

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Regulation of the)
Purchased Gas Adjustment Clauses)
Contained within the Rate Schedules of) Case No. 15-218-GA-GCR
Duke Energy Ohio, Inc. and Related)
Matters

DIRECT TESTIMONY OF THOMAS SCARPITTI

March 21, 2016

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1 I. INTRODUCTION

2 Q. Please state your full name, title and business address.

3 A. My name is Thomas Scarpitti. I am employed by Interstate Gas Supply, Inc.
4 ("IGS") as Gas Supply Director. My business address is 6100 Emerald Parkway,
5 Dublin, Ohio 43016.

6 Q. Please provide your background and qualifications.

7 A. I received a bachelor's degree in business administration with a specialization in
8 logistics from The Ohio State University in 1996. Immediately upon graduating, I
9 began my career in the energy field at Enron Energy Services and I have worked
10 in retail energy for 19 years in various roles, including scheduling, trading, and
11 leadership. I joined IGS in 2001 as Gas Supply manager and attained the title of
12 Gas Supply Director in 2012, a title I hold today. I am responsible for managing
13 the local production, scheduling, and trading groups consisting of seven
14 employees for the eastern part of IGS' service territory. This region is composed
15 of Ohio and all areas east, including the service territory of Duke Energy Ohio
16 ("Duke").

17 Q. Please describe IGS Energy.

18 A. IGS is a certified competitive retail natural gas supplier ("CRNG" or "Supplier")
19 serving customers in the Duke, Vectren Energy Delivery of Ohio, Dominion East
20 Ohio and Columbia Gas of Ohio ("Columbia") territories. IGS has over 23 years
21 of experience serving natural gas customers in Ohio. IGS is also currently
22 serving electric customers in the AEP, FirstEnergy, Duke and the Dayton Power
23 & Light service territories. Throughout the United States, IGS provides natural

1 gas and electric service to over 1 million customers in 11 states and in over 30
2 utility programs. IGS has approximately 500 employees working at its
3 headquarters in Dublin, Ohio.

4 **Q. On whose behalf are you testifying today?**

5 A. I am testifying on behalf of the Retail Energy Supply Association ("RESA").
6 RESA is a national trade association of competitive retail natural gas and electric
7 power suppliers. IGS is a member of RESA.

8 **Q. Can you explain the background leading up to this stage of the**
9 **proceeding?**

10 A. Yes, this proceeding relates to the management and performance audit of the
11 gas purchasing practices and policies of Duke for the period of September 2012
12 through August 2015 (referred to as the Audit Report throughout my testimony).
13 The Audit Report covers a host of issues related to Duke's gas procurement
14 decisions, capacity procurement, and storage management. Moreover, the Audit
15 Report includes analyses and recommendations regarding the balancing rates
16 and services that Duke provides to Suppliers. I will provide background on many
17 of these issues in my testimony.

18 **Q. Was a Stipulation and Recommendation ("Stipulation") submitted in this**
19 **proceeding?**

20 A. Yes, a partial Stipulation was submitted by Duke and the Staff of the Public
21 Utilities Commission of Ohio ("Commission").

22 **Q. What is the purpose of your testimony?**

1 A. On behalf of RESA, I am responding to issues raised in the Management and
2 Performance Audit submitted by Exeter and Associates ("Audit Report"), as well
3 as the Stipulation submitted by Duke and Staff. Specifically, I address the
4 following issues in the Audit Report, which the Stipulation proposes the
5 Commission adopt: (1) the recommendations in the Audit Report regarding
6 Duke's gas balancing services and options; (2) the recommendations in the Audit
7 Report related to reducing storage levels by 20%; and (3) the multiple provisions
8 in the Stipulation that require Duke to perform additional evaluation and analysis.
9 Ultimately, I recommend that the Commission modify and then approve the
10 proposed Stipulation to address the concerns I identify in my testimony.

11 **II. STIPULATION REVIEW CRITERIA**

12 **Q. Are you familiar with the standard of review for a Stipulation filed in a**
13 **Commission proceeding?**

14 A. Yes. The ultimate issue for the Commission's consideration is whether the
15 Stipulation is reasonable and should be adopted. In considering the
16 reasonableness of a stipulation, the Commission must consider:

17 (1) Is the settlement a product of serious bargaining among
18 capable, knowledgeable parties?

19 (2) Does the settlement, as a package, benefit ratepayers and the
20 public interest?

21 (3) Does the settlement package violate any important regulatory
22 principle or practice?

23 I discuss the applicability of this standard to the Stipulation below.

1 **Q. Do you believe that the Commission should approve the Stipulation?**

2 A. No, the Commission should not approve the Stipulation without the additional
3 modifications discussed in my testimony. The limited testimony of Duke witness
4 Kern fails to demonstrate how the Stipulation is in the public interest and does
5 not violate any regulatory policy or principle. Moreover, because the Stipulation
6 largely adopts certain unsupported and incomplete conclusions in the Audit
7 Report, the Commission should reject the Stipulation or condition its approval on
8 additional modifications that I recommend. Specifically, I refer to the Audit
9 Report's discussion and recommendations regarding Duke's balancing services
10 (EFBS and FBS), as well as my testimony in Case No. 15-50-GA-RDR.¹ The
11 Audit Report appears to have misunderstood or mischaracterized my testimony
12 from the *EFBS Case*. Further, in the *EFBS Case*, the Commission has relied
13 upon the Audit Report's incorrect interpretation to approve interim changes to
14 Duke's balancing tariffs for the 2016-2017 gas year. While the Commission
15 deferred consideration of additional changes to Duke's balancing tariffs to this
16 case, it is disconcerting that the Audit Report addressed only portions of my
17 testimony from the *EFBS Case*—it does not appear that any part of the Audit
18 Report actually addresses my primary recommendation. Thus, it would not be
19 just and reasonable to adopt the Auditor's recommendation as dispositive of
20 issues related to Duke's balancing rates and options without full consideration of
21 the positions put forth. Additionally, I conclude that the Stipulation is not just and
22 reasonable inasmuch as it places no concrete obligation on Duke to reduce its

¹ *In the Matter of the Application of Duke Energy Ohio, Inc. for Approval to Modify Rider FBS, Rider EFBS, Rider FRAS, and Rider GTS, Case No. 15-50-GA-RDR ("EFBS Case").*

1 storage assets despite the fact that the Audit Report concludes that Duke could
2 do so and reduce costs for both Suppliers on EFBS and gas cost recovery
3 ("GCR") customers. I further identify that the Stipulation contains a list of loose
4 commitments for Duke to perform additional evaluations without any formal
5 reporting or Supplier input requirements. I recommend that the Commission
6 establish a formal process through which Duke obtain Supplier input and provide
7 a report in this proceeding regarding elements in the Stipulation that require
8 Duke to perform additional analysis or evaluation, as well an opportunity for
9 parties to provide comments. My conclusions are discussed in more detail within
10 the appropriate factual and historical context below.

11 **III. TESTIMONY**

12 **A. Duke's Balancing Service Tariffs**

13
14 **Q. Did the Audit Report submitted in this proceeding address Duke's**
15 **balancing services and Suppliers' opportunity to elect balancing services?**

16 **A.** Yes. The Audit Report made recommendations on that particular topic.

17 **Q. Can you explain the balancing issues discussed in the Audit Report?**

18 **A.** Yes, the Audit Report discusses the two balancing options that Duke provides to
19 Suppliers, Enhanced Firm Balancing Service ("EFBS") and Firm Balancing
20 Service ("FBS"). Under the EFBS balancing option, Suppliers receive an
21 allocation of virtual storage assets. Under the FBS option, Suppliers receive no
22 storage. EFBS allows Suppliers the additional flexibility they may require for their
23 customers, but it comes at a greater cost than FBS service. On January 15,
24 2015, Duke filed an Application in the *EFBS Case* expressing concerns about its

1 ability to cycle through its storage given the change in the mix of its capacity and
2 storage portfolio and the decreasing size of the GCR load.² Duke claimed that
3 changes are needed to its balancing options because *potentially* too few
4 Suppliers could elect EFBS, which could cause Duke not to be able to cycle
5 through its storage assets. Moreover, Duke believed that, if no Suppliers, or not
6 enough Suppliers, elect EFBS, Duke will have too little Firm Transportation (“FT”)
7 available to use.³ Duke claimed that these factors could have a detrimental
8 impact on its GCR-related purchases.

9 **Q What modifications did Duke propose in its Application in the EFBS Case?**

10 A. In order to unilaterally change its capacity and storage portfolio mix, Duke
11 proposed to eliminate the FBS service option for Suppliers that have more than
12 20,000 dekatherms (“dth”) maximum daily quantity (“MDQ”) on the Duke system.
13 Duke proposed that all Suppliers over the 1,000 dth and below the 20,000 dth
14 MDQ threshold still be allowed to maintain the option to elect between FBS and
15 EFBS service.⁴

16 **Q. Did RESA agree with Duke’s proposal in the EFBS case?**

17 A. No. I submitted testimony on behalf of RESA recommending first that the
18 Commission reject Duke’s proposal, as Duke had not shown that the EFBS
19 service is undersubscribed, and if the EFBS is found to be undersubscribed,
20 making EFBS mandatory for large Suppliers is an ineffective method of
21 addressing undersubscription. Second, to the extent that the Commission

² EFBS Case, Duke Ex. 1 (Application) at 4; Duke Ex. 2 (Kern Direct Testimony) at 5-6.

³ EFBS Case, Duke Ex. 2 (Kern Direct Testimony) at 6.

⁴ EFBS Case, Duke Ex. 1 (Application) at 5-6.

1 determined that changes to Duke's balancing options were necessary, I
2 recommended that the Commission approve a less restrictive approach through
3 which Suppliers assist Duke in balancing its system while allowing Suppliers to
4 maintain an option to elect between EFBS and FBS. Third, in the event that the
5 Commission authorized Duke's proposal to make EFBS mandatory, I
6 recommended that the Commission reject Duke's proposal to discriminate
7 against larger Suppliers. Fourth, since the EFBS service depends on an annual
8 storage injection and withdraw program, I recommended that any major change
9 to the balancing tariffs must be made at least two storage seasons in advance to
10 allow Suppliers to adjust their supply programs and retail service agreements.

11 **Q. Why is your proposal in the *EFBS* case relevant to this proceeding?**

12 A. First, the Audit Report, which was filed in this case, addressed my testimony
13 made in the *EFBS* Case regarding changes to Duke's EFBS and FBS service.
14 Further, in the Order in the *EFBS* Case, the Commission approved interim
15 changes to its balancing services for the 2016-2017 gas year, requiring Suppliers
16 to maintain their EFBS and FBS elections for another year, effectively putting a
17 freeze on the EFBS and FBS election options. In that same Order, the
18 Commission stated "that Exeter's recommendations regarding Duke's storage
19 levels and any other balancing issues will be addressed in the 2015 GCR Case."
20 Thus, it appears to have been the Commission's intent in this proceeding to
21 come up with a more permanent solution for EFBS and FBS going forward.

22 **Q. After the hearing occurred in the *EFBS* Case, did the Audit Report address**
23 **your recommendations?**

1 A. The Audit Report addressed my testimony to some extent. The audit report,
2 however, misinterpreted portions of my testimony, including the fact that my
3 testimony recommended that Duke allocate storage to FBS Suppliers only if
4 there is an EFBS undersubscription. I further recommended that the allocation
5 be tailored to allocate storage increments in a manner that allows Duke to cycle
6 through its storage without eliminating the FBS option. Further discussion of my
7 recommendations in that case is necessary to place them within the context of
8 the recommendations discussed in the Audit Report and the Stipulation in this
9 case.

10 **Q. Can you please elaborate?**

11 A. Yes. In my previous testimony, I identified that Duke's alleged problem was
12 merely hypothetical. Duke has not had an undersubscription of EFBS to date, as
13 multiple suppliers continue to subscribe to enough EFBS service for Duke to
14 manage its system. Further, there is no reason to believe there will be an
15 undersubscription of EFBS in the foreseeable future. Thus, I recommended that
16 instead of withdrawing the right of the largest Suppliers or transportation
17 customers to elect FBS, Duke set up a contingency plan so that if there is an
18 undersubscription of EFBS service, the contingency plan goes into effect at that
19 time. Further, I recommended that the mandatory use of an EFBS-type service
20 be limited to just the amount needed to address the short fall. This would ensure
21 all Suppliers regardless of size are treated fairly, that all are required to
22 participate in system reliability and that any cost increases are known far enough
23 in advance to ensure Suppliers are not hit with last minute unknown charges.

1 **Q. How would your contingency plan work?**

2 A. From a high level, I proposed that, to the extent that there are insufficient EFBS
3 elections to allow Duke to cycle through its storage assets, Suppliers on FBS
4 take a pro rata allocation of the storage. That way, Suppliers can deliver gas in
5 and out of storage pursuant to a preset schedule that will allow Duke to cycle
6 through its storage assets. I further recommended that the Commission set a
7 baseline amount of storage that will be assigned to Suppliers. If the amount is
8 not met through EFBS elections, Duke would allocate the shortfall to Suppliers
9 electing FBS on a pro rata basis.

10 **Q. What amount of EFBS undersubscription would trigger your contingency**
11 **plan?**

12 A. In its Application, Duke provided historical data with respect to Supplier elections
13 between EFBS and FBS. For the winters of 2013/2014 and 2014/2015,
14 Suppliers electing EFBS reflected 41,400 Dth and 32,400 Dth respectively.
15 During that time, Duke experienced the coldest winters since the inception of the
16 Choice program. At these levels, Duke was able to manage its storage assets
17 without incurring penalties. While RESA did not and does not concede that Duke
18 could not manage its storage assets if less storage were assigned to Suppliers,
19 RESA posits that the Commission should select a level equivalent to the
20 2013/2014 level of 41,400 Dth as an acceptable amount of storage allocated to
21 Suppliers. Using Duke's data for the 2013/2014 winter period, the total capacity
22 required by FT/RFT shippers to meet a peak day was 464,337 Dth.⁵ Dividing the
23 EFBS level of 41,400 that was elected for the same winter yields an EFBS level

⁵ EFBS Case, Duke Application at Attachment 5

1 of approximately 9% of the capacity requirement. Given that the winter of
2 2013/2014 was one of the coldest on record and Duke was able to manage its
3 storage adequately, that level of 9% is sufficient as a threshold going forward.

4 **Q. Would your proposal apply to all Suppliers that elect FBS?**

5 A. I recommended that my proposal apply to all Suppliers with an MDQ over 1,000
6 Dth. This would spread the responsibility of assisting Duke to manage its
7 storage assets over nearly all Suppliers and avoid the discrimination inherent in
8 Duke's proposal. By spreading the responsibility over Suppliers at this level, the
9 burden on each Supplier will also be reduced. The current Duke FRAS tariff has
10 a 1,000 Dth/day level as the threshold a Supplier must hit to have the option to
11 elect EFBS; thus, it is an appropriate threshold. I also indicate that my proposal
12 could work with a 3,000 Dth threshold, although I note that 1,000 Dth would be
13 more ideal for purposes of maintaining a level playing field. I also do not object
14 to excluding Suppliers who solely service process-only customers and load from
15 the calculation.

16 **Q. Are there other aspects to your contingency plan?**

17 A. Yes, while I will not discuss them at length, I also addressed a potential fee that
18 Suppliers allocated a pro rata of storage would pay to account for the potential
19 seasonal spread that may exist.

20 **Q. Did you address any other issues in your testimony?**

21 A. Yes, while I indicated that a contingency plan is my preferred outcome, I
22 indicated that if Duke's proposal to force Suppliers onto EFBS is accepted, the
23 Commission should lower the threshold to 1,000 Dth.

1 **Q. Does the Audit Report in this proceeding address either of your proposals?**

2 A. It addresses only one of them. Specifically, it addresses my secondary position
3 to make EFBS mandatory for Suppliers above a 1,000 Dth threshold. The Audit
4 Report determined that the 20,000 Dth threshold recommended by Duke was too
5 high and the 1,000 Dth threshold recommended by RESA was too low, settling
6 on a 6,000 Dth threshold amount. The Audit Report, however, completely failed
7 to address my primary proposal to allocate a pro rata amount of any EFBS
8 undersubscription to FBS Suppliers.

9 **Q. Has the Commission issued a decision in the *EFBS Case* based upon the
10 recommendations in the Audit Report?**

11 A. Yes, although the Audit Report was issued after the hearing in the *EFBS Case*
12 and I did not have an opportunity to review the audit report before submitting my
13 testimony in that case, the Commission relied upon it as a basis for its Order in
14 the *EFBS case*. Specifically, the Commission adopted Duke's proposal to make
15 EFBS mandatory, although the Commission reduced the threshold amount to
16 6,000 Dth as recommended by the Audit Report in this proceeding.⁶

17 **Q. Did the Commission's Opinion and Order ("EFBS Order") address your
18 contingency plan?**

19 A. No, one of the more troubling issues is that the neither the Audit Report in this
20 proceeding nor the Commission Order in the *EFBS Case* provided any analysis
21 or reasoning regarding the merit of my proposed contingency plan. The
22 Commission, however, in the EFBS Order indicated that "We note that Exeter's

⁶ The EFBS Order, the Stipulation, and the Audit Report each fail to address my alternative proposal of 3,000 Dth threshold (either as part of my contingency plan or Duke's proposal for mandatory EFBS).

1 recommendations regarding Duke's storage levels and any other balancing
2 issues will be addressed in the 2015 GCR Case."⁷

3 **Q. Does the Stipulation address the Audit Report's recommendation?**

4 A. To some extent yes. The Stipulation provides the Audit Report shall be admitted
5 into the record and that "[t]he specific findings presented in the Conclusions and
6 Recommendations section of the [Audit] Report are reasonable and should be
7 adopted by the Commission." The section of the Audit Report I describe above
8 related to Duke's balanced options is contained in Section 6.5 of the Conclusions
9 and Recommendations section of the Audit Report. Thus, the Stipulation claims
10 that the Audit Report's recommendations are reasonable.

11 **Q. Do you believe that this provision of the Stipulation should be approved?**

12 A. No, as discussed above, the Audit Report contains incomplete and unsupported
13 recommendations. While the Audit Report tacitly recognizes that RESA filed
14 testimony in the *EFBS Case*, the Audit Report fails to address RESA's primary
15 recommendation regarding a contingency plan. Therefore, it would be unfair,
16 misleading, and against the public interest to adopt the Audit Report's analysis
17 and recommendations as a reasonable resolution of the issues pertaining to
18 Duke's balancing rates and options.

19 **Q. Do you believe that this provision of the Stipulation denies RESA the**
20 **opportunity to address its proposal for EFBS and FBS services in this**
21 **proceeding?**

⁷ It is my understanding that RESA has raised concerns with the *EFBS Case* decision, and the merits are still under consideration on rehearing.

1 A. Yes, as I already noted, the EFBS Order approved an interim one-year freeze on
2 Suppliers' ability to elect between EFBS and FBS, while deferring consideration
3 of future years or a more permanent solution to this proceeding. Because neither
4 the Audit Report, Stipulation, nor EFBS Order addresses RESA's contingency
5 plan, adoption of the Stipulation (coupled with the EFBS Order) would deny
6 RESA an opportunity to have its EFBS contingency proposal from being
7 considered, effectively denying RESA the opportunity to fully participate in
8 Commission proceedings.

9 **Q. How can the Commission remedy the shortcomings in the Stipulation?**

10 A. My initial recommendation is that the Commission modify the Stipulation to
11 require Duke to adopt my contingency plan proposal starting in the 2017-2018
12 gas year. The Commission should require Duke to file an application to
13 incorporate this modification to Duke's balancing tariffs. The Commission
14 acknowledged in its Order in the *EFBS Case* that Duke's balancing services will
15 receive additional consideration in this case; thus, I believe it would be
16 appropriate to adopt my contingency plan in this proceeding. But if the
17 Commission does not adopt my contingency plan, at a minimum and as
18 discussed in the Application for Rehearing submitted by RESA in the *EFBS*
19 *Case*, the Commission should at least delay the deadline for forcing Suppliers to
20 take EFBS for an additional year. This would allow Suppliers additional time to
21 unwind their contracts and positions that were entered into based upon the
22 option to take balancing service under FBS. The Audit Report identifies this
23 issue, stating "[w]hether any modifications are warranted to DE-Ohio's proposal

1 to account for consideration of existing contractual obligations of suppliers will be
2 addressed by the Commission.”

3 **B. Duke’s Storage Assets**

4 **Q. Does the Audit Report contain recommendations regarding Duke’s storage**
5 **assets?**

6 A. Yes, the Audit Report indicates that “Exeter’s analysis indicated that DE-Ohio
7 could potentially reduce current storage levels by 20 percent, serve its GCR
8 customers, and still meet the balancing requirements of its firm customers. This
9 would reduce costs for both GCR and firm transportation customers.”

10 **Q. Does the Stipulation address this recommendation?**

11 A. In part, yes. The Stipulation states that Duke “agrees to reevaluate whether it
12 could meet its firm customers’ balancing requirements at reduced storage levels,
13 taking into consideration the possibility that the propane plants may not be
14 available.”

15 **Q. Do you support this language as written in the Stipulation?**

16 A. No. As currently written in the Stipulation, Duke has very little obligation to do
17 anything with its storage assets. For example, there is no indication regarding
18 Duke’s obligations besides performing an evaluation. It does not appear there is
19 even any obligation for Duke to file the results of its evaluation in a formal docket.
20 Further, there is no commitment that if Duke determines it can reduce storage
21 assets and maintain reliability on its system, Duke would actually do so. These
22 are important questions that have real economic implications for Suppliers and
23 GCR customers, given that the Commission is forcing them to pay for a portion of

1 Duke's storage assets through EFBS and the GCR mechanism. Leaving this
2 provision so open ended is not in the public interest. At a minimum, the
3 Commission should require Duke to work with Suppliers on the issues that will
4 impact their costs and supply options and also to file the results of its evaluation
5 in this proceeding and provide parties an opportunity to submit written comments.
6 Duke should further be required to meet with and incorporate Supplier input into
7 their decision process to limit impacts to our customers and contracts. Through
8 that process, Suppliers can potentially avoid seeing for the first time Duke's
9 analysis and recommendations in a tariff filing that may negatively impact the
10 retail market. There is no reason Suppliers and customers must react to a tariff
11 filing when a process to allow for reasonable discussions and plenty of time to
12 prepare could easily be provided for in this case. RESA supports a well-
13 functioning and safe system however last-minute major changes (which is what a
14 tariff case provides) results in needless chaos, costs and potential harm to
15 systems.

16 **Q. If the Commission were to maintain the option to elect between FBS and**
17 **EFBS, would you still be concerned about Duke's storage-related**
18 **obligations?**

19 A. Not to the same degree. To the extent that Suppliers maintain an option to elect
20 FBS, they can choose to not take storage and the associated costs. But, if EFBS
21 is mandatory, Suppliers are effectively captive customers to Duke's storage-
22 related decisions.

1 **C. Reporting Obligations**

2 **Q. What additional concerns do you have regarding the Stipulation?**

3 A. The Stipulation contains several provisions that require Duke to undertake
4 additional evaluations or investigatory analysis, but the Stipulation fails to
5 indicate what, if anything, Duke is required to do with its conclusions.
6 Specifically, the Stipulation states:

- 7 • “The Company agrees to reevaluate whether its current KO Transmission
8 capacity entitlements are reasonable, and adjust those entitlements as
9 appropriate.”⁸
- 10 • “The Company agrees to assess the potential for loss of the two remaining
11 propane facilities and evaluate the optimal interstate pipeline capacity
12 portfolio that would be required to replace the loss of supply;”⁹
- 13 • “The Company agrees to reevaluate whether it could meet its firm
14 customers' balancing requirements at reduced storage levels, taking into
15 consideration the possibility that the propane plants may not be
16 available.”¹⁰
- 17 • “The Company agrees to assess whether adopting daily balancing
18 tolerances for IT service would improve the Company's ability to manage
19 storage and/or reduce its contract storage capacity entitlements and to
20 investigate making changes to the rates charged for interruptible monthly

⁸ Stipulation at 6.

⁹ Stipulation at 6.

¹⁰ Stipulation at 7. This provision is discussed in more depth in Section B.

1 balancing service to provide a more significant contribution toward
2 recovery of storage demand charges.”¹¹

3 I agree that Duke should be required to perform the evaluations and analyses
4 discussed above, but I also recommend that the Commission require Duke to file
5 its results in this docket within a set period of time. Parties should also have an
6 opportunity to work with Duke prior to filing to discuss concerns and make
7 suggestions. Another opportunity after filing of the results in this docket should
8 be given to parties to submit written comments in response to these filings. If this
9 formal process is not put into place, Duke will be in the position to selectively
10 determine the timing and venue for which it shall make public its findings—most
11 likely in the form of a tariff filing that may have a detrimental impact on the
12 competitive market.

13 **Q. Does this conclude your testimony?**

14 A. Yes, it does, but I reserve the right to supplement my testimony based upon new
15 information that may become available.

¹¹ Stipulation at 7.

CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio'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 the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served (via electronic mail) on the 21st day of March 2015 upon the persons listed below.

/s/ Gretchen L. Petrucci _____

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