BEFORE THE

PUBLIC UTILITIES COMMISSION OF OHIO

THE DAYTON POWER AND LIGHT COMPANY

CASE NO. 16-0395-EL-SSO
CASE NO. 16-0397-EL-AAM
CASE NO. 16-0396-EL-ATA

DIRECT TESTIMONY OF CLAIRE E. HALE

OCTOBER 11, 2016

- □ **MANAGEMENT POLICIES, PRACTICES, AND ORGANIZATION**
- □ **OPERATING INCOME**
- □ **RATE BASE**
- □ **ALLOCATIONS**
- □ **RATE OF RETURN**
- ■ **RATES AND TARIFFS**
- □ **OTHER**

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CLAIRE E. HALE

ON BEHALF OF
THE DAYTON POWER AND LIGHT COMPANY

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I. <u>INTRODUCTION</u>

Q. Please state your name and business address.

A. My name is Claire E. Hale. My business address is 1065 Woodman Drive, Dayton, OH 45432.

Q. By whom and in what capacity are you employed?

A. I am employed by The Dayton Power and Light Company ("DP&L" or the "Company") as a Rate Analyst II.

Q. What are your responsibilities in your current position?

A. I am responsible for assisting in the development, analyses, revision, and administration of the Company's tariff schedules, rate designs, and policies. This includes participating in the development of the Company's rate cases and having responsibility for the administration of certain riders, specifically the Transmission Cost Recovery Riders, the Reliability Pricing Model Rider, and the Storm Cost Recovery Rider.

Q. Will you describe briefly your educational and business background?

A. I received a Bachelor of Science degree in Mathematics from The Ohio State University in June 2008. Prior to my position at DP&L, I was a Technical Analyst at Accenture, where I worked on the Service Oriented Architecture Team providing client support on middleware applications. I joined DP&L as a rate analyst in January 2011.

Q. Have you previously provided testimony before the Public Utilities Commission of Ohio ("PUCO" or the "Commission")?

A. Yes. I sponsored testimony before the PUCO in Case No. 12-426-EL-SSO as well as in Case No. 15-1830-EL-AIR.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of this testimony?

A. The purpose of this testimony is to support and explain the Distribution Modernization Rider ("DMR") rate design and the Clean Energy Rider.

Q. Do you support any exhibits attached to your testimony?

A. Yes. I am supporting Exhibit CEH-1, DMR Rate Design.

III. DISTRIBUTION MODERNIZATION RIDER

Q. Please explain the Distribution Modernization Rider.

A. As described by Company Witness Jackson, the Distribution Modernization Rider will help to ensure that Ohio customers continue to receive reliable service. The DMR will be billed on a service-rendered basis beginning January 2017 and will be billed to all customers on a non-bypassable basis.

Q. Please describe DP&L's DMR rate design.

A. DP&L proposes to use a modified version of its current Service Stability Rider ("SSR") rate methodology for the basis of the structure for the DMR rate design. Using the current SSR rates as a starting point promotes the retail rate stability intended by the DMR. The modifications to the SSR rates bring the DMR rates in line with DP&L's more recent rate design, as proposed in its distribution rate case (see Company Witness Parke testimony in Case No. 15-1830-EL-AIR) and within this case (see Company

Witness Brown testimony). The modifications also simplify the rate structure with minimal inter- and intra-class impact. Exhibit CEH-1 attached to this testimony shows the calculation of the DMR rates. Page 1 of this exhibit shows the calculation of the proposed 2017 DMR rates by beginning with SSR rates, applying the rate design modifications, and scaling those rates to meet the 2017 DMR revenue requirement.

Q. Can you describe the calculation of the 2017 DMR rates more fully?

A. Yes. As noted above and shown in Exhibit CEH-1, the calculation begins with SSR rates applied to the distribution forecast (supported by Company Witness Adams) for 2017. This creates an SSR revenue requirement by tariff class. The desired rate design changes are then applied to each class's rates. These rate design changes impact the revenue calculated for each class, so the new rates are then scaled up or down to bring the revenue for each class back in line with that originally calculated from the SSR rates. This prevents rate design changes from causing any inter-class shifts in revenue. Finally, a factor is calculated based on the 2017 DMR revenue requirement and the calculated 2017 SSR revenues. This factor is applied to the modified rates to determine 2017 DMR rates.

Q. What modifications are you proposing to the rate design?

A. For Residential, the rate design changes are intended to bring the rates more in line with those proposed for the Standard Offer Rate. Specifically, the blocked rates for Residential are removed to create a straight kWh rate, and the Residential Heating discount is also modified to a lower rate for all kWh in the winter months. For the Secondary class, the rate design changes accomplish a few different objectives: exchange the blocked kWh rates for a straight kWh rate; incorporate current School customers into the Secondary class (in accordance with the elimination of that tariff in 2017); eliminate the first five "free" kW by implementing a straight kW rate for all kW; and implement the max charge rate changes discussed by Company Witness Parke. The rate design changes for the Primary class also incorporate current School customers and the proposed max charge rate changes. Finally, the Private Outdoor Lighting rates are changed to a consistent kWh charge, rather than a varying per lamp charge. However, tariffed rates are still shown on a per lamp basis for the convenience of customers. No rate design changes are proposed for the Primary Substation, High Voltage, or Street Lighting classes. All of these rate design changes employ average rates in order to minimize any intra-class shifts. In the end, these changes simplify the rates for customers while maintaining rate stability.

Q. Have you proposed rates for the DMR for 2017?

A. Yes. For 2017, Exhibit CEH-1 Page 1 shows the proposed rates for implementation in January 2017.

IV. CLEAN ENERGY RIDER

Q. Does the Company propose any new riders or deferrals regarding environmental costs?

A. Yes, the Company proposes a new Clean Energy Rider that will facilitate future investment in renewable and advanced technologies consistent with state and federal policies. This rider, set initially at zero, will recover any currently unknown environmental compliance costs, including but not limited to green energy initiatives, environmental expenses, and decommissioning costs. Once those costs are known, the Company will apply for recovery of those costs through the non-bypassable Clean

Energy Rider in a separate proceeding. The timing of recovery will be on a case-by-case basis for each expense.

Q. What is the nature of these environmental expenses?

A. Many existing, pending, and future regulations aim to achieve a clean energy policy at both the state and national level. Encouraging the use of renewables, reducing pollutants in both air and water, and environmentally sound long-term solutions are all part of that overall policy goal. To that end, the Company expects it will incur environmental costs as a result of its current ownership of generation assets. It also expects that, consistent with state and federal policies, new renewable requirements will be imposed by future regulations. Therefore the Company wishes to establish the Clean Energy Rider as a mechanism to enable that investment and recover the related costs for compliance with those currently unknown or unquantifiable clean energy obligations.

Q. Can you provide an example of the type of environmental expenses that DP&L expects to incur?

A. Yes. There are a number of pending regulations related to environmental compliance. The generation plants are subject to a number of new environmental regulations that are not yet finalized. Examples include revisions to the Cross State Air Pollution Rule ("CSAPR") and implementation of the Resource Conservation and Recovery Act ("RCRA") including the potential closing of existing ash ponds.

Q. Why is it appropriate for the Company's customers to pay for these expenses?

A. Certain environmental and decommissioning expenses are related to activities involved in serving the Company's customers and were caused when the generation assets were owned by the regulated entity and were for the benefit of DP&L's customers. It is appropriate that these expenses are recovered on a non-bypassable basis because DP&L's ownership of these assets benefitted all of DP&L's distribution customers. In fact, those generation assets were originally placed in service years, and sometimes decades, before the generation market was deregulated. Therefore, such environmental and decommissioning expenses are related to customers' prior use of and benefit from those generation assets. Additionally, any efforts to comply with clean energy obligations will benefit all of the Company's customers, making non-bypassable recovery appropriate.

V. CONCLUSION

Q. Please summarize your testimony.

A. In summary, the DMR rate design described above maintains rate stability while still updating rates for consistency across DP&L's tariffs. Additionally, the Clean Energy Rider proposed above is reasonable and should be approved.

Q. Does this conclude your direct testimony?

A. Yes, it does.

The Dayton Power and Light Company
Case No. 16-0395-EL-SSO
Distribution Modernization Rider
Allocation and Rate Design

Line	Class/Description	Unit	2017 LTFR Distribution Forecast[1]	SSR Rate	SSR Revenue	SSR Rate Design Changes[2]	SSR Rate Design Revenue	Scale Rates to SSR Level[3]	SSR Revenue Under New Rate Design	DMR Revenue	DMR Rate	DMR Revenue
(A)	(B)		(C)	(D)	(E) = (C) * (D)	(F)	(G) = (C) * (F)	(H)	(I) = (C) * (H)	(J) = (H) * Line 1	(K) = (H) * (J) Line 2	(L) = (C) * (K)
1	Total Distribution Sales Forecast				$ 112,698,439		$ 114,004,658		$ 112,698,439	$ 145,000,000		$ 145,000,000
2	All kWh		14,140,910,971		$ 86,781,525		$ 88,087,744			129%		$ 111,470,382
3	All kW		23,488,053		$ 25,916,914		$ 25,916,914					$ 33,529,618
4												
5	**Total Residential**			**43.9%**	**$ 49,495,276**	**44.9%**	**$ 51,178,441**	**43.9%**	**$ 49,495,276**	**$ 63,681,583**	**43.9%**	**$ 63,681,583**
6	Residential Non-Heating							96.7%				
7	0-750	kWh	2,415,026,282	$ 0.0103362	$ 24,962,195	$ 0.0097807	$ 23,620,556	$ 0.0094590	$ 22,843,719		$ 0.0121701	$ 29,391,173
8	> 750	kWh	1,154,728,278	$ 0.0084287	$ 9,732,858	$ 0.0097807	$ 11,294,007	$ 0.0094590	$ 10,922,568		$ 0.0121701	$ 14,053,188
9	Residential Heating					*15.27%*	*Residential Heating Discount*					
10	0-750 (S)	kWh	348,685,541	$ 0.0103362	$ 3,604,083	$ 0.0097807	$ 3,410,375	$ 0.0094590	$ 3,298,214		$ 0.0121701	$ 4,243,547
12	> 750 (S)	kWh	203,143,776	$ 0.0084287	$ 1,712,238	$ 0.0097807	$ 1,986,881	$ 0.0094590	$ 1,921,536		$ 0.0121701	$ 2,472,285
11	0-750 (W)	kWh	540,817,500	$ 0.0103362	$ 5,589,998	$ 0.0082871	$ 4,481,782	$ 0.0080145	$ 4,334,385		$ 0.0103116	$ 5,576,703
13	> 750 (W)	kWh	770,459,802	$ 0.0050540	$ 3,893,904	$ 0.0082871	$ 6,384,840	$ 0.0080145	$ 6,174,854		$ 0.0103116	$ 7,944,687
14	**Total Secondary**			**30.5%**	**$ 34,405,296**	**29.9%**	**$ 34,062,026**	**30.5%**	**$ 34,405,296**	**$ 44,266,522**	**30.5%**	**$ 44,266,522**
15	Standard							*101.0%*	*Secondary Scale Factor*			
16	0-5	kW	2,671,804	$ -	$ -	$ 0.9566038	$ 2,555,858	$ 0.9662442	$ 2,581,615		$ 1.2431886	$ 3,321,556
17	> 5	kW	10,460,046	$ 1.2104318	$ 12,661,172	$ 0.9566038	$ 10,006,119	$ 0.9662442	$ 10,106,959		$ 1.2431886	$ 13,003,810
18	0-1,500	kWh	510,092,604	$ 0.0101459	$ 5,175,349	$ 0.0050927	$ 2,597,759	$ 0.0051440	$ 2,623,939		$ 0.0066184	$ 3,376,011
19	1,501-125,000	kWh	2,880,174,472	$ 0.0044547	$ 12,830,313	$ 0.0050927	$ 14,667,925	$ 0.0051440	$ 14,815,745		$ 0.0066184	$ 19,062,225
20	> 125,000	kWh	644,223,215	$ 0.0037842	$ 2,437,869	$ 0.0050927	$ 3,280,849	$ 0.0051440	$ 3,313,913		$ 0.0066184	$ 4,263,745
21	Max Charge											
22	0-5	kW	187,755	$ -	$ -	$ -	$ -	$ -	$ -		$ -	$ -
23	> 5	kW	821,639	$ -	$ -	$ -	$ -	$ -	$ -		$ -	$ -
24	0-1,500	kWh	26,962,977	$ 0.0248410	$ 669,787	$ 0.0164054	$ 442,338	$ 0.0165707	$ 446,796		$ 0.0213202	$ 574,856
25	1,501-125,000	kWh	13,729,955	$ 0.0248410	$ 341,066	$ 0.0164054	$ 225,245	$ 0.0165707	$ 227,515		$ 0.0213202	$ 292,725
26	> 125,000	kWh	0	$ 0.0248410	$ -	$ 0.0164054	$ -	$ 0.0165707	$ -		$ 0.0213202	$ -
27	School											
28	0-5	kW	5,066	$ -	$ -	$ 0.9566038	$ 4,846	$ 0.9662442	$ 4,895		$ 1.2431886	$ 6,298
29	> 5	kW	98,630	$ -	$ -	$ 0.9566038	$ 94,349	$ 0.9662442	$ 95,300		$ 1.2431886	$ 122,615
30	0-1,500	kWh	1,509,771	$ 0.0079018	$ 11,930	$ 0.0050927	$ 7,689	$ 0.0051440	$ 7,766		$ 0.0066184	$ 9,992
31	1,501-125,000	kWh	34,596,757	$ 0.0079018	$ 273,377	$ 0.0050927	$ 176,192	$ 0.0051440	$ 177,967		$ 0.0066184	$ 228,976
32	> 125,000	kWh	560,980	$ 0.0079018	$ 4,433	$ 0.0050927	$ 2,857	$ 0.0051440	$ 2,886		$ 0.0066184	$ 3,713
33	**Total Primary**			**16.5%**	**$ 18,608,439**	**16.3%**	**$ 18,574,763**	**16.5%**	**$ 18,608,439**	**$ 23,941,979**	**16.5%**	**$ 23,941,979**
34	Standard							*100.2%*	*Primary Scale Factor*			
35	All	kW	6,108,233	$ 1.4208780	$ 8,679,054	$ 1.4115752	$ 8,622,231	$ 1.4141343	$ 8,637,863		$ 1.8194527	$ 11,113,642
36	All	kWh	2,866,184,251	$ 0.0033887	$ 9,712,639	$ 0.0034129	$ 9,782,073	$ 0.0034191	$ 9,799,808		$ 0.0043991	$ 12,608,623
37	Max Charge											
38	All	kW	99,790	$ -	$ -	$ -	$ -	$ -	$ -		$ -	$ -
39	All	kWh	3,788,117	$ 0.0249517	$ 94,520	$ 0.0160619	$ 60,844	$ 0.0160910	$ 60,955		$ 0.0207030	$ 78,425
40	School											
41	All	kW	40,256	$ -	$ -	$ 1.4115752	$ 56,824	$ 1.4141343	$ 56,927		$ 1.8194527	$ 73,243
42	All	kWh	15,468,129	$ 0.0079018	$ 122,226	$ 0.0034129	$ 52,792	$ 0.0034191	$ 52,887		$ 0.0043991	$ 68,046
43	**Primary Substation**			**3.4%**	**$ 3,797,704**	**3.3%**	**$ 3,797,704**	**3.4%**	**$ 3,797,704**	**$ 4,886,200**	**3.4%**	**$ 4,886,200**
44	All	kW	1,126,507	$ 1.5092978	$ 1,700,234	$ 1.5092978	$ 1,700,234	$ 1.5092978	$ 1,700,234		$ 1.9418919	$ 2,187,554
45	All	kWh	645,733,135	$ 0.0032482	$ 2,097,470	$ 0.0032482	$ 2,097,470	$ 0.0032482	$ 2,097,470		$ 0.0041792	$ 2,698,646
46	**High Voltage**			**5.5%**	**$ 6,153,565**	**5.4%**	**$ 6,153,565**	**5.5%**	**$ 6,153,565**	**$ 7,917,297**	**5.5%**	**$ 7,917,297**
47	All	kW	1,868,328	$ 1.5395867	$ 2,876,454	$ 1.5395867	$ 2,876,454	$ 1.5395867	$ 2,876,454		$ 1.9808621	$ 3,700,901
48	All	kWh	978,943,698	$ 0.0033476	$ 3,277,112	$ 0.0033476	$ 3,277,112	$ 0.0033476	$ 3,277,112		$ 0.0043071	$ 4,216,396
49	**Street Lighting**			**0.1%**	**$ 150,393**	**0.1%**	**$ 150,393**	**0.1%**	**$ 150,393**	**$ 193,499**	**0.1%**	**$ 193,499**
50	All	kWh	55,701,176	$ 0.0027000	$ 150,393	$ 0.0027000	$ 150,393	$ 0.0027000	$ 150,393		$ 0.0034739	$ 193,499
51	**Private Outdoor Lighting (lamp)**			$0.0007788	**$ 87,765**							
52	9500 L HPS	lamp	12,328	$0.1107400	$ 1,365							
53	28000 L HPS	lamp	8,008	$0.2468800	$ 1,977							
54	7000 L Mercury	lamp	274,765	$0.2129700	$ 58,517							
55	21000 L Mercury	lamp	52,962	$0.3960400	$ 20,975							
56	2500 L Incand.	lamp	64	$0.2630200	$ 17							
57	7000 L Fluor.	lamp	162	$0.3707200	$ 60							
58	4000 L PT Mercury	lamp	8,201	$0.5918600	$ 4,854							
59	**Private Outdoor Lighting (kWh)**					**0.1%**	**$ 87,765**	**0.1%**	**$ 87,765**	**$ 112,920**	**0.1%**	**$ 112,920**
60	9500 L HPS	kWh	480,777			$ 0.0028889	$ 1,389	$ 0.0028889	$ 1,389		$ 0.0037169	$ 1,787
61	28000 L HPS	kWh	768,806			$ 0.0028889	$ 2,221	$ 0.0028889	$ 2,221		$ 0.0037169	$ 2,858
62	7000 L Mercury	kWh	20,607,391			$ 0.0028889	$ 59,532	$ 0.0028889	$ 59,532		$ 0.0037169	$ 76,595
63	21000 L Mercury	kWh	8,156,083			$ 0.0028889	$ 23,562	$ 0.0028889	$ 23,562		$ 0.0037169	$ 30,315
64	2500 L Incand.	kWh	4,119			$ 0.0028889	$ 12	$ 0.0028889	$ 12		$ 0.0037169	$ 15
65	7000 L Fluor.	kWh	10,723			$ 0.0028889	$ 31	$ 0.0028889	$ 31		$ 0.0037169	$ 40
66	4000 L PT Mercury	kWh	352,656			$ 0.0028889	$ 1,019	$ 0.0028889	$ 1,019		$ 0.0037169	$ 1,311

[1] Exhibit RJA-2
[2] Residential/Residential Heating (Summer): Sum Col (F) / Sum Col (D), Lines 7 thru 11
[2] Residential Heating (Winter): Residential Heating (Summer) * (1 - Residential Heating Discount)
[2] Secondary (kW): Sum Col (F) / Sum Col (D), Lines 16, 17, 28, 29
[2] Secondary (kWh): Sum Col (F) / Sum Col (D), Lines 18 thru 20, 30 thru 32
[2] Secondary (Max Charge): Sum Col (F) / Sum Col (D) * 2, Lines 16 thru 20, 28 thru 32
[2] Primary (kW): Sum Col (F) / Sum Col (D), Lines 35, 41
[2] Primary (kWh): Sum Col (F) / Sum Col (D), Lines 36, 42
[2] Primary (Max Charge): Sum Col (F) / Sum Col (D) * 2.5, Lines 35, 36, 41, 42
[2] Private Outdoor Lighting: Col (G) Line 59 / Sum (C), Lines 60-66
[3] Residential/Residential Heating: Col (F) * Col (H), Line 6
[3] Secondary: Col (F) * Col (H), Line 15
[3] Primary: Col (F) * Col (H), Line 34

The Dayton Power and Light Company
Case No. 16-0395-EL-SSO
Distribution Modernization Rider
Calculation of Private Outdoor Lighting Charges

Line	Description	kWh/Fixture		2017 DMR		2017 DMR Charge/Fixture/Month
				$/kWh		$/Fixture/Month
(A)	(B)	(C)		(D)		(E)
						(E) = (C) * (D)
1	**Private Outdoor Lighting**					
2	9,500 Lumens High Pressure Sodium (HPS)	39	$	0.0037169	$	0.1449576
3	28,000 Lumens High Pressure Sodium (HPS)	96	$	0.0037169	$	0.3568186
4	7,000 Lumens Mercury	75	$	0.0037169	$	0.2787645
5	21,000 Lumens Mercury	154	$	0.0037169	$	0.5723965
6	2,500 Lumens Incandescent	64	$	0.0037169	$	0.2378791
7	7,000 Lumens Fluorescent	66	$	0.0037169	$	0.2453128
8	4,000 Lumens PT Mercury	43	$	0.0037169	$	0.1598250

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing testimony has been served via electronic mail upon the following counsel of record, this 11th day of October, 2016:

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