

FILE

Ohio

Public Utilities
Commission

Mike DeWine, Governor
Sam Randazzo, Chairman

Commissioners

M. Beth Trombold
Lawrence K. Friedeman
Dennis P. Deters
Daniel R. Conway

December 12, 2019

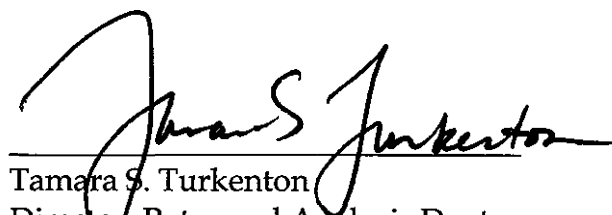
2019 DEC 12 AM 9:06
PUCO

Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus OH 43215

RE: *In the Matter of the Application of The Dayton Power and Light
Company for Approval of Its Electric Security Plan, Case No. 08-1094-EL-SSO, et. al*

Dear Docketing Division:

Enclosed please find the Staff's Review of the Tariffs filed in Application of The Dayton
Power and Light Company for Approval of Its Electric Security Plan, Case No. 08-1094-
EL-SSO.


Tamara S. Turkenton
Director, Rates and Analysis Dept.
Public Utilities Commission of Ohio

This is to certify that the images appearing are an
accurate and complete reproduction of a case file
document delivered in the regular course of business.
Technician mmm Date Processed 12/12/19

Enclosure
Cc: Parties of Record

180 East Broad Street
Columbus, Ohio 43215-3793

(614) 466-3016
www.PUCO.ohio.gov

An equal opportunity employer and service provider

Dayton Power and Light Company

Case No. 08-1094-EL-SSO, et. al.

Background

On November 26, 2019, Dayton Power and Light Company (DP&L or Company) filed a notice of withdrawal of its application of an Electric Security Plan (ESP) in Case No. 16-395-EL-SSO ("ESP III"). In addition, pursuant to R.C. 4928.143(C)(2)(a) DP&L states that it is exercising its statutory right to implement its ESP from Case No. 08-1094-EL-SSO ("ESPI").

On November 26, 2019, DP&L filed proposed tariffs to withdraw ESPIII tariffs and implement ESP I tariffs. DP&L indicates that the proposed tariffs are consistent with the tariffs that the Commission approved in its August 26, 2016 Opinion and Order, and that were in effect before the Commission's October 10, 2017 Opinion and Order in ESPIII. DP&L requests that the proposed tariffs remain in effect until a subsequent Standard Service Offer is approved pursuant to R.C. 4928.143 or section 4928.142 of the Revised Code.

Staff Review

Staff has reviewed the proposed tariffs filed on November 26, 2019, and finds:

DP&L is proposing to eliminate two riders that are currently in effect and to add two riders that were in effect as a result of ESPI but were eliminated upon the approval ESPIII. The Riders that are being eliminated are the Smart Grid Rider (Sheet D29) and the Reconciliation Rider (Sheet D40). The two riders DP&L proposes to reinstate from ESPI are the Rate Stabilization Charge (Sheet G12) and the Infrastructure Investment Rider as Sheet D29. The rates included in the Rate Stabilization Rider are identical to the rates approved in ESPI.

DP&L proposes to maintain its current generation and transmission riders to honor existing contracts it has with winning competitive bid suppliers. This is consistent with its actions on July 27, 2016, when the Company withdrew its application in Case No. 12-426-EL-SSO ("ESP II") and reverted to its ESPI tariffs, which were ultimately approved by the Commission on August 26, 2016.

DP&L proposes to maintain the currently effective distribution riders that were in effect or approved in ESPI. The riders include the Universal Service Fund Rider (Sheet D28),

Storm Cost Recovery Rider (Sheet D30), Excise Tax Surcharge Rider (Sheet D33), Switching Fees (Sheet D34), Energy Efficiency Rider (Sheet D38), and the Economic Development Rider (Sheet D39).

DP&L also proposes to maintain the currently effective riders that were approved as new riders in ESPIII. The riders include the Uncollectible Rider (Sheet 27), Regulatory Compliance Rider (Sheet D31), Distribution Decoupling Rider (Sheet D32) and the Distribution Investment Rider (Sheet D36). The Uncollectible Rider and the Distribution Investment Rider were approved as zero-rate or placeholder riders in ESPIII. Additional details and rates were approved for the Distribution Decoupling Rider and Distribution Investment Rider in Case No. 15-1830-EL-AIR.

The Tax Savings Credit Rider (Sheet D41) is also maintained in the proposed tariffs. The rider was approved by the Commission in Case No. 19-568-EL-ATA on September 26, 2019.

The Distribution Modernization Rider (DMR) is not included in the proposed tariffs. The DMR was approved in ESPIII, but recently eliminated pursuant to the Commission's Supplemental Opinion and Order, November 21, 2019. The elimination of the DMR was reflected in DP&L's Revised Final Tariffs filed on November 29, 2019, in Case No. 16-395-EL-SSO. In addition, the Economic Development Rider was modified in the final tariffs filed on November 29, 2019 to reflect the terms of the stipulation in Case No. 16-395-EL-SSO.

The Staff review is only a review of the tariffs filed on November 26, 2019 and does not address the request for withdrawal, nor the appropriateness of the elimination, addition, or the maintaining of tariff rates and riders.