**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| --- | --- | --- |
| In the Matter of the Application of Duke Energy Ohio, Inc. for Recovery of Program Costs, Lost Distribution Revenue and Performance Incentives Related to its Energy Efficiency and Demand Response Programs. | )  )  )  )  )  ) | Case No. 19-0622-EL-RDR |

**COMMENTS**

**BY**

**OHIO PARTNERS FOR AFFORDABLE ENERGY**

Ohio Partners for Affordable Energy (“OPAE”) recommends that the Commission follow its precedent in this most recent application of Duke Energy Ohio, Inc. (“Duke”) for the recovery (or return to ratepayers) of costs (or over-collections) through Duke’s energy efficiency and peak demand response (“EE-PDR”) rider. The Commission has established precedents in similar rider cases that should be followed in this and all subsequent rider cases. The prior cases are Case No. 16-664-EL-RDR, Finding and Order (May 15, 2019) and Case No. 17-781-EL-RDR, Finding and Order (May 15, 2019). In Case No. 18-397-EL-RDR, the Staff of the Commission issued its Review and Recommendation on June 12, 2019 and comments and reply comments have been filed. The Staff will issue its Review and Recommendation in this proceeding as well. The lag in resolving these annual filings has created unnecessary uncertainty about what costs are allowed to be recovered through the rider. The Commission should follow the Staff’s recommendations and set a precedent so that the necessary annual adjustments to the rider can be accomplished without delay.

OPAE has also identified several anomalies in the form of inconsistencies between savings claimed in 2018, savings projected in 2019, and the savings as determined by evaluation reports. We reviewed a selection of residential program evaluations and determined that the data used in determining achievement of the savings targets and triggering shared savings cannot be reconciled with the bill savings and engineering calculations. The data is included in the following chart:

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| --- | --- | --- | --- | --- |
| Program (all data in kWh) | 2018 Results -- Application for Recovery1 | 2019 Projections Application for Recovery2 | Evaluation Bill Analysis | Evaluation Deemed (TRM) |
| Energy Efficiency Education in Schools Program | 534.92 | 534.92 | 209.3 3 | 499.00 4 |
| My Home Energy Report Program | 257.09 | 272.67 | 209.00 5 | 256.00 6 |
| Residential Energy Assessments Program | 215.98 | 206.21 | 1059.00 7 | 285.60 8 |
| Low Income Neighborhood Program | 450.24 | 450.24 | 412.00 9 | NA |
|  | | | | |
| 1. Application, Attachment JEZ-1, Page 3 of 15. | | | | |
| 2. Application, Attachment JEZ-1, Page 7 of 15. | | | | |
| 3. Energy Efficiency Education in Schools Program Year 2017 - 2018 Report, prepared by Nexant (October 22, 2018), included in Part 2 of the Application at 67. | | | | |
| 4. Ibid. at 69. | | | | |
| 5. My Home Energy Report Program Evaluation, prepared by Nexant (October 30, 2018), included in Part 1 of Application at 165. | | | | |
| 6. Ibid. at 166. | | | | |
| 7. Residential Energy Assessments Program Evaluation Report -- Final, prepared by opiniondymanics.com (October 16, 2018), included in Part 3 of Application at 37. | | | | |
| 8. Ibid. | | | | |
| 9. Process and Impact Evaluation of the 2013-2014 Residential Neighborhood Program In Ohio prepared by TecMarket Works (February 27,2015). Duke DSM Collaborative, July 18, 2015. | | | | |

OPAE requests that the Commission conduct a detailed review of the savings reported in the program evaluations and the savings used to calculate compliance and shared savings to ensure that ratepayers are getting what they paid and will pay for.

Respectfully submitted,

/s/Colleen Mooney

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**CERTIFICATE OF SERVICE**

A copy of the foregoing Commentswill be served electronically by the Commission’s Docketing Division upon the parties identified below on this 25th day of July 2019.

/s/Colleen L. Mooney

Colleen L. Mooney

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