

From: [PUCO Consumer Call Center](#)
To: [Puco Docketing](#)
Subject: PUBLIC UTILITIES COMMISSION OF OHIO - CASE #: 00773757 [ref:_00Dt0GzXt_5008y539px:ref]
Date: Saturday, August 27, 2022 9:21:01 AM
Attachments: [SWORT Duke Rate Increase Opposition SSFOF BizHu22081707170.pdf](#)



**PUBLIC UTILITIES COMMISSION OF OHIO
Consumer Service Division
Memorandum**

CASE ID: 00773757

COMPANY: Southwest Ohio for Responsible Technology/SWORT

CUSTOMER: Vincent Welage

ADDRESS: 92 Julep Lane, Cincinnati, Ohio 45218

SERVICE ADDRESS: 154 Junefield Avenue, Cincinnati, Ohio 45218

AIQ: Duke Energy Ohio

NIQ: 5137314843

To ensure your response attaches to the appropriate case, please reply to this email without changing the subject line. Thank you!

DOCKETING CASE #: 21-0887-EL-AIR

SUBJECT: Duke Energy Ohio - Protest Rate Case

Please docket the associated customer comment and/or attached in the case number referenced above under "Public Comments". This information was received by the Consumer Services Division through alternate channels and is being forwarded to be filed formally. This information is not the opinion of Staff and should not be viewed as such.

Attached please find a letter from SWORT detailing their opposition to Duke's request rate increase on Case #21-0887-EL-AIR.

This message and any response to it may constitute a public record and thus may be publicly available to anyone who requests it.



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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

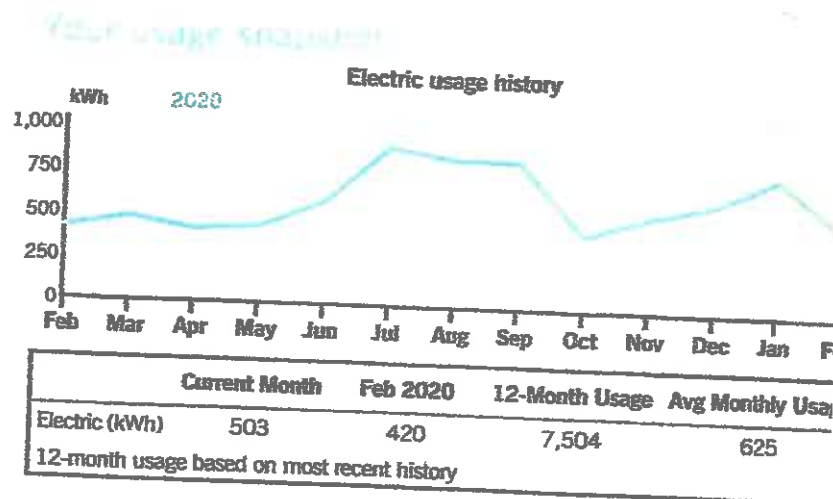
Monthly Statements 225
Time Period 2018-2022
Customer Accounts 16
Home Square Ft 1230 – 3520

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



Gas & Electric Monthly Fees

- 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 swort@responsibletch@fuse.net

Efficient Home

Residential

Duke Energy Monthly Charges
2018-2021Exhibit C
(400-750 kWh) Fees Cost Total (top 25)

Acct#	Zip	Home SqFt	Date	Unit Ccf	Gas Supply Total	Gas Delivery Rider #	Gas Total	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	\$42.31	986	\$48.51	\$21.20	\$106.75	\$33	\$98.29	65.9%	\$149.06
3	45218	1878	2020/08	9	\$2.87	\$4.99	\$41.18	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%	\$138.01
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	\$83.66	\$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	\$95.32	48.4%	\$122.91
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

Residential

Duke Energy Monthly Charges
2018-2021Exhibit D
Delivery Rider Hidden Cost (top25)

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	\$65.97	\$178.22	\$0	\$44.55	25.0%	\$178.22
6	45241	3460	2020/09	1871	\$0.0546	\$102.16	\$37.94	\$68.90	\$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	\$61.38	\$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	36.4%	\$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%	\$166.20
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 (USB)

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

#Fee Cost Items

Residential

Duke Energy Monthly Charges
2018-2021

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

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	\$43.87	* 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	\$57.73	\$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	\$158.27	\$30	\$102.56	51.0%	\$200.97
2	45218	1570	2021/06	16	\$5.56	\$8.90	\$48.01	* 1003	\$65.67	\$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%	\$168.63
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	\$106.76	\$33	\$98.29	86.9%	\$149.06
1	45218	1910	2020/08	12	\$4.17	\$5.06	\$42.65	* 1141	\$62.30	\$24.14	\$128.36	\$30	\$98.23	67.4%	\$171.01
2	45218	1570	2020/07	16	\$5.56	\$6.18	\$44.29	* 1107	\$60.44	\$23.50	\$124.79	\$30	\$97.71	57.8%	\$169.08
2	45218	1570	2020/06	20	\$6.96	\$5.40	\$46.82	* 1453	\$74.25	\$28.40	\$154.39	\$30	\$97.63	48.5%	\$201.21
3	45218	1878	2020/08	9	\$2.87	\$4.99	\$41.18	* 736	\$36.21	\$16.45	\$81.83	\$37	\$97.47	79.4%	\$122.81
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	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 (USB)

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**

8/29/2022 9:26:16 AM

in

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

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