

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter Of The Application Of)	CASE NO. 16-395-EL-SSO
The Dayton Power And Light)	
Company To Establish A Standard)	
Service Offer In The Form Of An)	
Electric Security Plan.)	
)	
In The Matter Of The Application Of)	CASE NO. 16-396-EL-ATA
The Dayton Power And Light)	
Company For Approval Of Revised)	
Tariffs.)	
)	
In The Matter Of The Application Of)	CASE NO. 16-397-EL-AAM
The Dayton Power And Light)	
Company For Approval Of Certain)	
Accounting Authority.)	

**SUPPLEMENTAL DIRECT TESTIMONY OF
JOHN FINNIGAN
ON BEHALF OF
OHIO ENVIRONMENTAL COUNCIL AND
ENVIRONMENTAL DEFENSE FUND**

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1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is John Finnigan and my address is 128 Winding Brook Lane, Terrace Park,
4 Ohio 45174.

5 **Q. ARE YOU THE SAME JOHN FINNIGAN WHO PREVIOUSLY FILED DIRECT**
6 **TESTIMONY IN THIS PROCEEDING?**

7 A. Yes.

8 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY?**

9 A. I recommend that the Commission reject the Amended Stipulation filed by The Dayton
10 Power and Light Company ("DP&L" or "Company") on March 14, 2017 (the
11 "Stipulation").

12 **Q. WHY DO YOU RECOMMEND THAT THE COMMISSION REJECT THE**
13 **STIPULATION?**

14 A. While the Stipulation reduces the amount of revenues that DP&L can collect under Rider
15 DMR, the Stipulation does not address the fundamental flaws that I discussed in my
16 direct testimony. The Stipulation still allows DP&L to collect transition revenues and
17 does not follow the Commission's policy for grid modernization riders. Moreover, under
18 DP&L's original proposal, a significant portion of the Rider DMR revenues would have
19 been used to pay for grid modernization. The Stipulation states that the Rider DMR
20 revenues can be used for either debt reduction or grid modernization, without specifying
21 how much can be spent for either one. So DP&L could choose to spend all of the
22 revenues on debt reduction, and not use any of the revenues for grid modernization. Per
23 Craig Jackson's original testimony, the Rider DMR revenues to be collected under the

1 Stipulation will be insufficient to protect DP&L's financial integrity, so now it does not
2 appear that DP&L will use any of the Rider DMR revenues for grid modernization. In
3 this respect, the Stipulation is worse than DP&L's original proposal.

4 **Q. HAVE ANY CHANGES OCCURRED SINCE YOUR DIRECT TESTIMONY**
5 **THAT YOU WOULD LIKE TO ADDRESS?**

6 A. Yes. On March 8, 2017, the Commission announced its *PowerForward* initiative to
7 modernize the grid. The Commission should be applauded for launching this initiative.
8 This announcement makes an even more compelling case that the Commission should
9 require DP&L to file a business plan and cost/benefit study for grid modernization in this
10 docket. The plan should include distribution automation, voltage optimization, AMI
11 deployment, and customer and CRES provider access to customer energy usage data.
12 The Commission has already approved grid modernization plans for Duke Energy and
13 AEP, and FirstEnergy has filed a preliminary business plan for grid modernization, which
14 is awaiting Commission approval. The Commission should require DP&L to begin the
15 grid modernization process in this docket. Otherwise, DP&L's grid modernization
16 process could be delayed by a few years, to the disadvantage of its customers.

17 **II. CONCLUSION**

18 **Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT TESTIMONY?**

19 A. Yes.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been served upon the following parties by electronic mail this 29th day March, 2017.

/s/ Miranda Leppla
Miranda R. Leppla

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Summary: Testimony Supplemental Direct Testimony of John Finnigan electronically filed by Ms. Miranda R Leppla on behalf of Environmental Defense Fund and Ohio Environmental Council