

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the Application of The)	
Dayton Power and Light Company for)	Case No. 16-0649-EL-POR
Approval of its Energy Efficiency and Peak)	Case No. 16-1369-EI-WVR
Demand Reduction Program Portfolio)	
Plan for 2017 through 2019.		

OBJECTIONS OF INTERSTATE GAS SUPPLY INC.

Joseph Olikier (0086088)
Email: joliker@igsenergy.com
Counsel of Record
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
Telephone: (614) 659-5000
Facsimile: (614) 659-5073

Attorney for IGS Energy

August 15, 2016

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the Application of The)	
Dayton Power and Light Company for)	Case No. 16-0649-EL-POR
Approval of its Energy Efficiency and Peak)	Case No. 16-1369-EI-WVR
Demand Reduction Program Portfolio)	
Plan for 2017 through 2019.		

OBJECTIONS OF INTERSTATE GAS SUPPLY, INC.

On June 15, 2016, The Dayton Power and Light Company ("DP&L") filed an application to establish a three-year energy efficiency and peak demand reduction ("EE/PDR") portfolio plan ("EE/PDR Plan"). Pursuant to Rule 4901:1-39-04(D), Ohio Administrative Code ("O.A.C."), Interstate Gas Supply, Inc. ("IGS") submits the following objections.

I. Rebates

The proposed DP&L EE/PDR plan includes incentives which provide DP&L customers the opportunity to collect rebates on certain energy efficient products.¹ Under the proposed EE/PDR plan DP&L will provide thermostat rebates through the Residential HVAC Equipment Program ("HVAC Program").² DP&L projects that a total of 20,922 rebates will be distributed during the course of the EE/PDR plan with an average rebate amount of \$149.73 (for all program measures).³ The plan, as proposed, makes rebates

¹ Application at 3-5 (June 15, 2016).

² *Id.* at 24-26.

³ *Id.* at 24 and 26

only available to customers through DP&L's list of HVAC contractors and not through any other means. IGS objects to the manner in which rebates, specifically for thermostats, are implemented under the proposed plan for the following reasons.

1. IGS objects to the inability of third parties, who are not contractors, to submit and receive rebates on behalf of customers at the point of sale. Failure to implement this process denies customers with the opportunity to receive an "instant" rebate.
2. IGS objects to smart/learning thermostat rebates of less than \$100, as lower amounts do not promote efficient customer participation.
3. IGS objects to proposed rebates which cannot be processed through electronic means and/or provided instantly to customers at the point of sale.

II. Shared Savings

DP&L's proposed EE/PDR plan includes a shared savings element which would provide compensation for achieving savings above the benchmarks outlined in R.C. 4928.66.⁴

1. IGS objects to the proposed shared savings plan as it is unnecessary to provide compensation to electric distribution utilities ("EDU") for complying with Ohio law. Each EDU is required under Ohio Law (R.C. 4928.66) to achieve annual energy savings and reduce peak demand. Under R.C. 4928.66 an EDU that does not achieve annual reduction goals shall be assessed a forfeiture by the Commission.

⁴ *Id.* at 5

III. Other Matters

IGS reserves the right to raise additional objections and issues at any hearing in this matter and through any briefs IGS might file in the proceeding that IGS' continued examination identify relating to DP&L's EE/PDR Plan.

IV. Conclusion

Pursuant to Rule 4901:1-39-04(D), O.A.C., IGS submits the foregoing objections to DP&L's EE/PDR Plan.

Respectfully submitted,

/s/ Joseph Olikier
Joseph Olikier (0086088)
Email: joliker@igsenergy.com
Counsel of Record
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
Telephone: (614) 659-5000
Facsimile: (614) 659-5073

Attorney for IGS Energy

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Objections of Interstate Gas Supply, Inc.* was served this 15th day of August 2016 via electronic mail upon the following:

jeremy.grayem@icemiller.com ORourke@carpenterlipps.com Bojko@carpenterlipps.com Ghiloni@carpenterlipps.com christopher.healey@occ.ohio.gov tdougherty@theOEC.org mleppla@theoec.org jfinnigan@edf.org mfleisher@elpc.org	John.jones@ohioattorneygeneral.gov Natalia.messenger@ohioattorneygeneral.gov Dick.Bulgrin@puc.state.oh.us fdarr@mwncmh.com mpritchard@mwncmh.com dparram@taftlaw.com Rick.sites@ohiohospitals.org mwarnock@bricker.com dborchers@bricker.com
--	--

/s/ Joseph Olikier

Joseph Olikier

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/15/2016 5:24:05 PM

in

Case No(s). 16-0649-EL-POR, 16-1369-EL-WVR

Summary: Objection of Interstate Gas Supply, Inc. electronically filed by Mr. Joseph E. Olier
on behalf of IGS Energy