

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Annual Verification of the )	
Energy Efficiency and Peak Demand )	
Reductions Achieved by the Electric )	Case No. 14-0569-EL-UNC
Distribution Utilities Pursuant to Section )	
4928.66, Revised Code for the 2012 and 2013 )	
Compliance Years.	

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**COMMENTS OF THE DAYTON POWER AND LIGHT COMPANY  
REGARDING THE INDEPENDENT PROGRAM EVALUATOR’S REVIEW OF THE  
2012 AND 2013 ENERGY EFFICIENCY AND PEAK DEMAND REDUCTION  
COMPLIANCE YEARS**

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The Dayton Power and Light Company (“DP&L” or “the Company”) appreciates the opportunity to provide comments in response to the Entry dated January 14, 2019 in which the Public Utilities Commission of Ohio (“Commission” or “PUCO”) solicited interested parties’ comments on the Independent Program Evaluator’s (“Evaluator”) verification of the Energy Efficiency and Peak Demand Reductions achieved by each of the electric utilities for the 2012 and 2013 compliance years. DP&L’s comments are set forth below.

It appears as though the Evaluator’s 2012 Report contains typos regarding the amount by which DP&L exceeded the cumulative benchmarks set forth in R.C. 4928.66(A)(1)(a). On page 19 of the 2012 report, the Evaluator states “DP&L exceeded the cumulative annual energy efficiency benchmarks for PY2012 by 325,475 MWh and 89.7 MW.” However, DP&L’s cumulative benchmark for PY2012 was 325,475 MWh and in that program year DP&L reported cumulative savings of 660,597 MWh, which means DP&L exceeded the cumulative benchmark by 335,122 MWh. Similarly, 89.7 MW was DP&L’s cumulative demand benchmark in PY2012 and in that program year DP&L reported cumulative demand savings of 122.7 MW, which means DP&L exceeded the cumulative benchmark by 33 MW.

DP&L also recommends minor edits to the Evaluator Report to align with the benchmark terminology set forth in the Ohio Revised Code. In accordance with O.R.C. § 4928.66(A)(1)(a), DP&L is implementing energy efficiency programs for the purpose of “achieving cumulative energy savings in excess of twenty-two per cent by the end of 2027.” The Revised Code further describes how the cumulative benchmark progresses each year. The Evaluator, however, employs the term “cumulative annual” benchmark, throughout the 2012 and 2013 reports, including on page 19 of the 2012 report. Because there is no annual benchmark; rather, a cumulative benchmark that is calculated annually, DP&L recommends that the statement on page 19 should read “DP&L exceeded the cumulative energy efficiency benchmarks for PY2012 by 335,122 MWh and 33 MW.”

DP&L appreciates the opportunity to provide comments in connection with the 2012 and 2013 Evaluator reports.

Respectfully submitted,

/s/ Michael J. Schuler

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Summary: Comments electronically filed by Mr. Tyler A. Teuscher on behalf of The Dayton Power and Light Company