

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton Power and Light Company for Approval of its Market Rate Offer.	)	Case No. 12-426-EL-SSO
	)	
	)	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs.	)	Case No. 12-427-EL-ATA
	)	
	)	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Authority.	)	Case No. 12-428-EL-AAM
	)	
	)	
In the Matter of the Application of The Dayton Power and Light Company for Waiver of Certain Commission Rules.	)	Case No. 12-429-EL-WVR
	)	
	)	
In the Matter of the Application of The Dayton Power and Light Company to Establish Tariff Riders.	)	Case No. 12-672-EL-RDR
	)	
	)	

**DIRECT TESTIMONY  
OF  
JAMES D. WILLIAMS**

**On Behalf of**  
**The Office of the Ohio Consumers' Counsel**  
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***March 1, 2013***

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## **ATTACHMENTS**

JDW-1	List of Previous Testimony Filed at the PUCO by James Williams
JDW-2	DP&L Response to OCC Interrogatory No. 75
JDW-3	DP&L Response to OCC Interrogatory No. 86
JDW-4	DP&L Response to OCC Interrogatory No. 77
JDW-5	DP&L Response to OCC Interrogatory No. 89
JDW-6	DP&L Response to OCC Interrogatory No. 90
JDW-7	DP&L Response to OCC Interrogatory No. 87
JDW-8	DP&L Response to OCC Interrogatory No. 81
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JDW-10	DP&L Response to OCC Interrogatory No. 83
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JDW-12	DP&L Response to OCC Interrogatory No. 95
JDW-13	DP&L Response to OCC Interrogatory No. 98
JDW-14	DP&L Response to OCC Interrogatory No. 97
JDW-15	DP&L Response to OCC Interrogatory No. 92
JDW-16	DP&L Response to OCC Interrogatory No. 102
JDW-17	January 15, 2013 PUCO Ohio Utility Rate Survey
JDW-18	January 15, 2008 PUCO Ohio Utility Rate Survey
JDW-19	DP&L Response to OCC Request for Production of Document No. 52
JDW-20	Ohio Quick Facts from U.S. Census Bureau
JDW-21	Montgomery County Quick Facts from U.S. Census Bureau
JDW-22	Dayton Quick Facts from U.S. Census Bureau
JDW-23	Fayette County Quick Facts from U.S. Census Bureau
JDW-24	Clinton County Quick Facts from U.S. Census Bureau
JDW-25	DP&L Response to OCC Request for Production of Documents No. 17
JDW-26	DP&L Response to OCC Interrogatory No.103

1    **I.        INTRODUCTION**

2

3    ***Q1.    PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.***

4    ***A1.***    My name is James D. Williams. My business address is 10 West Broad Street,  
5       Suite 1800, Columbus, Ohio 43215-3485. I am employed by the Office of the  
6       Ohio Consumers' Counsel ("OCC") as a Senior Consumer Protection Research  
7       Analyst.

8

9    ***Q2.    PLEASE BRIEFLY SUMMARIZE YOUR EDUCATION AND***  
10    ***PROFESSIONAL EXPERIENCE.***

11   ***A2.***    I am a 1994 graduate of Webster University, in St. Louis, Missouri, with a  
12       Master's in Business Administration, and a 1978 graduate of Franklin University,  
13       in Columbus, Ohio, with a Bachelor of Science, Engineering Technology. My  
14       professional experience includes a career in the Air Force and over 17 years of  
15       utility regulatory experience with the OCC.

16

17       Initially, I served as a compliance specialist with the OCC and my duties included  
18       the development of compliance programs for electric, natural gas and water  
19       industries. Later, I was appointed to manage all of the agency compliance  
20       specialists who were developing compliance programs in each of the utility  
21       industries. After six years, my role evolved into the management of the OCC  
22       consumer hotline, the direct service provided to consumers to resolve complaints  
23       and inquiries that involve Ohio utilities.

*Testimony of James D. Williams  
On Behalf of the Office of the Ohio Consumers' Counsel  
PUCO Case Nos. 12-426-EL-SSO, et al.*

1 My position has since evolved into the Senior Consumer Protection Research  
2 Analyst. In this capacity, I am responsible for researching and recommending  
3 positions on a host of policy issues that affect residential consumers. I have been  
4 directly involved in the development of comments in various rulemaking  
5 proceedings at the Public Utilities Commission of Ohio (“PUCO” or “the  
6 Commission”) and the Ohio Development Services Agency (“ODSA”) advocating  
7 consumer protections, utility service affordability, and the provision of  
8 reasonable access to essential utility services for residential consumers. I  
9 represent the OCC on the Consumer Protection Subcommittee of the National  
10 Association of State Utility Consumer Advocates (“NASUCA”) and have  
11 participated in the development of policy positions in that organization, including  
12 efforts to reduce disconnections, improve customer privacy, and reducing charges  
13 for paying utility bills.

14  
15 Specifically related to this proceeding, my experience has involved helping  
16 formulate OCC positions in rulemakings on the subject of the Disconnection of  
17 Natural Gas, or Electric Service for Residential Customers, set forth in Ohio  
18 Admin. Code 4901:1-18 and the electric Percentage of Income Payment Plan Plus  
19 (“PIPP Plus”) rules set forth in Ohio Admin. Code 122:5-3. I represent the OCC  
20 on the Public Benefits Advisory Board (“PBAB”), a state mandated body that  
21 advises policy makers on low-income assistance matters.

1   **Q3.   HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY OR TESTIFIED**  
2       **BEFORE THIS COMMISSION?**

3   **A3.**   Yes. The cases in which I have submitted testimony and/or have testified before  
4       the Commission can be found in attachment JDW-1.

5  
6   **II.   PURPOSE OF MY TESTIMONY**

7  
8   **Q4.   WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**  
9       **PROCEEDING?**

10   **A4.**   I am providing testimony on behalf of OCC and recommending that the  
11       Commission consider customer bill affordability prior to approving any  
12       aspect of the proposed Standard Service Offer (“SSO”) that impacts the  
13       amount of the electric bills for residential customers of Dayton Power and  
14       Light (“DP&L” or “the Utility”).

15  
16   **Q5.   WHAT ARE YOUR GENERAL RECOMMENDATIONS?**

17   **A5.**   I recommend that the Commission initiate a review of credit and  
18       collection policies and practices to examine ways to reduce the high  
19       number of disconnections being experienced by DP&L residential  
20       customers while keeping rates affordable. I also recommend additional  
21       bill payment assistance funding for residential customers.

22

**Q6. PLEASE SUMMARIZE YOUR QUALIFICATIONS IN REGARD TO  
ADDRESSING UTILITY SERVICE AFFORDABILITY ISSUES.**

**A6.** I routinely review and analyze pleadings filed by the utilities concerning various customer service matters including the impact that rate changes will have on residential consumers. In addition, I review reports such as the Ohio Poverty Report, U.S. Census Bureau reports, reports concerning the Low-Income Home Energy Assistance Program (“LIHEAP”), reports related to utility service affordability, and employment data from the Bureau of Labor Statistics (“BLS”) concerning the level of poverty and unemployment in the state. I also review reports from organizations such as the National Consumer Law Center (“NCLC”) related to utility affordability for at-risk populations including, but not limited to low-income Ohioans, the elderly, and those with medical needs.

**III. AFFORDABILITY OF RETAIL ELECTRIC SERVICE**

**Q7. DOES OHIO POLICY ADDRESS AFFORDABILITY IN REGARDS TO THE  
PRICE OF ELECTRICITY?**

**A7.** Yes.

1   **Q8.   WHAT IS OHIO POLICY REGARDING AFFORDABILITY OF**  
2   **ELECTRICITY?**

3   **A8.**   It is my understanding that R.C.4928.02(A) and (L), set forth the State policy  
4   concerning reasonably priced retail electric service:

5           (A)   *Ensure the availability to consumers of adequate, reliable,*  
6                   *safe, efficient, nondiscriminatory, and **reasonably priced***  
7                   *retail electric service; (Emphasis added.)*

8           and

9           (L)   ***Protect[ing] at-risk populations, including, but not limited***  
10                *to, when considering implementation of any new advanced*  
11                *energy or renewable energy resources; (Emphasis added)*

12

13       Based on my understanding of this language, I recommend that the Commission  
14       advance the policy of the state (described above) by considering affordability of  
15       DP&L's current electric rates when rendering its decision on the Application to  
16       establish an Electric Security Plan ("ESP") in this case.

17

18   **Q9.   WHAT IMPACT WOULD THE ESTABLISHMENT OF A NEW ELECTRIC**  
19   **SECURITY PLAN HAVE ON THE AFFORDABILITY OF RETAIL**  
20   **ELECTRIC SERVICE FOR RESIDENTIAL CUSTOMERS?**

21   **A9.**   As can be seen on Table 1 below, a significant number of DP&L residential  
22   customers are currently struggling to afford electric service under the existing

Electric Security Plan (“ESP”) rates.<sup>1</sup> Any proposed modification in the ensuing ESP rates that does not reduce the current rates or results in higher electric bills for DP&L’s residential customers will have a negative financial impact on them. Table 1 provides a summary based on PUCO and other 2011/ 2012 data of the number of residential customers who were disconnected for non-payment, customers on the low-income PIPP Plus, and the average number of customers on a monthly basis who were on a Commission-ordered payment plan. I consider these customers to be part of the at-risk population that R.C. 4928.02(L) specifically mentions.

**Table 1: DP&L Disconnections and Payment Plans**

<b>Description</b>	<b>Total (2012)</b>	<b>Percentage</b>
Disconnections for Non-payment <sup>2</sup>	34,389	7.5
Number of Customers on PIPP Plus <sup>3</sup>	35,715	7.8
Number of Customers on Payment Plans <sup>4</sup>	22,701/ 78,502 <sup>5</sup>	17.3

<sup>1</sup>*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.

<sup>2</sup> DP&L Response to OCC Interrogatory No. 75 (Attached herein as JDW-2).

<sup>3</sup> DP&L Response to OCC Interrogatory No. 86 (Attached herein as JDW-3).

<sup>4</sup>*In the Matter of the Commission’s Review of Chapters 4901:1-17 and 4901:1-18, and Rules 4901:1-5-07, 4901:1-10-22, 4901:1-13-11, 4901:1-15-17, 4901:1-21-14, and 4901:1-29-12 of the Ohio Administrative Code*, Case No. 08-723-AU-ORD, PIPP Plus Metrics Data reported to the PUCO Staff and is provided to OCC upon request. According to PIPP Plus Metrics Data, the average number of customers on Commission-ordered extended payment plans on a monthly basis.

<sup>5</sup> DP&L Response to OCC Interrogatory No. 77 (attached herein as JDW-4) showed 78,502 customers on Commission-ordered payment plans in 2012. The 22,701 is the average number of customers on a Commission-ordered payment plan per month.



1 Table 1 indicates that 34,389 residential customers of DP&L were disconnected  
2 for non-payment in 2012. In addition to the disconnections, another 35,715 (7.8  
3 percent) of DP&L's residential customers participated in the specialized PIPP  
4 Plus payment program in 2012. This is an increase of 1,670 customers from  
5 2011. Finally, an additional 22,701 (5.0 percent) of DP&L's residential  
6 customers were on other Commission-ordered payment plans during an average  
7 month in 2012 in an effort to avoid disconnection of service.<sup>6</sup> Customers who  
8 have household incomes that exceed the PIPP guidelines are eligible to apply for  
9 other payment plans such as the one-ninth, one-sixth, and one-third payment plans  
10 set forth in Ohio Admin. Code 4901:1-18-05(B).

11  
12 In order to qualify for these payment plans, customers must contact the utility and  
13 establish an inability to pay the bill and a desire to avoid further delinquency.<sup>7</sup>

14 There were a total of 78,502 customers on Commission-ordered payment plans in  
15 2012.

16  
17 Thus, approximately 32.6 percent of the total number of residential customers  
18 served by DP&L (up to 148,606 of the approximate 456,000 residential  
19 customers) were struggling or were unable to pay their electric bills in 2012.

20 While there might be several reasons, including the sluggish recovery of the local

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<sup>6</sup> As shown in Table 3 later in this testimony, the 7.5 percent DP&L disconnection rate is much higher than the other Ohio electric utilities.

<sup>7</sup> Ohio Admin. Code 4901:1-18-05(A).

economy, that result in customers struggling to pay electric bills, the numbers show the magnitude of the problem that customers are having to afford their electric service.<sup>8</sup> The Commission approves the rates that DP&L charges its customers. The large number of customers struggling to make payment demonstrates the importance of affordability as a factor that the Commission should consider in rendering its decision on the proposed SSO in this case. To the extent that the proposed SSO does not result in major rate reductions for residential customers, then electric service is likely to continue to be unaffordable for many residential customers. Such a result would not advance the policies of the state, as discussed above.

***Q10. DOES ENROLLMENT ON PERCENTAGE OF INCOME PAYMENT PLAN PLUS ELIMINATE THE AFFORDABILITY CONCERNS FOR LOW-INCOME CONSUMERS?***

***A10.*** No.

***Q11. PLEASE EXPLAIN WHY THE AVAILABILITY OF THE PERCENTAGE OF INCOME PAYMENT PLAN PLUS PROGRAM DOES NOT ELIMINATE THE AFFORDABILITY CONCERNS FOR LOW-INCOME CONSUMERS?***

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<sup>8</sup> The Ohio Poverty Report, Ohio Development Services Agency, February 2013 at page 10.

1 **III.** To qualify for PIPP Plus, customers must have a household income not exceeding  
2 150 percent of the Federal Poverty Guidelines.<sup>9</sup> In the PIPP Plus program, rather  
3 than paying the entire actual bill, PIPP Plus customers pay 6 percent of their  
4 monthly household income (or ten percent if their home is an all-electric  
5 dwelling) as a payment for their electric service, and the difference from the  
6 actual bill accrues as an arrearage for the customers.<sup>10</sup> Customers are financially  
7 responsible for these arrearages; however, there are provisions for credits towards  
8 the arrearages if payments are made in-full and on-time.<sup>11</sup>  
9  
10 Although PIPP Plus customers pay a percentage of their household income for  
11 electric service, rather than the actual bill, they are still financially responsible for  
12 the entire electric bill. Therefore, PIPP Plus can be an effective payment plan for  
13 the lowest-income customers, but is not necessarily the most effective payment  
14 plan for all at-risk low-income consumers. For example, a family of four with a  
15 household income at 150 percent poverty qualifies for PIPP, but the installment  
16 payment amount of \$167.63<sup>12</sup> per month would exceed the average DP&L PIPP  
17 Plus electric bill of \$132 in 2012.<sup>13</sup>  
18

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<sup>9</sup> Ohio Admin. Code 122:5-3-02.

<sup>10</sup> Ohio Admin. Code 122:5-3-04.

<sup>11</sup> Id.

<sup>12</sup> Annual income for a family of four at 150 percent of the federal poverty guideline is \$34,574. With a 6 percent PIPP Plus payment level, the annual payment for electric is \$2,011.50 or \$167.63 monthly.

<sup>13</sup> DP&L response to OCC Interrogatory No. 89 (Attached herein as JDW-5).

1 **Q12. HOW HAS THE AFFORDABILITY OF DP&L SERVICE CHANGED OVER**  
2 **THE LAST SIX YEARS?**

3 **A12.** Table 2 below provides a comparison of the average residential bill amount,  
4 number of PIPP customers, number of PIPP disconnections, average  
5 disconnection amounts and arrearages, customers reconnected using the  
6 Commission winter reconnection procedures, and number of customers on  
7 extended payment plans from 2012 with comparable 2007 data.

8 **Table 2: Comparison of Affordability Data (2007 – 2012)**

<b>Description</b>	<b>2007</b>	<b>2012</b>	<b>Percentage Increase</b>
Average Residential Customer Monthly Bill <sup>14</sup>	\$95	\$113	18.9
PIPP Customers Disconnected <sup>15</sup>	2,648	5,023	90.0
Customers Reconnected using Special Winter Order <sup>16</sup>	1,785	4,286	140.1
Average Disconnection Amount <sup>17</sup>	\$375	\$469	25.0
Average Amount Owed on Disconnection Notice <sup>18</sup>	\$192	\$272	41.7
Average Arrearages Owed for more than 60 Days <sup>19</sup>	\$410	\$447	9.0
Number of Customers on PIPP Plus <sup>20</sup>	21,242	35,715	68.1
Number of Customers on Payment Plan <sup>21</sup>	76,367	78,502	2.8

<sup>14</sup> DP&L Response to OCC Interrogatory No. 90 (Attached herein as JDW-6).

<sup>15</sup> DP&L Response to OCC Interrogatory No. 87 (Attached herein as JDW-7).

<sup>16</sup> DP&L Response to OCC Interrogatory No. 81 (Attached herein as JDW-8)

<sup>17</sup> DP&L Response to OCC Interrogatory No. 76 (Attached herein as JDW-9).

<sup>18</sup> DP&L Response to OCC Interrogatory No. 83 (Attached herein as JDW-10).

<sup>19</sup> DP&L Response to OCC Interrogatory No. 85 (Attached herein as JDW-11).

<sup>20</sup> Refer to JDW-3.

<sup>21</sup> Id.

1 Table 2 above demonstrates that the average DP&L residential bill has increased  
2 by approximately 19 percent over the last six years. As shown later in my  
3 testimony, DP&L's residential customers went from paying electric bills that  
4 were below the average Ohio electric bill in 2008 to paying one of the highest  
5 average electric bills in the state today. Along with that increase there has been a  
6 90 percent increase in the number of PIPP customers being disconnected for non-  
7 payment – a strong indicator that at-risk residential customers are not being  
8 protected. Furthermore, there has been a 140 percent increase in the number of  
9 customers who needed the special Commission winter reconnection procedures to  
10 have services reconnected during the winter months. The amounts owed at the  
11 time of disconnection have also increased by 25 percent on average and arrearage  
12 amounts have grown by 41 percent. Enrollment on the PIPP Plus program has  
13 grown by 68.1 percent. A 2.8 percent increase occurred in the number of  
14 customers who enrolled on Commission-ordered payment plans.

15  
16 ***Q13. DOES THE UNAFFORDABILITY OF ELECTRIC SERVICE RATES***  
17 ***NEGATIVELY IMPACT RESIDENTIAL CONSUMERS?***

18 ***A13.*** Yes it does.

1 **Q14. PLEASE DESCRIBE HOW THE UNAFFORDABILITY OF ELECTRIC**  
2 **SERVICE RATES CAN NEGATIVELY IMPACT RESIDENTIAL**  
3 **CONSUMERS?**

4 **A14.** Unaffordable electric rates can lead to a loss of service. There can be serious  
5 health and safety concerns when residential customers lose access to electricity.<sup>22</sup>  
6 This is especially true for disconnected customers who have young children,  
7 disabled, ill, or elderly living in the home.<sup>23</sup> I am familiar with reports that  
8 conclude that *exposure to heat and cold kills thousands of people prematurely in*  
9 *the United States each year.*<sup>24</sup> Even though PUCO data shows that in 2012,  
10 medical professionals certified that it would be especially dangerous to the health  
11 of 6,316<sup>25</sup> DP&L customers if electric services were disconnected, there may  
12 have been even more people with the need for this protection. This is because  
13 there are limits on the number of medical certifications available per household  
14 and the duration of time in which medical certifications can be used.<sup>26</sup>  
15  
16 Further demonstrating the health and safety concerns for the *at-risk* residential  
17 customers, approximately 34.4 percent of the medical certifications that were used  
18 in 2012 involved low-income PIPP customers. However, approximately 7.9  
19 percent of DP&L customers are on the PIPP program. Therefore, a clear disparity

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<sup>22</sup> Access to Utility Service, National Consumer Law Center, Fourth Edition, at 325.

<sup>23</sup> Affordable Home Energy and Health: Making the Connections, AARP Public Policy Institute, June 2010, at 6.

<sup>24</sup> Id., at 7.

<sup>25</sup> According to the PIPP Plus Metrics Data provided by the PUCO Staff.

<sup>26</sup> Ohio Admin. Code 4901:1-18-06(C) limits the number of medical certifications to three per household in any twelve-month period, each with a duration of up to 30 days.

exists in the need for medical certifications by the lowest income DP&L customers to prevent service disconnection. Affordable electric service promotes public health to the extent that customers are able to adequately heat their homes in the winter and cool homes in the summer.<sup>27</sup>

***Q15. PLEASE DESCRIBE OTHER WAYS THAT UNAFFORDABILITY OF ELECTRIC SERVICE RATES CAN NEGATIVELY IMPACT RESIDENTIAL CONSUMERS?***

***A15.*** In addition to the health and safety issues discussed above, unaffordable electric service harms customers in financial ways that make maintaining utility service all the more difficult. For example, residential customers in the DP&L service territory are subject to a delayed payment charge<sup>28</sup> of 1.5 percent per month if the bill is not paid by the due date. Between 2010 and 2012, residential customers paid \$10,283,015 in delayed payment charges that could have been avoided if customers were able to pay their electric bill on time.<sup>29</sup> In addition, customers who are behind in payments or are disconnected for non-payment can be assessed an additional security deposit to reestablish creditworthiness.<sup>30</sup> These security deposits can be expensive (130 percent of the average annual monthly bill)<sup>31</sup> and

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<sup>27</sup> Id, at 10.

<sup>28</sup> Dayton Power and Light Tariff, Original Sheet No. D15, Page 1, (A)(1).

<sup>29</sup> DP&L Response to OCC Interrogatory No. 95 (Attached herein as JDW-12).

<sup>30</sup> Ohio Admin. Code 4901:1-17-04(B).

<sup>31</sup> Ohio Admin. Code 4901:1-17-05(A).

1 average \$148.00 for DP&L residential consumers.<sup>32</sup> For customers whose service  
2 was disconnected for non-payment, this security deposit can be another  
3 impediment to re-establishing service or may extend the time of disconnection.  
4 In fact, deposit amounts have increased by 37 percent in just the last six years.<sup>33</sup>  
5 In 2012, DP&L customers paid approximately \$5,000,000 dollars in deposits to  
6 establish or reestablish creditworthiness.<sup>34</sup> DP&L does not separately track if  
7 deposits are being collected to initiate, maintain, or as a condition to reconnect  
8 service.<sup>35</sup> Furthermore, customers who are disconnected for non-payment are  
9 required to pay reconnection charges<sup>36</sup> before service is restored. For the period  
10 2010 through 2012, DP&L's residential customers who were disconnected for  
11 non-payment paid approximately \$1,623,154 in reconnection charges to have  
12 services restored.<sup>37</sup> The bottom line is that the charges and fees associated with  
13 having services restored following a disconnection can be cost prohibitive for  
14 many consumers.

15  
16 ***Q16. ARE EXTRA CHARGES COLLECTED FOR PAYING BILLS FOR***  
17 ***RESIDENTIAL CUSTOMERS?***

18 ***A16.*** Yes.

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<sup>32</sup> DP&L Response to OCC Interrogatory No.98 (Attached herein as JDW-13).

<sup>33</sup> According to JDW-11, average deposit amounts were \$108 in 2007 and have increased 25 percent to \$148 in 2012.

<sup>34</sup> DP&L Response to OCC Interrogatory No. 97 (Attached herein as JDW-14).  $34,389 \times \$148.00 = \$5,089,572$ .

<sup>35</sup> Id.

<sup>36</sup> Dayton Power and Light Tariff, Second Revised Sheet No. D 26.

<sup>37</sup> DP&L Response to OCC Interrogatory No. 92 (Attached herein as JDW-15).



1

2 ***Q 17 WHAT ARE THE EXTRA CHARGES COLLECTED FOR PAYING BILLS***  
3 ***FOR RESIDENTIAL CONSUMERS?***

4 ***A17.*** Customers who pay the electric bill in person at an authorized agent are also  
5 subject to a \$1.50 charge for making the payment.<sup>38</sup> In 2012 alone, 341,272  
6 payments were made at authorized agents<sup>39</sup> at a total cost to residential consumers  
7 of approximately \$511,908. Bill payments that are made electronically via credit  
8 card or electronic checks are subject to charges of \$2.95 per payment.<sup>40</sup> In 2012,  
9 982,987 payments were made via credit card or electronic checks<sup>41</sup> at a cost to  
10 customers of \$2,899,812.<sup>42</sup> These charges are often referred to as “convenience”  
11 fees and the Commission has not approved the level of the charge.

12

13 ***Q18. DO THESE EXTRA CHARGES COLLECTED FOR PAYING BILLS***  
14 ***CONTRIBUTE TO THE UNAFFORDABILITY OF ELECTRIC SERVICE***  
15 ***RATES FOR RESIDENTIAL CONSUMERS?***

16 ***A18.*** Each of these costs, which are often incurred by at-risk customers, has a negative  
17 impact on the affordability of electric service for residential customers. Based on  
18 research of the impact that the charges have on low-income customers and  
19 customers struggling financially due to illness, layoffs, and other reasons, the

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<sup>38</sup><http://www.dpandl.com/customer-service/account-center/payment-options/>

<sup>39</sup> DP&L Response to OCC Interrogatory No. 102 (Attached herein as JDW-16).

<sup>40</sup> Id.

<sup>41</sup> Id.

<sup>42</sup> Id.

1 NASUCA recently sponsored a resolution urging the elimination of convenience  
2 fees for paying utility bills with debit and credit cards.<sup>43</sup>  
3

4 ***Q19. HOW DOES THE DP&L DISCONNECTION DATA COMPARE WITH THE***  
5 ***DISCONNECTION DATA OF OTHER OHIO ELECTRIC UTILITIES FOR***  
6 ***2012?***

7 ***A19.*** Table 3 below provides a comparison of the DP&L disconnection data that was  
8 presented earlier with similar disconnection data involving other large Ohio  
9 electric utilities. Although DP&L is one of the smallest of the EDU's operating in  
10 Ohio, DP&L has the largest percentage of customers being disconnected for non-  
11 payment, on payment plans, and defaulting on payment plans when compared to  
12 the data regarding residential customers of the other Ohio utilities.  
13

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<sup>43</sup> National Association of State Utility Consumer Advocates, Resolution 2012-07 Urging Utilities to Eliminate "Convenience" Fees for Paying Utility Bills With Debit and Credit Cards and Urging Appropriate State Regulatory Oversight, November 13, 2012.

**Table 3: Comparison of Electric Utility Disconnection and Payment Plan Data<sup>44</sup> (2012)**

<b>Utility<sup>45</sup></b>	<b>Number of Customers</b>	<b>Number of Disconnections</b>	<b>Percentage of Customers Disconnected</b>	<b>Customers on Extended Payment Plans</b>	<b>Percentage of Customers on Extended Payment Plans</b>	<b>Total Defaults on Payment Plans</b>	<b>Percentage of Customer Defaults</b>
<b>DP&amp;L</b>	455,890	34,389 <sup>46</sup>	7.5	22,701	5.0	7,382	32.5
<b>CSP</b>	674,006	45,969	6.8	24,761	3.7	2,003	8.1
<b>OPCo.</b>	605,446	37,718	6.2	16,767	2.8	1,242	7.4
<b>OE</b>	918,372	46,558	5.1	30,516	3.3	9,434	30.9
<b>TE</b>	271,999	9,508	3.5	10,930	4.0	2,002	18.3
<b>CEI</b>	660,757	17,169	2.6	20,720	3.1	4,142	20.0

As shown in Table 3 above, the residential customers of DP&L are far more likely to be disconnected for non-payment than customers of the other electric utilities. Whereas approximately 7.5 percent of all DP&L customers were disconnected in 2012, disconnections for other electric utilities averaged 4.8 percent. Even though DP&L has approximately 205,000 fewer residential customers compared to CEI, DP&L disconnected over twice the number of residential customers disconnected by CEI in 2012. In addition, whereas 32.5 percent of DP&L customers who were on extended payment plans defaulted on

<sup>44</sup>*In the Matter of the Commission's Review of Chapters 4901:1-17 and 4901:1-18, and Rules 4901:1-5-07, 4901:1-10-22, 4901:1-13-11, 4901:1-15-17, 4901:1-21-14, and 4901:1-29-12 of the Ohio Administrative Code*, Case No. 08-723-AU-ORD, PIPP Plus Metrics Data Reported to the PUCO Staff and provided to the OCC.

<sup>45</sup> This comparison involved data from electric utilities only. Duke Energy Ohio data was not included in the calculations because the Company is a combination gas and electric utility.

<sup>46</sup> Refer to JDW-2.

1 payments, the average default rate for the other Ohio electric utilities was only  
2 16.94 percent. The high disconnection rates for residential customers of DP&L --  
3 when compared with disconnection rates for residential customers of the other  
4 electric utilities -- leaves little doubt about the unaffordable nature of DP&L's  
5 electric service.

6  
7 ***Q20. IS THE HIGH PERCENTAGE OF DP&L CUSTOMERS THAT WERE***  
8 ***DISCONNECTED IN 2012 ISOLATED TO JUST A SINGLE YEAR?***

9 ***A20.*** Unfortunately the high percentage of DP&L customers that were disconnected in  
10 2012 is not unique to that year. Ohio Revised Code 4933.123 requires each  
11 energy company to file a written report with the PUCO and provide the OCC an  
12 annual report that includes among other requirements, reporting of the total  
13 number of disconnections for non-payment for the period June 1<sup>st</sup> through May  
14 31<sup>st</sup> of the following year.<sup>47</sup> I have summarized the number of disconnections that  
15 were reported by the different electric utilities for the last three years as shown in  
16 Table 4.

17  

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<sup>47</sup> R.C. 4933.123(B)(1) – (B)(6).

1      **Table 4: Comparison of State Disconnection Numbers (Electric Utilities<sup>48</sup>)**

Case No.	DP&L	AEP Ohio	CEI	OE	TE	Total
<b>10-1222-GE-UNC</b> 6/1/2009 – 5/31/2010	40,640	87,162 <sup>49</sup>	22,310	48,876	10,446	209,434
<b>11-2682-GE-UNC</b> 6/1/2010 – 5/31/2011	35,744	68,526 <sup>50</sup>	25,067	48,069	9,971	187,377
<b>12-1449-GE-UNC</b> 6/1/2011 – 5/31/2012	36,996	110,224	19,622	47,559	9,975	224,376
<b>Avg. # Customers<sup>51</sup></b>	<b>455,981</b>	<b>1,273,457</b>	<b>662,430</b>	<b>919,447</b>	<b>272,339</b>	<b>3,583,654</b>
Current Disconnection Rate	8.1%	8.6%	3.0%	5.2%	3.7%	6.3%
Disconnection Rate Change from 2011	.3%	3.2%	-.8%	-.06%	-	1.1%
3 Year Average Disconnection Rate	8.3%	7.0%	3.4%	5.2%	3.7%	5.8%

2

3      The number of DP&L disconnections in the most recent reporting period (June 1,

4      2011 – May 31, 2012) was 36,996 representing a disconnection rate of 8.1

5      percent. AEP Ohio had a slightly higher disconnection rate of 8.6% for the

6      period. The disconnection rate for the other electric utilities varied from 3 percent

7      to 5.2 percent. However, in reviewing the number of disconnections over a three-

8      year period, I observed that the DP&L disconnections are a much higher

9      percentage of total customers than the other Ohio electric utilities. I calculated a

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<sup>48</sup> Disconnection numbers for Duke Energy are not included because the reporting reflects natural gas and electric numbers.

<sup>49</sup> In the original filing, disconnection numbers for CSP and OPC were reported as 46,072 and 41,090 respectively for a total of 87,162.

<sup>50</sup> In the original filing, disconnection numbers for CSP and OPC were reported as 34,148 and 34,378 respectively for a total of 68,256.

<sup>51</sup> Average number of residential customers over the three years.

1       disconnection rate of 8.3 percent for DP&L which was significantly higher than  
2       any of the other Ohio electric utilities which averaged together was approximately  
3       4.8 percent.

4  
5       ***Q21. DOES THE HIGH POVERTY LEVEL IN DAYTON EXPLAIN WHY DP&L***  
6       ***HAS SUCH EXTRAORDINARILY HIGH DISCONNECTION RATES?***

7       ***A21.*** While it may be true that Dayton has a poverty level of 32.5 percent, other Ohio  
8       electric utilities provide service in cities that have poverty levels that exceed  
9       Dayton; yet the disconnection numbers are not close to DP&L.<sup>52</sup> For example,  
10      the poverty level in Cleveland<sup>53</sup> is 32.6 percent. Even with a Cleveland  
11      population that is 177 percent greater<sup>54</sup> than Dayton, the CEI disconnection rate is  
12      2.6 percent. The poverty level in Youngstown<sup>55</sup> is 33.8 percent; yet the Ohio  
13      Edison disconnection rate is 5.1 percent. The poverty level in Athens<sup>56</sup> is 53.3  
14      percent; yet the Columbus Southern Power disconnection rate is 6.8 percent.  
15      Additional economic information is provided later in this testimony. My point is  
16      that other Ohio electric utilities operate in areas with high poverty rates and are  
17      able to maintain lower disconnection numbers.

18  

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<sup>52</sup><http://quickfacts.census.gov/qfd/states/39000.html>.

<sup>53</sup>Id.

<sup>54</sup> According to quickfacts.census.gov, the population in Cleveland is 393,806 compared with a Dayton population of 142,148.

<sup>55</sup> Id.

<sup>56</sup> Id.

1   ***Q22. HOW DOES THE ELECTRIC BILL FOR DP&L RESIDENTIAL***  
2           ***CUSTOMERS COMPARE WITH THE ELECTRIC BILL OF CUSTOMERS***  
3           ***IN OTHER PARTS OF OHIO (ASSUMING A USAGE OF 750 KWH PER***  
4           ***MONTH)?***

5   **A22.** According to the PUCO Ohio Utility Rate Survey of January 15, 2013 (attached  
6       herein as JDW-17), DP&L residential electric bills are 10.9 percent higher than  
7       the average electric bill in the state. An average electric bill across eight Ohio  
8       cities was \$96.87 assuming usage of 750 KWH. However, DP&L electric bills  
9       are \$107.42 (the second highest in the state behind Columbus Southern Power)  
10      for the same usage. However, DP&L electric bills were 5.8 percent below the  
11      average electric bill in the state five years ago. According to the PUCO Ohio  
12      Utility Rate Survey of January 15, 2008 (attached herein as JDW-18), a DP&L  
13      electric bill with a usage of 750 KWH was \$76.98 compared with a state average  
14      of \$81.45. Electric rates have increased from \$0.10 per KWH in 2008 to \$0.14  
15      per KWH today in DP&L service territory. Table 5 provides an electric bill  
16      comparison from January 2008 with January 2013.

17

18      The Ohio Utility Rate Survey reflects the bills based on the rates that have been  
19      approved by the PUCO. If the Commission were to approve the DP&L ESP as  
20      filed, the bill impact for a residential consumer using 750 KWH is \$2.81 per  
21      month.<sup>57</sup> The residential bill would increase to \$110.23 per month or 13.8 percent  
22      higher than the average residential bill in the eight cities included in the survey.

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<sup>57</sup> DP&L Response to OCC Request for Production of Documents No. 52 (Attached herein as JDW-19).

1           However, DP&L has also filed an application to recover storm costs and the  
2           projected bill impact is \$2.08 per month.<sup>58</sup> The impact of the ESP and the storm  
3           cost recovery case could result in a DP&L customer using 750 KWH paying  
4           \$112.31 per month – almost 16 percent higher than the state average bill.

5                           **Table 5: Ohio Energy Bills – Residential Customers**  
6                           **Major Ohio Cities (January 2008 Compared with January 2013)**

City	January 2008		January 2013	
	Electric Bill*	Per KWH	Electric Bill*	Per KWH
Akron	\$89.43	\$0.12	\$93.53	\$0.12
Canton	\$62.97	\$0.08	\$100.33	\$0.13
Cincinnati	\$81.57	\$0.11	\$87.07	\$0.12
Cleveland	\$83.93	\$0.11	\$91.16	\$0.12
Columbus	\$78.56	\$0.10	\$110.33	\$0.15
<b>Dayton**</b>	<b>\$76.98</b>	<b>\$0.10</b>	<b>\$107.42</b>	<b>\$0.14</b>
Toledo	\$88.69	\$0.12	\$91.57	\$0.12
Youngstown	\$89.43	\$0.12	\$93.53	\$0.12
Average	\$81.45	\$0.11	\$96.87	\$0.13

7           \* Assumed 750KWH

8           \*\* Emphasis added.

9

10           ***Q23. DOES THE ECONOMY IN THE DP&L SERVICE TERRITORY***  
11           ***CONTRIBUTE TO CONCERNS ABOUT ELECTRIC AFFORDABILITY?***

12           ***A23. Yes.***

13

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<sup>58</sup> In the Matter of the Application of The Dayton Power and Light Company for Authority to Recover Certain Storm-Related Service Restoration Costs, Case No. 12-3062-EL-RDR, Application at 8 (December 21, 2012).



**Q24. HOW DO THE ECONOMIC CONDITIONS IN THE DP&L SERVICE  
TERRITORY CONTRIBUTE TO CONCERNS ABOUT ELECTRIC  
AFFORDABILITY?**

**A24.** The Ohio poverty level is 14.8 percent which is higher than the national average poverty level of 14.3 percent.<sup>59</sup> The poverty level in the DP&L service territory is even higher than the Ohio average. For example, the poverty level in Montgomery County is 16.0 percent.<sup>60</sup> The poverty level in the city of Dayton is 32.5 percent.<sup>61</sup> Making matters even worse, the unemployment levels in some parts of DP&L's service territory are above the state unemployment levels. Table 6 provides comparative economic information for parts of the DP&L service territory.<sup>62</sup> In addition, Table 6 provides information on the percentage of income that median income households in different locations across the DP&L service territory spend on electric service. A customer served by DP&L with a median household income of \$48,071 spends approximately 2.7 percent of their income on electric service. However, a customer in the city of Dayton with a median household income of \$28,843 spends approximately 4.4 percent of their annual income on electric costs.

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<sup>59</sup> Ohio Quick Facts from the U.S. Census Bureau (Attached herein as JDW-20).

<sup>60</sup> Montgomery County Quick Facts from the U.S. Census Bureau (Attached herein as JDW-21). Montgomery County is by far the most populated county in the DP&L service territory.

<sup>61</sup> Dayton Quick Facts from the U.S. Census Bureau (Attached herein as JDW-22). Dayton is by far the most populated city in the DP&L service territory.

<sup>62</sup> The comparison does not include data for every county in the DP&L service territory.

**Table 6: Comparison of Economic Information**

<b>Location</b>	<b>Persons Below Poverty (Percentage)<sup>63</sup></b>	<b>Unemployment Level 2010 (Percentage)<sup>64</sup></b>	<b>Median Household Income<sup>65</sup></b>	<b>Electric Costs as a Percentage of Annual Income<sup>66</sup></b>
United States	14.3	8.9	\$52,762	-
Ohio	14.8	10.1	\$48,071	2.7
Dayton	32.5	10.7 <sup>67</sup>	\$28,843	4.5
Fayette County <sup>68</sup>	18.5	11.5	\$39,263	3.3
Montgomery County	16.0	11.1	\$44,585	2.9
Clinton County <sup>69</sup>	14.8	16.4	\$47,264	2.7

***Q25. SHOULD DP&L'S FINANCIAL PERFORMANCE OVER THE LAST SEVERAL YEARS BE CONSIDERED IN REGARD TO THE AFFORDABILITY OF THE RATES IN DP&L'S PROPOSED ELECTRIC SECURITY PLAN?***

***A25.*** This issue is addressed in the testimony of OCC Witness, Dr. Daniel J. Duann.

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<sup>63</sup> <http://quickfacts.census.gov>.

<sup>64</sup> County profiles. [www.odjfs.org](http://www.odjfs.org).

<sup>65</sup> Id.

<sup>66</sup> Assuming constant usage of 750 KWH per month and the January 13, 2012 Ohio Utility Rate Survey cost for Dayton of \$107.42 multiplied by 12 or \$1,289 annually.

<sup>67</sup> <http://data.bls.gov/pdq/SurveyOutputServlet>.

<sup>68</sup> Fayette County Quick Facts from the U.S. Census Bureau (Attached herein as JDW-23).

<sup>69</sup> Clinton County Quick Facts from the U.S. Census Bureau (Attached herein as JDW-24).

1 **IV. RECOMMENDATIONS**

2

3 ***Q26. DO YOU HAVE ANY RECOMMENDATIONS FOR HOW YOUR***  
4 ***AFFORDABILITY CONCERNS CAN BE ADDRESSED BY THE***  
5 ***COMMISSION?***

6 ***A26.*** Yes.

7

8 ***Q27. WHAT ARE YOUR RECOMMENDATIONS FOR HOW AFFORDABILITY***  
9 ***CONCERNS CAN BE ADDRESSED BY THE COMMISSION?***

10 ***A27.*** I recommend that the Commission consider affordability in rendering a decision  
11 in this case. Consideration of affordability should include a review into the credit  
12 and collection policies and practices of DP&L to seek ways to reduce the overall  
13 number of disconnections for non-payment. While many of these policies are  
14 governed by the Ohio Admin Code 4901:1-18, these are minimum service  
15 standards. The Company can adopt other policies that are more conducive in  
16 helping reduce the number of disconnections. A review is necessary to ensure  
17 proper balance between the cost-effectiveness of different policies and practices,  
18 and the public interest in reducing the number of disconnections. Affordability is  
19 not an issue that is confined to just low-income families in the DP&L service  
20 territory. In fact, families in Dayton with incomes at the median household  
21 income levels do not even qualify for the low-income PIPP Plus program.<sup>70</sup> To

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<sup>70</sup> According to JDW-18, the average number of household members is 2.28 persons. To qualify for PIPP Plus, a family of three must have income below \$28,635 according to the HEAP Application on the Ohio

1           the extent these families get behind in electric payments, the Company is only  
2           obligated to offer one of the extended payment plans described earlier.

3  
4   ***Q28. PLEASE ELABORATE ON THE SCOPE OF THE REVIEW YOU ARE***  
5   ***RECOMMENDING TO REDUCE THE NUMBER OF DISCONNECTIONS?***

6   ***A28.*** I am recommending a review by the PUCO Staff, DP&L, OCC and other  
7           interested stakeholders to seek cost effective ways to enhance the current credit  
8           and collection policies and practices to reduce disconnections. The review should  
9           be performed with full disclosure in an open and public environment.<sup>71</sup> DP&L  
10          customers should not be held responsible for complying with classified credit and  
11          collection policies and practices in which they have no knowledge.

12  
13         The review should consider the possibility of suspending disconnections during  
14         inclement weather, adjusting due dates when possible, reducing payment plan  
15         costs, suspension of delayed payment charges, and reducing bill payment charges.  
16         Suspension of disconnections during times of especially hot or cold weather is  
17         necessary given the health and safety concerns mentioned earlier. The review  
18         should also consider suspending disconnections when temperatures are below 32

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Department of Development website.  
<http://development.ohio.gov/Community/ocs/Documents/HEAPApp.pdf>

<sup>71</sup> DP&L Response to OCC Request for Production of Documents No. 17 (Attached herein as JDW-25) indicates that the Company has designated its policies and practices as privileged and confidential. The review by the PUCO should include an open and public review of **all** credit and collection policies and practices.

1 degrees or higher than 90 degrees Fahrenheit.<sup>72</sup> Furthermore, the review should  
2 include an examination of the effectiveness of medical certifications for  
3 customers who have chronic illnesses.<sup>73</sup>

4  
5 The high number of customers who default on payment plans indicates that more  
6 customized payment plans may be needed to help reduce the number of defaults.  
7 Customized payment plans might include lower out-of pocket upfront payments  
8 and/or the use of ceiling amounts so that customers who are not eligible for PIPP  
9 Plus are able to pay an amount not to exceed say 5 percent of their monthly  
10 income<sup>74</sup> to maintain service. Adjusted due dates can help customers, who have  
11 fixed incomes, avoid late payment charges by coinciding the due date for electric  
12 bill payment with the time during the month that income is available. Limiting  
13 additional bill payment charges can help make more resources available for actual  
14 payment of electric charges.

15  
16 ***Q29. DO YOU HAVE OTHER RECOMMENDATIONS THAT SHOULD BE***  
17 ***CONSIDERED BY THE COMMISSION TO HELP REDUCE THE NUMBER***  
18 ***OF RESIDENTIAL CONSUMERS WHO HAVE THEIR ELECTRIC***  
19 ***SERVICE DISCONNECTED?***

20 ***A29.*** Yes.

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<sup>72</sup>*In the Matter of the Commission's Review of Chapters 4901:1-17 and 4901:1-18, and Rules 4901:1-5-07, 4901:1-10-22, 4901:1-13-11, 4901:1-15-17, 4901:1-21-14, and 4901:1-29-12 of the Ohio Administrative Code, Case 08-723-AU-ORD, Consumer Groups Initial Comments, (September 10, 2008), at 89.*

<sup>73</sup> Id. at 94.

<sup>74</sup> Id. at 86.

1   ***Q30. WHAT OTHER MEASURES WOULD HELP REDUCE THE NUMBER OF***  
2   ***DISCONNECTIONS?***

3   ***A30.*** The Company has funded a bill payment assistance program at a level of  
4       \$400,000 per year from 2009 through 2012.<sup>75</sup> In addition, the Company has  
5       continued the \$400,000 bill payment assistance through 2013.<sup>76</sup> However, as seen  
6       in Table 3 and 4, the disconnection rate in DP&L's service territory is the highest  
7       in the state despite the availability of bill payment assistance funds. This is not  
8       surprising considering that DP&L's electric bills rival the highest in the state.  
9       The Commission should encourage DP&L to initiate a shareholder-funded bill  
10      payment assistance program to help residential customers avoid disconnection of  
11      service.<sup>77</sup> Bill payment assistance can help make bills more affordable, reduce  
12      disconnections, and provide an opportunity for DP&L to enhance corporate  
13      citizenship. The bill payment assistance program should be in addition to all  
14      other financial assistance programs currently available to DP&L customers.<sup>78</sup>  
15      DP&L should collaborate with the PUCO Staff and OCC concerning the  
16      qualifications, methods and agencies that are available to distribute the bill  
17      payment assistance throughout its service territory.

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<sup>75</sup>*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, Stipulation and Recommendation, February 24, 2009, at 16.

<sup>76</sup>*In the Matter of the Application of The AES Corporation, Dolphin Sub, Inc., DPL Inc. and The Dayton Power and Light Company for Consent and Approval for a Change of Control of The Dayton Power and Light Company*, Case No. 11-3002-EL-MER, Stipulation and Recommendation, September 19, 2011, at 6(b).

<sup>77</sup> Qualifications for assistance should include any DP&L customer where the annual household income is at or below 200 percent of the federal poverty guidelines.

<sup>78</sup> DP&L Response to OCC Interrogatory No. 103 (Attached herein as JDW-26).

1           If DP&L would fund the bill payment program at a level of \$1.5 million per year,  
2           benefit amounts of approximately \$250.00 could help 6,000 or more low-income  
3           residential customers per year maintain electric service.<sup>79</sup> DP&L should continue  
4           funding the bill payment assistance program at the \$1.5 million per year level  
5           until such time as the trends in disconnection rates are more closely aligned with  
6           the disconnections of the other Ohio electric utilities.

7

8   **V.     CONCLUSION**

9

10   ***Q31.   DOES THIS CONCLUDE YOUR TESTIMONY?***

11   ***A31.***   Yes. However, I reserve the right to incorporate new information that may  
12           subsequently become available through outstanding discovery or otherwise.

---

<sup>79</sup> According to JDW-3, the average disconnection notice amount was \$272.00 in 2012. Assuming average benefits in the amount of \$250, a reduction of 6,000 disconnections would decrease the current 7.5 percent disconnection rate to approximately 6.2 percent. While this number is still considerably higher than the three year average disconnection rate of any other electric utility in the state, changes in credit and collection policies and practices should also have an impact on reducing the overall number of disconnections to levels more commensurate with the other electric utilities.

## **CERTIFICATE OF SERVICE**

It is hereby certified that a true copy of the foregoing *Testimony of James D.*

*Williams* has been served via electronic transmission this 1<sup>st</sup> day of March 2013.

/s/ Edmund (Tad) Berger  
Edmund (Tad) Berger  
Assistant Consumers' Counsel

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**Testimony of James D. Williams**  
**Filed at the Public Utilities Commission of Ohio**

1. *In the Matter of the Application of the Cincinnati Gas and Electric Company for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 95-0656-GA-AIR (August 12, 1996).*
2. *In the Matter of the Application of the Cincinnati Gas and Electric Company for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 01-1228-GA-AIR (February 15, 2002).*
3. *In the Matter of the Commission's Investigation into the Policies and Procedures of Ohio Power Company, Columbus Southern Power Company, The Cleveland Electric Illuminating Company, Ohio Edison Company, The Toledo Edison Company and Monongahela Power Company regarding installation of new line extensions, Case No. 01-2708-EL-COI (May 30, 2002).*
4. *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 07-0829-GA-AIR (June 23, 2008).*
5. *In the Matter of the Application of the Columbia Gas of Ohio, Inc. for Authority to Amend Filed Tariffs to Increase the Rates and Charges for Gas Distribution, Case No. 08-072-GA-AIR (September 25, 2008).*
6. *In the Matter of a Settlement Agreement Between the Staff of the Public Utilities Commission of Ohio, The Office of the Consumers' Counsel and Aqua Ohio, Inc. Relating to Compliance with Customer Service Terms and Conditions Outlined in the Stipulation and Recommendation in Case No. 07-564-WW-AIR and the Standards for Waterworks Companies and Disposal System Companies, Case No. 08-1125-WW-UNC (February 17, 2009).*
7. *In the Matter of the Application of the Ohio American Water Company to Increase its Rates for water and Sewer Services Provided to its Entire Service Area, Case No. 09-391-WS-AIR (January 4, 2010).*
8. *In the Matter of the Application of Aqua Ohio, Inc. for Authority to Increase its Rates and Charges in its Masury Division, Case No. 09-560-WW-AIR (February 22, 2010).*
9. *In the Matter of the Application of Aqua Ohio, Inc. for Authority to Increase its Rates and Charges in Its Lake Erie Division, Case No. 09-1044-WW-AIR (June 21, 2010).*

10. *In the Matter of the Application of The Ohio American Water Company to Increase its Rates for Water Service and Sewer Service*, Case No. 11-4161-WS-AIR (March 1, 2012).
11. *In the Matter of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan*, Case No. 11-346-EL-SSO, et al (May 4, 2012).
12. *In the Matter of the Application of The Dayton Power and Light Company for Approval of its Market Rate Offer*, Case No. 12-426-EL-SSO (August 6, 2012).

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Electric Security Plan	: : : :	Case No. 12-426-EL-SSO
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs	: : : :	Case No. 12-427-EL-ATA
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Authority	: : : :	Case No. 12-428-EL-AAM
In the Matter of the Application of The Dayton Power and Light Company for the Waiver of Certain Commission Rules	: : : :	Case No. 12-429-EL-WVR
In the Matter of the Application of The Dayton Power and Light Company to Establish Tariff Riders	: : : :	Case No. 12-672-EL-RDR

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**SUPPLEMENTAL OBJECTIONS AND RESPONSES OF  
THE DAYTON POWER AND LIGHT COMPANY TO  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
PROPOUNDED UPON THE DAYTON POWER AND LIGHT COMPANY  
FIFTEENTH SET (DATED NOVEMBER 29, 2012)**

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The Dayton Power and Light Company ("DP&L") objects and responds to The Office of the Ohio Consumers' Counsel's ("OCC") Interrogatories and Requests for Production of Documents, Fifteenth Set as follows.

**GENERAL OBJECTIONS**

1. DP&L objects to and declines to respond to each and every discovery request to the extent that it seeks information that is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence. Ohio Admin. Code § 4901-1-16(B).

Interrogatory 75: For calendar year 2007, 2008, 2009, 2010, and 2011, how many residential customers in the DP&L service territory were disconnected for non-payment?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that responsive data for residential customers is as follows:

2007	2008	2009	2010	2011	2012
35,005	35,382	42,909	35,020	38,398	33,478

Interrogatory 86: For each calendar year 2007, 2008, 2009, 2010, and 2011, how many residential customers were on the Percentage of Income Payment Plan ("PIPP") program or the PIPP Plus program?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that responsive data for residential customers is as follows:

2007	2008	2009	2010	2011	2012
21,242	24,641	28,969	32,425	34,045	35,715

DP&L notes that the responses are based on the number of PIPP customers at year end, with 2010 and 2011 figures also including GRAD PIPP customers.

Interrogatory 77: For calendar year 2007, 2008, 2009, 2010, and 2011, how many customers participated in a Commission-ordered payment plan (such as a one-third, one-sixth, or one-ninth payment plan) in order to avoid disconnection?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that responsive data for residential customers is as follows:

2007	2008	2009	2010	2011	2012
76,367	75,765	74,423	79,881	89,982	78,502

Interrogatory 89: For each calendar year 2007, 2008, 2009, 2010, and 2011, what was the average monthly electric bill amount for a PIPP or PIPP Plus customer?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that responsive data for residential customers is as follows:

2007	2008	2009	2010	2011	2012
\$93	\$97	\$104	\$126	\$139	\$132

DP&L notes that the responses are based on the number of PIPP customers at year end, with 2010 and 2011 figures also including GRAD PIPP customers.

Interrogatory 90: For each calendar year 2007, 2008, 2009, 2010, and 2011, what was the average monthly electric bill amount for a non-PIPP residential customer?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that responsive data for residential customers is as follows:

2007	2008	2009	2010	2011	2012
\$95	\$98	\$103	\$124	\$129	\$113



**Interrogatory 87:** For each calendar year 2007, 2008, 2009, 2010, and 2011, how many PIPP or PIPP Plus customers were disconnected for non-payment?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that responsive data for residential customers is as follows:

2007	2008	2009	2010	2011	2012
2,648	6,318	9,672	6,651	5,540	5,023

DP&L notes that the responses are based on the number of PIPP customers at year end, with 2010 and 2011 figures also including GRAD PIPP customers.

**Interrogatory 81:** For calendar year 2007, 2008, 2009, 2010, and 2011, how many residential customers used the Commission special winter reconnection procedures to have services restored following disconnection?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that responsive data for residential customers is as follows:

2007	2008	2009	2010	2011	2012
1,785	1,902	2,448	2,927	4,149	4,286

Interrogatory 76: Referring to the Company response to OCC Interrogatory No. 75, what was the average disconnection amount for each customer disconnected?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states responsive data for residential customers is as follows:

2007	2008	2009	2010	2011	2012
\$375	\$321	\$317	\$347	\$435	\$469

Interrogatory 83: Referring to the Company response to OCC Interrogatory No. 82, for customers who received a disconnection notice, what was the average amount owed on the disconnection notice?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that responsive data for residential customers is as follows:

2007	2008	2009	2010	2011	2012
\$192	\$187	\$189	\$211	\$248	\$272

Interrogatory 85: Referring to the Company response to OCC Interrogatory No. 82, for customers who had arrearages that were owed for more than 60 days, what was the average amount of the arrearage?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that responsive data for residential customers is as follows:

2007	2008	2009	2010	2011	2012
\$410	\$451	\$510	\$598	\$505	\$447

Interrogatory 95: Referring to the Company response to OCC Interrogatory No. 93, what were the total revenues collected in late payment charges per year?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that responsive data for residential customers is as follows:

2010	2011	2012
\$2,653,160	\$4,098,433	\$3,531,422

DP&L notes that only 24 months worth of data is readily available without creating undue burden, thus 2010 represents figures from April through December.

Interrogatory 98: Referring to the Company response to OCC Interrogatory No. 96, what was the average amount of the residential security deposits per year?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that responsive data for residential customers is as follows:

2007	2008	2009	2010	2011	2012
\$108	\$114	\$122	\$129	\$135	\$148

Interrogatory 97: For each calendar year 2007, 2008, 2009, 2010, and 2011, how many residential customers were assessed a security deposit as a condition for initiating service?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that responsive data for residential customers is as follows:

2007	2008	2009	2010	2011	2012
51,613	50,139	46,779	48,105	38,612	43,461

DP&L notes that deposit data is not separated into type and that the figures include initiating, restoring and maintaining service.



Interrogatory 92: Referring to the Company response to OCC Interrogatory No. 91, what were the total revenues collected in reconnection charges per year?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that responsive data for residential customers is as follows:

2010	2011	2012
\$469,074	\$620,224	\$533,856

DP&L notes that only 24 months worth of data is readily available without creating undue burden, thus 2010 represents figures from April through December.

Interrogatory 102: For each calendar year 2007, 2008, 2009, 2010, and 2011, how many residential customer payments were made via:

A. Authorized agents of the Company where a fee is assessed to collect the payment?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that payment statistics are not kept by customer class. The figures below include all payments.

2007	2008	2009	2010	2011	2012
478,872	358,872	401,274	377,036	373,267	341,272

B. Company business office locations where no additional fee is charged to accept payment?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that there are no business offices where customers can make payments in person.

C. Credit card or electronic check payments?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that payment statistics are not kept by customer class. The figures below include all payments. DP&L notes that 2011 figures include Electronic Bill Presentment and Payment ("EBPP") payments.

2007	2008	2009	2010	2011	2012
503,308	595,518	662,914	753,604	938,211	982,987

D. For payments that were made via credit card, how many of the payments were made for accounts that were in collection status at the time the payment was made?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (overbroad and unduly burdensome), and 4 (proprietary). Subject to all general objections, DP&L states that this information is unavailable.

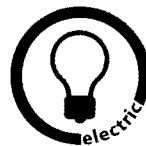


**The Public Utilities  
Commission of Ohio**

A report by the Staff of the  
Public Utilities Commission of Ohio

Ohio Utility Rate Survey

January 15, 2013



# Ohio Utility Bills - Residential Customers

## Comparison of Utility Bills 16 Major Ohio Cities

Rank	Cities	Combined Bill 01/15/12	Combined Bill 01/15/13	Electric Standard Service Offer* 01/15/13	Gas ** 01/15/13	Telephone*** 01/15/13
1	Ashtabula	\$192.45	\$187.10	\$91.16	\$76.35	\$19.59
2	Cleveland	194.68	191.00	91.16	76.35	23.49
3	Youngstown	188.78	191.42	93.53	76.35	21.54
4	Toledo	195.29	191.87	91.57	76.81	23.49
5	Akron	190.31	193.37	93.53	76.35	23.49
6	Marion	191.76	194.18	93.53	76.81	23.84
7	Lorain	188.21	195.35	93.53	76.81	25.01
8	Mansfield	195.08	197.95	93.53	76.81	27.61
9	Canton	190.66	200.17	100.33	76.35	23.49
10	Zanesville	190.09	200.63	100.33	76.81	23.49
11	Dayton	212.55	203.10	107.42	72.19	23.49
12	Lima	196.00	204.29	100.33	76.35	27.61
13	Marietta	194.71	210.17	110.33	76.35	23.49
14	Columbus	194.14	210.63	110.33	76.81	23.49
15	Cincinnati	211.59	213.39	87.07	95.55	30.77
16	Chillicothe	\$199.75	\$214.57	\$110.33	\$76.81	\$27.43
<b>Average</b>		<b>\$195.38</b>	<b>\$199.95</b>	<b>\$98.00</b>	<b>\$77.49</b>	<b>\$24.46</b>

Based on 750 KWH, 10 MCF, and Flat Rate Telephone Service

\* Price does not reflect savings available to customers participating in electric choice programs

\*\* Price does not reflect savings available to customers participating in gas choice programs

\*\*\* Price reflects incumbent local exchange carrier's flat rate, USF, SLC and 911

Combined Bill = Electric Standard Service Offer + Gas + Telephone

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## Ohio Utility Bills - Commercial Customers

### Comparison of Utility Bills 8 Major Ohio Cities

Rank	Cities	Combined Bill 01/15/12	Combined Bill 01/15/13	Electric Standard Service Offer* 01/15/13	Gas ** 01/15/13	Telephone*** 01/15/13
1	Cincinnati	\$28,919.77	\$28,939.98	\$28,539.51	\$345.40	\$55.07
2	Akron	28,905.29	30,207.95	29,844.25	325.68	38.02
3	Youngstown	28,931.09	30,227.23	29,844.25	345.40	37.58
4	Dayton	32,047.91	32,120.39	31,736.97	345.40	38.02
5	Toledo	35,358.63	32,298.84	31,915.42	345.40	38.02
6	Cleveland	35,027.50	32,553.82	32,156.32	359.48	38.02
7	Canton	34,008.22	33,847.42	33,483.72	325.68	38.02
8	Columbus	\$37,534.66	\$38,104.76	\$37,721.34	\$345.40	\$38.02
<b>Average</b>		<b>\$32,591.63</b>	<b>\$32,287.55</b>	<b>\$31,905.22</b>	<b>\$342.23</b>	<b>\$40.10</b>

Based on 300,000 KWH, 1,000 KWD, 46 MCF, and Business Rate Telephone Service

\* Price does not reflect savings available to customers participating in electric choice programs

\*\* Price does not reflect savings available to customers participating in gas choice programs

\*\*\* Price reflects incumbent local exchange carrier's flat rate, USF, SLC and 911

Combined Bill = Electric Standard Service Offer + Gas + Telephone

## Ohio Utility Bills - Industrial Customers

### Comparison of Utility Bills 8 Major Ohio Cities

Rank	Cities	Combined Bill 01/15/12	Combined Bill 01/15/13	Electric Standard Service Offer* 01/15/13	Gas ** 01/15/13	Telephone*** 01/15/13
1	Columbus	\$453,234.53	\$457,003.87	\$454,583.17	\$2,382.68	\$38.02
2	Cincinnati	457,186.54	475,801.71	473,363.96	2,382.68	55.07
3	Cleveland	447,079.63	488,470.08	485,911.71	2,520.35	38.02
4	Akron	420,347.19	492,317.93	489,563.11	2,716.80	38.02
5	Youngstown	420,348.42	492,318.74	489,563.11	2,716.80	38.83
6	Toledo	451,789.07	492,410.98	489,656.16	2,716.80	38.02
7	Canton	468,027.72	533,250.20	530,495.38	2,716.80	38.02
8	Dayton	\$573,314.25	\$572,163.98	\$569,901.99	\$2,223.97	\$38.02
<b>Average</b>		<b>\$461,415.92</b>	<b>\$500,467.19</b>	<b>\$497,879.82</b>	<b>\$2,547.11</b>	<b>\$40.25</b>

Based on 6,000,000 KWH, 20,000 KWD, 350 MCF, and Business Rate Telephone Service

\* Price does not reflect savings available to customers participating in electric choice programs

\*\* Price does not reflect savings available to customers participating in gas choice programs

\*\*\* Price reflects incumbent local exchange carrier's flat rate, USF, SLC and 911

Combined Bill = Electric Standard Service Offer + Gas + Telephone

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## Ohio Energy Bills - Residential Customers Major Ohio Cities As of January 15, 2013

Cities	2010 Population	Electric Bill	Per KWH	Gas Bill	Per MCF	GCR Rate
Akron	199,110.00	\$93.53	\$0.12	\$76.35	\$7.64	\$3.95
Canton	73,007.00	100.33	0.13	76.35	7.64	3.95
Cincinnati	296,943.00	87.07	0.12	76.81	7.68	5.07
Cleveland	396,815.00	91.16	0.12	95.55	9.56	3.95
Columbus	787,033.00	110.33	0.15	76.35	7.64	4.88
Dayton	141,527.00	107.42	0.14	72.19	7.22	4.45
Toledo	287,208.00	91.57	0.12	76.81	7.68	4.88
Youngstown	66,982.00	\$93.53	\$0.12	\$76.35	\$7.64	\$3.95
<b>Average</b>		<b>\$96.87</b>	<b>\$0.13</b>	<b>\$78.35</b>	<b>\$7.83</b>	<b>\$4.388</b>

Based on Usage of 750KWH and 10 MCF

## Ohio Energy Bills - Commercial Customers Major Ohio Cities As of January 15, 2013

Cities	2010 Population	Electric Bill	Per KWH	Gas Bill	Per MCF	GCR Rate
Akron	199,110.00	\$29,844.25	\$0.10	\$359.48	\$7.81	\$3.95
Canton	73,007.00	33,483.72	0.11	325.68	7.08	3.95
Cincinnati	296,943.00	28,539.51	0.10	345.40	7.51	5.07
Cleveland	396,815.00	32,156.32	0.11	359.48	7.81	3.95
Columbus	787,033.00	37,721.34	0.13	401.21	8.72	4.88
Dayton	141,527.00	31,736.97	0.11	345.40	7.51	4.45
Toledo	287,208.00	31,915.42	0.11	345.40	7.51	4.88
Youngstown	66,982.00	\$29,844.25	\$0.10	\$345.40	\$7.51	\$3.95
<b>Average</b>		<b>\$31,905.22</b>	<b>\$0.11</b>	<b>\$353.43</b>	<b>\$7.68</b>	<b>\$4.388</b>

Based on Usage of 300,000 KWH, 1,000 KWD and 46MCF

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# Ohio Energy Bills - Industrial Customers

## Major Ohio Cities

### As of January 15, 2013

Cities	2010 Population	Electric Bill	Per KWH	Gas Bill	Per MCF	GCR Rate
Akron	199,110.00	\$489,563.11	\$0.08	\$2,716.80	\$7.76	\$3.95
Canton	73,007.00	530,495.38	0.09	2,716.80	7.76	3.95
Cincinnati	296,943.00	473,363.96	0.08	2,382.68	6.81	5.07
Cleveland	396,815.00	485,911.71	0.08	2,520.35	7.20	3.95
Columbus	787,033.00	454,583.17	0.08	2,382.68	6.81	4.88
Dayton	141,527.00	569,901.99	0.09	2,223.97	6.35	4.45
Toledo	287,208.00	489,656.16	0.08	2,716.80	7.76	4.88
Youngstown	66,982.00	\$489,563.11	\$0.08	\$2,716.80	\$7.76	\$3.95
<b>Average</b>		<b>\$497,879.82</b>	<b>\$0.08</b>	<b>\$2,547.11</b>	<b>\$7.28</b>	<b>\$4.388</b>

Based on Usage of 6,000,000KWH, 20,000 KWD and 350 MCF

Cities	Electric	Gas	Telephone
Akron	Ohio Edison	Dominion	AT&T Ohio
Ashtabula	Cleveland Electric Illuminating	Dominion	Windstream
Canton	Ohio Power	Dominion	AT&T Ohio
Chillicothe	Columbus Southern Power	Columbia Gas	Horizon Chillicothe
Cincinnati	Duke Energy	Duke Energy	Cincinnati Bell
Cleveland	Cleveland Electric Illuminating	Dominion	AT&T Ohio
Columbus	Columbus Southern Power	Columbia Gas	AT&T Ohio
Dayton	Dayton Power & Light	Vectren	AT&T Ohio
Lima	Ohio Power	Dominion	Embarq
Lorain	Ohio Edison	Columbia Gas	CenturyTel
Mansfield	Ohio Edison	Columbia Gas	Embarq
Marietta	Columbus Southern Power	Dominion	AT&T Ohio
Marion	Ohio Edison	Columbia Gas	Verizon
Toledo	Toledo Edison	Columbia Gas	AT&T Ohio
Youngstown	Ohio Edison	Dominion	AT&T Ohio
Zanesville	Ohio Power	Columbia Gas	AT&T Ohio

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The Public Utilities  
Commission of Ohio

A report by the Staff of the  
Public Utilities Commission of Ohio

Ohio Utility Rate Survey

January 15, 2008



## Ohio Utility Bills - Residential Customers

### Comparison of Utility Bills 16 Major Ohio Cities

Rank	Cities	Combined Bill 01/15/06	Combined Bill 01/15/08	Electric Standard Service Offer* 01/15/08	Gas ** 01/15/08	Telephone*** 01/15/08
1	Canton	\$234.55	\$196.61	\$62.97	\$112.71	\$20.93
2	Lima	243.55	205.61	62.97	112.71	29.93
3	Dayton	227.57	207.73	76.98	109.82	20.93
4	Marietta	247.43	212.20	78.56	112.71	20.93
5	Ashtabula	255.96	214.38	83.93	112.71	17.74
6	Zanesville	246.84	217.52	62.97	133.62	20.93
7	Cleveland	259.15	217.57	83.93	112.71	20.93
8	Cincinnati	248.22	220.01	81.57	115.35	23.09
9	Akron	264.72	223.07	89.43	112.71	20.93
10	Youngstown	264.72	223.07	89.43	112.71	20.93
11	Columbus	259.72	233.11	78.56	133.62	20.93
12	Chillicothe	264.55	237.94	78.56	133.62	25.76
13	Toledo	275.65	243.24	88.69	133.62	20.93
14	Lorain	280.45	247.42	89.43	133.62	24.37
15	Marion	281.64	248.61	89.43	133.62	25.56
16	Mansfield	\$286.01	\$252.98	\$89.43	\$133.62	\$29.93
Average		\$258.80	\$225.07	\$80.43	\$121.84	\$22.80

Based on 750 KWH, 10 MCF, and Flat Rate Telephone Service

\* Price does not reflect savings available to customers participating in electric choice programs

\*\* Price does not reflect savings available to customers participating in gas choice programs

\*\*\* Price reflects incumbent local exchange carrier's basic service rate

Combined Bill = Electric Standard Service Offer + Gas + Telephone

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## Ohio Utility Bills - Commercial Customers

### Comparison of Utility Bills 8 Major Ohio Cities

Rank	Cities	Combined Bill 01/15/06	Combined Bill 01/15/08	Electric Standard Service Offer* 01/15/08	Gas ** 01/15/08	Telephone*** 01/15/08
1	Canton	\$17,921.16	19,938.72	\$19,366.74	\$532.25	\$39.73
2	Dayton	22,413.02	23,179.07	22,697.58	446.40	35.09
3	Cincinnati	23,835.94	26,113.92	25,532.81	476.99	104.12
4	Columbus	24,951.91	27,590.56	26,956.26	599.21	35.09
5	Cleveland	33,195.97	33,523.94	32,956.60	532.25	35.09
6	Akron	32,734.35	34,641.99	34,074.65	532.25	35.09
7	Youngstown	32,736.41	34,644.05	34,074.65	532.25	37.15
8	Toledo	\$36,238.73	\$37,238.08	\$36,603.78	\$599.21	\$35.09
<b>Average</b>		<b>\$28,003.44</b>	<b>\$29,608.79</b>	<b>\$29,032.88</b>	<b>\$531.35</b>	<b>\$44.56</b>

Based on 300,000 KWH, 1,000 KWD, 46 MCF, and Business Rate Telephone Service

\* Price does not reflect savings available to customers participating in electric choice programs

\*\* Price does not reflect savings available to customers participating in gas choice programs

\*\*\* Price reflects incumbent local exchange carrier's basic service rate

Combined Bill = Electric Standard Service Offer + Gas + Telephone

## Ohio Utility Bills - Industrial Customers

### Comparison of Utility Bills 8 Major Ohio Cities

Rank	Cities	Combined Bill 01/15/06	Combined Bill 01/15/08	Electric Standard Service Offer* 01/15/08	Gas ** 01/15/08	Telephone*** 01/15/08
1	Columbus	\$306,474.21	\$345,776.88	\$341,345.04	\$4,396.75	\$35.09
2	Canton	320,446.51	346,639.91	342,879.79	3,720.39	39.73
3	Dayton	400,431.33	418,113.33	414,717.41	3,360.83	35.09
4	Cincinnati	457,915.71	446,165.61	442,539.33	3,522.16	104.12
5	Akron	554,927.04	537,358.99	533,603.51	3,720.39	35.09
6	Youngstown	554,929.10	537,361.05	533,603.51	3,720.39	37.15
7	Cleveland	641,084.08	651,300.24	647,544.76	3,720.39	35.09
8	Toledo	\$786,045.84	\$796,577.46	\$792,145.62	\$4,396.75	\$35.09
<b>Average</b>		<b>\$502,781.73</b>	<b>\$509,911.68</b>	<b>\$506,047.37</b>	<b>\$3,819.75</b>	<b>\$44.56</b>

Based on 6,000,000 KWH, 20,000 KWD, 350 MCF, and Business Rate Telephone Service

\* Price does not reflect savings available to customers participating in electric choice programs

\*\* Price does not reflect savings available to customers participating in gas choice programs

\*\*\* Price reflects incumbent local exchange carrier's basic service rate

Combined Bill = Electric Standard Service Offer + Gas + Telephone

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## Ohio Energy Bills - Residential Customers Major Ohio Cities As of January 15, 2008

Cities	2000 Population	Electric Bill	Per KWH	Gas Bill	Per MCF	GCR Rate
Akron	217,074.00	\$89.43	\$0.12	\$112.71	\$11.27	\$9.02
Canton	80,806.00	62.97	0.08	112.71	11.27	9.02
Cincinnati	331,285.00	81.57	0.11	115.35	11.54	9.04
Cleveland	478,403.00	83.93	0.11	112.71	11.27	9.02
Columbus	711,740.00	78.56	0.10	133.62	13.36	10.38
Dayton	166,179.00	76.98	0.10	109.82	10.98	9.03
Toledo	313,619.00	88.69	0.12	133.62	13.36	10.38
Youngstown	82,026.00	\$89.43	\$0.12	\$112.71	\$11.27	\$9.02
<b>Average</b>		<b>\$81.45</b>	<b>\$0.11</b>	<b>\$117.91</b>	<b>\$11.79</b>	<b>\$9.36</b>

Based on Usage of 750KWH and 10 MCF

## Ohio Energy Bills - Commercial Customers Major Ohio Cities As of January 15, 2008

Cities	2000 Population	Electric Bill	Per KWH	Gas Bill	Per MCF	GCR Rate
Akron	217,074.00	\$34,074.65	\$0.11	\$532.25	\$11.57	\$9.02
Canton	80,806.00	19,366.74	0.06	532.25	11.57	9.02
Cincinnati	331,285.00	25,532.81	0.09	476.99	10.37	9.04
Cleveland	478,403.00	32,956.60	0.11	532.25	11.57	9.02
Columbus	711,740.00	26,956.26	0.09	599.21	13.03	10.38
Dayton	166,179.00	22,697.58	0.08	446.40	9.70	9.03
Toledo	313,619.00	36,603.78	0.12	599.21	13.03	10.38
Youngstown	82,026.00	\$34,074.65	\$0.11	\$532.25	\$11.57	\$9.02
<b>Average</b>		<b>\$29,032.88</b>	<b>\$0.10</b>	<b>\$531.35</b>	<b>\$11.55</b>	<b>\$9.3646</b>

Based on Usage of 300,000 KWH, 1,000 KWD and 46MCF

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## Ohio Energy Bills - Industrial Customers

### Major Ohio Cities

### As of January 15, 2008

Cities	2000 Population	Electric Bill	Per KWH	Gas Bill	Per MCF	GCR Rate
Akron	217,074.00	\$533,603.51	\$0.09	\$3,720.39	\$10.63	\$9.02
Canton	80,806.00	342,879.79	0.06	3,720.39	10.63	9.02
Cincinnati	331,285.00	442,539.33	0.07	3,522.16	10.06	9.04
Cleveland	478,403.00	647,544.76	0.11	3,720.39	10.63	9.02
Columbus	711,740.00	341,345.04	0.06	4,396.75	12.56	10.38
Dayton	166,179.00	414,717.41	0.07	3,360.83	9.60	9.03
Toledo	313,619.00	792,145.62	0.13	4,396.75	12.56	10.38
Youngstown	82,026.00	\$533,603.51	\$0.09	\$3,720.39	\$10.63	\$9.02
<b>Average</b>		<b>\$506,047.37</b>	<b>\$0.08</b>	<b>\$3,819.75</b>	<b>\$10.91</b>	<b>\$9.3646</b>

**Based on Usage of 6,000,000KWH, 20,000 KWD and 350 MCF**

Cities	Electric	Gas	Telephone
Akron	Ohio Edison	Dominion	AT&T Ohio
Ashtabula	Cleveland Electric Illuminating	Dominion	Windstream
Canton	Ohio Power	Dominion	AT&T Ohio
Chillicothe	Columbus Southern Power	Columbia Gas	Horizon Chillicothe
Cincinnati	Duke Energy	Duke Energy	Cincinnati Bell
Cleveland	Cleveland Electric Illuminating	Dominion	AT&T Ohio
Columbus	Columbus Southern Power	Columbia Gas	AT&T Ohio
Dayton	Dayton Power & Light	Vectren	AT&T Ohio
Lima	Ohio Power	Dominion	Embarq
Lorain	Ohio Edison	Columbia Gas	CenturyTel
Mansfield	Ohio Edison	Columbia Gas	Embarq
Marietta	Columbus Southern Power	Dominion	AT&T Ohio
Marion	Ohio Edison	Columbia Gas	Verizon
Toledo	Toledo Edison	Columbia Gas	AT&T Ohio
Youngstown	Ohio Edison	Dominion	AT&T Ohio
Zanesville	Ohio Power	Columbia Gas	AT&T Ohio



RPD-52. Referring to the Company's responses to OCC Request for Production of Documents 25 and 26, please update the Company's responses and provide any and all documents (including memoranda, reports, studies and analysis) that indicate whether affordability was considered in the proposed ESP.

**RESPONSE:** General Objections Nos. 2 (unduly burdensome), 3 (privileged and work product), 7 (available on PUCO website), and 9 (vague). Subject to all general objections, DP&L states that that the Rate Blending Plan, as included in the ESP filing, discusses how the Company's plan provides an overall revenue decrease of approximately \$46 million, with per-bill decreases for non-residential customers between 0 and 3%. Residential customers that use 750 kWh per month will experience a slight bill increase of \$2.81, or 2.61%.



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State &amp; County QuickFacts

## Ohio

People QuickFacts	Ohio	USA
Population, 2012 estimate	11,544,225	313,914,040
Population, 2011 estimate	11,541,007	311,587,816
Population, 2010 (April 1) estimates base	11,536,502	308,747,508
Population, percent change, April 1, 2010 to July 1, 2012	0.1%	1.7%
Population, percent change, April 1, 2010 to July 1, 2011	Z	0.9%
Population, 2010	11,536,504	308,745,538
Persons under 5 years, percent, 2011	6.2%	6.5%
Persons under 18 years, percent, 2011	23.3%	23.7%
Persons 65 years and over, percent, 2011	14.3%	13.3%
Female persons, percent, 2011	51.2%	50.8%
White persons, percent, 2011 (a)	83.6%	78.1%
Black persons, percent, 2011 (a)	12.4%	13.1%
American Indian and Alaska Native persons, percent, 2011 (a)	0.3%	1.2%
Asian persons, percent, 2011 (a)	1.7%	5.0%
Native Hawaiian and Other Pacific Islander persons, percent, 2011 (a)	Z	0.2%
Persons reporting two or more races, percent, 2011	1.9%	2.3%
Persons of Hispanic or Latino Origin, percent, 2011 (b)	3.2%	16.7%
White persons not Hispanic, percent, 2011	81.0%	63.4%
Living in same house 1 year & over, percent, 2007-2011	85.3%	84.6%
Foreign born persons, percent, 2007-2011	3.9%	12.8%
Language other than English spoken at home, percent age 5+, 2007-2011	6.5%	20.3%
High school graduate or higher, percent of persons age 25+, 2007-2011	87.8%	85.4%
Bachelor's degree or higher, percent of persons age 25+, 2007-2011	24.5%	28.2%
Veterans, 2007-2011	914,971	22,215,303
Mean travel time to work (minutes), workers age 16+, 2007-2011	22.9	25.4
Housing units, 2011	5,133,446	132,312,404
Homeownership rate, 2007-2011	68.7%	66.1%
Housing units in multi-unit structures, percent, 2007-2011	22.9%	25.9%
Median value of owner-occupied housing units, 2007-2011	\$135,600	\$186,200
Households, 2007-2011	4,554,007	114,761,359
Persons per household, 2007-2011	2.46	2.60
Per capita money income in the past 12 months (2011 dollars), 2007-2011	\$25,618	\$27,915
Median household income, 2007-2011	\$48,071	\$52,762
Persons below poverty level, percent, 2007-2011	14.8%	14.3%
Business QuickFacts	Ohio	USA
Private nonfarm establishments, 2010	253,491 <sup>1</sup>	7,396,628
Private nonfarm employment, 2010	4,352,481 <sup>1</sup>	111,970,095
Private nonfarm employment, percent change, 2000-2010	-13.0 <sup>1</sup>	-1.8
Nonemployer establishments, 2010	730,393	22,110,628
Total number of firms, 2007	897,939	27,092,908
Black-owned firms, percent, 2007	5.8%	7.1%
American Indian- and Alaska Native-owned firms, percent, 2007	0.3%	0.9%
Asian-owned firms, percent, 2007	2.0%	5.7%
Native Hawaiian and Other Pacific Islander-owned firms, percent, 2007	S	0.1%
Hispanic-owned firms, percent, 2007		

	1.1%	8.3%
Women-owned firms, percent, 2007	27.7%	28.8%
<hr/>		
Manufacturers shipments, 2007 (\$1000)	295,890,890	5,338,306,501
Merchant wholesaler sales, 2007 (\$1000)	135,575,279	4,174,286,516
Retail sales, 2007 (\$1000)	138,816,008	3,917,663,456
Retail sales per capita, 2007	\$12,049	\$12,990
Accommodation and food services sales, 2007 (\$1000)	17,779,905	613,795,732
Building permits, 2011	13,762	624,061
<hr/>		
<b>Geography QuickFacts</b>	<b>Ohio</b>	<b>USA</b>
Land area in square miles, 2010	40,860.69	3,531,905.43
Persons per square mile, 2010	282.3	87.4
FIPS Code	39	

1: Includes data not distributed by county.

(a) Includes persons reporting only one race.

(b) Hispanics may be of any race, so also are included in applicable race categories.

D: Suppressed to avoid disclosure of confidential information

F: Fewer than 100 firms

FN: Footnote on this item for this area in place of data

NA: Not available

S: Suppressed; does not meet publication standards

X: Not applicable

Z: Value greater than zero but less than half unit of measure shown

Source U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, American Community Survey, Census of Population and Housing, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits, Consolidated Federal Funds Report  
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State &amp; County QuickFacts

**Montgomery County, Ohio**

<b>People QuickFacts</b>	<b>Montgomery County</b>	<b>Ohio</b>
Population, 2012 estimate	NA	11,544,225
Population, 2011 estimate	537,602	11,541,007
Population, 2010 (April 1) estimates base	535,153	11,536,502
Population, percent change, April 1, 2010 to July 1, 2012	NA	0.1%
Population, percent change, April 1, 2010 to July 1, 2011	0.5%	Z
Population, 2010	535,153	11,536,504
Persons under 5 years, percent, 2011	6.2%	6.2%
Persons under 18 years, percent, 2011	22.7%	23.3%
Persons 65 years and over, percent, 2011	15.8%	14.3%
Female persons, percent, 2011	52.0%	51.2%
White persons, percent, 2011 (a)	74.7%	83.6%
Black persons, percent, 2011 (a)	21.0%	12.4%
American Indian and Alaska Native persons, percent, 2011 (a)	0.3%	0.3%
Asian persons, percent, 2011 (a)	1.8%	1.7%
Native Hawaiian and Other Pacific Islander persons, percent, 2011 (a)	Z	Z
Persons reporting two or more races, percent, 2011	2.3%	1.9%
Persons of Hispanic or Latino Origin, percent, 2011 (b)	2.4%	3.2%
White persons not Hispanic, percent, 2011	72.8%	81.0%
Living in same house 1 year & over, percent, 2007-2011	82.0%	85.3%
Foreign born persons, percent, 2007-2011	3.5%	3.9%
Language other than English spoken at home, percent age 5+, 2007-2011	5.3%	6.5%
High school graduate or higher, percent of persons age 25+, 2007-2011	88.1%	87.8%
Bachelor's degree or higher, percent of persons age 25+, 2007-2011	24.4%	24.5%
Veterans, 2007-2011	48,889	914,971
Mean travel time to work (minutes), workers age 16+, 2007-2011	21.1	22.9
Housing units, 2011	254,513	5,133,446
Homeownership rate, 2007-2011	64.0%	68.7%
Housing units in multi-unit structures, percent, 2007-2011	26.0%	22.9%
Median value of owner-occupied housing units, 2007-2011	\$118,600	\$135,600
Households, 2007-2011	223,546	4,554,007
Persons per household, 2007-2011	2.31	2.46
Per capita money income in the past 12 months (2011 dollars), 2007-2011	\$25,225	\$25,618
Median household income, 2007-2011	\$44,585	\$48,071
Persons below poverty level, percent, 2007-2011	16.0%	14.8%
<b>Business QuickFacts</b>	<b>Montgomery County</b>	<b>Ohio</b>
Private nonfarm establishments, 2010	11,638	253,491 <sup>1</sup>
Private nonfarm employment, 2010	217,779	4,352,481 <sup>1</sup>
Private nonfarm employment, percent change, 2000-2010	-24.8	-13.0 <sup>1</sup>
Nonemployer establishments, 2010	30,894	730,393
Total number of firms, 2007	37,894	897,939
Black-owned firms, percent, 2007	10.7%	5.8%
American Indian- and Alaska Native-owned firms, percent, 2007	0.3%	0.3%
Asian-owned firms, percent, 2007	2.6%	2.0%

Native Hawaiian and Other Pacific Islander-owned firms, percent, 2007	F	S
Hispanic-owned firms, percent, 2007	0.9%	1.1%
Women-owned firms, percent, 2007	29.6%	27.7%

Manufacturers shipments, 2007 (\$1000)	14,049,197	295,890,890
Merchant wholesaler sales, 2007 (\$1000)	3,766,651	135,575,279
Retail sales, 2007 (\$1000)	6,844,551	138,816,008
Retail sales per capita, 2007	\$12,719	\$12,049
Accommodation and food services sales, 2007 (\$1000)	882,692	17,779,905
Building permits, 2011	373	13,762

<b>Geography QuickFacts</b>	<b>Montgomery County</b>	<b>Ohio</b>
Land area in square miles, 2010	461.55	40,860.69
Persons per square mile, 2010	1,159.5	282.3
FIPS Code	113	39
Metropolitan or Micropolitan Statistical Area	Dayton, OH Metro Area	

1: Includes data not distributed by county.

(a) Includes persons reporting only one race.

(b) Hispanics may be of any race, so also are included in applicable race categories.

D: Suppressed to avoid disclosure of confidential information

F: Fewer than 100 firms

FN: Footnote on this item for this area in place of data

NA: Not available

S: Suppressed; does not meet publication standards

X: Not applicable

Z: Value greater than zero but less than half unit of measure shown

Source U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, American Community Survey, Census of Population and Housing, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits, Consolidated Federal Funds Report  
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State &amp; County QuickFacts

**Dayton (city), Ohio**

<b>People QuickFacts</b>	<b>Dayton</b>	<b>Ohio</b>
Population, 2011 estimate	142,148	11,541,007
Population, 2010 (April 1) estimates base	141,527	11,536,502
Population, percent change, April 1, 2010 to July 1, 2011	0.4%	Z
Population, 2010	141,527	11,536,504
Persons under 5 years, percent, 2010	6.9%	6.2%
Persons under 18 years, percent, 2010	22.9%	23.7%
Persons 65 years and over, percent, 2010	11.8%	14.1%
Female persons, percent, 2010	51.3%	51.2%
White persons, percent, 2010 (a)	51.7%	82.7%
Black persons, percent, 2010 (a)	42.9%	12.2%
American Indian and Alaska Native persons, percent, 2010 (a)	0.3%	0.2%
Asian persons, percent, 2010 (a)	0.9%	1.7%
Native Hawaiian and Other Pacific Islander, percent, 2010 (a)	Z	0.0%
Persons reporting two or more races, percent, 2010	2.9%	2.1%
Persons of Hispanic or Latino origin, percent, 2010 (b)	3.0%	3.1%
White persons not Hispanic, percent, 2010	50.5%	81.1%
Living in same house 1 year & over, percent, 2007-2011	72.6%	85.3%
Foreign born persons, percent, 2007-2011	3.1%	3.9%
Language other than English spoken at home, percent age 5+, 2007-2011	4.8%	6.5%
High school graduate or higher, percent of persons age 25+, 2007-2011	81.3%	87.8%
Bachelor's degree or higher, percent of persons age 25+, 2007-2011	15.0%	24.5%
Veterans, 2007-2011	10,992	914,971
Mean travel time to work (minutes), workers age 16+, 2007-2011	20.2	22.9
Housing units, 2010	74,065	5,127,508
Homeownership rate, 2007-2011	48.7%	68.7%
Housing units in multi-unit structures, percent, 2007-2011	31.6%	22.9%
Median value of owner-occupied housing units, 2007-2011	\$76,000	\$135,600
Households, 2007-2011	57,843	4,554,007
Persons per household, 2007-2011	2.22	2.46
Per capita money income in the past 12 months (2011 dollars), 2007-2011	\$16,424	\$25,618
Median household income, 2007-2011	\$28,843	\$48,071
Persons below poverty level, percent, 2007-2011	32.5%	14.8%
<b>Business QuickFacts</b>	<b>Dayton</b>	<b>Ohio</b>
Total number of firms, 2007	9,071	897,939
Black-owned firms, percent, 2007	22.9%	5.8%
American Indian- and Alaska Native-owned firms, percent, 2007	F	0.3%
Asian-owned firms, percent, 2007	2.2%	2.0%
Native Hawaiian and Other Pacific Islander-owned firms, percent, 2007	F	S
Hispanic-owned firms, percent, 2007	1.3%	1.1%
Women-owned firms, percent, 2007	32.3%	27.7%
Manufacturers shipments, 2007 (\$1000)	3,197,109	295,890,890
Merchant wholesaler sales, 2007 (\$1000)	1,370,377	135,575,279
Retail sales, 2007 (\$1000)	961,298	138,816,008
Retail sales per capita, 2007	\$6,181	\$12,049
Accommodation and food services sales, 2007 (\$1000)		

	190,854	17,779,905
<b>Geography QuickFacts</b>	<b>Dayton</b>	<b>Ohio</b>
Land area in square miles, 2010	55.65	40,860.69
Persons per square mile, 2010	2,543.1	282.3
FIPS Code	21000	39
Counties		

(a) Includes persons reporting only one race.

(b) Hispanics may be of any race, so also are included in applicable race categories.

D: Suppressed to avoid disclosure of confidential information

F: Fewer than 100 firms

FN: Footnote on this item for this area in place of data

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Z: Value greater than zero but less than half unit of measure shown

Source U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, American Community Survey, Census of Population and Housing, County Business Patterns, Economic Census, Survey of Business Owners, Building Permits, Consolidated Federal Funds Report, Census of Governments  
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State &amp; County QuickFacts

## Fayette County, Ohio

People QuickFacts	Fayette County	Ohio
Population, 2012 estimate	NA	11,544,225
Population, 2011 estimate	28,985	11,541,007
Population, 2010 (April 1) estimates base	29,030	11,536,502
Population, percent change, April 1, 2010 to July 1, 2012	NA	0.1%
Population, percent change, April 1, 2010 to July 1, 2011	-0.2%	Z
Population, 2010	29,030	11,536,504
Persons under 5 years, percent, 2011	6.8%	6.2%
Persons under 18 years, percent, 2011	24.4%	23.3%
Persons 65 years and over, percent, 2011	15.1%	14.3%
Female persons, percent, 2011	50.7%	51.2%
White persons, percent, 2011 (a)	95.1%	83.6%
Black persons, percent, 2011 (a)	2.3%	12.4%
American Indian and Alaska Native persons, percent, 2011 (a)	0.3%	0.3%
Asian persons, percent, 2011 (a)	0.6%	1.7%
Native Hawaiian and Other Pacific Islander persons, percent, 2011 (a)	Z	Z
Persons reporting two or more races, percent, 2011	1.6%	1.9%
Persons of Hispanic or Latino Origin, percent, 2011 (b)	1.9%	3.2%
White persons not Hispanic, percent, 2011	93.5%	81.0%
Living in same house 1 year & over, percent, 2007-2011	83.6%	85.3%
Foreign born persons, percent, 2007-2011	1.4%	3.9%
Language other than English spoken at home, percent age 5+, 2007-2011	3.0%	6.5%
High school graduate or higher, percent of persons age 25+, 2007-2011	80.9%	87.8%
Bachelor's degree or higher, percent of persons age 25+, 2007-2011	13.4%	24.5%
Veterans, 2007-2011	2,462	914,971
Mean travel time to work (minutes), workers age 16+, 2007-2011	23.4	22.9
Housing units, 2011	12,688	5,133,446
Homeownership rate, 2007-2011	63.0%	68.7%
Housing units in multi-unit structures, percent, 2007-2011	16.9%	22.9%
Median value of owner-occupied housing units, 2007-2011	\$110,000	\$135,600
Households, 2007-2011	11,543	4,554,007
Persons per household, 2007-2011	2.46	2.46
Per capita money income in the past 12 months (2011 dollars), 2007-2011	\$20,523	\$25,618
Median household income, 2007-2011	\$39,263	\$48,071
Persons below poverty level, percent, 2007-2011	18.5%	14.8%
Business QuickFacts	Fayette County	Ohio
Private nonfarm establishments, 2010	615	253,491 <sup>1</sup>
Private nonfarm employment, 2010	9,363	4,352,481 <sup>1</sup>
Private nonfarm employment, percent change, 2000-2010	-2.5	-13.0 <sup>1</sup>
Nonemployer establishments, 2010	1,440	730,393
Total number of firms, 2007	1,761	897,939
Black-owned firms, percent, 2007	F	5.8%
American Indian- and Alaska Native-owned firms, percent, 2007	F	0.3%
Asian-owned firms, percent, 2007	F	2.0%
Native Hawaiian and Other Pacific Islander-owned firms, percent, 2007	F	S

Hispanic-owned firms, percent, 2007	F	1.1%
Women-owned firms, percent, 2007	21.4%	27.7%
<hr/>		
Manufacturers shipments, 2007 (\$1000)	975,549	295,890,890
Merchant wholesaler sales, 2007 (\$1000)	D	135,575,279
Retail sales, 2007 (\$1000)	610,736	138,816,008
Retail sales per capita, 2007	\$21,602	\$12,049
Accommodation and food services sales, 2007 (\$1000)	38,947	17,779,905
Building permits, 2011	20	13,762

<b>Geography QuickFacts</b>	<b>Fayette County</b>	<b>Ohio</b>
Land area in square miles, 2010	406.36	40,860.69
Persons per square mile, 2010	71.4	282.3
FIPS Code	047	39
Metropolitan or Micropolitan Statistical Area	Washington Court House, OH Micro Area	

1: Includes data not distributed by county.

(a) Includes persons reporting only one race.

(b) Hispanics may be of any race, so also are included in applicable race categories.

D: Suppressed to avoid disclosure of confidential information

F: Fewer than 100 firms

FN: Footnote on this item for this area in place of data

NA: Not available

S: Suppressed; does not meet publication standards

X: Not applicable

Z: Value greater than zero but less than half unit of measure shown

Source: U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, American Community Survey, Census of Population and Housing, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits, Consolidated Federal Funds Report  
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State &amp; County QuickFacts

## Clinton County, Ohio

People QuickFacts	Clinton County	Ohio
Population, 2012 estimate	NA	11,544,225
Population, 2011 estimate	41,927	11,541,007
Population, 2010 (April 1) estimates base	42,040	11,536,502
Population, percent change, April 1, 2010 to July 1, 2012	NA	0.1%
Population, percent change, April 1, 2010 to July 1, 2011	-0.3%	Z
Population, 2010	42,040	11,536,504
Persons under 5 years, percent, 2011	6.3%	6.2%
Persons under 18 years, percent, 2011	24.3%	23.3%
Persons 65 years and over, percent, 2011	13.7%	14.3%
Female persons, percent, 2011	51.0%	51.2%
White persons, percent, 2011 (a)	95.0%	83.6%
Black persons, percent, 2011 (a)	2.4%	12.4%
American Indian and Alaska Native persons, percent, 2011 (a)	0.3%	0.3%
Asian persons, percent, 2011 (a)	0.5%	1.7%
Native Hawaiian and Other Pacific Islander persons, percent, 2011 (a)	Z	Z
Persons reporting two or more races, percent, 2011	1.8%	1.9%
Persons of Hispanic or Latino Origin, percent, 2011 (b)	1.5%	3.2%
White persons not Hispanic, percent, 2011	93.7%	81.0%
Living in same house 1 year & over, percent, 2007-2011	86.4%	85.3%
Foreign born persons, percent, 2007-2011	1.1%	3.9%
Language other than English spoken at home, percent age 5+, 2007-2011	1.8%	6.5%
High school graduate or higher, percent of persons age 25+, 2007-2011	87.2%	87.8%
Bachelor's degree or higher, percent of persons age 25+, 2007-2011	14.6%	24.5%
Veterans, 2007-2011	3,848	914,971
Mean travel time to work (minutes), workers age 16+, 2007-2011	25.7	22.9
Housing units, 2011	18,105	5,133,446
Homeownership rate, 2007-2011	70.8%	68.7%
Housing units in multi-unit structures, percent, 2007-2011	15.8%	22.9%
Median value of owner-occupied housing units, 2007-2011	\$123,800	\$135,600
Households, 2007-2011	16,190	4,554,007
Persons per household, 2007-2011	2.55	2.46
Per capita money income in the past 12 months (2011 dollars), 2007-2011	\$22,582	\$25,618
Median household income, 2007-2011	\$47,264	\$48,071
Persons below poverty level, percent, 2007-2011	14.8%	14.8%
Business QuickFacts	Clinton County	Ohio
Private nonfarm establishments, 2010	763	253,491 <sup>1</sup>
Private nonfarm employment, 2010	13,518	4,352,481 <sup>1</sup>
Private nonfarm employment, percent change, 2000-2010	-43.1	-13.0 <sup>1</sup>
Nonemployer establishments, 2010	2,661	730,393
Total number of firms, 2007	3,210	897,939
Black-owned firms, percent, 2007	S	5.8%
American Indian- and Alaska Native-owned firms, percent, 2007	F	0.3%
Asian-owned firms, percent, 2007	S	2.0%
Native Hawaiian and Other Pacific Islander-owned firms, percent, 2007	F	S

Hispanic-owned firms, percent, 2007	F	1.1%
Women-owned firms, percent, 2007	22.6%	27.7%
<hr/>		
Manufacturers shipments, 2007 (\$1000)	1,025,387	295,890,890
Merchant wholesaler sales, 2007 (\$1000)	D	135,575,279
Retail sales, 2007 (\$1000)	450,943	138,816,008
Retail sales per capita, 2007	\$10,489	\$12,049
Accommodation and food services sales, 2007 (\$1000)	62,173	17,779,905
Building permits, 2011	22	13,762

<b>Geography QuickFacts</b>	<b>Clinton County</b>	<b>Ohio</b>
Land area in square miles, 2010	408.68	40,860.69
Persons per square mile, 2010	102.9	282.3
FIPS Code	027	39
Metropolitan or Micropolitan Statistical Area	Wilmington, OH Micro Area	

1: Includes data not distributed by county.

(a) Includes persons reporting only one race.

(b) Hispanics may be of any race, so also are included in applicable race categories.

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Source U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, American Community Survey, Census of Population and Housing, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits, Consolidated Federal Funds Report  
Last Revised: Thursday, 10-Jan-2013 15:16:19 EST

**RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

17. Provide a copy of all current credit and collection policies and practices of the Company related to residential customers

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (unduly burdensome), 3 (privileged and work product), 4 (proprietary), and 9 (vague or undefined). Subject to all general objections, DP&L states that it will produce responsive unprivileged documents.

Interrogatory 103: Please describe each financial assistance program that is available to assist DP&L customers?

**RESPONSE:** General Objections Nos. 1 (relevance), 2 (unduly burdensome), 4 (proprietary), 6 (calls for narrative answer), and 9 (vague or undefined). Subject to all general objections, DP&L states that the following financial assistance programs are available to customers:

- Home Energy Assistance Program ("HEAP") - Federal funds available via the Ohio Dept. of Development for low income customers.
- Emergency-HEAP - Federal funds available via the Ohio Dept. of Development for low-income customers in danger of disconnection of service or reconnection of service due to non-payment. Also available for low-income customers to start new service.
- Fuel Fund Assistance - Funds provided by DP&L to Ohio Partners for Affordable Energy to assist low-income customers or customers who are at-risk of losing electric service.
- Jobs and Family Services ("J&FS") Assistance - State Funds for low-income customers.
- Community Services Block Grant ("CSBG") - Federal funds for low-income customers.
- Other assistance is available from various other sources such as, FISH, St. Vincent DePaul, Salvation Army, numerous churches, etc.
- Percentage of Income Payment Plan Plus ("PIPP Plus") - low-income payment program that enables customers to have a portion or all of their arrears forgiven if the customer pays their monthly installments. PIPP is administered by the Ohio Dept. of Development.

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

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**in**

**Case No(s). 12-0426-EL-SSO, 12-0427-EL-ATA, 12-0428-EL-AAM, 12-0429-EL-WVR, 12-0672-EL-RDR**

Summary: Testimony Direct Testimony of James D. Williams on Behalf of the Office of the Ohio Consumers' Counsel electronically filed by Patti Mallarnee on behalf of Berger, Edmund "Tad" Mr.