

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the Ohio)	
Development Services Agency for an Order)	
Approving Adjustments to the Universal)	Case No. 14-1002-EL-USF
Service Fund Riders of Jurisdictional Ohio)	
Electric Distribution Utilities.)	

APPLICATION

The Ohio Development Services Agency ("ODSA"), by its Director, David Goodman, hereby petitions the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4928.52(B), Revised Code, for an order approving adjustments to the Universal Service Fund ("USF") riders of all jurisdictional Ohio electric distribution utilities ("EDUs"). In support of its application, ODSA states as follows:

1. Under the legislative scheme embodied in SB 3, the 1999 legislation that restructured Ohio's electric utility industry and transferred administration of the electric percentage of income payment plan ("PIPP") program to the Ohio Department of Development ("ODOD"), now known as ODSA,¹ the USF riders replaced the EDUs' existing PIPP riders. The USF riders were to be calculated so as to generate the same level of revenue as the PIPP riders they replaced,² plus an amount equal to the level of funding for low-income customer energy efficiency programs reflected in the electric rates in effect on the effective date of the statute,³

¹Pursuant to SB 314, the Ohio Department of Development's name was changed to the Ohio Development Services Agency, effective September 28, 2012. To avoid confusion in this proceeding, ODSA will be referred to throughout this application even though it was actually known as ODOD during relevant periods of time.

² See Section 4928.52(A)(1), Revised Code.

³ See Section 4928.52(A)(2), Revised Code.

plus the amount necessary to pay the administrative costs associated with the low-income customer assistance programs and the consumer education program created by Section 4928.56, Revised Code.⁴

2. Pursuant to Section 4928.51(A), Revised Code, all USF rider revenues collected by the EDUs are remitted to ODSA for deposit in the state treasury's USF. ODSA then makes disbursements from the USF to fund the low-income customer assistance programs (including PIPP and the low-income customer energy efficiency programs) and the consumer education program, and to pay their related administrative costs.

3. Section 4928.52(B), Revised Code, provides that, if ODSA, after consultation with the Public Benefits Advisory Board ("PBAB"), determines that the revenues in the USF, together with revenues from federal and other sources of funding,⁵ will be insufficient to cover the cost of the low-income customer assistance and consumer education programs and their related administrative costs, ODSA shall file a petition with the Commission for an increase in the USF rider rates. The statute further provides that, after providing reasonable notice and opportunity for hearing, the Commission may adjust the USF rider by the minimum amount necessary to generate the additional revenues required; provided, however, that the Commission may not decrease a USF rider without the approval of the ODSA Director, after consultation by the Director with the PBAB.

4. Unlike traditional ratemaking, where the objective is to establish rates that will

⁴ See Section 4928.52(A)(3), Revised Code.

⁵ Section 4928.52(B), Revised Code specifically identifies the Ohio Energy Credit Program as a funding source. However, this program was discontinued as of July 1, 2003.

provide the applicant utility with a reasonable earnings opportunity, the USF riders must actually generate sufficient revenues during the collection period to enable ODSA to meet its USF-related statutory and contractual obligations on an ongoing basis. In recognition of this fact, the stipulations adopted by the Commission in all prior USF rider rate adjustment proceedings have required that ODSA file a Section 4928.52(B), Revised Code, application with the Commission each year, proposing such adjustments to the USF rider rates as may be necessary to assure, to the extent possible, that each EDU's rider will generate its associated revenue requirement — but not more than its associated revenue requirement — during the annual collection period following Commission approval of such adjustments. This is the fourteenth annual USF rider adjustment application filed pursuant to this statute since the establishment of the initial USF riders in the electric transition plan proceedings initiated by applications filed by the EDUs pursuant to SB 3.

5. By its opinion and order of December 18, 2013 in Case No. 13-1296-EL-USF, this Commission granted ODSA's 2013 application for approval of adjustments to the USF riders of all Ohio EDUs based on its acceptance of a stipulation and recommendation submitted jointly by a majority of the parties to that proceeding. The new USF riders replaced the USF riders approved by the Commission in Case No. 12-1719-EL-USF, and became effective on a bills-rendered basis with the January 2014 EDU billing cycles.

6. The Commission's opinion and order of December 18, 2013 in Case No. 13-1296-EL-USF provided for the continuation of the notice of intent ("NOI") process first approved by the Commission in Case No. 04-1616-EL-UNC. Under this process, ODSA was required to make a preliminary filing by May 31 setting out the methodology it would employ in developing the USF rider revenue requirements and rate design for its subsequent annual USF rider

adjustment application. The purpose of this procedure is to permit the Commission to resolve any issues relating to methodology prior to the preparation and filing of the application itself, so as to limit the number of potential issues in the second phase of the case and thereby permit the Commission to act on the application in time for the new USF rider rates to take effect on January 1 of the following year. ODSA filed its NOI in this case on May 30, 2014. The Commission, consistent with the terms of a stipulation jointly submitted by a majority of the parties to the proceeding, approved the methodology proposed by ODSA in the NOI by its opinion and order of September 25, 2014 (the "*NOI Order*").

7. Based on its analysis of the annual pro forma revenue generated by applying the current USF rider rates to test-period sales volumes, and utilizing the USF rider revenue requirement methodology approved in the *NOI Order* as described below, ODSA has determined that, on an aggregated basis, the total pro forma annual revenue generated by the current USF riders will fall short, by some \$21,553,060, of the annual revenue required to fulfill the objectives identified in Section 4928.52(A), Revised Code, during the 2015 collection period. On an EDU-specific basis, ODSA's analysis shows that the pro forma revenue that would be generated by the current USF riders of Ohio Power Company ("OP"),⁶ and the Dayton Power and Light Company ("DPL") would exceed their indicated revenue targets, while the pro forma revenue that would be generated by the current Columbus Southern Power Company ("CSP"), Duke Energy Ohio ("Duke"), The Cleveland Electric Illuminating Company ("CEI"), Ohio Edison Company ("OE"), and Toledo Edison Company ("TE") USF riders would fall short

⁶ The AEP Ohio operating companies, Columbus Southern Power Company ("CSP") and Ohio Power Company ("OP") merged, effective December 31, 2011, with OP as the surviving entity. However, the former CSP customers continue to be subject to separate rate schedules, including a separate USF rider, as are the customers that were served by OP prior to the merger. For ease of reference, ODSA refers herein to CSP as if it were an EDU, but it is understood that these references actually relate to the CSP Rate Zone and that references to OP actually relate to the OP Rate Zone.

of their indicated revenue targets. Accordingly, ODSA, having consulted with the PBAB, proposes that the OP and DPL USF rider rates be reduced so as to generate the required annual revenue indicated in the following table and that the CSP, Duke, CEI, OE, and TE USF rider rates be increased so as to generate their respective indicated revenue targets.

Company	Test-Period USF Rider Revenue	Required Annual USF Rider Revenue	USF Rider Surplus/Deficiency
CSP	\$73,253,065	\$79,225,884	(\$5,972,819.00)
OP	\$111,739,830	\$106,658,371	\$5,081,459.00
DPL	\$49,072,858	\$27,741,532	\$21,331,326.00
DUKE	\$18,343,650	\$35,687,476	(\$17,343,826.00)
CEI	\$24,994,725	\$38,837,081	(\$13,842,356.00)
OE	\$43,691,138	\$59,657,205	(\$15,966,067.00)
TE	\$10,925,989	\$23,148,131	(\$12,222,142.00)
Totals	\$332,021,254	\$370,955,680	(\$38,934,425.00)

8. As described in further detail in the written testimony of ODSA witness Susan M. Moser filed with this application, the revenue requirement that the proposed USF riders are designed to generate consists of the elements identified below.

a. Cost of PIPP. The cost of PIPP component of the USF rider revenue requirement is intended to reflect the total cost of electricity consumed by the EDU's PIPP customers for the 12-month period January 2014 through December 2014 (the "test period"), plus pre-PIPP balances, less the monthly installment payments billed to PIPP customers, less payments made by or on behalf of PIPP customers, including agency payments, to the extent that these payments are applied to outstanding PIPP arrearages over the same period. Because actual data for September through December 2014 was

not available at the time the application was prepared, information from the corresponding months of 2013 was combined with actual data from January through August of 2014 to determine the test-period cost of PIPP for each EDU as displayed in Exhibit A hereto. As explained in ODSA witness Moser's written testimony, and consistent with the *NOI Order*, ODSA adjusted the test-period cost of PIPP to recognize the impact of Commission-approved EDU rate changes that took effect during the 2014 test period and to annualize the impact of Commission-approved EDU rate changes that will take effect in 2015. The calculations of these adjustments are shown in attached Exhibits A.1.a through A.1.d. The net impact of these adjustments is shown in Exhibit A.1. As explained in Ms. Moser's testimony, and consistent with the *NOI Order*, the totals shown in Exhibit A.1 were then adjusted to reflect the projected increase in PIPP enrollments during the 2015 collection period. The projections are shown in attached Exhibit A.2. The cumulative effect of the foregoing adjustments is shown in the Total Adjusted Test-Period Cost of PIPP column (Column F) in Exhibit A.2.

b. Electric Partnership Program and Consumer Education Program Costs.

This element of the USF rider revenue requirement reflects the cost of the low-income customer energy efficiency programs and the consumer education program, referred to collectively by ODSA as the "Electric Partnership Program" ("EPP"), and their associated administrative costs, which are recovered through the USF riders pursuant to Section 4928.52(A)(2) and (3), Revised Code. ODSA's proposed \$14,946,196 allowance for these items is identical to the allowance accepted by the Commission in all previous USF riders rate adjustment proceedings and is supported by the analysis submitted by ODSA as Exhibit A to the NOI. Consistent with the *NOI Order*, which again approved

this allowance, this component of the USF rider revenue requirement is allocated to the EDUs based on the ratio of their respective costs of PIPP to the total cost of PIPP. The results of the allocation are shown in attached Exhibit B.

c. Administrative Costs. This USF rider revenue requirement element represents an allowance for the costs ODSA incurs in connection with its administration of the PIPP program and is included as a revenue requirement component pursuant to Section 4928.52(A)(3), Revised Code. As explained in the testimony of ODSA witness Randall Hunt filed with the application, the proposed allowance for administrative costs of \$4,777,725 has been determined in accordance with the standard approved by the Commission in the *NOI Order*. The requested allowance for administrative costs has been allocated to the EDUs based on the number of PIPP customer accounts as of April 2014, the test-period month exhibiting the highest PIPP customer account totals. The results of the allocation are shown in attached Exhibit C.

d. December 31, 2014 USF PIPP Account Balances. Because the USF rider rate is based on historical sales and historical PIPP enrollment patterns, the cost of PIPP component of an EDU's USF rider rate will, in actual practice, either over-recover or under-recover its associated annual revenue requirement over the collection period. Over-recovery creates a positive USF PIPP account balance for the company in question, thereby reducing the amount needed on a forward-going basis to satisfy the USF rider revenue requirement. Conversely, where under-recovery has created a negative USF PIPP account balance as of the effective date of the new riders, there will be a shortfall in the cash available to ODSA, which will impair its ability to make the PIPP

reimbursement payments due the EDUs on a timely basis. Thus, the amount of any existing positive USF PIPP account balance must be deducted in determining the target revenue level the adjusted USF rider is to generate, while the deficit represented by a negative USF PIPP account balance must be added to the associated revenue requirement. In this case, ODSA is requesting that its proposed USF riders be implemented on a bills-rendered basis effective January 1, 2015. Accordingly, the USF rider revenue requirement of each EDU has been adjusted by the amount of the EDU's projected December 31, 2014 USF PIPP account balance so as to synchronize the new riders with the EDU's USF PIPP account balance as of their effective date. This conforms to the methodology approved by the Commission in the *NOI Order*. The adjusted projected December 31, 2014 USF PIPP account balance for each EDU is shown in the final column of Exhibit D.

e. Reserve. PIPP-related cash flows can fluctuate significantly throughout the year, due, in large measure, to the weather-sensitive nature of electricity sales and PIPP enrollment patterns. As shown on the test-period graph attached hereto as Exhibit E, these fluctuations had, in the past resulted in negative USF PIPP account balances, which means that, in those months, ODSA will have insufficient cash to satisfy its reimbursement obligations to the EDUs on a timely basis. To address this problem, ODSA has included an allowance to create a cash reserve as an element of the USF rider revenue requirement, with the amount of the allowance determined based on the EDU's highest monthly deficit during the test period. The Commission approved this methodology in its *NOI Order* in this case. The proposed reserve component for each EDU is set forth in attached Exhibit F.

f. Allowance for Undercollection. This component of the USF rider revenue requirement is an adjustment to recognize that, due to the difference between amounts billed through the USF rider and the amounts actually collected from EDU customers, the rider will not generate the target revenues. In accordance with the methodology approved by the Commission in the *NOI Order*, the allowance for undercollection for each company is based on the collection experience of that company. The allowance for undercollection for each EDU is shown in attached Exhibit G.

g. Allowance for EDU Audit Costs. In the NOI, ODSA reserved the right to request an allowance for audit costs in this application if it determined that additional audits of PIPP-related accounting and reporting should be conducted in 2015. ODSA believes that an audit is not necessary for this Application.

9. A summary schedule showing the USF rider component costs by EDU is attached as Exhibit H. ODSA proposes to recover the annual USF rider revenue requirement for each EDU through a USF rider that incorporates the same two-step declining block rate design approved by the Commission in all prior USF rider rate adjustment cases and the *NOI Order* in this proceeding. The first block of the rate applies to all monthly consumption up to and including 833,000 Kwh. The second rate block applies to all consumption above 833,000 Kwh per month. For each EDU, the rate per Kwh for the second block is set at the lower of the PIPP charge in effect in October 1999 or the per Kwh rate that would apply if the EDU's annual USF rider revenue requirement were to be recovered through a single block per Kwh rate. The rate for the first block rate is set at the level necessary to produce the remainder of the EDU's annual USF rider revenue requirement. Thus, if the EDU's October 1999 PIPP charge exceeds the per Kwh rate that would apply if the EDU's annual USF rider revenue requirement were to

be recovered through a single block per Kwh rate, a calculation shown in Exhibit I, the rate for both consumption blocks would be the same. As discussed in the testimony of ODSA witness Moser, in this case, the October 1999 PIPP charge cap has been triggered for each of the EDUs, so all the new USF rider rates proposed herein have the declining block feature. The following table compares the resulting proposed USF riders for each EDU with the EDU's current USF rider.

Company	Declining Block Riders			
	Current USF Rider		Proposed USF Rider	
	First 833,000 Kwh	Above 833,000 Kwh	First 833,000 Kwh	Above 833,000 Kwh
CSP	\$0.0043882	\$0.0001830	\$0.0043882	\$0.0001830
OP	\$0.0072152	\$0.0001681	\$0.0059804	\$0.0001681
DPL	\$0.0039788	\$0.0005700	\$0.0023110	\$0.0005700
Duke	\$0.0010791	\$0.0004690	\$0.0019249	\$0.0004690
CEI	\$0.0015068	\$0.0005680	\$0.0023687	\$0.0005680
OE	\$0.0015843	\$0.0010461	\$0.0028480	\$0.0010461
TE	\$0.0009692	\$0.0005610	\$0.0044630	\$0.0005610

10. Consistent with Section 4928.52(B), Revised Code, the proposed USF rider rates set forth above for CSP, Duke, CEI, OE, and TE reflect the minimum increases necessary to produce the additional revenues required to satisfy the respective USF rider revenue responsibility of those companies. The proposed USF rider rates for OP and DPL, which are lower than their current rider rates, also represent the minimum rates necessary to satisfy their respective USF rider revenue responsibilities. If its application is granted, ODSA will consent to the USF rider decreases for OP and DPL as required by Section 4928.52(B), Revised Code.

11. In calculating the USF rider revenue requirement, ODSA has relied on certain

information reported by the EDUs. Although ODSA believes this information to be reliable, ODSA has not performed an audit to verify the accuracy of this information. If any party questions or wishes to challenge the accuracy of this information, ODSA requests that the Commission require such party to direct its inquiries to the EDU in question, either informally or through formal discovery.

12. The adjustments to the USF riders proposed in this application are based on the most recent information available to ODSA at the time the application was prepared and includes actual data for the calendar 2014 test period through the month of August 2014. In previous ODSA USF rider rate adjustment applications, ODSA has reserved the right to amend its application by updating its test-period calculations to incorporate additional actual data as it became available. Thus, ODSA again reserves the right to amend its application to incorporate additional actual test-period data that becomes available subsequent to the preparation of this initial Application.

13. ODSA requests that, as a part of its order in this proceeding, the Commission require that ODSA file its 2015 USF rider rate adjustment application no later than October 30, 2015 and provide that the NOI procedure again be used in connection with the 2015 application.

WHEREFORE, ODSA respectfully requests that the Commission, after providing such notice as it deems reasonable, affording interested parties the opportunity to be heard, and conducting a hearing, if a hearing is deemed to be required, issue an order (1) finding that USF rider rate adjustments proposed in the application represent the minimum adjustments necessary to provide the revenues necessary to satisfy the respective USF rider revenue

requirements; (2) granting the application; and (3) directing the EDU's to incorporate the new USF rider rates approved herein in their filed tariffs, to be effective January 1, 2015 on a bills-rendered basis.

Respectively submitted,



Dane Stinson (0019101)

J. Thomas Siwo (0088069)

BRICKER & ECKLER LLP

100 South Third Street

Columbus, Ohio 43215-4291

Telephone: (614) 227-4854

Facsimile: (614) 227-2390

Email: dstinson@bricker.com

tsiwo@bricker.com

Special Counsel for

The Ohio Development Services Agency

Exhibit A

Test-Period Cost of PIPP Plus

	PIPP Customer Cost		PIPP Installments	Payments to	Cost of
	Electrical Service A	Pre-PIPP B	Billed C	PIPP Arrears D	PIPP (A+B)-C-D
CSP	\$114,356,471	\$9,111,036	\$47,290,252	\$7,751,289	\$68,425,967
OP	\$148,332,371	\$10,055,650	\$57,691,323	\$9,501,662	\$91,195,036
DPL	\$70,563,157	\$3,720,709	\$28,757,543	\$2,565,683	\$42,960,640
DUKE	\$44,283,339	\$3,512,332	\$20,637,793	\$4,762,809	\$22,395,069
CEI	\$63,380,645	\$5,954,215	\$32,741,652	\$1,708,302	\$34,884,906
OE	\$105,586,356	\$7,334,166	\$50,939,591	\$3,296,892	\$58,684,040
TE	\$35,351,751	\$3,021,695	\$16,832,864	\$1,124,892	\$20,415,690
Total:	\$581,854,090	\$42,709,803	\$254,891,018	\$30,711,529	\$338,961,348

Exhibit A.1

	Test Period Cost of PIPP	2014 EDU Rate Changes	2015 EDU Rate Changes	Adjusted Test-Period Cost of PIPP
CSP	\$68,425,967	\$3,348,247	(\$1,488,869)	\$70,285,345
OP	\$91,195,036	\$2,436,584	(\$1,652,318)	\$91,979,302
DPL	\$42,960,640	\$0	(\$521,665)	\$42,438,975
Duke	\$22,395,069	\$413,691	\$149,676	\$22,958,436
CEI	\$34,884,906	\$0	\$1,774,658	\$36,659,564
OE	\$58,684,040	\$0	\$422,345	\$59,106,385
TE	\$20,415,690	\$0	\$282,614	\$20,698,304
	\$338,961,348	\$6,198,522	(\$1,033,559)	\$334,126,311

Exhibit A.1.a

Columbus Southern Power					
	Current	2014 4%	2015 (5%)	Total	For 2014- 2015
Sep-13	9,251,970	370,078.79	-	9,622,048.51	Sep-14
Oct-13	6,953,239	278,129.55	-	7,231,368.23	Oct-14
Nov-13	7,407,149	296,285.95	-	7,703,434.73	Nov-14
Dec-13	9,951,337	398,053.48	-	10,349,390.46	Dec-14
Jan-14	11,324,267	452,970.68	-	11,777,237.78	Jan-15
Feb-14	11,479,018	459,160.73	-	11,938,179.10	Feb-15
Mar-14	10,313,532	412,541.29	-	10,726,073.53	Mar-15
Apr-14	9,187,998	367,519.92	-	9,555,517.90	Apr-15
May-14	7,837,677	313,507.08	-	8,151,183.98	May-15
Jun-14	9,864,570	-	(493,228.52)	9,371,341.94	Jun-15
Jul-14	10,729,965	-	(536,498.23)	10,193,466.34	Jul-15
Aug-14	9,182,837	-	(459,141.87)	8,723,695.62	Aug-15
	10,055,749	3,348,247.47	(1,488,868.63)		
Ohio Power					
	Current	2014 4%	2015 (5%)	Total	For 2014- 2015
Sep-13	9,270,728	92,707.28	-	9,363,435.16	Sep-14
Oct-13	8,227,080	82,270.80	-	8,309,350.37	Oct-14
Nov-13	9,772,635	97,726.35	-	9,870,361.20	Nov-14
Dec-13	14,616,187	146,161.87	-	14,762,348.47	Dec-14
Jan-14	17,415,014	174,150.14	-	17,589,164.58	Jan-15
Feb-14	18,032,974	180,329.74	-	18,213,303.67	Feb-15
Mar-14	15,947,309	159,473.09	-	16,106,781.68	Mar-15
Apr-14	13,102,156	131,021.56	-	13,233,177.48	Apr-15
May-14	10,172,952	101,729.52	-	10,274,681.48	May-15
Jun-14	10,140,405	405,616.19	(527,301.05)	10,018,720.00	Jun-15
Jul-14	11,273,039	450,921.58	(586,198.05)	11,137,762.95	Jul-15
Aug-14	10,361,893	414,475.74	(538,818.46)	10,237,550.66	Aug-15
		2,436,583.84	(1,652,317.56)		

Dayton Power and Light

2013 Rate Change Adjustment

Cost of Electricity

Date	Cost of Electricity
Sep-13	\$5,327,673
Oct-13	\$4,452,611
Nov-13	\$4,913,365
Dec-13	\$6,123,892
Jan-14	\$7,456,283
Feb-14	\$7,829,688
Mar-14	\$6,721,363
Apr-14	\$5,551,007
May-14	\$4,431,261
Jun-14	\$5,476,022
Jul-14	\$6,356,364
Aug-14	\$5,923,628

Total: \$ 70,563,157

Rate Adjustment: -0.74%

Total Adjustment: \$ (521,665)

Exhibit A.1.c

Duke Energy			
Billing Cycle End Date	Cost of Electricity	Rate of Adjustment	Adjustment
Oct-12	\$ 2,526,351	0.0102	\$ 25,768.78
Nov-12	\$ 2,759,952	0.0102	\$ 28,151.51
Dec-12	\$ 3,202,354	0.0102	\$ 32,664.01
Jan-13	\$ 3,841,130	0.0102	\$ 39,179.52
Feb-13	\$ 3,697,047	0.0102	\$ 37,709.88
Mar-13	\$ 3,594,375	0.0102	\$ 36,662.63
Apr-13	\$ 3,233,421	0.0102	\$ 32,980.90
May-13	\$ 2,584,608	0.0102	\$ 26,363.01
Jun-13	\$ 3,307,400	0.0102	\$ 33,735.48
Jul-13	\$ 4,053,578	0.0102	\$ 41,346.50
Aug-13	\$ 3,833,557	0.0102	\$ 39,102.29
Sep-13	\$ 3,924,149	0.0102	\$ 40,026.32
	\$ 40,557,925		\$413,690.83
Billing Cycle End Date	Cost of Electricity	Rate of Adjustment	Adjustment
Oct-13	\$ 2,526,351	0.0437	\$110,401.53
Nov-13	\$ 2,759,952	0.0437	\$120,609.91
Dec-13	\$ 3,202,354	0.0437	\$139,942.87
Jan-14	\$ 3,841,130	-0.0069	\$(26,503.80)
Feb-14	\$ 3,697,047	-0.0069	\$(25,509.63)
Mar-14	\$ 3,594,375	-0.0069	\$(24,801.19)
Apr-14	\$ 3,233,421	-0.0069	\$(22,310.61)
May-14	\$ 2,584,608	-0.0069	\$(17,833.80)
Jun-14	\$ 3,307,400	-0.0069	\$(22,821.06)
Jul-14	\$ 4,053,578	-0.0069	\$(27,969.69)
Aug-14	\$ 3,833,557	-0.0069	\$(26,451.55)
Sep-14	\$ 3,924,149	-0.0069	\$(27,076.63)
	\$ 40,557,925		\$149,676.36

CEI		Ohio Edison	
Billing Cycle End Date	Cost of Electricity	Billing Cycle End Date	Cost of Electricity
Sep-13	\$5,050,217	Sep-13	\$8,384,068
Oct-13	\$4,092,829	Oct-13	\$6,702,991
Nov-13	\$4,376,446	Nov-13	\$7,262,733
Dec-13	\$5,145,295	Dec-13	\$8,889,410
Jan-14	\$6,292,339	Jan-14	\$10,645,220
Feb-14	\$6,299,941	Feb-14	\$10,719,312
Mar-14	\$6,104,545	Mar-14	\$10,236,314
Apr-14	\$5,276,440	Apr-14	\$8,736,921
May-14	\$4,670,619	May-14	\$7,537,050
Jun-14	\$4,727,117	Jun-14	\$7,690,909
Jul-14	\$5,567,128	Jul-14	\$9,485,781
Aug-14	\$5,777,728	Aug-14	\$9,295,647
Total:	\$63,380,645	Total:	\$105,586,356
Rate Adjustment:	2.80%	Rate Adjustment:	0.40%
Total Adjustment:	\$1,774,658	Total Adjustment:	\$422,345
Toledo Edison/First Energy			
Billing Cycle End Date	Cost of Electricity		
Sep-13	\$2,782,110		
Oct-13	\$2,145,086		
Nov-13	\$2,272,167		
Dec-13	\$3,039,569		
Jan-14	\$3,664,334		
Feb-14	\$3,631,853		
Mar-14	\$3,764,643		
Apr-14	\$3,045,680		
May-14	\$2,393,353		
Jun-14	\$2,515,840		
Jul-14	\$3,084,792		
Aug-14	\$3,012,325		
Total:	\$35,351,751		
Rate Adjustment:	0.80%		
Total Adjustment:	\$282,814		

Cost of PIPP Adjustment for Projected Enrollment Increases

	Average	Adjusted	Average	Projected	Projected	Total
	Test Period	Test Period	Test Period	Annual	Additional	Adjusted
	Enrollment	Cost of PIPP	Cost of PIPP	Enrollment	Cost of PIPP	Cost of PIPP
	A	B	C	D	E	F
			(B/A)		(D-A)*C	(B+E)
CSP	66,866	\$70,285,345	\$1,051	75,117	\$8,672,723	\$78,958,068
OP	73,929	\$91,979,302	\$1,244	84,684	\$13,381,285	\$105,360,587
DPL	38,396	\$42,438,975	\$1,105	41,479	\$3,408,072	\$45,847,047
Duke	29,239	\$22,958,436	\$785	33,021	\$2,969,466	\$25,927,902
CEI	59,415	\$36,659,564	\$617	61,501	\$1,286,956	\$37,946,520
OhEd	81,972	\$59,106,385	\$721	84,524	\$1,840,423	\$60,946,808
ToEd	27,498	\$20,698,304	\$753	29,048	\$1,166,340	\$21,864,644
Total	377,315	\$344,126,311		409,394	\$32,725,265	\$376,851,576

Projected Average Annual PIPP Enrollment

	CSP	OP	DPL	Duke	CEI	OE	TE
2010	41,846	42,523	30,789	22,946	51,626	74,561	23,691
2011	51,301	54,467	35,254	26,537	56,196	82,195	26,709
2012	58,899	64,872	38,147	30,045	56,512	81,330	27,461
2013	63,427	70,046	37,918	30,907	57,874	81,451	27,410
2014	66,866	73,929	38,396	29,239	59,415	81,972	27,498
2015	75,117	84,684	41,479	33,021	61,501	84,524	29,048

Exhibit B

	Cost of PIPP	Percent Cost of PIPP	Total EPP/CE	Allocated EPP/CE
CSP	\$78,958,069	20.95%	\$14,946,196	\$3,131,532
OP	\$105,360,587	27.96%	\$14,946,196	\$4,178,674
DPL	\$45,847,048	12.17%	\$14,946,196	\$1,818,326
Duke	\$25,927,902	6.88%	\$14,946,196	\$1,028,319
CEI	\$37,946,521	10.07%	\$14,946,196	\$1,504,985
OE	\$60,946,807	16.17%	\$14,946,196	\$2,417,193
TE	\$21,864,644	5.80%	\$14,946,196	\$867,167
Total	\$376,851,596			\$14,946,196

Exhibit C

Allocation of USF Administrative Costs

Company	Customers Apr-14	ADM Costs per Customer	Administrative Costs
CSP	68,531	\$12.35	\$846,669.34
OP	76,435	\$12.35	\$944,319.66
CEI	60,819	\$12.35	\$751,391.08
DPL	38,831	\$12.35	\$479,739.34
Duke	29,818	\$12.35	\$368,387.83
OE	83,980	\$12.35	\$1,037,534.70
TE	28,304	\$12.35	\$349,683.05
Total	386,718		\$4,777,725

Universal Service Fund Account Balance

	Balance 12/31/2013	Balance 12/31/2014
CSP	\$4,609,312	\$4,502,645
OP	(\$7,910,557)	\$9,136,261
DPL	\$2,515,615	\$20,861,462
Duke	\$5,072,047	(\$4,002,996)
CEI	\$14,559,870	\$4,584,884
OE	\$32,760,830	\$5,340,902
TE	\$17,378,238	\$743,779
Total	\$68,985,355	\$41,155,938

Universal Service Fund Account Balance

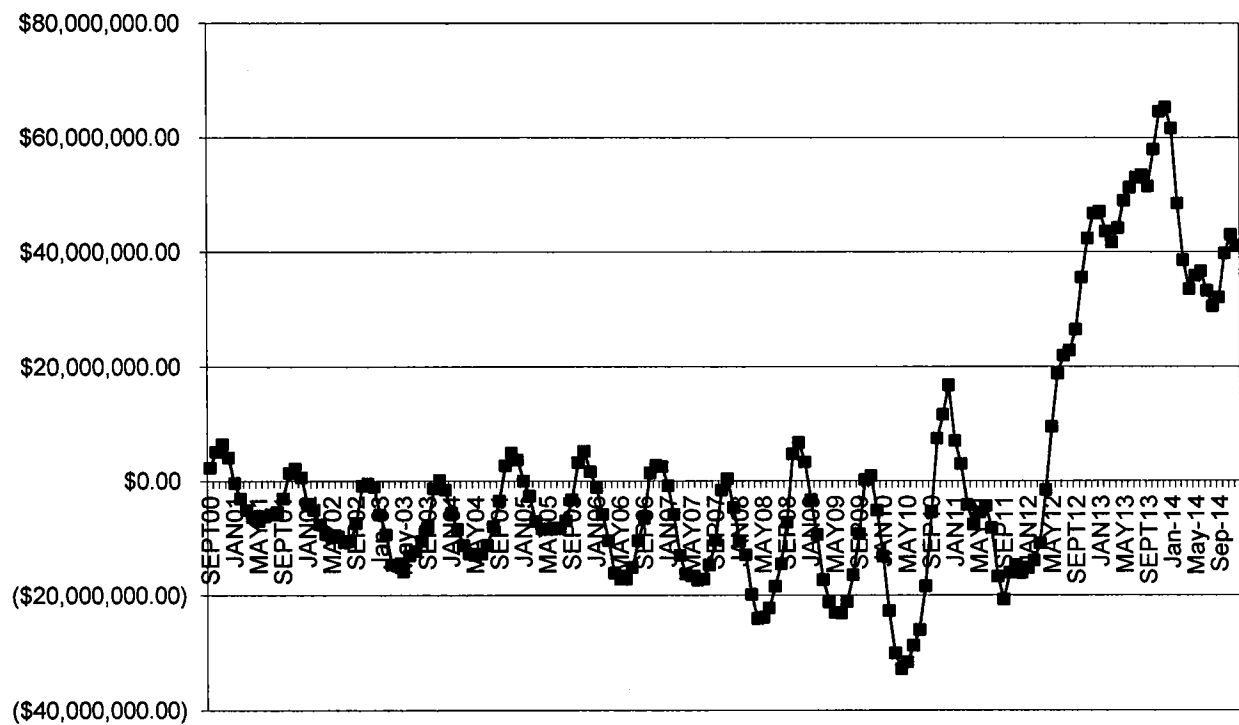


Exhibit F

Calculation of Annual Reserve Component

Company	Largest Monthly Cash Deficit	
	Month	Deficit
CSP	N/A	\$0
OP	14-Mar	(\$4,244,467)
DPL	N/A	\$0
DUKE	14-Dec	(\$4,002,996)
CEI	14-Aug	(\$2,368,414)
OE	N/A	\$0
TE	N/A	\$0

Totals: (\$10,615,877)

Allowance for Undercollection

Company	Estimated Undercollection
CSP	\$792,259
OP	\$1,066,584
DPL	\$457,881
Duke	\$356,875
CEI	\$850,651
OE	\$596,572
TE	\$810,416
Total	\$4,931,241

Revenue Requirement Summary

	CSP	OP	DPL	Duke
Cost of PIPP Plus	\$78,958,069	\$105,360,587	\$45,847,048	\$25,927,902
EPP/CE	\$3,131,532	\$4,178,674	\$1,818,326	\$1,028,319
Administration	\$846,669	\$944,320	\$479,739	\$368,388
Account Balance 12/31	(\$4,502,645)	(\$9,136,261)	(\$20,861,462)	\$4,002,996
Reserve	\$0	\$4,244,467	\$0	\$4,002,996
Adjustment for Undercollection	\$792,259	\$1,066,584	\$457,881	\$356,875
Total	\$79,225,884	\$106,658,371	\$27,741,532	\$35,687,476

	CEI	OE	TE
Cost of PIPP Plus	\$37,946,521	\$60,946,807	\$21,864,644
EPP/CE	\$1,504,985	\$2,417,193	\$867,167
Administration	\$751,391	\$1,037,535	\$349,683
Account Balance 12/31	(\$4,584,884)	(\$5,340,902)	(\$743,779)
Reserve	\$2,368,414	\$0	\$0
Adjustment for Undercollection	\$850,654	\$596,572	\$810,416
Total	\$38,837,081	\$59,657,205	\$23,148,131

Uniform Kwh Rate

Company	KWH Sales ¹	Required Revenue	Indicated Costs/KWH
CSP	19,624,846,392	\$79,225,884	\$0.0040370
OP	24,268,611,512	\$106,658,371	\$0.0043949
Duke	20,400,279,768	\$35,687,476	\$0.0017494
DPL	14,005,672,425	\$27,741,532	\$0.0019807
CEI	18,821,082,888	\$38,370,128	\$0.0020635
OE	24,793,779,249	\$59,657,205	\$0.0024061
TE	10,301,776,158	\$22,563,349	\$0.0022470
Total:	132,216,048,392	\$369,903,945	

1- KWH Sales were sales reported for the last twelve months (Sep13-Aug14).

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Application has been served upon the following parties by first class mail, postage prepaid, and electronic mail this 31st day of October 2014.



Dane Stinson

Steven T. Nourse
Matthew J. Satterwhite AEP
Service Corporation 1 Riverside
Plaza
Columbus, Ohio 43215
stnouse@aep.com
mjsatterwhite@aep.com

William L. Wright
Section Chief, Public Utilities Section
Thomas W. McNamee
Assistant Attorney General
Public Utilities Commission of Ohio
180 East Broad Street, 6th Floor
Columbus, Ohio 43215
William.Wright@puc.state.oh.us
Thomas.McNamee@puc.state.oh.us

Randall V. Griffin
Judi L. Sobecki
The Dayton Power & Light Company
MacGregor Park
1065 Woodman Avenue
Dayton, Ohio 45432
Randall.Griffin@dplinc.com
Judi.Sobecki@dplinc.com

Sam Randazzo
Frank P. Darr
Matthew Pritchard
McNees, Wallace & Nurick
Fifth Third Center
Suite 910
21 East State Street
Columbus, Ohio 43215
sam@mwncmh.com
fdarr@mwncmh.com
mpritichard@mwncmh.com

Elizabeth H. Watts
Duke Energy Ohio, Inc. 155 East
Broad Street
Columbus, Ohio 43215
Elizabeth.Watts@duke-energy.com

Carrie M. Dunn
FirstEnergy Corp.
76 South Main Street
Akron, Ohio 44308
cdunn@firstenergycorp.com

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Case No(s). 14-1002-EL-USF

Summary: Application of the Ohio Development Services Agency for an Order Approving Adjustments to the Universal Service Fund Riders electronically filed by Teresa Orahood on behalf of Dane Stinson