

CUCA Data Request Responses to 2.7(a) and (c)  
Docket No. E-2, Sub 1219; Response to Order Granting in Part and Denying in Part Motion  
to Compel by Duke Energy Progress, LLC

2.7(a). On page 8 of his testimony, Witness O'Donnell states: "If the cost to manufacture a particular product is less expensive in another state or country, the manufacturer has a duty to its customers and stockholders to move the manufacturing to the area of least cost."

- a. Please provide all analysis, workpapers or reports regarding electric utility rate design rate options, or retail electric price comparisons in North Carolina, other states and other utilities performed by CUCA, its member companies, or their agents/consultants in the last five years.
  - i. If no such analysis exists, please provide an explanation for each member-company of why such analysis has not been performed.

RESPONSE: See Chart 1 of Mr. O'Donnell's pre-filed testimony in this proceeding showing a comparison of DEP's costs in North Carolina compared to electric utility costs in other Southern states and to the national average. Except as noted, neither CUCA nor Mr. O'Donnell performed any such analysis. No additional analysis was considered necessary to support the statement in Mr. O'Donnell's testimony referenced in the DR.

2-7(c). Please identify any reports or analysis purchased by CUCA, its member companies or their agents/consultants over the last five years necessary to meet the "duty [of the member-companies] to its customers and stockholders to move the manufacturing to the area of least cost."

- i. If no such analysis exists, please provide an explanation for each member-company of why such analysis has not been performed.

RESPONSE: Neither CUCA nor Mr. O'Donnell purchased any such reports or analysis. Such reports or analysis were not considered to be necessary to support the statement in Mr. O'Donnell's testimony referenced in the DR.

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