	2020/09	1498	\$0.0495	\$74.15	\$33.10	\$47.16	\$160.41	\$30	\$69.10	43.1%	\$160.41
1	45218	1910	2018/11	1335	\$0.0547	\$73.02	\$31.68	\$33.83	\$144.53	\$0	\$82.44	31.4%	\$262.49
1	45218	1910	2019/12	1518	\$0.0547	\$83.03	\$30.22	\$47.79	\$167.04	\$30	\$110.82	38.4%	\$288.67
1	45218	1910	2018/01	1240	\$0.0547	\$67.83	\$29.24	\$31.42	\$134.49	\$0	\$83.24	29.4%	\$283.09
1	45218	1910	2018/06	1216	\$0.0547	\$66.52	\$29.10	\$30.82	\$132.44	\$0	\$75.93	43.0%	\$176.67
1	45218	1910	2018/09	1179	\$0.0547	\$64.49	\$28.56	\$29.88	\$128.93	\$0	\$76.40	43.6%	\$173.00
3	45218	1878	2019/07	1453	\$0.0511	\$74.25	\$28.40	\$45.74	\$154.39	\$30	\$97.63	48.5%	\$201.21
6	45241	3460	2021/02	1156	\$0.0506	\$58.49	\$28.08	\$36.39	\$128.96	\$30	\$109.01	39.2%	\$280.32
6	45241	3460	2021/01	1143	\$0.0508	\$58.06	\$27.78	\$35.98	\$127.82	\$30	\$108.44	41.3%	\$262.48
1	45218	1910	2018/10	1137	\$0.0547	\$62.19	\$27.73	\$28.81	\$124.73	\$0	\$75.71	40.7%	\$186.20
1	45218	1910	2021/08	1143	\$0.0555	\$63.44	\$27.39	\$35.98	\$132.81	\$30	\$105.11	58.9%	\$178.33
1	45218	1910	2021/06	1137	\$0.0554	\$62.99	\$27.29	\$35.80	\$132.08	\$30	\$105.15	58.8%	\$178.89

#Gas Fixed Delivery \$33.03

#Elec Fixed Delivery \$6

#SM Opt Out \$30-\$33

Distribution Rates (USD)

Gas - \$.032728/Cof ; Elec - \$.031482/kWh

#Fee Cost Items

Duke Energy Monthly Charges
2018-2021

Exhibit E
(May-Sept) Gas Cost X times Supply

Residential

Acct#	Zip	Home SqFt	Date	Unit Ccf	Gas Supply Total	Gas Delivery Rider #	Gas Cost Total	Unit kWh	Elec Supply Total	Elec Delivery Rider #	Elec Cost Total	SM Opt Out	Monthly Fees Total	% Fees Cost	Total Usage Charges
6	45241	3460	2020/08	17	\$4.86	\$5.22	\$43.67	* 1989	\$108.60	\$40.17	\$217.39	\$30	\$114.42	43.8%	\$261.06
6	45241	3460	2020/06	20	\$5.73	\$5.40	\$44.81	* 1986	\$108.44	\$39.14	\$216.10	\$30	\$113.57	43.5%	\$260.91
6	45241	3460	2020/09	32	\$10.78	\$5.64	\$50.50	* 1871	\$102.16	\$37.94	\$205.00	\$30	\$112.61	44.1%	\$255.50
1	45218	1910	2021/06	13	\$4.52	\$8.83	\$46.81	* 1137	\$62.99	\$27.29	\$132.08	\$30	\$105.15	58.8%	\$178.89
1	45218	1910	2021/08	10	\$3.48	\$8.69	\$45.53	* 1143	\$63.44	\$27.39	\$132.81	\$30	\$105.11	58.9%	\$178.34
1	45218	1910	2021/07	10	\$3.48	\$8.69	\$45.53	* 1042	\$67.73	\$25.17	\$121.70	\$30	\$102.89	61.5%	\$167.23
6	45241	3460	2020/05	80	\$19.61	\$7.44	\$62.70	* 1232	\$67.39	\$26.09	\$138.27	\$30	\$102.56	51.0%	\$200.97
2	45218	1570	2021/06	16	\$5.56	\$8.90	\$48.01	* 1003	\$55.67	\$24.32	\$117.57	\$30	\$102.25	61.8%	\$165.58
2	45218	1570	2021/08	13	\$4.52	\$8.78	\$46.76	* 999	\$55.34	\$24.22	\$117.01	\$30	\$102.03	62.3%	\$163.77
1	45218	1910	2020/07	11	\$3.83	\$5.05	\$42.27	* 1272	\$69.45	\$26.60	\$142.10	\$30	\$100.68	54.6%	\$184.37
1	45218	1910	2021/05	40	\$13.91	\$9.61	\$57.86	* 891	\$48.47	\$21.70	\$104.22	\$30	\$100.34	61.9%	\$162.08
7	45056	1694	2020/08	12	\$4.04	\$5.06	\$42.52	* 1210	\$66.07	\$25.44	\$135.60	\$30	\$99.53	55.9%	\$178.12
1	45218	1910	2021/09	19	\$6.61	\$8.91	\$49.17	* 943	\$52.43	\$21.34	\$109.46	\$30	\$99.28	62.6%	\$158.63
2	45218	1570	2021/07	13	\$4.52	\$8.78	\$46.76	* 860	\$47.64	\$21.16	\$102.50	\$30	\$98.97	66.3%	\$149.26
3	45218	1878	2020/07	12	\$3.83	\$5.06	\$42.31	* 986	\$48.51	\$21.20	\$106.75	\$33	\$98.29	65.9%	\$149.06
1	45218	1910	2020/08	12	\$4.17	\$5.06	\$42.65	* 1141	\$62.30	\$24.14	\$128.36	\$30	\$98.23	57.4%	\$171.01
1	45218	1910	2020/06	12	\$4.17	\$5.13	\$42.72	* 1134	\$61.92	\$24.01	\$127.63	\$30	\$98.17	57.6%	\$170.35
2	45218	1570	2020/07	16	\$5.56	\$5.18	\$44.29	* 1107	\$60.44	\$23.50	\$124.79	\$30	\$97.71	57.8%	\$169.08
3	45218	1878	2019/07	22	\$6.87	\$6.20	\$46.82	* 1453	\$74.25	\$28.40	\$154.39	\$30	\$97.63	48.5%	\$201.21
2	45218	1570	2020/06	20	\$6.96	\$5.40	\$46.40	* 1090	\$59.51	\$23.17	\$123.00	\$30	\$97.60	57.6%	\$169.40
3	45218	1878	2020/08	9	\$2.87	\$4.99	\$41.18	* 736	\$36.21	\$16.45	\$81.63	\$37	\$97.47	79.4%	\$122.81
2	45218	1570	2021/05	36	\$12.52	\$9.48	\$56.21	* 765	\$41.62	\$18.92	\$90.62	\$30	\$97.43	66.4%	\$146.83
2	45218	1570	2018/08	13	\$5.05	\$7.97	\$46.48	* 816	\$44.64	\$20.21	\$91.53	\$30	\$97.21	70.4%	\$138.01
2	45218	1570	2019/07	14	\$4.60	\$5.94	\$44.03	* 1077	\$58.91	\$21.22	\$120.04	\$30	\$96.19	49.6%	\$194.07
2	45218	1570	2018/05	22	\$7.87	\$8.23	\$49.85	* 678	\$37.09	\$18.19	\$78.47	\$30	\$95.45	74.4%	\$128.32

#Gas Fixed Delivery \$33.03

#Elec Fixed Delivery \$6

#SM Opt Out \$30-\$37

Distribution Rates (US\$)

Gas - \$.032728/Ccf ; Elec - \$.031482/kWh

#Fee Cost Items

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

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in

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

Summary: Public Comment of Vince Welage, via website, electronically filed by
Docketing Staff on behalf of Docketing