

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
The Dayton Power and Light Company	)	
for Approval of its Energy Efficiency and	)	Case No. 17-1398-EL-POR
Peak Demand Reduction Portfolio Plan	)	Case No. 17-1399-EL-WVR
for 2018 through 2020.	)	

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**OHIO PARTNERS FOR AFFORDABLE ENERGY’S  
OBJECTIONS TO THE APPLICATION**

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Pursuant to Ohio Administrative Code 4901:1-39-04(D), Ohio Partners for Affordable Energy (“OPAE”) herein submits to the Public Utilities Commission of Ohio (“Commission”) these objections to the application of The Dayton Power and Light Company (“DP&L”) for approval of its Energy Efficiency and Peak Demand Reduction Portfolio Plan for 2018 through 2020 (“Application”).

OPAE objects that DP&L’s new cross-sector program, non-programmatic savings, is to be eligible for the shared savings incentive under the Application. The non-programmatic savings are savings achieved outside DP&L’s utility programs. Application at 83-84. The savings are achieved by customers’ activities outside the utility programs. DP&L’s Application lists the savings, budget, and Total Resource Cost test score for these non-programmatic savings. Application at 83-85. In addition, DP&L is applying to earn a shared savings incentive on the non-programmatic savings as is evident in that DP&L does not include non-programmatic savings in the list of programs not included in the calculation of the shared savings incentive. Application at 6.

Savings achieved from non-utility programs may count toward compliance with the statutory benchmarks but such savings should not be included in the calculation of the shared savings incentive. Non-utility-program savings, while eligible for compliance purposes, should not be eligible for a shared savings

incentive. *FirstEnergy Corp.*, Case Nos. 12-2190-EL-POR, et al., Opinion and Order (March 20, 2013) at 16; American *Electric Power*, Case No. 11-5568-EL-POR, et al., Opinion and Order (March 21, 2012) at 9, 18.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

A copy of the foregoing Objections will be served electronically by the Commission's Docketing Division on the parties listed below who are electronically subscribed on this 14th day of August 2017.

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Summary: Objection to the Application electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy