

**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. 16-395-EL-SSO
In the Matter of the Application of the Dayton Power and Light Company for Approval of Revised Tariffs)))	Case No. 16-396-EL-ATA
In the Matter of the Application of the Dayton Power and Light Company for Approval of Certain Accounting Authority Pursuant to Ohio Rev. Code § 4905.13))))	Case No. 16-397-EL-AAM

REPLY BRIEF OF PEOPLE WORKING COOPERATIVELY, INC.

People Working Cooperatively, Inc. (“PWC”) submits this reply brief to demonstrate support for the Amended Stipulation and Recommendation (“Amended Stipulation”).¹ PWC explained in its initial brief how the Amended Stipulation satisfies the three-prong test. As such, PWC will limit the scope of this brief to the Office of Ohio Consumers’ Counsel’s (“OCC”) argument regarding whether the Amended Stipulation benefits low-income customers.²

Edgemont Neighborhood Coalition (“Edgemont”), Ohio Partners for Affordable Energy (“OPAE”), and PWC are three organizations that represent the interest of low-income customers in this case. Each one of these low-income advocates is a signatory party to the Amended Stipulation.³ This is largely because the Amended Stipulation provides critical funding for the low-income customers that Edgemont, OPAE, and PWC represent. For low-income advocates

¹ Amended Stipulation (“Joint Ex 1”).

² OCC Initial Brief at 23, 33, and 41.

³ Joint Ex 1 at 40.

like PWC, this funding is no small matter. Further, the importance of these provisions of the Amended Stipulation is evident from the record. Edgemont/OPAE's witness Cronmiller testified that nearly one in five people in Montgomery County were living below poverty in 2014.⁴ She also testified that utility costs are one of the primary concerns of low-income customers.⁵ The low-income funding commitments of Dayton Power and Light Company ("DP&L") will help to directly address these issues. DP&L has agreed to provide \$765,000 per year in shareholder funds during the term of the DMR to support low-income customers through bill payment assistance and economic development programs.⁶ In addition, DP&L has agreed to provide \$200,000 per year in funding for PWC's programs, which will support PWC's efforts to assist low-income, elderly, and disabled customers in DP&L's territory.⁷ Although OCC characterizes this funding as a mere "pittance"⁸, these financial commitments by DP&L are incredibly important for low-income advocates, and important for the populations low-income advocates represent.

Further, the Amended Stipulation is consistent with the policy goal of R.C. 4928.02(L) because it protects these at-risk populations. Because of the important benefits the Amended Stipulation provides low-income customers, PWC respectfully requests that the Commission approve and adopt the stipulation.

⁴ Direct Testimony of Cherish Cronmiller ("Edgemont/OPAE Ex. 1") at 3.

⁵ *Id.*

⁶ Direct Testimony of Sharon Schroder ("DP&L Ex. 3) at 16.

⁷ Joint Ex. 1 at 36; DP&L Ex. 3 at 16; Direct Testimony of R. Jeffery Malinak ("DP&L Ex. 2B") at 17.

⁸ OCC Initial Brief at 23.

Respectfully submitted on behalf of
PEOPLE WORKING COOPERATIVELY, INC.



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Reply Brief was served via electronic mail upon the following, this 15th day of May 2017.



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Summary: Reply Reply Brief of People Working Cooperatively electronically filed by Mr. Devin D. Parram on behalf of People Working Cooperatively