

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)	
Dayton Power and Light Company to)	Case No. 19-841-EL-RDR
Update its Standard Offer Rate Tariffs.)	

INITIAL COMMENTS OF INTERSTATE GAS SUPPLY, INC.

On September 26, 2019, a procedural schedule was established in this proceeding regarding the PUCO/OCC assessment fees recovered through the Standard Offer Rate (“SOR”) of The Dayton Power and Light Company (“DP&L”). Interstate Gas Supply, Inc. (“IGS” or “IGS Energy”) appreciates the opportunity to submit these brief comments in support of Staff’s Review and Recommendation (“Staff Report”) filed on September 6, 2019 in this docket.

As detailed in the Staff Report, in DP&L’s most recent distribution rate case, the Commission adopted Staff’s recommendation “that the SSO generation revenue percentage of the PUCO/OCC assessment expense be recovered through an appropriate bypassable rider.”¹ However, because DP&L did not remove this portion of the full expense from its base rates, DP&L has double recovered a portion of their PUCO/OCC assessment fees from customers. Therefore, Staff recommends that “the Commission direct [DP&L] to credit to customers the PUCO/OCC assessment fees collected through

¹ *In re App. of The Dayton Power and Light Company for an Increase in its Electric Distribution Rates*, Case Nos. 15-1830-EL-AIR, et al., Staff Report (Mar. 12, 2018) at 28; Opinion and Order (Sept. 26, 2018) at ¶ 32.

the SOR rider within a non-bypassable rider to avoid a double recovery.”² IGS supports Staff’s recommendation.

For purposes of determining a public utility’s annual PUCO/OCC assessment fees, the Commission utilizes the utility’s intrastate gross earnings.³ For an EDU, these earnings include the EDU’s SSO generation revenue. However, CRES providers are also required to pay the annual PUCO/OCC assessment fees based on their intrastate gross earnings. Thus, if an EDU collects recovers their entire assessment through distribution rates, shopping customers are unfairly burdened twice for the PUCO/OCC assessment with regards to generation service: paying once through rates charged by their CRES provider associated with that shopping customer’s generation, and again through distribution rates associated with other customers’ generation served under the SSO. Therefore, IGS recommends that the Commission adopt Staff’s recommendation.

Respectfully submitted,

/s/ Bethany Allen
Bethany Allen (0093732)
Counsel of Record
bethany.allen@igs.com
Joseph Olikier (0086088)
joe.oliker@igs.com
Michael Nugent (0090408)
michael.nugent@igs.com
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
Telephone: (614) 659-5000
Facsimile: (614) 659-5073

² Staff Report at 3.

³ See R.C. 4905.10(A).

Attorneys for IGS
(willing to accept service via email)

CERTIFICATE OF SERVICE

I certify that these *Initial Comments of Interstate Gas Supply, Inc.* was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on October 17, 2019. The PUCO's e-filing system will electronically serve notice of the filing of this document on the parties subscribed to the proceeding.

/s/ Bethany Allen

Bethany Allen

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Summary: Comments Initial Comments of Interstate Gas Supply, Inc. electronically filed by Bethany Allen on behalf of Interstate Gas Supply, Inc.