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| |) | |
| In the matter of the Application of Ohio |) | Case No. 20-0585-EL-AIR |
| Power Company For an increase in Electric |) | |
| Distribution Rates |) | |
| |) | |
| In the Matter of the Application of Ohio |) | Case No. 20-0586-EL-ATA |
| Power Company For Tariff Approval |) | |
| |) | |
| In the Matter of the Application of Ohio |) | Case No. 20-0587-EL-AAM |
| Power Company For Approval to Change |) | |
| Accounting |) | |
| |) | |

The Ohio Environmental Council and Environmental Law & Policy Center file this Joint Motion to amend ELPC Exhibit 2 to include portions originally excluded in the Commission's May 27 Entry. The Ohio Power Company (AEP Ohio) does not oppose this motion. During the hearing, ELPC, OEC, and AEP Ohio were directed "to work together to highlight those sections of this exhibit so that the parties can use the highlighted portions that were discussed in the course of the cross-examination as part of their brief." *Tr. Vol. V* at 1004, line 22 to 105, line 2.

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During the hearing, Ms. Leppla had asked Mr. Williams on cross to “turn to page 20” of the DSM Plan attached to his testimony and to “explain what energy DRIPE means and how this is a benefit to AEP Ohio customers as proposed in the DSM Plan.” *Tr. Vol. V* at 960, lines 19 - 22. This discussion specifically referenced the page number and DRIPE in the context of the DSM plan, but the final version of the exhibit admitted on May 27 did not include any highlighted portion of the exhibit identified by Ms. Leppla on the day the joint highlighted document was submitted.

AEP Ohio does not oppose the inclusion of the identified sections. AEP Ohio does not oppose the inclusion of the identified sections. Accordingly, ELPC and OEC request that the entirety of the “Energy DRIPE” section on page 20 of JFW-1 be included as part of ELPC Exhibit 2.

June 24, 2021

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Joint Motion of Ohio Environmental Council and Environmental Law & Policy Center to Amend ELPC Exhibit 2* was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on June 24, 2021. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ Chris Tavenor
Chris Tavenor

Figure 5. Percent of measures resulting in non-energy benefits by type of benefit (n=79)

| Benefit category | Measures resulting in benefit | Percent |
|--------------------------------|-------------------------------|---------|
| Comfort Increased | 41 | 52% |
| Safety Increased | 34 | 43% |
| Productivity Increased | 22 | 28% |
| Other Revenue Increased | 3 | 4% |
| Sales Increased | 2 | 3% |
| Other Increase | 2 | 3% |
| Downtime Decreased | 19 | 24% |
| Labor Costs Decreased | 10 | 13% |
| Other Decrease | 10 | 13% |
| Material Costs Decreased | 5 | 6% |
| License Costs Decreased | 2 | 3% |
| Waste Disposal Costs Decreased | 0 | 0% |

f. Energy DRIPE

Demand Reduction Induced Price Effects, or DRIPE, is defined from the EPA's Office of Energy Efficiency and Renewable Energy (EERE)⁹ as: In wholesale electricity markets, DRIPE is usually conceptualized as a downward movement in the demand curve, leading to a new equilibrium of supply and demand being established at a lower price point. This basic theoretical model applies to price effects arising from both energy efficiency and demand response, though the duration of demand reductions is much longer in the case of energy efficiency, as the reductions continue throughout the lifetime of the project as opposed to the few minutes or hours during which a demand response resource is dispatched.

DRIPE reduces the marginal cost of electricity by exposing market inefficiencies and substituting lower cost energy efficiency for higher cost supply. This means that greater energy efficiency will decrease the need to purchase energy from higher cost sources, and lower peak demand will lessen the need to invest in new generation capacity.

AEP Ohio has utilized the study completed for ComEd in 2015¹⁰, by Energy Futures Group and Resource Insight. The quantified value AEP Ohio is proposing to use is a 1% decrease in energy costs, thus providing a benefit for energy reductions achieved by AEP Ohio and its customers. For more detail, please refer to JFW-2 Appendix Section VI.i.

⁹ https://www4.eere.energy.gov/seeaction/system/files/documents/DRIPE-finalv3_0.pdf

¹⁰ <https://www.raponline.org/knowledge-center/the-value-of-demand-reduction-induced-price-effects-dripe/>

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in

Case No(s). 20-0585-EL-AIR, 20-0586-EL-ATA, 20-0587-EL-AAM

Summary: Motion to Amend ELPC Exhibit 2 electronically filed by Chris Tavenor on behalf of The Ohio Environmental Council and Environmental Law & Policy Center