

Duke Energy Ohio – Need No. DEOK-2026-004

At the Needs and Solutions meeting held last month, OCC submitted several questions regarding the Needs presentation for this project. To date, those questions have not been addressed.

OCC respectfully requests that Duke Energy Ohio provide written responses to the outstanding questions before these projects proceed further in the planning process. The questions concern matters central to evaluating the proposed projects, including the basis for the identified need, underlying load forecast assumptions, customer commitments, consideration of alternatives, project scope, timing, and expected consumer cost impacts.

As it pertains to the Solutions stage of the project, OCC requests the following additional information:

1. What evidence supports the increase from 500MW to 800 MW?

Specifically, has the customer made a binding commitment for the additional 300 MW, and what is the anticipated in-service schedule for that additional load?

As described in the previous set of questions, DEO has one Electric Service Agreement (ESA) executed for 250 MW. Additional requested load is still under review.

2. Has Duke evaluated scenarios in which only the original 500 MW materializes or the additional 300 MW is delayed?

If so, would the same transmission upgrades still be required under those scenarios?

The system upgrades necessary to bring the original 500 MW online were identified during the Attachment M-3 Supplemental Project Do-No-Harm study process for DEOK-2024-006. The newly identified transmission upgrades are required to supply the combination of the originally studied-and-approved 500 MW load in addition to the requested 300 MW load increase.

3. How will Duke ensure that existing retail customers are not responsible for costs associated with facilities built primarily to serve this customer's increased load?

This question is focused on cost assignment and cost recovery, which goes beyond the scope of planning information that DEOK is required to provide through the stakeholder process pursuant to Attachment M-3. Notwithstanding

that the question seeks information beyond the scope of Attachment M-3, DEOK clarifies that electric service agreements are entered into so data centers and other large customers pay for both the infrastructure needed to serve them and their share of overall system costs. These contracts include long-term commitments and financial safeguards – such as minimum billing requirements, upfront investments, credit support and termination fees.