

Chester Willcox & Saxbe, LLP 65 East State Street, Suite 1000 Columbus, OH 43215

MAIN: 614.221.4000 FAX: 614.221.4012

WWW.CWSLAW.COM

MARK S. YURICK DIRECT: 614.334.7197 myurick@cwslaw.com RECEIVED-DOCKETING DIV

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PUCO

December 30, 2010

Renee' Jenkins Chief of Docketing The Public Utilities Commission of Ohio 180 E. Broad Street, 11th Floor Columbus, Ohio 43215

> Re: Incentive Application – The Kroger Co. and Duke Energy of Ohio PUCO Case No. 10-3134-EL-EEC

Dear Ms. Jenkins:

Please find enclosed the incentive application for energy efficiency projects to be filed on behalf of The Kroger Co. and Duke Energy of Ohio. The docket number was obtained today by telephone.

Do not hesitate to contact me with any questions or concerns. Thank you for your assistance.

Very truly yours Mark S.

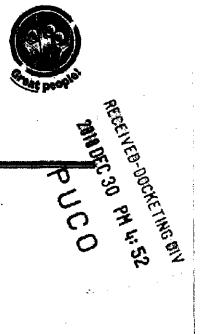
Enclosure

4853-2746-2408, v. 1

This is to certify that the mages spearing are an accurate and complete reproduction of a case file locument delivered in the regular course of business Technician ______ Date Processed 12/30/10







1014 Vine Street Cincinnati, Ohio 45202-1100 (513) 762-4957 office (513) 762-1537 fax

Tracy MacDonald The Kroger Co. Energy Department, 5th Fl 1014 Vine St. Cincinnati, OH 45202 Tracy.MacDonald@Kroger.com

Ohio Public Utility Commission 180 East Broad Street Columbus, Ohio 453215

Attention: Docketing Division

RE: Incentive application for 2007 Projects with Duke Energy - Case No. 10-3134 EL-EEC

On behalf of The Kroger Co., I am submitting an incentive application for energy efficiency projects completed in 2007. These projects include a HID retrofit and ECM motor retrofit. Kroger opted out of Duke Energy's 2007 energy efficiency rider but the 2007 efficiency program offered by Duke Energy did not include a custom program, so these measures were not eligible for incentives. We are currently working with Duke Energy to determine the cash value of these projects and will supplement this filing once we determine the amount.

We have already collected incentive payments for our HID and ECM motor retrofits from other Ohio utility companies, please refer to Case No. 09-1494 EL-EEC as an example. We hope to collect payments for the energy efficiency measures completed in Duke Energy's territory.

Please return a time stamped copy of this application to me in the enclosed self-addressed envelope. If you have any questions, please contact me at 513.762.4957.

Thank yoù, Tracy D. MacDonald

The Kroger Co. Energy Department, 5th Fl 1014 Vine St. Cincinnati, OH 45202 Tracy.MacDonald@Kroger.com

Ohio Public Utilities Commission

Application to Commit Energy Efficiency/Peak Demand Reduction Programs (Mercantile Customers Only)

Case No.: 10-3134-EL-EEC

Rule 4901:1-39-05(F), Ohio Administrative Code (O.A.C.), permits a mercantile customer to file, either individually or jointly with an electric utility, an application to commit the customer's existing demand reduction, demand response, and energy efficiency programs for integration with the electric utility's programs. The following application form is to be used by mercantile customers, either individually or jointly with their electric utility, to apply for commitment of such programs implemented during the prior three calendar years.

Completed applications requesting the cash rebate reasonable arrangement option (Option 1) in lieu of an exemption from the rider will be automatically approved on the sixty-first calendar day after filing, unless the Commission, or an attorney examiner, suspends or denies the application prior to that time. Completed applications requesting the exemption from the electric utilities' energy efficiency rider option (Option 2) will not qualify for the 60-day automatic approval.

Complete a separate application for each customer program. Projects undertaken by a customer as a single program at a single location or at various locations within the same service territory should be submitted together as a single program filing, when possible. Check all boxes that are applicable to your program. For each box checked, be sure to complete all subparts of the question, and provide all requested additional information. Submittal of incomplete applications may result in a suspension of the automatic approval process or denial of the application.

If you consider some of the items requested in the application to be confidential or trade secret information, please file a copy of the application under seal, along with a motion for protective order pertaining to the material you believe to be confidential. Please also file a copy of the application in the public docket, with the information you believe to be confidential redacted.

Section 1: Company Information

Name: The Kroger Co.

Principal address: 1014 Vine Street Cincinnati, Ohio 45202

Address of facility for which this energy efficiency program applies: See Attached

Name and telephone number for responses to questions:

Tracy MacDonald 513.762.4957 or Denis George 513.762.4538

Electricity use by our company (at least one must apply to your company—check the box or boxes that apply):

- We use more than seven hundred thousand kilowatt hours per year at our facility. (Please attach documentation.) See Attached
- We are part of a national account involving multiple facilities in one or more states. (Please attach documentation.) See Attached

Section 2: Application Information

- A) We are filing this application (choose which applies):
 - □ J Individually, on our own.
 - Jointly with our electric utility.
- B) Our electric utility is: **Duke Energy**

C) We are offering to commit (choose which applies):

- Energy savings from our energy efficiency program. (Complete Sections 3, 5, 6, and 7.)
- Demand reduction from our demand response/demand reduction program. (Complete Sections 4, 5, 6, and 7.)
- Both the energy savings and the demand reduction from our energy efficiency program. (Complete all sections of the Application.)

Address of facility for which this energy efficiency program applies:

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Site ID	Account Number	Address 1	City	State	Zip Code
01400310	064435277	2435 Harrison Ave	Cincinnati	ОН	45211
01400376	106941934	2900 W.St .Rte. 22 & 3	Maineville	OH	45039
01400379	106008079	954 E.McMillan	Cincinnati	OH	45206
01400383	106072987	7300 Yankee Road	Middletown	OH	45044
01400396	000645605	1783 Ohio Pike - SR 125	Amelia	ОН	45102
01400400	106967484	6401 Colerain Ave.	Cincinnati	ОН	45239
01400402	89600703200	6950 Miami Ave	Madeira	OH	45243
01400405	011352571	8241 Vine St	Cincinnati	OH	45216
01400413	011552517	800 Loveland Madeira Rd	Loveland	OH	45140
01400426	54202078020	5210 State Route 741	Mason	OH	45040
01400428	7202089024	4777 Kenard Ave	Cinc inna ti	OH	45232
01400430	106967713	5420 Liberty - Fairfield Rd	Hamilton	OH	45011
01400431	9501	450 Ohio Pike(SR 125)	Cincinnati	OH	45255
01400432	108011054	2310 Ferguson Rd	Cincinnati	OH	45238
01400435	682159	6388 Branch Hill Guinea Pike	Loveland	OH	45140
01400436	90502199047	5830 Harrison	Cincinnati	OH	45248
01 400 445	3260219701	4001 ST.RT. 128	Clevers	OH	45002
01400448	52003508021	5100 Terra Firma Drive	Mason	OH	4504 0
01400902	10129	4530/500 EASTGATE BLVD	CINCINNATI	OH	45245
01400908	13867	9690 COLERAIN AVENUE	CINCINNATI	OH	45251
01400915	48103542017	7580 Beechmont Avenue	Cincinnati	OH	45255
01400921	010296669	1093 ST. RT. 28 BY-PASS	MILFORD	OH	45150
01400943	000004925	1212 W. KEMPER RD.	FOREST PARK	OH	45240

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We use more than seven hundred thousand kilowatt hours per year at our facility.

Listed below are those sites specific to this application and their KWh usage for 2009. Total usage for all Duke energy account listed below.

	Year: 2009
	Elec
	Use
Site Name	(kWh)
01400310 Cincinnati	2,238,565
01400379 Cincinnati	1,790,280
01400405 Cincinnati	2,428,427
01400413 Loveland	2,964,098
01400396 Amelia	3,299,609
01400430 Hamilton	3,048,335
01400921 Milford	2,876,762
01400426 Mason	2,798,510
01400400 Cincinnati	2,626,599
01400428 Cincinnati	4,132,358
01400943 Forest Park	3,367, 466
01400908 Cincinnati	3,316,267
01400445 Whitewater	2,972,073
01400431 Cincinnati	3 ,133,630
01400402 Madeira	2,792,637
01400376 Maineville	3,122,118
01400436 Dent	3,130,915
01400432 Cincinnati	3,020,573
01400448 Deerfield	3,005,522
01400435 Miami Township	2,992,797
01400902 Cincinnati	2,770,413
01400915 Cincinnati	4,437,830
01400383 Liberty Township	3,598,819
	Total 69,864,603
Total Usage for all Duke Energy	

lotai	Usage for all Duke Energy	
Accol	ints company wide:	

450,743,237

We are part of a national account involving multiple facilities in one or more states.



http://www.thekrogerco.com/operations/operations_grocery_locations.htm

Grocery Store Banners by State

State Alabama Alaska Arizona Arkansas California Colorado Georgia Idaho Ilinois Indiana Kansas Kentucky Louisiana Michigan Mississippl	Banner Kroger Fred Meyer Fry's, Smith's, Fry's Marketplace Kroger Ralphs, Food 4 Less, Foods Co. King Soopers, City Market Kroger, Kroger Marketplace Fred Meyer, Smith's Kroger, Hilander, Food 4 Less Kroger, Jay C, Pay Less, Owen's, Food 4 Less, Scott's Dillons, Dillons Marketplace Kroger, Kroger Marketplace Kroger Kroger	State Nebraska Nevada New Mexico North Carolina Oregon South Carolina Tennessee Texas Utah Virginia Washington West Virginia Wyoming	Banner Baker's Smith's, Food 4 Less Smith's, City Market Kroger Kroger, Kroger Marketplace Fred Meyer, QFC Kroger, Kroger Marketplace Kroger, Kroger Marketplace Smith's, Smith's Marketplace, City Market Kroger QFC, Fred Meyer Kroger Smith's, King Soopers, City Market
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Section 3: Energy Efficiency Programs

- A) Our energy efficiency program involves (choose whichever applies):
 - Early replacement of fully functioning equipment with new equipment. (Provide the date on which you replaced your fully functioning equipment, and the date on which you would have replaced your equipment if you had not replaced it early. Please include a brief explanation for how you determined this future replacement date (or, if not known, please explain why this is not known)).
 - Installation of new equipment to replace equipment that needed to be replaced We installed our new equipment on the following date(s):
 - Installation of new equipment for new construction or facility expansion.
 We installed our new equipment on the following date(s):
- B) Energy savings achieved/to be achieved by your energy efficiency program:
 - a) If you checked the box indicating that your project involves the early replacement of fully functioning equipment replaced with new equipment, then calculate the annual savings [(kWh used by the original equipment) (kWh used by new equipment) = (kWh per year saved)]. Please attach your calculations and record the results below:

Annual savings: <u>2,397,691</u> kWh

b) If you checked the box indicating that you installed new equipment to replace equipment that needed to be replaced, then calculate the annual savings [(kWh used by less efficient new equipment) - (kWh used by the higher efficiency new equipment) = (kWh per year saved)]. Please attach your calculations and record the results below:

Annual savings: _____kWh

Please describe the less efficient new equipment that you rejected in favor of the more efficient new equipment.

 c) If you checked the box indicating that your project involves equipment for new construction or facility expansion, then calculate the annual savings [(kWh used by less efficient new equipment) - (kWh used by higher efficiency new equipment) = (kWh per year saved)]. Please attach your calculations and record the results below:

Section 3: Energy Efficiency Programs

Assumption: 10 year life expectancy

A) Early replacement of fully functioning equipment with new equipment.

HID Lay-in Retrofits

The decision to retrofit was based solely on the energy savings gained by replacing the 360w & 400w HID fixtures with the lower wattage 226w T8 HID lay-in fixtures. Otherwise, it is company policy that lighting is not replaced until a store is remodeled. Typically stores are scheduled to be remodeled every 10 years.

Site ID	Account Number	Address 1	City	State	Zip Code	Equipment Replaced	Possible replacement
0140040	2 89600703200	6950 Miami Ave	Madeira	OH	45243	10/2007	2010
0140044	5 3260219701	4001 ST.RT. 128	Clevers	OH	45002	09/2007	201 1
0140044	8 52003508021	5100 Terra Firma Drive	Mason	OH	45040	09/2007	2016
0140091	5 48103542017	7580 Beechmont Avenue	Cincinnati	OH	45255	01/2007	2017

ECM (Electronically Commutated Motor) for Air Cooled Single Condenser Fan

The ECM motor retrofit was designed to replace the PSC motors used on air cooled single condenser fans. This retrofit changed our strategy from cycling fan to variable speed drives. This initiative also added additional control points for maximum energy efficiency. Although inefficient, we do have some motors that are in service for over 15 years. Motors are not typically replaced unless there is a problem or an upgrade has been planned. Therefore it is not known when these motors would have been replaced. Equipment is assumed to have a 10 year life expectancy.

Site ID Account Number	Address 1	City	State	Zip Code	Equipment Replaced
01400310 064435277	2435 Harrison Ave	Cincinnati	OH	45211	8/9/2007
01400376 105941934	2900 West .Rte. 22 & 3	Marienville	OH	45039	11/29/2007
01400379 106008079	954 E.McMillan	Cincinnati	OH	45206	12/20/2007
01400383 106072987	7300 Yankee Road	Middletown	OH	45044	11/14/2007
01400396 000645605	1783 Ohio Pike - SR 125	Amelia	OH	45102	12/4/2007
01400400 106967484	6401 Colerain Ave.	Cincinnati	он	45239	11/21/2007
01400405 011352571	8241 Vine St	Cincinnati	OH	45216	12/20/2007
01400413 011552517	800 Lovelandi Madeira Rd	Loveland	OH	45140	12/4/2007
01400426 54202078020	5210 State Route 741	Mason	OH	45040	8/9/2007
01400428 7202089024	4777 Kenard Ave	Cincinnati	OH	45 232	12/4/2007
01400430 106967713	5420 Liberty - Fairfield Rd	Hamilton	OH	45011	10/26/2007
01400431 9501	450 Ohio Pike(SR 125)	Cincinnati	ОН	45255	12/20/2007
01400432 108011054	2310 Ferguson Rd	Cincinnati	OH	45238	10/26/2007
01400435 682159	6388 Branch Hill Guinea Pike	Loveland	OH	45140	12/4/2007
01400436 90502199047	5830 Harrison	Cincinnati	OH	45248	10/26/2007
01400902 10129	4530/500 EASTGATE BLVD	CINCINNA	OH	45245	12/20/2007
01400908 13867	9690 COLERAIN AVENUE	CINCINNA	OH	45251	10/26/2007
01400921 010296669	1093 ST. RT. 28 BY-PASS	MILFORD	OH	45150	12/20/2007
01400943 000004925	1212 W. KEMPER RD.	FOREST P/	HOH	45240	11/7/2007

B) Energy savings achieved/to be achieved by your energy efficiency program:

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[(kWh used by the original equipment) - (kWh used by new equipment) = (kWh per year saved)]

HID Lay Original f	-in Retrofits ixture				New fixtu	re				
			(18)					(18)		
Store	# of fixtures	Wattage	Hours/day	KWh	Store	# of fixtures	Wattage	Hours/day	KWh	Savings
402	96	400	6570	252288	402	95	226	6570	142543	109745
445	139	400	6570	365292	445	139	226	6570	206390	158902
448	102	400	6570	268056	448	102	226	6570	151452	116604
915	325	400	6570	854100	915	325	226	6570	482567	371534
			Total	1739736					Total	756785

982,951 KWh saved per year

ECM (Electronically Commutated Motor) for Air Cooled Single Condenser Fan

Original mo	otor				New moto	ar a				
# of stores 19	avg # of motors/str 68	Wattage 450	(12) Hours/day 4380	KWh 134028	# of stores X	avg # of motors/str 68	Wattage 250	(12) Hours/day 4380	KWh 74460	Savings 59568
			Total	134028					Total	59568

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1,414,740 KWh saved per year

Annual savings: ____kWh

Please describe the less efficient new equipment that you rejected in favor of the more efficient new equipment.

Section 4: Demand Reduction/Demand Response Programs

- A) Our program involves (choose which applies):
 - □ Coincident peak-demand savings from our energy efficiency program.
 - Actual peak-demand reduction. (Attach a description and documentation of the peak-demand reduction.)
 - □ Potential peak-demand reduction (choose which applies):
 - Choose one or more of the following that applies:
 - Our peak-demand reduction program meets the requirements to be counted as a capacity resource under a tariff of a regional transmission organization (RTO) approved by the Federal Energy Regulatory Commission.
 - Our peak-demand reduction program meets the requirements to be counted as a capacity resource under a program that is equivalent to an RTO program, which has been approved by the Public Utilities Commission of Ohio.
- B) What is the date your peak demand reduction program was initiated?
- C) What is the peak demand reduction achieved or capable of being achieved (show calculations through which this was determined):

____ kW

Section 5: Request for Cash Rebate Reasonable Arrangement (Option 1) or Exemption from Rider (Option 2)

Under this section, check the box that applies and fill in all blanks relating to that choice.

Note: If Option 2 is selected, the application will not qualify for the 60-day automatic approval. All applications, however, will be considered on a timely basis by the Commission.

- A) We are applying for:
 - Option 1: A cash rebate reasonable arrangement.

OR

- Option 2: An exemption from the cost recovery mechanism implemented by the electric utility.
- B) The value of the option that we are seeking is:
 - Option 1: A cash rebate reasonable arrangement, which is the lesser of (show both amounts):
 - A cash rebate of \$ <u>TBD See attached</u>. (Attach documentation showing the methodology used to determine the cash rebate value and calculations showing how this payment amount was determined.)

OR

- A cash rebate valued at no more than 50% of the total project cost, which is equal to \$______.
 (Attach documentation and calculations showing how this payment amount was determined.)
- Option 2: An exemption from payment of the electric utility's energy efficiency/peak demand reduction rider.
 - An exemption from payment of the electric utility's energy efficiency/peak demand reduction rider for _____ months (not to exceed 24 months). (Attach calculations showing how this time period was determined.)

OR

Ongoing exemption from payment of the electric utility's energy efficiency/peak demand reduction rider for an initial period of 24 months because this program is part of an ongoing efficiency program that is practiced by our organization. (Attach documentation that establishes your organization's ongoing efficiency program. In order to continue the exemption beyond the initial 24 month period your organization will need to provide a future application establishing additional energy savings and the continuance of the organization's energy efficiency program.)

Section 6: Cost Effectiveness

The program is cost effective because it has a benefit/cost ratio greater than 1 using the (choose which applies):

- □ Total Resource Cost (TRC) Test. The calculated TRC value is: <u>See</u> <u>Attached</u> (Continue to Subsection 1, then skip Subsection 2)
- Utility Cost Test (UCT) . The calculated UCT value is: <u>See Attached</u> (Skip to Subsection 2.)

Subsection 1: TRC Test Used (please fill in all blanks).

The TRC value of the program is calculated by dividing the value of our avoided supply costs (capacity and energy) by the sum of our program costs and our electric utility's administrative costs to implement the program.

Our avoided supply costs were _____.

Our program costs were _____.

The utility's administrative costs were _____.

Subsection 2: UCT Used (please fill in all blanks).

We calculated the UCT value of our program by dividing the value of our avoided supply costs (capacity and energy) by the costs to our electric utility (including administrative costs and incentives paid or rider exemption costs) to obtain our commitment.

Our avoided supply costs were _____.

Revised December 30, 2010

The utility's administrative costs were _____.

The utility's incentive costs/rebate costs were _____

Section 7: Additional Information

Please attach the following supporting documentation to this application:

- Narrative description of your program including, but not limited to, make, model, and year of any installed and replaced equipment.
- A copy of the formal declaration or agreement that commits your program to the electric utility, including:
 - 1) any confidentiality requirements associated with the agreement;
 - 2) a description of any consequences of noncompliance with the terms of the commitment;
 - a description of coordination requirements between you and the electric utility with regard to peak demand reduction;
 - permission by you to the electric utility and Commission staff and consultants to measure and verify energy savings and/or peak-demand reductions resulting from your program; and,
 - 5) a commitment by you to provide an annual report on your energy savings and electric utility peak-demand reductions achieved.
- A description of all methodologies, protocols, and practices used or proposed to be used in measuring and verifying program results. Additionally, identify and explain all deviations from any program measurement and verification guidelines that may be published by the Commission.

Section 5: Request for Cash Rebate Reasonable

B) The value of the option that we are seeking:

Duke Energy will calculate the value of the option at a later date. After the parties agree to the cash payment, Kroger will submit the data.

Section 6: Cost Effectiveness

Duke Energy will calcuate the benefit/cost ration of these programs at a later date. Once this value has been determined. Kroger will submit the data.

Section 7: Additional Information

HID Lay-in Retrofits

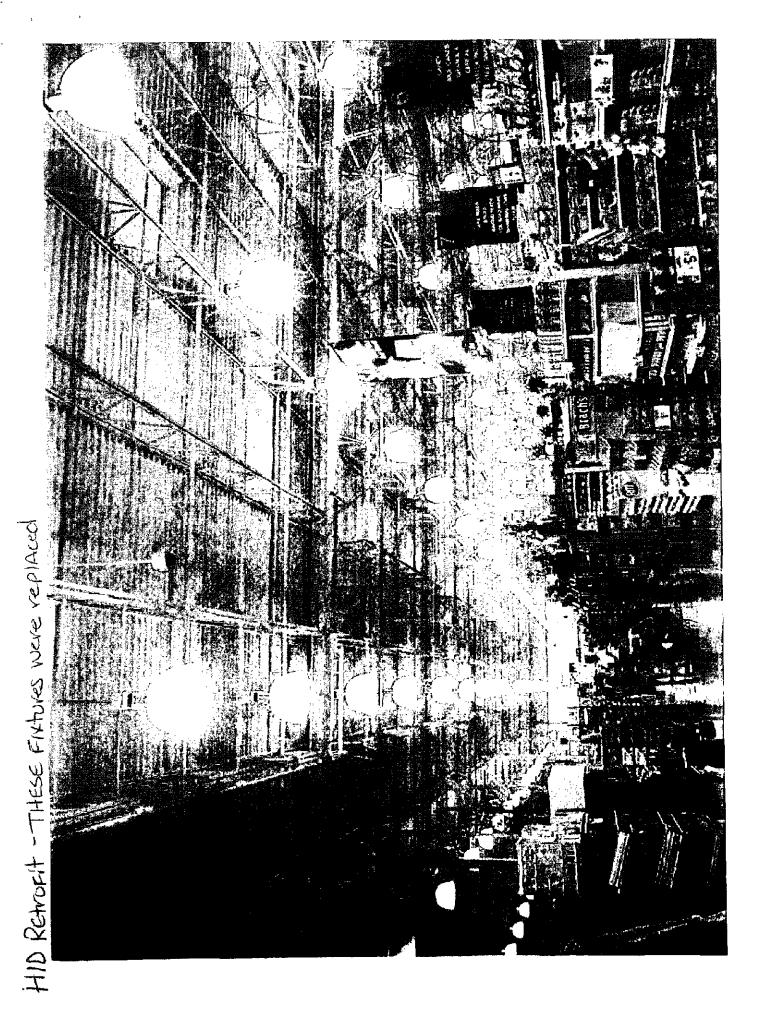
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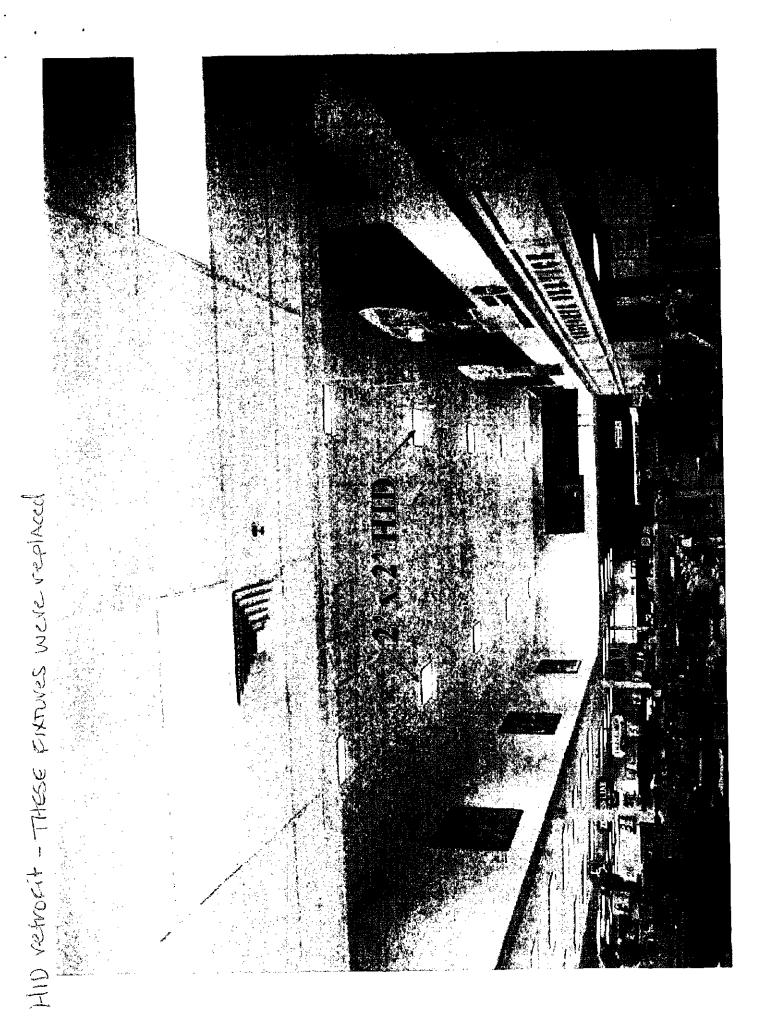
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The decision to retrofit was based solely on the energy savings gained by replacing the 360w & 400w HID fixtures with the lower wattage 226w T8 HID lay-in fixtures. These 2'x4' 6 tamp, HO recessed Harris Lighting troffer fixtures are typically placed in grid cellings. It is company policy that lighting is not replaced until a store is remodeled. Typically stores are scheduled for a remodel every 10 years. The program began in 2007 and continued into 2008. See Attached

ECM (Electronically Commutated Motor) for Air Cooled Single Condenser Fan

The ECM motor retrofit was designed to replace the PSC motors used on air cooled single condenser fans. The three speed ECM motor changed our strategy from cycling fan to variable speed drives. This motor upgrade also required that we go to a temperature differential control strategy which added additional control points and resulted in maximum energy efficiency. The program began in 2007 and replaced a variety of PSC motors with a single 142 ECM motor that came in a kit that consisted of a new fan blade, mounting spacers and low voltage control whip. See Attached



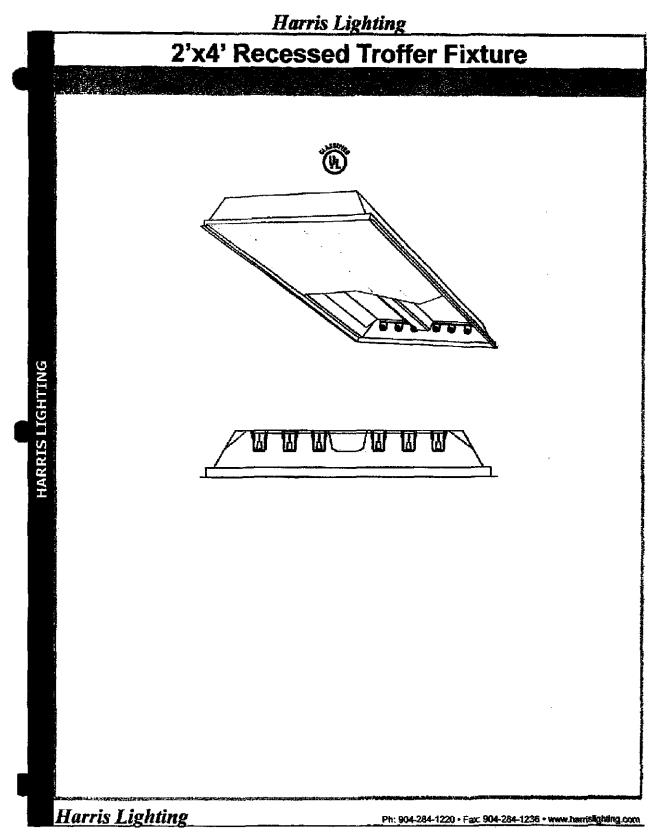


Harris Lighting 2'x4' Recessed Troffer Fixture **Design Features:** Highly efficient One piece reflector construction "No tools ballast access" UL Listed Optional customer supplied ballast or standard factory supplied ballast Specifications: Electrical - Electronic Class P, CBM/ETL Construction - Die formed code gauge cold rolled steel housing, rigid for strength certified, HPF ballast comply with Federal and uniformity. Reflector easily removed Energy Efficiency Standards. UL and CUL without tools. Access Plate on housing Listed. HARRIS LIGHTING top and flush Knockouts on ends for mounting and electrical connections. One piece extruded 100% clear virgin acrylic prismatic lens. Finish - All metal parts pretreated with a phosphate bonding process and post painted with an electrostatically-applied high temperature baked white enamel for superior quality and durability. Reflectance in excess of 89%. Kroger P-Net Numbers: 060-00049010 (6 Lamp, HO, Troffer Fixture) 060-00049022 (Lamps for this fixture)

Harris Lighting

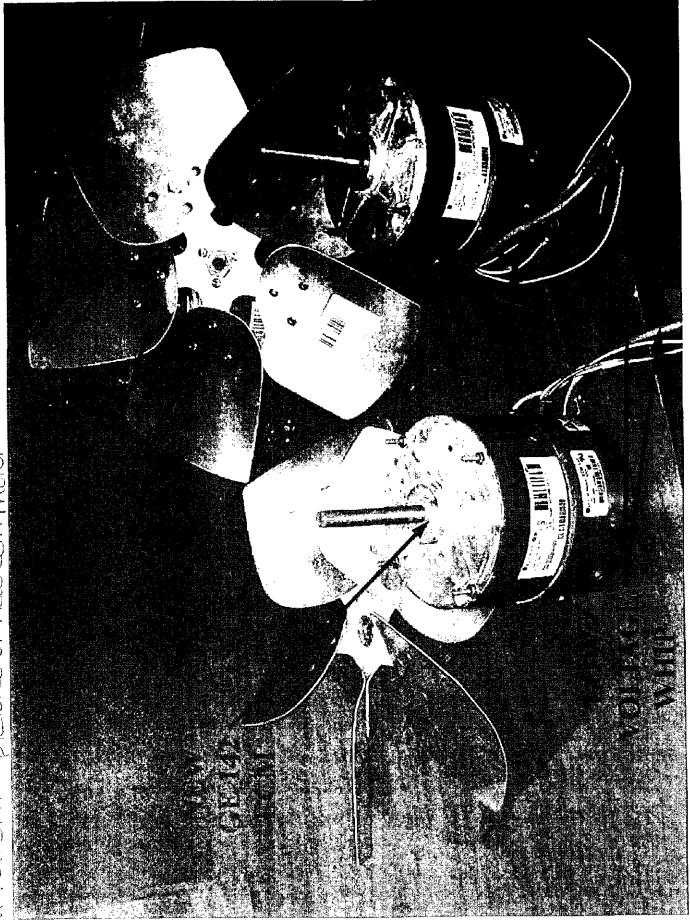
Ph: 904-284-1220 • Fax: 904-284-1235 • www.harrislighting.com

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2007 Herris Manufacturing, All Rights Reserved





ECN VETROPH - PICTURS OF NUL COM MUTOR

ECN retroest

PROJECT SCOPE

- single condenser fan motors with new Electronically Commutated Motors. To replace existing PSC air-cooled
- To take advantage of the fan laws and use the existing controls to var the speeds of the new motors.

ECM refrort

NEW EQUIPMENT

- GE 142 ECM w/ low voltage whip for 3 preset speeds.
- · Lau fan blade.
- · Spacers & mounting screws.

Ohio Public Utilities Commission

Application to Commit Energy Efficiency/Peak Demand Reduction Programs (Mercantile Customers Only)

Case No.: 10-3134 -EL-EEC

State of <u>OHIO</u>:

<u>Tracy D. MacDonald</u>, Affiant, being duly sworn according to law, deposes and says that:

1. I am the duly authorized representative of:

The Kroger Co.

[insert customer or EDU company name and any applicable name(s) doing business as]

- 2. I have personally examined all the information contained in the foregoing application, including any exhibits and attachments. Based upon my examination and inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete.
- 3. I am aware of fines and penalties which may be imposed under Ohio Revised Code Sections 292,1.11, 2921.31, 4903.02, 4903.03, and 4903.99 for submitting false

information. **Corporate Incentive Engineer** Signature of Affiant & Fitle

Sworn and subscribed before me this 30th day of December, 2010 Month/Year

Signature of official administering oath

My commission expires on

DENIS E. GEORGE. Attorney at Law Notary Public, State of Ohio My Commission has no expiration date Section 147.03 O. R. C.

Denis F. George

Print Name and Title



Revised December 30, 2010

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO STATUS

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In the Matter of The Kroger Company and Columbus Southern Power Company for Approval of A Special Arrangement Agreement with a Mercantile Customer

Case No. 09-1494 EL-E

JOINT APPLICATION FOR APPROVAL OF A SPECIAL ARRANGEMENT BETWEEN COLUMBUS SOUTHERN POWER COMPANY WITH THE KROGER COMPANY

Applicants, Columbus Southern Power Company (Company), and The Kroger Company (Customer) (collectively, "Applicants"), submit this application for Commission approval of the special arrangement described in this Joint Application and the attachment. The Customer has agreed to support this filing by its affirmation in Attachment 1 (Self Direct Project Overview/Commitment).

Amended Substitute Senate Bill 221 sets forth in R.C. 4928.66 energy efficiency/peak demand reduction (EE/PDR) benchmarks that electric distribution utilities shall be required to The statute allows utilities to include EE/PDR resources committed by meet or exceed. mercantile customers for integration into the utilities programs to be counted toward compliance with a utility's EE/PDR benchmarks. The statute also enables the Commission to approve special arrangements for mercantile customers that commit EE/PDR resources to be counted toward compliance with EE/PDR benchmarks.

The Company is an electric distribution utility as defined in R. C. 4928.01(A). The Customer is a Mercantile customer as defined in R.C. 4928.01(A)(19). The Customer implemented the EE/PDR projects included in this Joint Application after January 1, 2006. In its application to the Company, the Customer has agreed to commit the EE/PDR resources

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identified in this application to the Company's compliance toward the EE/PDR benchmarks in SB 221.

The Company has reviewed the details associated with the project(s) submitted in this application and based upon a thorough review of the available records believe that the project(s) included in this Joint Application satisfy the requirements in R.C. 4928.66 and also further the State of Ohio's policy goals of reducing energy costs and usage. Attachment 1 (Self Direct Project Overview/Commitment) to this Joint Application includes a project overview that outlines the project, customer size, project installation date, kWh reduction, peak KW demand reduction, total project cost, incentive total, the eligible self direct incentive, and the exemption period from the rider. Attachment I (Self Direct Project Overview/Commitment) also provides the signature of the Customer indicating the validity and acceptance of the information, the Customer's support of this Joint Application, and the Customer's intent to participate in the program. The Applicants attest to the fact that the program in this Joint Application complies with the presumption that the mercantile projects are part of a demand response, energy efficiency, or peak demand reduction program to the extent the project either provides for early retirement of functioning equipment which is not yet fully depreciated, or achieves reductions in energy use and peak demand that exceed the reductions that would have occurred had the customer used standard new equipment, to the extent standard is defined by current code or statute.

Applicants agree that approval by the Commission of the Joint Application will result in an arrangement that: 1) addresses coordination requirements between the electric utility and the mercantile customer with regard to voluntary reductions in load by the mercantile customer, which are not part of an electric utility program, including specific communication procedures, if necessary 2) grants permission to the electric utility and Commission staff to measure and verify savings and/or peak-demand reductions resulting from customer-sited projects and resources, and 3) identifies all consequences of noncompliance by the customer with the terms of the commitment. Attachment 2 (blank Self Direct Program Project Application including Rules & Requirements) is a blank application form identical to the application signed by the Customer that reflects the "Rules and Requirements" agreed to by the Customer without disclosing potential Customer-specific confidential information that would be revealed in a final executed version of the application.

The Customer has provided the Company documentation necessary to calculate energy savings and peak demand reductions. The Company uses methodologies, protocols and/or practices that conform to the general principles of the International Performance Measurement Verification Protocol (IPMVP) in order to justify the energy savings and/or demand reductions.

The Applicants recognize that this Joint Application is filed at a time when the final version of the applicable rules governing the program are not yet effective. This filing attempts to the extent practical to implement the adopted rules ordered by the Commission in 08-888 even though they are not final and effective. As contemplated in the statute, the Company has been seeking mercantile customers, in the absence of final rules, to commit resources consistent with the framework set forth in R.C. 4928.66. Approval of this agreement as proposed under these rules would not serve as precedent for future agreements reached after the final and effective rules. The Commission recognized the need to be flexible in its October 15, 2009, Entry on Rehearing in 08-888-EL-ORD with respect to historical programs implemented prior to the adoption of official rules. At such time as new rules are developed and implemented future filings involving the Company will property reflect those changes.

If the Joint Application is approved by the Commission, the Customer will have the option to either: (1) take a one-time reduced incentive payment on the condition of continuing

payment of the EE/PDR Rider, or (2) take advantage of an exemption from the EE/PDR Rider for a defined period. It is important to note that a stipulation was filed on November 12, 2009 in 09-1089-EL-POR dealing with the Company's EE/PDR Portfolio plan. The Signatory Parties¹ to the Stipulation support the Company's two options for the Self Direct Program to solicit commitments of previously-installed EE/PDR resources. (See Paragraph XII.3 of the 09-1089 Stipulation.)

"Option 1" provides mercantile customers the opportunity to receive a reduced incentive payment that is equivalent to the estimated payment of a portion of the customer's EF/PDR rider cost obligation due to the requirement that the customer continues to pay the EE/PDR rider cost for the projected period of time that the customer would otherwise be exempt from the EE/PDR Rider. Option 1 is an incentive payment of 75% of the calculated incentive amount under the Prescriptive and Custom Programs and requires the Customer to continue paying the EE/PDR rider. Because the Customer stays in the EE/PDR rider; i.e., keeps paying it, this incentive is simply an advance of a portion of those payments. The reduced incentive and requirement to continue paying the EE/PDR rider provides rate payers a benefit of lower overall program costs reflected in the EE/PDR rider because the Customer continues paying the EE/PDR rider rather than exempting from it as in Option 2. Whereas, a strict exemption approach would spread the overall program costs over fewer customers. The Customer continues to pay the EE/PDR rider for the period of exemption time calculated in Option 2. The 25% reduction over a new project incentive is reasonable because the customer has already made the EE/PDR investment. By remaining in the EE/PDR rider, the customer benefits by also remaining eligible for future

¹ Ohio Consumers' Counsel, Ohio Environmental Council, Sierra Club, Natural Resources Defense Council, Ohio Poverty Law Center (the previous groups are collectively referred to as the Ohio Consumer and Environmental Advocates), Ohio Energy Group, Ohio Hospital Association, the Ohio Manufacturers' Association, the Ohio Partners for Affordable Energy, Columbus Southern Power Company, and the Ohio Power Company incentives and can utilize Option 1 incentives to provide additional funding for future EE/PDR investments. "Option 1" is for customers who have completed some EE/PDR projects but want to use the advanced payment to help support new EE/PDR investments. Option 1 also requires participating customers to continue paying the EE/PDR rider allowing the customer to continue participation in EE/PDR programs offered by the Companies.

If the customer has no new energy efficiency projects to complete, the customer may be better served by Option 2 because the Option 1 incentive payment is typically less than the net present value of the projected EE/PDR rider costs over the exemption period calculated in Option 2. The customer may be better served taking Option 1 if they use the incentive payment to supplement Prescriptive or Custom program incentive dollars to help fund new energy efficiency projects. Option 1 encourages greater future energy efficiency investments from mercantile customers at a lower cost to rate payers.

Option 2 provides mercantile customers the opportunity to be exempt from the EE/PDR rider for the period of time that their committed energy savings are equal to the Company's mandated benchmark requirement percentages of energy savings based on the customer's 2006-2008 average annual energy usage baseline. If Option 2 is selected, the Customer is not entitled to participate in any of the Company's EE/PDR programs during the calculated period of exemption. In order to extend the Customer's exemption period, the Customer has to commit additional EE/PDR resources by application for approval by the PUCO. Option 2 is for customers who have installed all cost effective energy efficiency projects and plan no further projects in the exemption period. The Company seeks approval of both Option 1 and Option 2 as part of the Commission's overall approval of this application.

5

As shown in Attachment 1 (Self Direct Project Overview/Commitment), the Customer must comply with any Commission requirement to provide an annual report on the energy savings and electric utility peak-demand.

The Company will adjust the energy savings and demand reduction effects from this joint application during its applicable baseline period by excluding such effects from the baselines by increasing its applicable baseline for energy savings and baseline for peak demand reductions by the amount of corresponding Customer's energy savings and peak demand reductions, recognizing that savings may have diminishing effects over time as technology evolves or equipment degrades.

For these reasons, the Applicants request that the Commission approve the Joint Application applying the Customer's energy and demand resources to the Company's energy and demand target/benchmarks as identified in SB 221 and approve the Company to either pay the one-time incentive payment or exempt the Customer from the EE/PDR rider as outlined above. Upon approval, the agreement will be implemented and the Company will reflect the cost recovery as part of the EE/PDR Rider.

Respectfully submitted,

Steven T. Nodrse Matthew J. Satterwhite American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Columbus, Ohio 43215 Telephone: (614) 716-1915 Fax: (614) 716-2950 Email: stnourse@aep.com mjsatterwhite@aep.com

Counsel for Columbus Southern Power Company

Ohio.gov Public Utilities Commission

CASE NUMBER:	09-1494-EL-EEC			
CASE DESCRIPTION:	COLUMBUS SOUTHERN POWER COMPANY			
DOCUMENT SIGNED ON:	12/30/2010			
DATE OF SERVICE:				
06/16/2010 Service N				
06/16/2010 Finding and order stating that the joint applications be approved with concurring opinion of Commissioner Paul A. Centolella.				
06/03/2010 Staff review and recommendations for a special arrangement between Columbus Southern Power Company and The Kroger Company filed by R. Wolfe.				

04/13/2010 Corrected Exhibit electronically filed by Mr. Matthew J Satterwhite on behalf of Columbus Southern Power Company.

 $\frac{12/31/2009}{\text{Southern Power Company with The Kroger Company.}} In the matter of the joint application for approval of a special arrangement between Columbus Southern Power Company with The Kroger Company.}$

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Ohio.gov Public Utilities Commission

Case Record For:	09-1494-EL-EEC	File	a Public Comment
Case Title:	COLUMBUS SOUTHERN PO	WER COMPANY	
Status:	OPEN-OPEN		
Industry Code:	EL-ELECTRIC		
Purpose Code:	EEC-Energy Efficiency Credits	\$	
Date Opened:	12/31/2009		
Date Closed:			
Case Documents	Public Comments Par	ties of Record	Related Cases

<u> </u>	iew All
1 - 5 of 5 documents 1/1	
Date Filed Summary	Pages
06/16/2010 Service Notice	3
06/16/2010 Finding and order stating that the joint applications be approved with concurring opinion of Commissioner Paul A. Centolella.	7
06/03/2010 Staff review and recommendations for a special arrangement between Columbus Southern Power Company and The Kroger Company filed by R. Wolfe.	3
04/13/2010 Corrected Exhibit electronically filed by Mr. Matthew J Satterwhite on behalf of Columbus Southern Power Company.	3
12/31/2009 In the matter of the joint application for approval of a special arrangement between Columbus Southern Power Company with The Kroger Company.	12
1/1	

Attorney General:

Attorney Examiner:



Attachment 1 Self Direct Overview & Commitment Page 1 of 1

Self Direct Project Overview & Commitment

Project Name:	The Kroger Co.
Project Number:	735
Date Received	11/23/2009
Project Installation Date	6/26/2008
kWh Reduction:	166251 kWh
Peak KW Demand Reduction:	23kW
Total Project Cost	\$16871.9
Preliminary/Unadjusted Incentive Calculation	\$7957.5467
Option 1 - Self Direct Incentive (75%)	\$5968.16
Option 2 - Rider Exemption Expires	81 Months (after PUCO approval)
Simple Payback	1.5 Years

Project Overview:

The Self Direct Custom/Prescriptive project that The Kroger Company # 514 has completed and applied is as follows:

27 ECM Motors

95 400 W HID to 6L T8 replacements

The documentation that was included with the application proved that the energy measures applied for were purchased and installed.

By signing this document, the Mercantile customer affirms its intention to commit and integrate the above listed demand reduction, response, and/or energy efficiency resources into the utility's demand reduction, demand response, and energy efficiency programs. By signing, the Mercantile customer also agrees to serve as a joint applicant in any filings necessary to secure approval of this arrangement by the Public Utilities Commission of Ohio, and comply with any information and compliance reporting requirements imposed by rule or as part of that approval.

Columbus Southern Power Company

The Kroger Co.

By:____

Ву:____

Title:

Title: Manager

Dáte:

Date:

Attachment 2- Self Direct Program Project Application Blank including Rules and Requirements Page 1 of 5

AEP OHIO" A unif of Pression Electric Pressur

Self-Direct Program Project Application

Application Instructions

- Complete the application form for each installation account number.
- Complete the appropriate Self-Direct Program Excel spreadsheet fully describing each measure
 replaced and installed along with project costs, existing and new equipment inventories/operation
 descriptions, baseline and new usage measurements or detailed calculations, total energy and demand
 savings, and other specified information. It shall be the customer's responsibility to provide all
 necessary documentation, calculations, and energy impact and summer peak demand saving
 verification in order to justify the project for incentives. Select the appropriate spreadsheet based on
 the project:
 - The Self-Direct Custom Spreadsheet for lighting improvements not covered in the Lighting Program and for any other energy efficiency installation.
 - The Self-Direct Lighting Spreadsheet for lighting conversions and installations covered in the Lighting Program.
- Complete the Self-Direct Program project description and include all required documentation including detailed customer-approved invoices, proof of purchase, receipts, technical specifications, studies/proposals, etc. Please submit up to five photos of the new equipment and the removed equipment (if available).
- NOTE: Sending inadequate involce documentation, incomplete/incorrect forms, or incomplete backup information, including detailed energy and summer peak demand calculations, will delay review of the application. Contact AEP Ohio if you require additional assistance in completing the application.
- Submit all information to AEP Ohio. All completed submissions become the property of AEP Ohio. Make a copy of all documents for your records.

FORM SUBMITTAL: Please note all Rules and Requirements.

Emailed submissions with attachments are preferred.

Return the signed, completed form and all required detailed documentation to:

Email: gridSMARTohio@kema.com

Mail:

AEP Ohio 6031 East Main Street, Suite 190 Columbus, OH 43213

Fax: 877-607-0740

Questions: 877-607-0739

Visit gridSMARTohio.com for more information on the Self-Direct Program and other energy efficiency incentive programs offered by AEP Ohio.

				Atla Appi	chment 2- Set lication Blank I	i Direct Includin	Program Pro g Rules and	oject Requirements	
AEP OHIO	Self-Direct						m		
A with of America	n Electric Power		Pr	oject /	Applicat	ion			
THIS INCENTIVE APPLICATION FORM IS VALID THROUGH DECEMBE Account Qualification (Check one or both if applicable)						P	Project III provided by AEP Ohlo PROJECT ID:		
CI 700,000 kWh per	-	nal Account o	r Multiple F	acilities (under tue sa				
Company Name				Contract Date of Acceptance					
Nalling Address	· · · · · · · · · · · · · · · · · · ·				Contact E-m	12 11 7			
City				State			Zip Code		
Contact Name (print)	· · · · · · · · · · · · · · · · · · ·		Phone			Fax		····	
Taxpayer ID # of Recipient (f not a Corporation or '	Tax Exempt)	Tax Status (may receit	-	Corporatio		INC, PC, et Other	c) 🗆 Tax Exempt	
Attention to				Total In	centive Amour	it Requi	ested		
Taxpayer ID # of Recipient (if not a Corporation or Tax Exempt)				Total Project Cost			Total Incremental Cost		
	rporation (Incl. INC, Pl dMidual 🖸 Other	C, ebc.) [] Tav	Exempt		mual kWh Clai	med	kW Dema	nd Reduction Claimed	
SECTOR SCORE	iter inder					ی میر ت	ete Alexandre dan dar		
Job Site Name					oject Contact			······································	
Job Site Address (physical loc	ation)			P	oject Contact	Telepho)ne		
City		State	Zip Code	Project Contact Email					
lob Site Account Number			Priman	Account N	umber (if diffe	rent tha	an Job Site)		
Construction Type: 🔲 New C	onstruction 🛛 Existin	ig Buildi ng 13 Ma	jor Renovation]					
Building Type: 🔲 Office	G School (K-12)	-	Retail/Service	C Resta	····	atel/Ho			
Grocen		Olight industry	E Heavy In	dustry C	i Government/	Munici	al DOL		
Contractor Street Address				City			State	Zip Code	
Contractor Contact Name		Conta	t Telephone			Contact	Email		
SHOLLS DISIGNER	The contraction			8. C			11 (C. 5.)	1	
Option #1	Incentive Payment			Incentive Calculation: \$					
	D Exemption From EE/FOR Rider			# of Months Exempted: months (calculation provided by AEP Ohio)			within monider in		
Option #2		· · · · · · · · · · · · · · · · · · ·		AEP Ohio)	}				
Option #2 By signing here, I acknowledg Rules and Requirements of thi	e the information on th	is application is a		AEP Ohio) mplete, [ct) Datirin î have r	ead, ag	ree with an		

Atlachment 2- Self Direct Frogram Project Application Blank including Rules and Requirements

Self-Direct Program Retrospective Projects / Rules and Requirements

Columbus Southern Fower Company and Ohio Power Company are collectively known as AEP Ohio ("AEP Ohio"). AEP Ohio provides energy-efficiency inpantives for the purchase and installation of qualifying cost-effective equipment in the customer's facility (the customer's "Committeent of Resources") under the Rules and Requirements provided in this incentive application and autject to regulatory approvals.

Custamer Qualifications

The Self-Direct Program (the "Program") applies to customers served at AEP Ohlo's retail electric failes into meet the minimum energy usage requirements of 700,000 kMH per year or Who are part of a national account involving nultiple facilities in one or more states. This application defines the Date of Acceptance.

Tennis and Conditions

- THES INCENTIVE APPLICATION FORM IS VALID FOR SUBMITTRL BY SELF-DIRECT CUSTOMERS UNTIL DECEMBER 31, 2010. AEP ONto incentive programs may be dranged or cancelled at any time without notice. The Customer and its contractor are solarly responsible for concating AEP Onto to eak whether or not the program is still in effect and to verify program parameters.
- Customer agrees to commit all energy and demand resources identified in this application to AEP Ohle's energy and demand target / benchmarts as identified in Senate Bill 221.
- Incentive payments are available while program functing lasts.
- To assure madmum program participation, AEP Obio reserves the right to limit funding on a per project basis.
- Pre-approval by AEP Ohio is required.
- Incentive items must be installed on the AEP Ohio electric account listed on the application,
- The incentive payment shall be:
 - 75% of the calculated incentive under the Business Lighting or Custom Program, whichever is applicable to this project.
- In lieu of a one-time incentive payment, the customer may elect to seek an exemption from the Energy Efficiency / Peak Demaid Reduction (EC/PDR) Rider for the associated electric account(s) for a defined period of time as stated on this Application. For this exemption, and as dafined in the table below, the inconter's estimated metameter is compared to the estimated net present value (NFV) of the customer's estimated for the SEVER Rider for the sectore is citated by AEP Onto. If evenption is elected, the customer is not eligible for other programs offered by AEP Onto. If evenption is general to the specified number of months on this Application. Linkss additional resources are committed, the customer will, after the specified number of months on this Application, be adapted by EPDR Rider.
- If an incentive is elected, the customer remains in the EE/PDR rider for the period of time that an exemption would have been in effect and may also participate in other AEP Ohio programs.
- All equipment must be new; used or rebuilt equipment is not eligible for an iscentive.
- Eligible measures must produce <u>verticable</u> and <u>persistent</u> energy and/or demand reduction, for a period of no less than five (5) years from the date of installation, through an increase in efficiency or through die use of load-shifting betwologies. Measurement and verification may be required.
- Theligible measures:
 - Rely solely on changes in customer behavior and require no capital investment, or merely terminate existing processes, facilities and/or operations.
 - Are required by state or federal law, building or other ordes, or are standard industry practices.
 - 3. Involve fuel switching, plug loads, or generate electricity.
 - Are easily reverted / removed or are installed entirely for reasons other than improving energy efficiency.
 - 5. Enclude other conditions to be determined by AEP ONe.
- Projects submitted for refrospective datms must be installed and operating between January 1, 2006 and the Date of Acceptance into the Self-Direct Program. Transitive levels, as shown in the table below, are based on the calendar year of installation / operation. Clustomer shall provide proof of equipment installation / operation start-up.
- All applications are subject to AEP Ohio, its contractor(s) / agent(s), and the Public Utility Commission of Ohio (PUCO) review and approval prior to any incestives paid or exemption from the EE/PDR Rider under this program.

Incentive Levels (for retrospective projects completed since January 1, 2006)	75% of the calculated incentive payment under the current Business Lighting or Custom - Programs, whichever is applicable,
Min / Max payback w/o incentive applied	1 year Min / 7 Year Max

- Customer is allowed and encouraged to consider using all or a portion of the locanities payment, as received from AEP Onto under this program, to help fund other customer/stated energy esticiency and classed reducting projects in the future, Frome projects can also qualify for incentives under the Bueiness Ugiting or Custom program.
- A signed final application with documentation withing installation of the project including, but not limited to, equipment, involcas, approvals, and other related information must be submitted to AEP Dido prior to application approval.
- The summer peak period is defined as weekday posk-demand hours (7:00 AM to 9:00 PM, May through September).
- Customers are encouraged to submit projects that warrant special tradment (i.e., non-typical projects) to be causidared on a case-by-case basis by AEP Ohio.
- Appropriate projectory are an expensioned with a constructive testing testing of the testing of testing of the testing of testing of testing of testing of testing of the testing of testing of the testing of testing of the testing of testi
- If the inspection finds that customer did out camply with program raises and requirements, any incentive received under this Program fixed be returned to AEP Ohio including interest. Exemption from the rider will be volded as well. In addition, AEP Ohio reserves the right to withinkit payment or exemption for projects that do not meet responsible industry standards as determined by AEP Ohio.
- AEP Onto reserves the right to sense payment and paralogation if the customer or contractor violates program rules and programs. AEP Onto is not itsize for incentives promised to customers as a result of program interpresentation.
- The customer understands and agrees that all other terms and candidants, as specified in the application, including all interformatic and exhibits statched to this application, which will save as a contract for the customer's counsitatent of energy and demand ensauces to AEP (into, shell apply.
- AEP Olivia reserves the right to request additional backup trionnation. Supporting detail, calculations, manufacturer specification stuels or any other information prior to any incentive psymetric.
- Equipment could nove been installed in retrofit, replacement, or new construction applications and must meet reasonable industry standards. All equipment / manures must meet minimum cost effectiveness requirements as obtained or determined by Age Ohio. Optioner must also provide evidence of measure life.
- · AEP Onto will issue any approved locartives in the form of checks.
- Customer can not apply for incentives for future projects and elect after the fact to apply for exemption under this program.
- All documentation and verification is subject to strict confidentiality.
 - All completed submissions become the property of AEP Ohio.

Olscialmers

AEP Ohio:

- Does not endorse any periodian manufacturer, product or system dissign by vitering times incentives.
- Will not be responsible for any tax liability imposed on the customer as a result of the payment of incentives. AEP ONG will report incentives greater than that income on IRS form LDSP. Such incentives shall be taxable unless customer 600 meets acceptable ize exemption criteria. Customers are encouraged to consult with their tax advisors about the taxability of any incentive payments.
- Does not expressly or implicitly warrant the performance of installed equipment (contact your contractor for detailed equipment warranties).
- Is not responsible for the proper disposal/recycling of any waste generated as a result of this project.
- Is not liable for any damage caused by the operation or mathematics of the installed equipment.
- Does not guarantee that a specific level of energy or cost savage will result from the implementation of energy conservation measures or the use of products funded under this program.

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Exemption from the EE/PDR rider is determined by comparing the value of the one-time incentive payment with the astimated net present value (NPV) of the EE/PDR rider payments, as calculated by AEP Ohio, for the customer's associated electric account. This NPV is defined as the customer's financial contribution to AEP Ohio's efforts to reach EE/PDR targets. Exemption term will be rounded to the nearest month.

Attachment 2- Self Orect Program Project Application Blank including Rules and Requirements

Self-Direct Program

Retrospective Project Description: Project _____ of _____

Project Descriptive Name	Project In-service Date
Affected Electric Account Number(s)	

Claimed Project Baseline (AEP Onlo will make the final determination of applicable baseline):

____ Retrofit (the project was an elective retrofit and the equipment was still operable)

____ Replacement (the project was a replacement of equipment at or near the end of its useful life)

____ New (the project was an addition of new equipment in an existing facility or new construction)

Describe the project including detail of energy savings equipment. Attach additional sheets if needed.

Describe the removed equipment and operating strategy. Please provide up to five photos of the equipment, if available. Attach additional sheets if needed.

Describe the installed equipment and operating strategy. Please provide up to five photos of the equipment. Attach additional sheets if needed.

Describe your calculation method for energy savings. Attach additional sheets if needed.

In addition to electrical energy and/or demand reduction, other benefits of proposed project include:

__Conserves other utilities (gas, water, etc.)

___Improves process flow

___Improves product quality

___Increases production capacity

_Meets environmental regulations

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___Reduces labor

___Saves energy

Uses fewer raw materials

__Other _

Attachment 2- Self Direct Program Project Application Blank Including Rules and Requirements Page 5 of 5

Project Technical Specifications

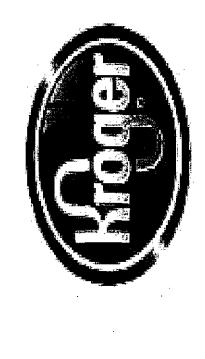
(This sheet provides an example of required data collection. The Self-Direct spreadsheet provides additional guidance and streamlines the process for collecting, documenting and reporting this information to AEP Ohio, and it follows the format of this sheet. Please provide as much detail as possible on the Self-Direct spreadsheet to expedite review and processing of the requested incentive).

Please complete the Self-Direct spreadsheat for each measure installed and provide supporting documentation including engineering or equipment suppler studies, customer-approved invoices, purchase orders, detailed calculations of baseline and energy and peak summer demand savings. A detailed proposal and complete package will expedite review of application. This information is required by AEP Ohio and/or its consultants for project enalysis.

	EQUIPMENT REMOVED OR LOWER EFFICIENCY OPTION	INSTALLED EQUIPMENT OR HIGHER EFFICIENCY OPTION
Equipment type		
Manufacturer of equipment		
Model number(s)		
Date of Removal / In-Service Date		
Age of equipment at removal		
Estimated remaining useful life at time of removal or installation		
Efficiency rating		
Nameplate data: kW, tons, HP, watts, etc.	- <u></u>	·
Quantity		
Annual operating hours		
Annual energy savings (kWh)		
Summer peak reduction (KW)*		
Annual electric bill savings (\$)		
Equipment		· · · · · · · · · · · · · · · · · · ·
Engineering		
Installation		
Other (explain)		
TOTAL PROJECT COST		· · · · · · · · · · · · · · · · · · ·
Incremental Cost = Installed Option Total Cost Removed Equipment or Lower Efficiency Option Total Cost		
* Determination of cosk demand adjustion (bit	A from non-10/AC equipment: For 500-HVAC I	ncasures calculate the average kW reduction

over the period from 7 s.m. to 9 p.m., westakys, from May 1 through September 30. The preferred calculation method will estimate hourly kW demands over the peak demand period, and average the results. However, if measures do not vary significantly during those hours, a less rigorous estimation process may be applied if approved in advance by the program.

* Determination of peak demand reduction (KW) within HVAC systems: Calculate the maximum HVAC peak demand reduction that occurs between 7 a.m. to 9 p.m. on a weekday from May 1 through September 30.

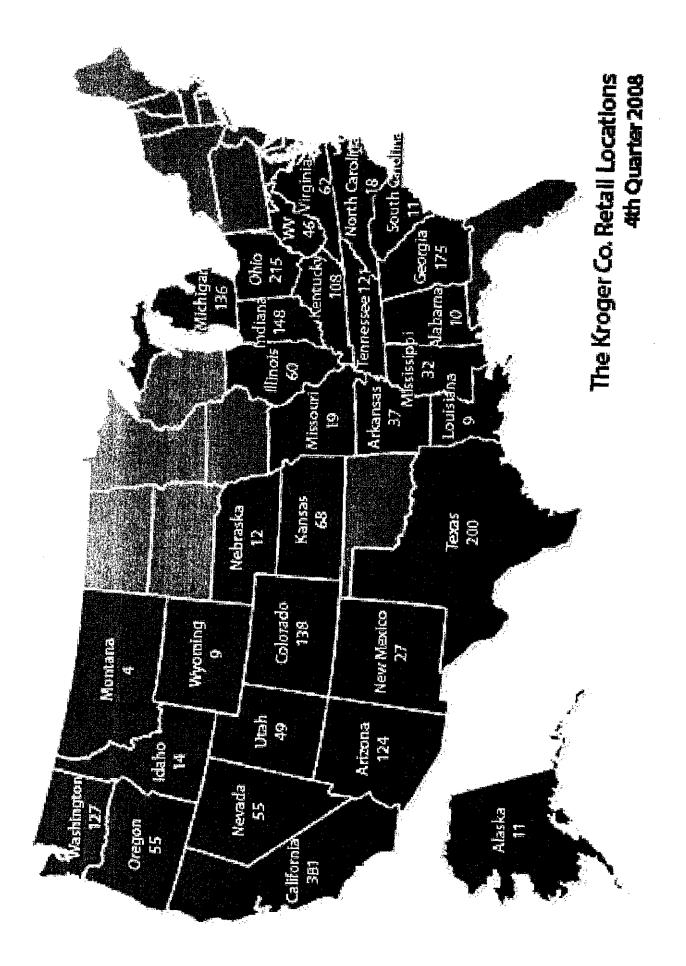


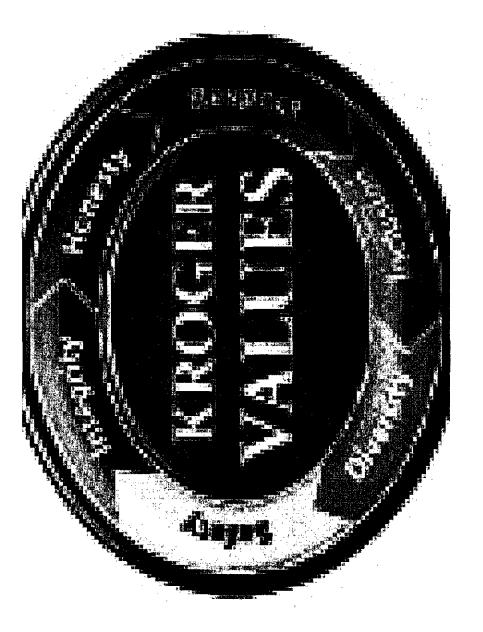
Energy Efficiency at The Kroger Co.

Public Utilities Commission of Ohio Columbus, OH May 20, 2009

About The Kroger Co.

- 326,000 associates who serve customers in 2,481 supermarkets and multi-One of the nation's largest retail grocery chains - employs more than department stores in 31 states.
- Ralphs, Fred Meyer, Food 4 Less, Fry's, King Soopers, Smith's, Dillons, QFC Operates stores under two dozen local banner names including, Kroger, and City Market.
- Also serve customers in 771 convenience stores, 385 fine jewelry stores and 781 supermarket fuel centers.
- 2008 Revenue \$76 Billion Fortune No. 22.
- Kroger charity focuses on hunger relief, K-12 education, grassroots service organizations and women's health:
- Named "Retailer of the Year" by America's Second Harvest food banks four of the last six vears.
- Customers and associates donated \$10.6 million to support The Salvation Army's 2008 Red Kettle campaign – 8% of the Army's total collections. I
 - Committed \$3 million in donations in 2008 for local breast cancer initiatives across the country to support National Breast Cancer Awareness month. L

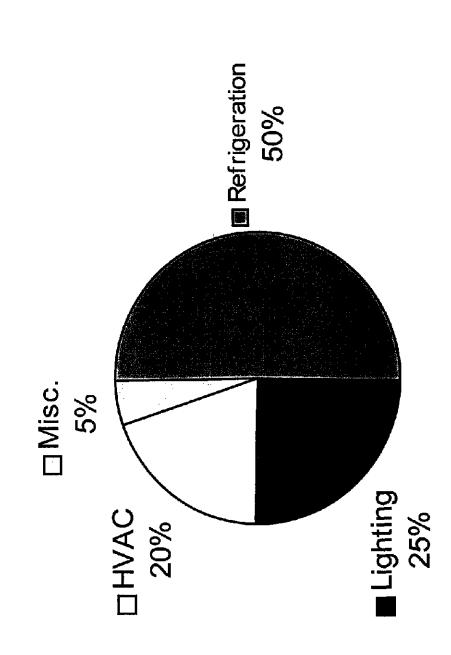




Kroger Co Values

- Rank among the Top 20 (No. 19) most reputable companies in America, according to the Reputation Institute's Reputation Pulse 2009 study of the 153 largest companies in the U.S.
- International Dairy Foods Association (IDFA) for outstanding Manufacturing division recognized in 2009 by the worker safety performance.
- Ongoing commitment to green living and sustainability:
- First LEED certified store opening in June 2009 in Portland, OR.
- Sold more than six million reusable bags last year.
- Recycled more than 16 million pounds of plastic in 2008. I
- Recycle nearly 1 billion pounds of cardboard and paper in '08. I
- Significant reductions in gasoline and diesel fuel usage. I
- To learn more about Kroger's green living initiatives visit www.kroger.com/green.
- 2008 Sustainability Report at <u>www.thekrogerco.com</u>
- May, 2009 joined US EPA EnergyStar partnership.





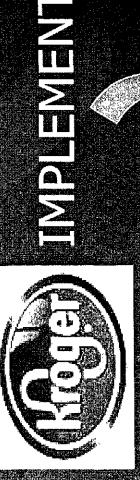
Energy Efficiency at Kroger



- "best practices," including retrofit projects, support, maintains metrics & interacts w/ Corporate Energy Management – defines sets reduction goals, provides technical merchandising and store design areas.
 - Associate energy awareness (S.A.V.E.-5) & Division Energy Engineers execute "best practices," manage crews, administer interact with Division personnel.



FOLLOW-UP







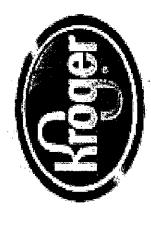


Efficiency Projects: 2000-2004



- T-12 to T-8 Lighting Retrofits -1,700 Stores.
- First Energy "Best Practices" Document.
- E-Commissioning 300 CA Stores.
- Night Lighting Setback Strategy.
- Energy Maintenance Program Commenced.
- Anti-Sweat & Lighting Controls 1,500 Stores.
- Variable Speed Drives ("VSD's") Exhaust Fans (w/ spring-loaded hoods & Baffling).
 - S.A.V.E 5 Program.

Efficiency Projects: 2005-2006



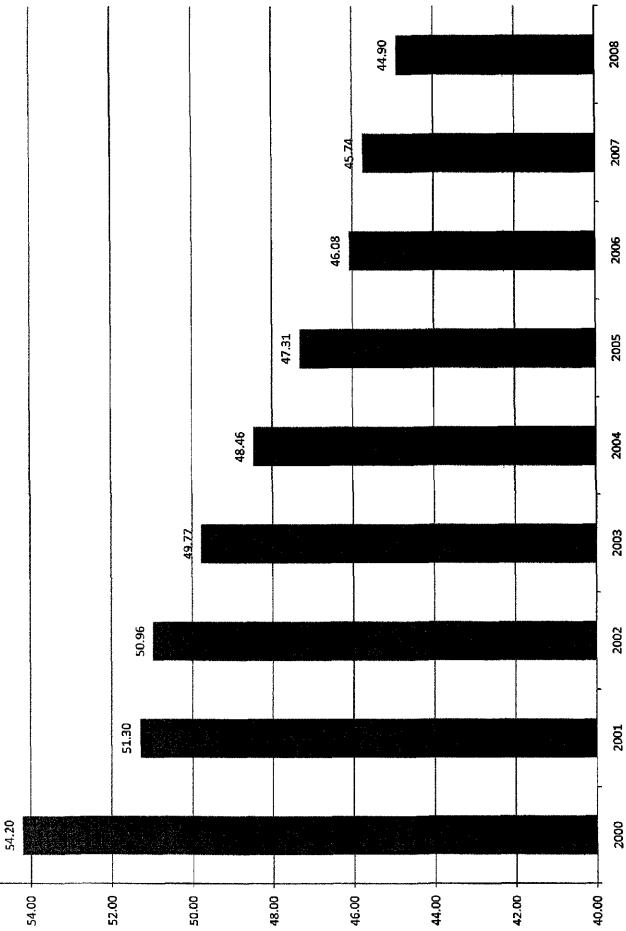
- Electronically Commutated Motor (ECM) Retrofit 190,300 in 18 Months.
- VSD's Air-Cooled Condenser Fans 715 Stores.
- VSD's Evaporative Condenser Fans 119 Stores.
- VSD's Air Handler Fans 467 Stores.
- Heat Reclaim Upgrades.
- Replacing "Legacy" Controllers (HVAC, and Refrigeration).
- Electronic Refrigeration Control Several Divisions.

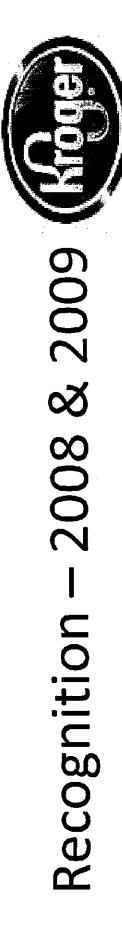
Efficiency Projects: 2007-2009



- LED Lighting Reach-in Doors Frozen & Dairy.
- Vending Machine Control & Energy Management.
- More ECM's:
- Head cooling fans,
- Condenser fans &
- Evaperator coils.
- Overhead Lighting Retrofits (HID to T-8).
- T-12 to T-8 case lighting retrofits.
- More controller upgrades.
- "Delamping."

Kroger Co: Grocery Store kWh/SF - 2000-2008

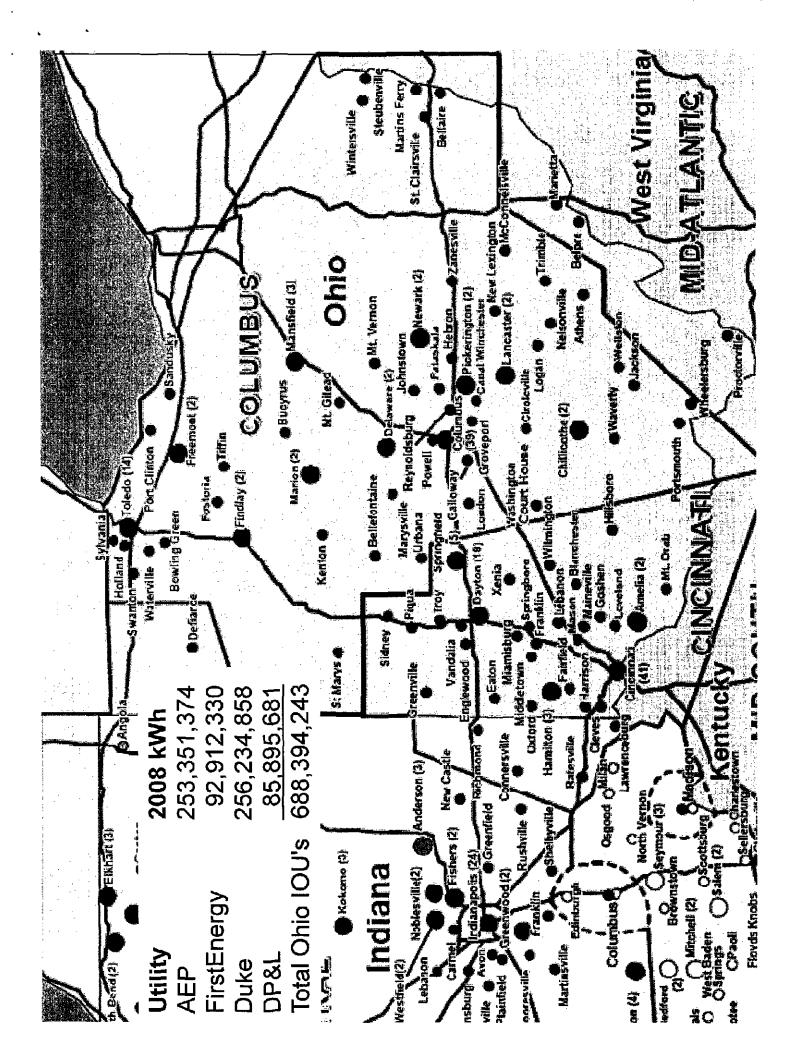




- Idaho Power
- Xcel Energy
- Southern California Gas
- Ameren-IL
- Detroit Edison/Engineering Society of Detroit.

The Kroger Co. in Ohio

- Corporate headquarters in Cincinnati, OH Division HQ's in Cincinnati and Columbus.
- and 124 In Columbus Division) > 13M Sq Ft. 218 Grocery Stores (94 in Cincinnati Division
- distribution centers, two data centers & other 19 other sites – four manufacturing sites, five sites – 3.5 million Sq Ft.
- Employ over 37,700 Associates in Ohio.
- 700+ million kWh & \$56 Million expense. 2008 electricity usage in Ohio:



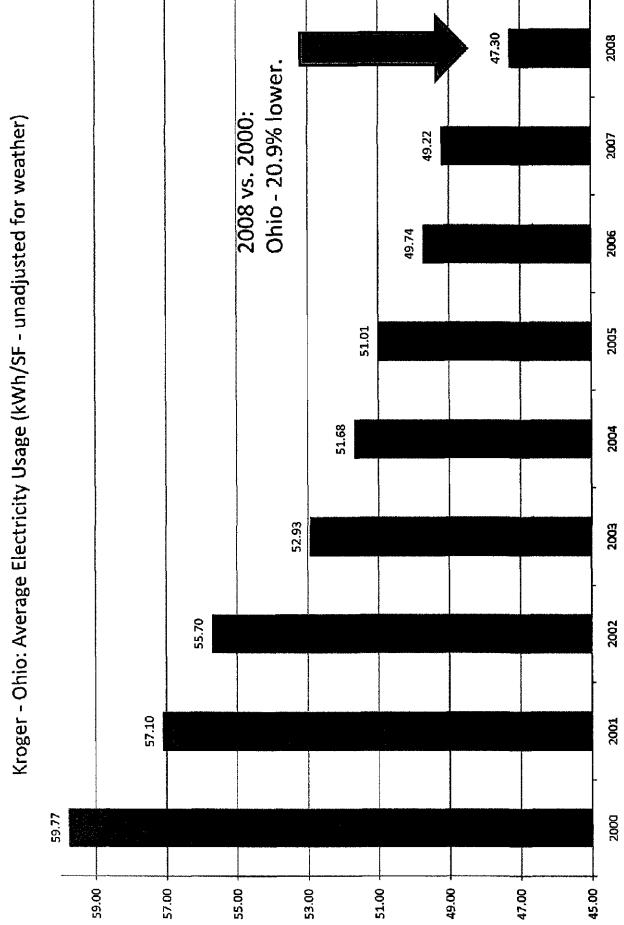
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2007-2008 Projects: Cincinnati



- Replaced HID fixtures w/ 6-lamp T-8 fluorescent fixtures 28 stores.
- T12 to T8 Case Lighting Retrofit -- 27 stores
- Walk-in cooler and freezer evaporator ECM motor retrofit 104 stores.
- Compressor Head Cooling Fan ECM retrofit 69 stores
- Condenser Fan ECM retrofit 37 stores.
- Vending Machine Program all stores (refrigeration control, lighting control, lighting removal).
- Electronic refrigeration controller upgrade 18 stores.



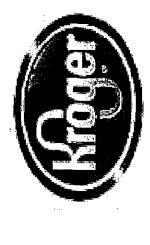
2009 Efficiency Projects:

Columbus

- LED glass door lighting 32 stores
- Removing beer shelf lights -40 stores.
- Removing wall wash 10 stores.
- Refrigeration controller upgrade - 10 stores.
- F-28 overhead lamp (28 watt lamp replacing 30 watt lamp)- 15 stores.

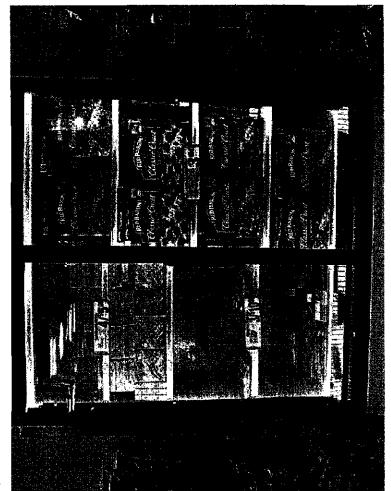
Cincinnati

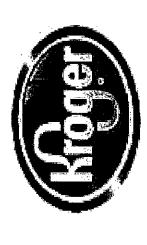
- LED glass door lighting 30 stores.
- Removing wall wash 21 stores.
- Refrigeration lead compressor VSD's - 30 stores.
- Refrigeration controller upgrade 15 stores.
- Cleaning up old, HID and T12 lighting in various stores on an as needed basis
- Installing Cooler & Freezer door alarms to minimize impact on refrigeration.
- F-28 Overhead Relamp 10 stores



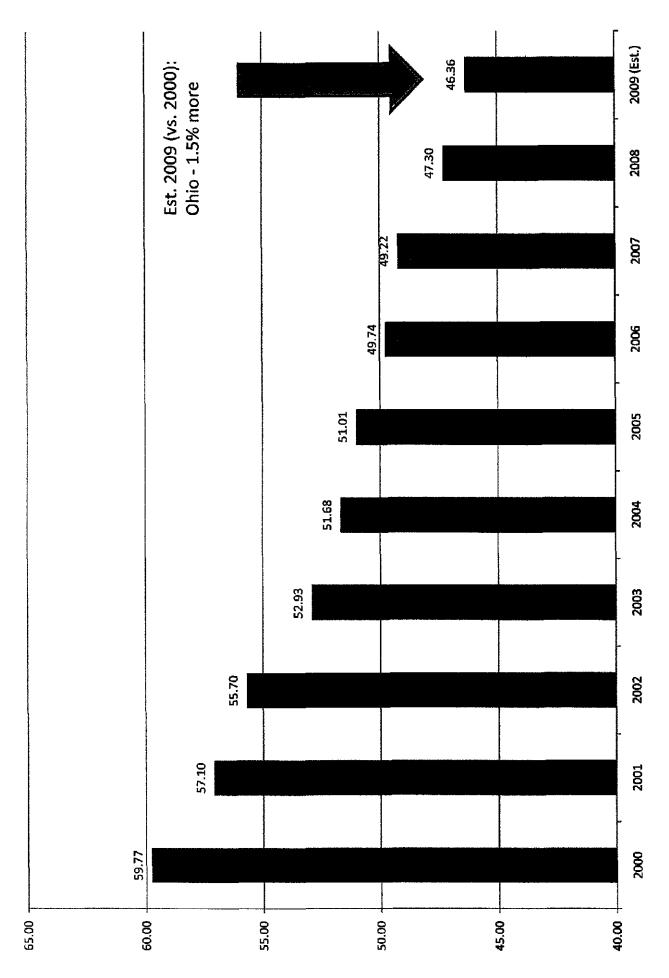
LED lighting in glass doors

- use 65% less energy, 76% less energy with motion control,
- are dimmable & controllable so they can be turned off and restarted instantly,
- render the same color as the existing lamps,
- are directional to reduce "wasted light," less glare in the aisles,
- last longer (50,000 hours to 70% lumen life) to reduce maintenance cost,
- give off less heat, which reduces refrigeration (energy) load,
- are inherently more rugged because there is no glass to break,
- burn brighter at colder temps,
- don't yellow over time, and
- are more environmentally sound no gasses, heavy metals or special disposal.





Kroger - Ohio: Average Electricity Usage (kWh/SF - unadjusted for weather)



2010-2012 Efficiency Projects:



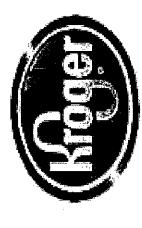
- LED glass door lighting all remaining stores (w/ vertical lighting).
- F-28 overhead lamp replacement.
- Fuel Center Canopy Lighting Retrofit.
- ECM retrofits in larger applications.
- WAN-based energy metering/monitoring.
- Control system upgrades.
- Other "R&D" projects based on feasibility and return.

Challenges

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- Economic Growth:
- Square Footage (and market share) continues to grow Nationwide and in Ohio. I
- Separate economic growth and energy efficiency.
- Environmental Compliance:
- HCFC's to replace HFC's.
- Ozone wins energy, GHG and grocery prices lose.
- Food Safety:
- Minimum temp requirements define floor for grocery energy efficiency.
 - Coordinating state & local policy.
- Energy efficiency vs. customer preferences either/or?

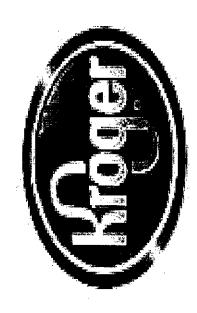
In conclusion . .



- Kroger has a very well established national and local energy efficiency program w/ inhouse specialized technical expertise.
- There are plans to further energy efficiency into the foreseeable future.
- We will apply Ohio monies saved from "opting out" toward energy efficiency in Ohio.
- Future efficiency gains will meet or exceed S.B. 211 reduction targets.



THANK YOU!



Energy Efficiency at The Kroger Co.

Public Utilities Commission of Ohio Columbus, OH May 20, 2009