

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc., for an Increase in Natural Gas Rates.	:	Case No. 22-507-GA-AIR
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In the Matter of the Application of Duke Energy Ohio, Inc., for Approval of an Alternative Form of Regulation.	:	Case No. 22-508-GA-ALT
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In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval.	:	Case No. 22-509-GA-ATA
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In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Change Accounting Methods.	:	Case No. 22-510-GA-AAM
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**OBJECTIONS TO STAFF REPORT  
OF THE OHIO ENERGY GROUP**

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**I. INTRODUCTION**

Pursuant to R.C. 4909.19 and Ohio Adm. Code 4901:1-19-07(F), the Ohio Energy Group (“OEG”) submits its Objections to the Staff Report filed on December 21, 2022, in the above-captioned proceedings.

**II. OBJECTIONS**

**1. Class Allocation**

OEG objects to Staff’s proposal cost-of-service method.<sup>1</sup> Staff has not established that its proposed adjustments to Duke Energy Ohio Inc.’s (“Company”) cost-of-service method are appropriate.

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<sup>1</sup> Staff Report, pp. 28-32.

## 2. Non-Residential Rate Design

OEG objects to Staff's proposed rate design for the GS-L, FT-L, IT and IS rate classes. Staff has not established that its proposed rate design appropriately recovers customer-related and demand-related costs through fixed charges; and does not over-recover costs through volumetric charges.<sup>2</sup>

## 3. Gas Surcredit Rider (GSR)

Staff recommends eliminating Rider GSR stating that the PUCO and OCC assessments paid today by the Company are distribution expenses to be paid by all distribution customers whether the customers receive their gas supply from a Competitive Retail Natural Gas Service.<sup>3</sup> OEG objects to the elimination of the GSR to the extent it would result in shopping customers paying for any costs attributable to commodity sales service for those customers that do not purchase that service from the Company.

Respectfully submitted,

/s/ Kurt J. Boehm

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**COUNSEL FOR THE OHIO ENERGY GROUP**

January 20, 2023

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<sup>2</sup> Staff Report, pp. 37-38.

<sup>3</sup> Staff Report, p. 19.

## 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 20<sup>th</sup> day of January, 2023 to the parties of record.

*/s/ Kurt J. Boehm*

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**Case No(s). 22-0507-GA-AIR, 22-0508-GA-ALT, 22-0509-GA-ATA, 22-0510-GA-  
AAM**

Summary: Objection Ohio Energy Group (OEG) Objections to Staff Report  
electronically filed by Mr. Kurt J. Boehm on behalf of Ohio Energy Group