

December 18, 2018

Via Electronic Filing

Ms. Barcy F. McNeal
Docketing Division Chief
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

RE: PUCO Case Nos. 15-1830-EL-AIR *et al.*, Environmental Parties Status Report on Non-Wires Alternatives Pilot

Dear Ms. McNeal:

The Environmental Law & Policy Center, Environmental Defense Fund, Natural Resources Defense Council, and Ohio Environmental Council (collectively, “Environmental Parties”) hereby submit this status report as provided in the Stipulation and Recommendation (“Stipulation”) filed in the above-captioned cases on June 18, 2018. As provided in the Stipulation, since that date the Environmental Parties, Dayton Power & Light Company (“DP&L”), and other interested stakeholders have begun a process to develop a pilot plan for potential implementation of “non-wires alternatives, or “NWA,” such as energy efficiency, demand response, distributed generation, and energy storage, in order to cost-effectively defer or avoid distribution investments otherwise planned by DP&L.

In accordance with the Stipulation, the Environmental Parties, DP&L, the Staff of the Public Utilities Commission of Ohio (“Commission”), and interested stakeholders met on August 15, 2018 in order to start collaborative discussions regarding a NWA pilot. The stakeholders have since followed up on this discussion via email and a phone discussion on December 14, 2018, with another in-person meeting scheduled for January 29, 2019.

The Environmental Parties expect to continue these discussions as contemplated in the Stipulation – including through a Non-Wires Alternatives Pilot Collaborative to be proposed in DP&L’s scheduled December 28, 2018 filing of a Distribution Infrastructure Modernization Plan – with the aim of developing a pilot plan by June 18, 2019. The Stipulation provides that DP&L will then have the option of filing the pilot plan for approval by the Commission by September 18, 2019. The Environmental Parties believe such a pilot will be an essential step in carrying out the Commission’s vision in the August 2018 PowerForward report, in which the Commission stated that any Ohio electric utility “is encouraged to consider the use of NWAs as an option to defer or avoid more expensive distribution system investments.” *PowerForward: A Roadmap to Ohio’s Electricity Future* (“PowerForward Roadmap”) (Aug. 29, 2018) at 24.

Certainly, the ongoing discussion regarding the details of a NWA pilot plan will provide useful input to the PowerForward Distribution System Planning Workgroup established by the Commission to consider “[d]evelopment of NWA suitability criteria, processes and timeline for

implementing NWA opportunities.” *PowerForward Roadmap* at 19. However, Ohio will ultimately realize the cost savings, as well as the reliability and resiliency benefits, offered by beneficial NWAs only by actually implementing a NWA pilot program. A well-designed pilot is vital for Ohio to move toward incorporating NWAs as a cost-effective component of the distribution grid, consistent with the Commission’s goal of promoting innovation that will enhance the customer electricity experience.

Sincerely,

/s/ Madeline Fleisher
Madeline Fleisher
Environmental Law & Policy Center
21 W. Broad St., 8th Floor
Columbus, OH 43215
(614) 569-3827
Mfleisher@elpc.org

*Counsel for the Environmental Law & Policy
Center*

/s Miranda R. Leppla
Miranda R. Leppla
1145 Chesapeake Avenue, Suite I
Columbus, OH 43212
(614) 487-5825
mleppla@theoec.org

*Counsel for the Ohio Environmental
Council and Environmental Defense Fund*

/s/ Robert Dove
Robert Dove (0092019)
Kegler Brown Hill + Ritter Co., L.P.A.
65 E State St., Ste. 1800
Columbus, OH 43215-4295
Office: (614) 462-5443
Fax: (614) 464-2634
rdove@keglerbrown.com

Counsel for Natural Resources Defense Council

cc: Service List, Case Nos. 15-1830-EL-AIR et al.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Correspondence submitted on behalf of the Environmental Law & Policy Center, Environmental Defense Fund, Natural Resources Defense Council, and Ohio Environmental Council was served by electronic mail, upon all Parties of Record, on December 18, 2018.

/s/ Madeline Fleisher

Madeline Fleisher

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/18/2018 5:05:35 PM

in

Case No(s). 15-1830-EL-AIR, 15-1831-EL-AAM

Summary: Correspondence Correspondence regarding Environmental Parties' Status Report on Development of Non-Wires Alternatives Pilot Plan electronically filed by Madeline Fleisher on behalf of Ohio Environmental Council and Environmental Law & Policy Center and Environmental Defense Fund and Natural Resources Defense Council