

In the Matter of the Application of The)
Dayton Power and Light Company for) Case No. 18-381-EL-RDR
Authority to Recover Certain Storm-)
Related Service Restoration Costs.)

The tariffs filed by The Dayton Power and Light Company (“DP&L”) in this case, along with the tariffs filed in Case No. 19-662-EL-RDR, are inconsistent with the Orders of the Public Utilities Commission of Ohio (“PUCO”). To protect DP&L’s consumers from being overcharged, the PUCO should require DP&L to file calculations and workpapers in this case showing the calculations of the charges to customers contained in the tariff filed by DP&L for major storm costs in 2017 and 2018. Further, the PUCO should direct either the PUCO Staff or an independent auditor to review the charges and workpapers to ensure that customers are properly charged.

The PUCO has approved DP&L's charges to consumers associated with expenses for restoring electric service following major storm events that occurred in 2017 and 2018. In this case, the PUCO authorized DP&L to charge residential consumers \$0.29 per month for 2017 major storm expenses. Then, in the subsequent case, Case No. 19-662-EL-RDR, the PUCO authorized DP&L to charge customers \$0.65 per month for 2018

major storm expenses.¹ But DP&L's proposed tariffs do not reflect the charges approved by the PUCO for 2017 and 2018 major storm expenses.

Under the tariffs filed in this case for 2017 major storm expenses, DP&L proposed to charge consumers \$0.38 cents per month (effective October 1, 2019),² which is \$0.09 more per month than the PUCO authorized for the 2017 major storm expenses. And under the tariff proposed by DP&L in Case No. 19-662-EL-RDR for 2018 major storm expenses, DP&L proposed to charge consumers \$1.01 per month (effective November 1, 2019),³ which is \$0.36 more than the PUCO authorized. While DP&L's intent appears to be to charge customers some combination of the 2017 and 2018 charges approved by the PUCO, the \$1.01 that DP&L has proposed in its most recent tariffs is more than the sum of the approved charges, which would be \$0.94 per month. Further, the previously tariffed charge (\$0.38) added to the charge most recently approved by the PUCO (\$0.65) does not equal the \$1.01 monthly charge. And to date, DP&L has not filed workpapers to support or explain its tariffs. Thus, there is nothing in the record of either case to determine whether DP&L's charges to customers through the rider are correct.

The PUCO has authority over DP&L's charges to consumers pursuant to R.C. 4905.06 and is charged with general supervision over public utilities and their compliance with all laws and orders of the commission. And R.C. 4905.54 requires public utilities to comply with the orders and requirements of the PUCO. No PUCO order has authorized DP&L to charge a blended rate, if that is in fact what DP&L is doing.

¹ See Case No. 18-381-EL-RDR, Finding and Order (September 26, 2019) ("18-381 Order"), ¶13; Case No. 19-662-EL-RDR, Finding and Order (October 23, 2019) ("19-662 Order"), ¶12.

² Case No. 18-381-EL-RDR, Tariff filing (September 30, 2019).

³ Case No. 19-662-EL-RDR, Tariff filing (October 31, 2019).

Further, according to R.C. 4905.29, the public utility shall file schedules showing all rates, joint rates, rentals, tolls, classifications, and charges for service of every kind. The schedules filed by DP&L regarding its storm expenses are not just plainly deficient, but entirely absent.

To protect DP&L's 460,000 residential consumers from being overcharged, the Office of the Ohio Consumers' Counsel ("OCC") files these objections to DP&L's tariffs. In order to protect DP&L's consumers, the PUCO should require DP&L to file calculations and workpapers in this case showing the calculations of the charges to customers contained in the tariff. Further, the PUCO should direct either the PUCO Staff or an independent auditor to review the charges and workpapers to ensure that customers are properly charged.

Customers should not be overcharged or double-charged for major storm expenses incurred by DP&L in 2017 and 2018. To protect consumers, the PUCO should immediately take the actions recommended by OCC.

Respectfully submitted,

Bruce Weston (0016973)
Ohio Consumers' Counsel

/s/ Ambrosia E. Logsdon
Ambrosia Logsdon (0096598)
Counsel of Record
Assistant Consumers' Counsel

Office of the Ohio Consumers' Counsel
65 East State Street, 7th Floor
Columbus, Ohio 43215
Telephone [Logsdon]: (614) 466-1292
ambrosia.logsdon@occ.ohio.gov
(willing to accept service by e-mail)

CERTIFICATE OF SERVICE

I hereby certify that a copy of these Objections were served on the persons stated below via electronic transmission, this 22nd day of January 2020.

/s/ Ambrosia E. Logsdon
Ambrosia E. Logsdon
Assistant Consumers' Counsel

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

SERVICE LIST

Robert.eubanks@ohioattorneygeneral.gov

Michael.schuler@aes.com

Attorney Examiners:

gregory.price@puco.ohio.gov
patricia.schabo@puco.ohio.gov

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/22/2020 11:21:07 AM

in

Case No(s). 18-0381-EL-RDR

Summary: Objection Objections to DP&L's Tariffed Charges to Consumers for Storm-Related Expenses by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Logsdon, Ambrosia E.