

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the Ohio)
Development Services Agency for an Order)
Approving Adjustments to the Universal)
Service Fund Riders of Jurisdictional Ohio)
Electric Distribution Utilities.)

Case No. 16-1223-EL-USF

AMENDED APPLICATION

By its application in this docket of October 31, 2016, the Ohio Development Services Agency ("ODSA"), by its Director, David Goodman, petitioned the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4928.52(B), Revised Code, for an order approving adjustments to the Universal Service Fund ("USF") riders of all jurisdictional Ohio electric distribution utilities ("EDUs"). Pursuant to Rule 4901-1-06, Ohio Administrative Code, ODSA hereby moves to amend its application as set forth below. As more fully described in the supplemental testimony of Susan M. Moser submitted herewith, this amended application reflects information that was not available to ODSA at the time the original application was prepared. Accordingly, ODSA respectfully requests the Commission to accept this amended application for filing.

As its amended application, ODSA states as follows:

1. Under the legislative scheme embodied in SB 3, the 1999 legislation that restructured Ohio's electric utility industry and transferred administration of the electric percentage of income payment plan ("PIPP") program to ODSA, the USF riders replaced the EDUs' existing PIPP riders. The USF riders were to be calculated so as to generate the same

level of revenue as the PIPP riders they replaced,¹ plus an amount equal to the level of funding for low-income customer energy efficiency programs reflected in the electric rates in effect on the effective date of the statute,² plus the amount necessary to pay the administrative costs associated with the low-income customer assistance programs and the consumer education program created by Section 4928.56, Revised Code.³

2. Pursuant to Section 4928.51(A), Revised Code, all USF rider revenues collected by the EDUs are remitted to ODSA for deposit in the state treasury's USF. ODSA then makes disbursements from the USF to fund the low-income customer assistance programs (including PIPP and the low-income customer energy efficiency programs) and the consumer education program, and to pay their related administrative costs.

3. Section 4928.52(B), Revised Code, provides that, if ODSA, after consultation with the Public Benefits Advisory Board ("PBAB"), determines that the revenues in the USF, together with revenues from federal and other sources of funding,⁴ will be insufficient to cover the cost of the low-income customer assistance and consumer education programs and their related administrative costs, ODSA shall file a petition with the Commission for an increase in the USF rider rates. The statute further provides that, after providing reasonable notice and opportunity for hearing, the Commission may adjust the USF rider by the minimum amount necessary to generate the additional revenues required; provided, however, that the Commission

¹ See Section 4928.52(A)(1), Revised Code.

² See Section 4928.52(A)(2), Revised Code.

³ See Section 4928.52(A)(3), Revised Code.

⁴ Section 4928.52(B), Revised Code, specifically identifies the Ohio Energy Credit Program as a funding source. However, this program was discontinued as of July 1, 2003.

may not decrease a USF rider without the approval of the ODSA Director, after consultation by the Director with the PBAB.

4. Unlike traditional ratemaking, where the objective is to establish rates that will provide the applicant utility with a reasonable earnings opportunity, the USF riders must actually generate sufficient revenues during the collection period to enable ODSA to meet its USF-related statutory and contractual obligations on an ongoing basis. In recognition of this fact, the stipulations adopted by the Commission in all prior USF rider rate adjustment proceedings have required that ODSA file a Section 4928.52(B), Revised Code, application with the Commission each year, proposing such adjustments to the USF rider rates as may be necessary to assure, to the extent possible, that each EDU's rider will generate its associated revenue requirement — but not more than its associated revenue requirement — during the annual collection period following Commission approval of such adjustments. This is the sixteenth annual USF rider adjustment application filed pursuant to this statute since the establishment of the initial USF riders in the electric transition plan proceedings initiated by applications filed by the EDUs pursuant to SB 3.

5. By its opinion and order of December 16, 2015 in Case No. 15-1046-EL-USF, this Commission granted ODSA's 2015 application for approval of adjustments to the USF riders of all Ohio EDUs based on its acceptance of a stipulation and recommendation submitted jointly by the parties to that proceeding. The new USF riders replaced the USF riders approved by the Commission in Case No. 14-1002-EL-USF, and became effective on a bills-rendered basis with the January 2016 EDU billing cycles.

6. The Commission's opinion and order of December 16, 2015 in Case No. 15-1046-EL-USF provided for the continuation of the notice of intent (“NOI”) process first approved by

the Commission in Case No. 04-1616-EL-UNC. Under this process, ODSA was required to make a preliminary filing by May 31 setting out the methodology it would employ in developing the USF rider revenue requirements and rate design for its subsequent annual USF rider adjustment application. The purpose of this procedure is to permit the Commission to resolve any issues relating to methodology prior to the preparation and filing of the application itself, so as to limit the number of potential issues in the second phase of the case and thereby permit the Commission to act on the application in time for the new USF rider rates to take effect on January 1 of the following year. ODSA filed its NOI in this case on May 31, 2016. The Commission, consistent with the terms of a stipulation jointly submitted by a majority of the parties to the proceeding, approved the methodology proposed by ODSA in the NOI by its opinion and order of September 7, 2016 (the "*NOI Order*").

7. Based on its analysis of the annual pro forma revenue generated by applying the current USF rider rates to test-period sales volumes, and utilizing the USF rider revenue requirement methodology approved in the *NOI Order* as described below, ODSA has determined that, on an aggregated basis, the total pro forma annual revenue generated by the current USF riders will exceed, by some \$348,832,368, the annual revenue required to fulfill the objectives identified in Section 4928.52(A), Revised Code, during the 2017 collection period. On an EDU-specific basis, ODSA's analysis shows that the pro forma revenue that would be generated by the current USF riders of each Ohio EDU (Ohio Power Company ("OP"))⁵

⁵ The AEP Ohio operating companies, Columbus Southern Power Company ("CSP") and Ohio Power Company ("OP") merged, effective December 31, 2011, with OP as the surviving entity. However, the former CSP customers continue to be subject to separate rate schedules, including a separate USF rider, as are the customers that were served by OP prior to the merger. For ease of reference, ODSA refers herein to CSP as if it were an EDU, but it is understood that these references actually relate to the CSP Rate Zone and that references to OP actually relate to the OP Rate Zone. The Commission confirmed the continued existence of the CSP and OP rate zones in its *NOI Order* issued October 28, 2015.

Columbus Southern Power Company (“CSP”), Dayton Power and Light Company (“DPL”), Duke Energy Ohio (“Duke”), The Cleveland Electric Illuminating Company (“CEI”), Ohio Edison Company (“OE”), and The Toledo Edison Company (“TE”)) would exceed its indicated revenue target. Accordingly, ODSA, having consulted with the PBAB, proposes that all of the EDUs’ riders be reduced so as to generate the required annual revenue indicated in the following table.

TABLE I

Company	Test-Period USF Rider Revenue	Required Annual USF Rider Revenue	USF Rider Surplus/(Deficiency)
CSP	\$92,062,756	\$2,749,767	\$89,312,989
OP	\$101,982,074	\$18,453,702	\$83,528,372
DPL	\$30,482,273	\$10,206,753	\$20,275,520
DUKE	\$23,778,700	\$5,830,681	\$17,948,019
CEI	\$60,862,209	\$17,624,226	\$43,237,983
OE	\$94,099,775	\$33,126,476	\$60,973,299
TE	\$38,403,529	\$4,847,342	\$33,556,186
Totals	\$441,671,316	\$92,838,947	\$348,832,368

8. As described in further detail in the written testimony of ODSA witness Susan M. Moser filed with this application, the revenue requirement that the proposed USF riders are designed to generate consists of the elements identified below.

a. Cost of PIPP. The cost of PIPP component of the USF rider revenue requirement is intended to reflect the total cost of electricity consumed by the EDU's PIPP customers for the 12-month period January 2016 through December 2016 (the “test period”), plus pre-PIPP balances, less the monthly installment payments billed to PIPP customers, less payments made by or on behalf of PIPP customers, including agency

payments, to the extent that these payments are applied to outstanding PIPP arrearages over the same period. Because actual data for October through December 2016 was not available at the time the application was prepared, information from the corresponding months of 2015 was combined with actual data from January through September of 2016 to determine the test-period cost of PIPP for each EDU as displayed in Exhibit A hereto. As explained in ODSA witness Moser's written testimony, and consistent with the *NOI Order*, ODSA adjusted the test-period cost of PIPP to recognize the impact of Commission-approved EDU rate changes that took effect during the 2016 test period and to annualize the impact of Commission-approved EDU rate changes that will take effect in 2017. The calculations of these adjustments are shown in attached Exhibits A.1.a through A.1.d. The net impact of these adjustments is shown in Exhibit A.1. As explained in Ms. Moser's testimony, and consistent with the *NOI Order*, the totals shown in Exhibit A.1 were then adjusted to reflect the projected increase in PIPP enrollments during the 2017 collection period. The projections are shown in attached Exhibit A.2. The cumulative effect of the foregoing adjustments is shown in the Total Adjusted Test-Period Cost of PIPP column (Column F) in Exhibit A.2.

b. Electric Partnership Program and Consumer Education Program Costs.

This element of the USF rider revenue requirement reflects the cost of the low-income customer energy efficiency programs and the consumer education program, referred to collectively by ODSA as the "Electric Partnership Program" ("EPP"), and their associated administrative costs, which are recovered through the USF riders pursuant to Section 4928.52(A)(2) and (3), Revised Code. ODSA's proposed \$14,946,196 allowance for these items is identical to the allowance accepted by the Commission in all previous

USF riders rate adjustment proceedings and is supported by the analysis submitted by ODSA as Exhibit A to the NOI. Consistent with the *NOI Order*, this component of the USF rider revenue requirement is allocated to the EDUs based on the ratio of their respective costs of PIPP to the total cost of PIPP. The results of the allocation are shown in attached Exhibit B.

c. Administrative Costs. This USF rider revenue requirement element represents an allowance for the costs ODSA incurs in connection with its administration of the PIPP program and is included as a revenue requirement component pursuant to Section 4928.52(A)(3), Revised Code. As explained in the testimony of ODSA witness Megan Meadows filed with the application, the proposed allowance for administrative costs of \$5,814,236 has been determined in accordance with the standard approved by the Commission in the *NOI Order*. The requested allowance for administrative costs has been allocated to the EDUs based on the number of PIPP customer accounts as of December 2015, the test-period month exhibiting the highest PIPP customer account totals. The results of the allocation are shown in attached Exhibit C.

d. December 31, 2016 USF PIPP Account Balances. Because the USF rider rate is based on historical sales and historical PIPP enrollment patterns, the cost of PIPP component of an EDU's USF rider rate will, in actual practice, either over-recover or under-recover its associated annual revenue requirement over the collection period. Over-recovery creates a positive USF PIPP account balance for the company in question, thereby reducing the amount needed on a forward-going basis to satisfy the USF rider revenue requirement. Conversely, where under-recovery has created a negative USF

PIPP account balance as of the effective date of the new riders, there will be a shortfall in the cash available to ODSA, which will impair its ability to make the PIPP reimbursement payments due the EDUs on a timely basis. Thus, the amount of any existing positive USF PIPP account balance must be deducted in determining the target revenue level the adjusted USF rider is to generate, while the deficit represented by a negative USF PIPP account balance must be added to the associated revenue requirement. In this case, ODSA is requesting that its proposed USF riders be implemented on a bills-rendered basis effective January 1, 2017. Accordingly, the USF rider revenue requirement of each EDU has been adjusted by the amount of the EDU's projected December 31, 2016 USF PIPP account balance so as to synchronize the new riders with the EDU's USF PIPP account balance as of their effective date. This conforms to the methodology approved by the Commission in the *NOI Order*. The adjusted projected December 31, 2016 USF PIPP account balance for each EDU is shown in Exhibit H.

e. Reserve. PIPP-related cash flows can fluctuate significantly throughout the year, due, in large measure, to the weather-sensitive nature of electricity sales and PIPP enrollment patterns. As shown on the test-period graph attached hereto as Exhibit E, the month-to-month cash flow fluctuations had, in the past resulted in negative USF PIPP account balances, which mean that, in those months, ODSA had insufficient cash to satisfy its reimbursement obligations to the EDUs on a timely basis. To address this problem, ODSA has included an allowance to create a cash reserve as an element of the USF rider revenue requirement, with the amount of the allowance determined based on the EDUs' highest monthly deficit in the aggregate during the test period, which occurred

in January 2016. This is consistent with methodology approved in the *NOI Order* in this case. The proposed reserve component for each EDU is set forth in attached Exhibit F.

f. Allowance for Undercollection. This component of the USF rider revenue requirement is an adjustment to recognize that, due to the difference between amounts billed through the USF rider and the amounts actually collected from EDU customers, the rider will not generate the target revenues. In accordance with the methodology approved in the *NOI Order*, the allowance for undercollection for each company is based on the collection experience of that company. The allowance for undercollection for each EDU is shown in attached Exhibit G.

g. PIPP Plus Program Audit Costs. In the NOI Application, ODSA recognized that the Commission has permitted audits⁶ to be conducted of each EDU's PIPP-related accounting and reporting to assure that the ODSA-EDU interface was functioning in accordance with ODSA's expectations and to identify any systemic problems that could indicate that the cost of PIPP recovered from ratepayers through the USF riders of the respective EDUs had been overstated.

Audits will be conducted of CSP, OP, DP&L and Duke during the collection period. ODSA's proposed allowance of \$150,000 is identical to the amount approved in the *NOI Order* and, in accordance with the *NOI Order*, this cost will be allocated to each EDU being audited based upon the amount expended to audit each EDU. As a placeholder, until ODSA receives the cost per EDU, it has allocated the cost based on the EDU's cost of PIPP. The allocation of costs to each of these EDUs is shown in Exhibit D.

⁶ Although characterized as an "audit" in the initial RFP, the work performed by the firm awarded the contract was actually an "application of agreed-upon procedures" designed to test the subject EDU's performance in specific areas. However, the terms are used interchangeably herein.

h. Aggregation of PIPP Plus Customers. Pursuant to Section 4928.544(B) of the Ohio Revised Code, the reimbursement of the Commission's costs incurred for aggregation are administrative costs of the program and will be included in the Administrative Costs set forth in paragraph 8.c.

9. A summary schedule showing the USF rider component costs by EDU is attached as Exhibit I. ODSA proposes to recover the annual USF rider revenue requirement for each EDU through a USF rider that incorporates the same two-step declining block rate design approved by the Commission in all prior USF rider rate adjustment cases and the *NOI Order* in this proceeding. The first block of the rate applies to all monthly consumption up to and including 833,000 Kwh. The second rate block applies to all consumption above 833,000 Kwh per month. For each EDU, the rate per Kwh for the second block is set at the lower of the PIPP charge in effect in October 1999 or the per Kwh rate that would apply if the EDU's annual USF rider revenue requirement were to be recovered through a single block per Kwh rate. The rate for the first block rate is set at the level necessary to produce the remainder of the EDU's annual USF rider revenue requirement. Thus, if the EDU's October 1999 PIPP charge exceeds the per Kwh rate that would apply if the EDU's annual USF rider revenue requirement were to be recovered through a single block per Kwh rate, a calculation shown in Exhibit J, the rate for both consumption blocks would be the same. As discussed in the testimony of ODSA witness Moser, in this case, the October 1999 PIPP charge cap has been triggered for each of the EDUs except CSP, Duke, and Toledo Edison. Thus, all the new USF rider rates proposed herein have the declining block feature for all EDUs except CSP, Duke and Toledo Edison. The following table compares the resulting proposed USF riders for each EDU with the EDU's current USF rider.

TABLE II

Company	Declining Block Riders			
	Current USF Rider		Proposed USF Rider	
	First 833,000 Kwh	Above 833,000 Kwh	First 833,000 Kwh	Above 833,000 Kwh
CSP	\$0.0059258	\$0.0001830	\$0.0001430	\$0.0001430
OP	\$0.0063895	\$0.0001681	\$0.0010772	\$0.0001681
DPL	\$0.0026925	\$0.0005700	\$0.0007710	\$0.0005700
Duke	\$0.0010965	\$0.0004690	\$0.0002896	\$0.0002896
CEI	\$0.0042748	\$0.0005680	\$0.0010497	\$0.0005680
OE	\$0.0051158	\$0.0010461	\$0.0014456	\$0.0010461
TE	\$0.0071340	\$0.0005610	\$0.0004615	\$0.0004615

10. Consistent with Section 4928.52(B), Revised Code, the proposed USF rider rates for all EDUs are lower than their current rider rate, and represent the minimum rates necessary to satisfy their USF rider revenue responsibility. If its application is granted, ODSA will consent to the USF rider decreases for all EDUs as required by Section 4928.52(B), Revised Code.

11. In calculating the USF rider revenue requirement, ODSA has relied on certain information reported by the EDUs. Although ODSA believes this information to be reliable, ODSA has not performed an audit to verify the accuracy of this information. If any party questions or wishes to challenge the accuracy of this information, ODSA requests that the Commission require such party to direct its inquiries to the EDU in question, either informally or through formal discovery.

13. ODSA requests that, as a part of its order in this proceeding, the Commission require that ODSA file its 2016 USF rider rate adjustment application no later than October 31, 2016 and provide that the NOI procedure again be used in connection with the 2016 application.

WHEREFORE, ODSA respectfully requests that the Commission, after providing such notice as it deems reasonable, affording interested parties the opportunity to be heard, and conducting a hearing, if a hearing is deemed to be required, issue an order (1) finding that USF rider rate adjustments proposed in the application represent the minimum adjustments necessary to provide the revenues necessary to satisfy the respective USF rider revenue requirements; (2) granting the application; and (3) directing the EDU's to incorporate the new USF rider rates approved herein in their filed tariffs, to be effective January 1, 2017 on a bills-rendered basis.

Respectively submitted,

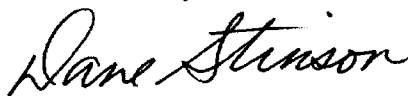
A handwritten signature in cursive script that reads "Dane Stinson".

Dane Stinson (0019101)
BRICKER & ECKLER LLP
100 South Third Street
Columbus, Ohio 43215-4291
Telephone: (614) 227-4854
Facsimile: (614) 227-2390
Email: dstinson@bricker.com

Special Counsel for
The Ohio Development Services Agency

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Amended Application* has been served upon the following parties by electronic mail this 28th day of November 2016.



Dane Stinson

Steven T. Nourse
Matthew J. Satterwhite AEP Service
Corporation 1 Riverside Plaza
Columbus, Ohio 43215
stnouse@aep.com
mjsatterwhite@aep.com

William L. Wright
Section Chief, Public Utilities Section
Thomas W. McNamee
Assistant Attorney General
30 East Broad Street, 16th Floor
Columbus, Ohio 43215
William.Wright@ohioattorneygeneral.gov
Thomas.McNamee@ohioattorneygeneral.gov

Randall V. Griffin
Judi L. Sobecki
The Dayton Power & Light Company
MacGregor Park
1065 Woodman Avenue
Dayton, Ohio 45432
Randall.Griffin@dplinc.com
Judi.Sobecki@dplinc.com

Kimberly W. Bojko
Ryan P. O'Rourke
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, Ohio 43215
Bojko@carpenterlipps.com
O'Rourke@carpenterlipps.com

Elizabeth H. Watts
Duke Energy Ohio, Inc.
155 East Broad Street
Columbus, Ohio 43215
Elizabeth.Watts@duke-energy.com

Carrie M. Dunn
Erika Ostrowski
FirstEnergy Corp.
76 South Main Street
Akron, Ohio 44308
cdunn@firstenergycorp.com
eostrowski@firstenergycorp.com

Ajay Kumar
Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
Ajay.kumar@occ.state.oh.us

Colleen L. Mooney
Ohio Partners for Affordable Energy
PO Box 1793
231 West Lima Street
Findlay, Ohio 45839-1793
cmooney@ohiopartners.org

Sam Randazzo
Frank P. Darr
Matthew Pritchard
McNees, Wallace & Nurick
Fifth Third Center
21 East State Street, Suite 910
Columbus, Ohio 43215
sam@mwncmh.com
fdarr@mwncmh.com
mpritchard@mwncmh.com

Cost of PIPP
October 2015 through September 2016

	Electrical Service A	Pre-PIPP B	PIPP Customer Portion C	Payments to PIPP Arrears D	Cost of PIPP (A+B)-C-D
CSP	\$99,949,933.94	\$4,830,648.17	\$47,810,705.11	\$9,879,400.22	\$47,090,476.78
OP	\$130,170,976.47	\$5,706,023.94	\$60,463,058.39	\$12,597,103.34	\$62,816,838.68
DPL	\$51,006,616.11	\$3,251,493.80	\$26,792,859.52	\$5,529,742.08	\$21,935,508.31
Duke	\$39,361,884.96	\$2,441,648.38	\$19,449,306.03	\$4,945,013.72	\$17,409,213.59
CEI	\$61,885,748.42	\$6,461,922.40	\$29,634,756.30	\$2,857,666.75	\$35,855,247.77
OE	\$97,784,821.20	\$8,307,453.25	\$46,375,009.64	\$5,251,319.19	\$54,465,945.62
TE	\$31,179,792.36	\$3,181,182.78	\$14,414,417.16	\$1,928,008.82	\$18,018,549.16
Total:	\$511,339,773.46	\$34,180,372.72	\$244,940,112.15	\$42,988,254.12	\$257,591,779.91

Adjusted Test-Period Cost of PIPP
--

	10/1/15 to 9/31/16 Cost of PIPP Plus Cost of PIPP	2016 EDU Rate Changes	2017 EDU Rate Changes	Adjusted Test-Period Cost of PIPP
CSP	\$47,090,476.78	-\$499,749.67	-\$994,501.86	\$45,596,225.25
OP	\$62,816,838.68	-\$781,025.00	-\$1,293,898.00	\$60,741,915.68
DPL	\$21,935,508.31	\$0.00	\$389,016.00	\$22,324,524.31
Duke	\$17,409,213.59	\$746,933.49	-\$1,460,920.76	\$16,695,226.32
CEI	\$35,855,247.77	\$0.00	-\$1,237,714.96	\$34,617,532.81
OE	\$54,465,945.62	\$0.00	-\$1,955,696.42	\$52,510,249.20
TE	\$18,018,549.16	\$0.00	-\$623,595.84	\$17,394,953.32
Total	\$257,591,779.91	-\$533,841.18	-\$7,177,311.84	\$249,880,626.89

Exhibit A.1.a

Columbus Southern Power Rate Zone

	Current	2016 ((.5%))	2017 ((1%))	Total	For 2016-2017
Oct-15	\$6,567,220.61	-\$32,836.10	-\$65,343.85	\$6,469,040.66	Oct-16
Nov-15	\$6,529,022.98	-\$32,645.11	-\$64,963.78	\$6,431,414.09	Nov-16
Dec-15	\$8,992,508.21	-\$44,962.54	-\$89,475.46	\$8,858,070.21	Dec-16
Jan-16	\$10,569,254.05	-\$52,846.27	-\$105,164.08	\$10,411,243.70	Jan-17
Feb-16	\$10,743,887.11	-\$53,719.44	-\$106,901.68	\$10,583,265.99	Feb-17
Mar-16	\$9,184,019.98	-\$45,920.10	-\$91,381.00	\$9,046,718.88	Mar-17
Apr-16	\$7,809,197.44	-\$39,045.99	-\$77,701.51	\$7,692,449.94	Apr-17
May-16	\$6,342,539.63	-\$31,712.70	-\$63,108.27	\$6,247,718.66	May-17
Jun-16	\$7,069,413.57	-\$35,347.07	-\$70,340.67	\$6,963,725.83	Jun-17
Jul-16	\$8,313,482.13	-\$41,567.41	-\$82,719.15	\$8,189,195.57	Jul-17
Aug-16	\$9,067,408.37	-\$45,337.04	-\$90,220.71	\$8,931,850.62	Aug-17
Sep-16	\$8,761,979.86	-\$43,809.90	-\$87,181.70	\$8,630,988.26	Sep-17
Total	\$99,949,933.94	-\$499,749.67	-\$994,501.86	\$98,455,682.41	

Ohio Power Rate Zone

	Current	2,016 ((.6%))	2,017 ((1%))	Total	For 2016-2017
Oct-15	\$7,971,728.43	-\$47,830.00	-\$79,239.00	\$7,844,659.43	Oct-16
Nov-15	\$8,734,277.30	-\$52,406.00	-\$86,819.00	\$8,595,052.30	Nov-16
Dec-15	\$12,241,941.55	-\$73,452.00	-\$121,685.00	\$12,046,804.55	Dec-16
Jan-16	\$14,342,978.01	-\$86,058.00	-\$142,569.00	\$14,114,351.01	Jan-17
Feb-16	\$14,394,392.27	-\$86,366.00	-\$143,080.00	\$14,164,946.27	Feb-17
Mar-16	\$12,257,444.43	-\$73,545.00	-\$121,839.00	\$12,062,060.43	Mar-17
Apr-16	\$10,582,535.60	-\$63,495.00	-\$105,190.00	\$10,413,850.60	Apr-17
May-16	\$8,239,318.92	-\$49,436.00	-\$81,899.00	\$8,107,983.92	May-17
Jun-16	\$8,915,230.19	-\$53,491.00	-\$88,617.00	\$8,773,122.19	Jun-17
Jul-16	\$10,347,215.79	-\$62,083.00	-\$102,851.00	\$10,182,281.79	Jul-17
Aug-16	\$11,445,378.47	-\$68,672.00	-\$113,767.00	\$11,262,939.47	Aug-17
Sep-16	\$10,698,535.51	-\$64,191.00	-\$106,343.00	\$10,528,001.51	Sep-17
Total	\$130,170,976.47	-\$781,025.00	-\$1,293,898.00	\$128,096,053.47	

Exhibit A.1.b

Dayton Power and Light

Rate Changes 2017	
Jan-17	\$133,699
Feb-17	\$126,238
Mar-17	(\$44,994)
Apr-17	\$416,065
May-17	\$403,390
Jun-17	(\$288,181)
Jul-17	(\$373,337)
Aug-17	(\$405,177)
Sep-17	\$78,729
Oct-17	\$109,475
Nov-17	\$110,507
Dec-17	\$122,602
Total	\$389,016.00

Exhibit A.1.c

Duke Energy Ohio

Billing Cycle End Date	Cost of Electricity	Rate Adjustment 8.03%	Rate Adjustment (4.86%)	Total	For 2016- 2017
Oct-15	\$2,937,338	\$235,868		\$3,173,206	Oct-16
Nov-15	\$2,931,548	\$235,403		\$3,166,951	Nov-16
Dec-15	\$3,432,901	\$275,662		\$3,708,563	Dec-16
Jan-16	\$3,915,589		-\$190,298	\$3,725,291	Jan-17
Feb-16	\$3,785,466		-\$183,974	\$3,601,493	Feb-17
Mar-16	\$3,317,359		-\$161,224	\$3,156,136	Mar-17
Apr-16	\$2,845,655		-\$138,299	\$2,707,356	Apr-17
May-16	\$2,522,075		-\$122,573	\$2,399,502	May-17
Jun-16	\$2,957,050		-\$143,713	\$2,813,337	Jun-17
Jul-16	\$3,478,375		-\$169,049	\$3,309,326	Jul-17
Aug-16	\$3,760,447		-\$182,758	\$3,577,689	Aug-17
Sep-16	\$3,478,082		-\$169,035	\$3,309,047	Sep-17
Total	\$39,361,885	\$746,933.49	-\$1,460,921	\$38,647,898	

First Energy

CEI

Billing Cycle End Date	Cost of Electricity	Rate change (2%)	Total	
Oct-15	\$ 4,643,074	\$ (92,861)	\$ 4,550,213	Oct-16
Nov-15	\$ 4,668,029	\$ (93,361)	\$ 4,574,669	Nov-16
Dec-15	\$ 5,205,724	\$ (104,114)	\$ 5,101,610	Dec-16
Jan-16	\$ 5,974,019	\$ (119,480)	\$ 5,854,538	Jan-17
Feb-16	\$ 6,119,244	\$ (122,385)	\$ 5,996,859	Feb-17
Mar-16	\$ 5,702,133	\$ (114,043)	\$ 5,588,091	Mar-17
Apr-16	\$ 5,194,060	\$ (103,881)	\$ 5,090,179	Apr-17
May-16	\$ 4,389,214	\$ (87,784)	\$ 4,301,430	May-17
Jun-16	\$ 4,413,899	\$ (88,278)	\$ 4,325,621	Jun-17
Jul-16	\$ 4,884,368	\$ (97,687)	\$ 4,786,681	Jul-17
Aug-16	\$ 5,432,172	\$ (108,643)	\$ 5,323,528	Aug-17
Sep-16	\$ 5,259,812	\$ (105,196)	\$ 5,154,616	Sep-17
Total	\$ 61,885,748	\$ (1,237,714.96)	\$ 60,648,033	

OE

Billing Cycle End Date	Cost of Electricity	Rate change (2%)	Total	
Oct-15	\$ 6,900,942.25	\$ (138,018.85)	\$ 6,762,923.41	Oct-16
Nov-15	\$ 6,990,036.21	\$ (139,800.72)	\$ 6,850,235.49	Nov-16
Dec-15	\$ 8,060,759.64	\$ (161,215.19)	\$ 7,899,544.45	Dec-16
Jan-16	\$ 9,685,024.01	\$ (193,700.48)	\$ 9,491,323.53	Jan-17
Feb-16	\$ 9,959,438.30	\$ (199,188.77)	\$ 9,760,249.53	Feb-17
Mar-16	\$ 9,239,029.63	\$ (184,780.59)	\$ 9,054,249.04	Mar-17
Apr-16	\$ 8,077,891.06	\$ (161,557.82)	\$ 7,916,333.24	Apr-17
May-16	\$ 6,826,713.35	\$ (136,534.27)	\$ 6,690,179.08	May-17
Jun-16	\$ 7,109,228.62	\$ (142,184.57)	\$ 6,967,044.05	Jun-17
Jul-16	\$ 7,918,138.85	\$ (158,362.78)	\$ 7,759,776.07	Jul-17
Aug-16	\$ 8,615,622.06	\$ (172,312.44)	\$ 8,443,309.62	Aug-17
Sep-16	\$ 8,401,997.22	\$ (168,039.94)	\$ 8,233,957.28	Sep-17
Total	\$ 97,784,821.20	(1,955,696.42)	\$ 95,829,124.79	

TE

Billing Cycle End Date	Cost of Electricity	Rate change (2%)	Total	
Oct-15	\$ 2,228,999.66	\$ (44,579.99)	\$ 2,184,419.67	Oct-16
Nov-15	\$ 2,221,737.16	\$ (44,434.74)	\$ 2,177,302.42	Nov-16
Dec-15	\$ 2,708,394.03	\$ (54,167.88)	\$ 2,654,226.15	Dec-16
Jan-16	\$ 3,243,108.48	\$ (64,862.17)	\$ 3,178,246.31	Jan-17
Feb-16	\$ 3,245,296.20	\$ (64,905.92)	\$ 3,180,390.28	Feb-17
Mar-16	\$ 2,894,431.68	\$ (57,888.63)	\$ 2,836,543.05	Mar-17
Apr-16	\$ 2,523,862.48	\$ (50,477.25)	\$ 2,473,385.23	Apr-17
May-16	\$ 2,125,048.33	\$ (42,500.97)	\$ 2,082,547.36	May-17
Jun-16	\$ 2,215,732.20	\$ (44,314.64)	\$ 2,171,417.56	Jun-17
Jul-16	\$ 2,582,269.35	\$ (51,645.39)	\$ 2,530,623.96	Jul-17
Aug-16	\$ 2,702,723.03	\$ (54,054.46)	\$ 2,648,668.57	Aug-17
Sep-16	\$ 2,488,189.76	\$ (49,763.80)	\$ 2,438,425.96	Sep-17
Total	\$ 31,179,792.36	\$ (623,595.84)	\$ 30,556,196.52	

Exhibit A.2

Cost of PIPP Adjustment for Projected Enrollment Increase

	Average Enrollment 9/15-8/16	Cost of PIPP	Average Cost of PIPP 10/15--9/16 B/A	Projected Annual Enrollment	Additional Cost of PIPP (D-A)X C	Total Adjusted Cost of PIPP B+E
	A	B	C	D	E	F
CSP	59,399	\$45,596,225	\$767.63	65,787	\$4,903,673	\$50,499,898
OP	67,820	\$60,741,916	\$895.63	74,953	\$6,388,291	\$67,130,206
DPL	32,530	\$22,324,524	\$686.27	34,204	\$1,148,893	\$23,473,417
Duke	24,995	\$16,695,226	\$667.94	25,088	\$61,985	\$16,757,211
CEI	51,248	\$34,617,533	\$675.49	54,820	\$2,413,122	\$37,030,655
OE	69,755	\$52,510,249	\$752.78	72,940	\$2,397,307	\$54,907,556
TE	21,734	\$17,394,953	\$800.36	22,977	\$994,523	\$18,389,477
Total	327,481	\$249,880,627		350,768	\$18,307,793	\$268,188,420

Projected Average Annual PIPP Enrollment

	9/2011- 8-2012	9/2012- 8/2013	9/2013- 8-2014	9/2014- 8/2015	9/2015- 8/2016	Projected 2017
CSP	59,220	63,742	67,251	69,761	59,399	65,787.10
OP	65,308	70,363	74,387	77,958	67,820	74,952.70
DPL	38,310	37,881	38,520	39,178	32,530	34,204.10
Duke	30,272	30,871	29,113	28,931	24,995	25,087.80
CEI	56,408	57,918	59,647	60,496	51,248	54,820.40
OE	81,098	81,287	82,180	82,535	69,755	72,939.60
TE	27,440	27,323	27,546	27,577	21,734	22,976.60
Total	357,344	369,385	378,644	386,436	327,481	350,768.30

Exhibit B**Electric Partnership Program Allocation**

	2017 Cost of PIPP	Percent Cost of PIPP		Allocated For EPP
CSP	\$50,499,897.81	18.83%	\$ 14,946,196	\$2,814,370
OP	\$67,130,206.18	25.03%	\$ 14,946,196	\$3,741,180
DPL	\$23,473,417.21	8.75%	\$ 14,946,196	\$1,308,178
Duke	\$16,757,211.40	6.25%	\$ 14,946,196	\$933,883
CEI	\$37,030,654.77	13.81%	\$ 14,946,196	\$2,063,726
OE	\$54,907,556.05	20.47%	\$ 14,946,196	\$3,060,009
TE	\$18,389,476.60	6.86%	\$ 14,946,196	\$1,024,849
Total	\$268,188,420.03			\$14,946,196

Exhibit C**Allocation of Administrative Costs**

	Customers Dec. 2015	Adm Costs per Customer	Administrative Costs
CSP	60,627	\$17.00	\$1,030,357.39
OP	69,276	\$17.00	\$1,177,347.36
DPL	34,510	\$17.00	\$586,498.32
Duke	26,353	\$17.00	\$447,869.90
CEI	54,203	\$17.00	\$921,181.35
OE	73,875	\$17.00	\$1,255,507.48
TE	23,270	\$17.00	\$395,474.23
Total	342,114		\$5,814,236.02

Exhibit D

Audit				
--------------	--	--	--	--

Cost of PIPP		Percent Cost of PIPP	Total Audit Cost	Allocated Audit Costs
CSP	\$50,499,898	32%	\$150,000	\$47,985.24
OP	\$67,130,206	43%	\$150,000	\$63,787.43
DPL	\$23,473,417	15%	\$150,000	\$22,304.55
Duke	\$16,757,211	11%	\$150,000	\$15,922.78
Total	\$157,860,733			\$150,000.00

Universal Service Fund Account Balances

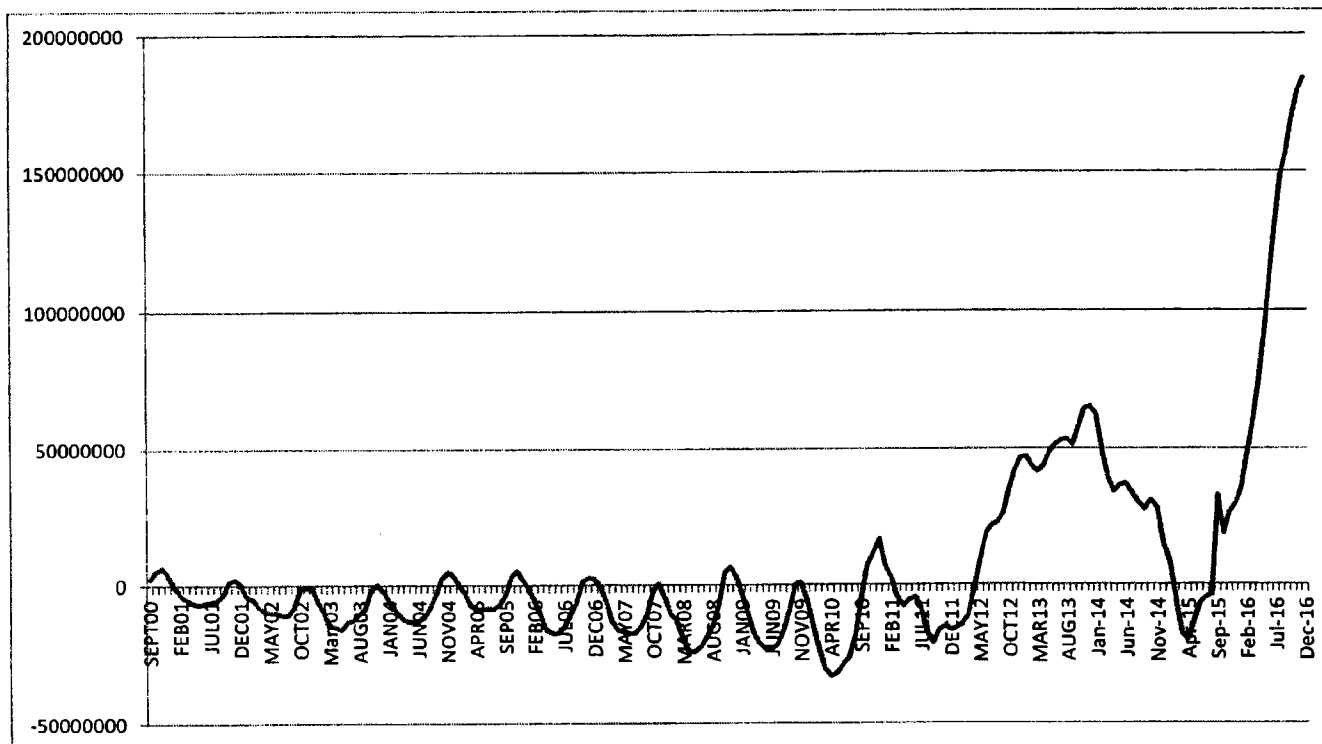


Exhibit F

Calculation of Annual Reserve Component

	Largest Monthly Cash Deficit	Reserve Required
CSP	N/A	\$0
OP	N/A	\$0
DPL	N/A	\$0
Duke	N/A	\$0
CEI	Jan-16	(\$940,242)
OE	Jan-16	(\$8,634,154)
TE	Jan-16	(\$4,091,821)
Total		(\$13,666,216)

Exhibit G

Allowance for Undercollection

CSP	\$10,038
OP	\$39,016
DPL	\$51,420
Duke	\$23,230
CEI	\$65,062
OE	\$419,630
TE	\$70,266
Total	\$678,662

Exhibit H**Universal Service Fund Account Balance**

	Balance 12/31/2016
CSP	\$51,652,881.35
OP	\$53,697,835.08
DPL	\$15,235,065.00
Duke	\$12,347,435.77
CEI	\$23,396,640.11
OE	\$35,150,381.19
TE	\$19,124,544.74
Total	\$210,604,783.24

Revenue Requirement Summary

	CSP	OP	DPL	Duke	CEI	OE	TE
Cost of PIPP Plus	\$50,499,897.81	\$67,130,206.18	\$23,473,417.21	\$16,757,211.40	\$37,030,654.77	\$54,907,556.05	\$18,389,476.60
EPP/CE	\$2,814,369.73	\$3,741,180.25	\$1,308,178.39	\$933,882.85	\$2,063,726.03	\$3,060,009.43	\$1,024,849.33
Administration	\$1,030,357.39	\$1,177,347.36	\$586,498.32	\$447,869.90	\$921,181.35	\$1,255,507.48	\$395,474.23
Audit	\$47,985.24	\$63,787.43	\$22,304.55	\$15,922.78	\$0.00	\$0.00	\$0.00
Reserve	\$0.00	\$0.00	\$0.00	\$0.00	\$940,241.62	\$8,634,153.60	\$4,091,820.89
Adjustment for Undercollection	\$10,038.49	\$39,015.92	\$51,419.66	\$23,229.80	\$65,062.26	\$419,630.28	\$70,266.08
Subtotal	\$54,402,648.65	\$72,151,537.14	\$25,441,818.13	\$18,178,116.72	\$41,020,866.03	\$68,276,856.84	\$23,971,887.13
Account Balance 12/31	-\$51,652,881.35	-\$53,697,835.08	-\$15,235,065.00	-\$12,347,435.77	-\$23,396,640.11	-\$35,150,381.19	-\$19,124,544.74
Total	\$2,749,767.30	\$18,453,702.06	\$10,206,753.13	\$5,830,680.95	\$17,624,225.92	\$33,126,475.65	\$4,847,342.39

Exhibit J**Uniform kWh Rate**

Company	KWH Sales	Required Revenue	Indicated Costs/KWH
CSP	19,224,621,308	\$ 2,749,767	\$ 0.0001430
OP	23,736,287,367	\$ 18,453,702	\$ 0.0007774
DPL	13,977,029,978	\$ 10,206,753	\$ 0.0007303
Duke	20,136,374,151	\$ 5,830,681	\$ 0.0002896
CEI	18,616,620,196	\$ 17,624,226	\$ 0.0009467
OE	24,062,033,637	\$ 33,126,476	\$ 0.0013767
TE	10,502,973,246	\$ 4,847,342	\$ 0.0004615
Total	130,255,939,883	\$ 92,838,947	

kWh sales were sales reported for the last twelve months
(October 2015-September 2016)

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/29/2016 5:03:09 PM

in

Case No(s). 16-1223-EL-USF

Summary: Amended Application electronically filed by Dane Stinson on behalf of Ohio Development Services Agency