BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The Dayton Power and Light Company for an increase in Electric Distribution Rates	: : :	Case No. 15-1830-EL-AIR
In the Matter of the Application of The Dayton Power and Light Company for Accounting Authority	: : :	Case No. 15-1831-EL-AAM
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs	: : : :	Case No. 15-1832-EL-ATA

PREFILED TESTIMONY
OF

CRAIG SMITH

Service Monitoring and Enforcement Department
Service Analysis and Reliability Division
Public Utilities Commission of Ohio

Staff Exhibit ______

Date: July 16, 2018

1. Q. Please state your name and your business address.

A. My name is Craig Smith. My business address is 180 East Broad Street, Columbus, Ohio 43215.

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

A. I am employed by the Public Utilities Commission of Ohio (PUCO or Commission). I am a Public Utilities Administrator with the Reliability and Service Analysis Division within the Service Monitoring and Enforcement Department. My current duties include the oversight of service reliability, consumer protection policies and rules for gas, water, and electric, as well as low income assistance programs.

3. Q. Would you briefly state your educational background and work experience.

A. I received a Bachelor of Arts degree that included a Major in Political Science and a Minor in Chemistry from Denison University. I received a Master's degree in Public Administration from The Ohio State University. I received a Juris Doctor from Capital University. In addition, I completed over a dozen post-baccalaureate classes in accounting from Columbus State Community College.

While obtaining my Master's and Law degrees, I served as a management and legal intern with the PUCO in the Consumers Services Department.

After law school, I began employment with the Ohio Department of Taxation. While at the Department of Taxation I was employed as an Internal Audit Supervisor 2, Chief Counsel Supervisor 2 in Tax Appeals, and as a Deputy Tax Commissioner. I have also been a private sector attorney and a Certified Internal Auditor (2006-2017).

In January of 2014, I accepted a Utilities Specialist 1 position with the PUCO in the Accounting and Electricity Division. In October of 2014, I accepted a Utilities Specialist 2 positon with the PUCO in the Reliability and Service Analysis Division. And in October of 2015, I accepted my current position, a Public Utilities Administrator 2 with the PUCO in the Reliability and Service Analysis Division.

4. Q. What is the purpose of your testimony?

A. The purpose of my testimony is provide the results of Staff's evaluation of costs contained in distribution rates that may be necessary to provide standard service offer (SSO) service and to address Retail Energy Suppliers Association's (RESA) Objections #6 and #7 and Interstate Gas Supply, Inc.'s (IGS) Objection A to the SSO section of the Staff Report. In addition, my testimony responds to IGS's Objection C regarding the lack of changes to the Dayton Power and Light Company's (DP&L or Company) Supplier tariff regarding credit and collateral requirements.

5.. Q. How did Staff evaluate the costs contained in distribution rates that may be necessary to provide SSO?

A. The Rates and Analysis Staff reviewed a Cost of Service Study (COSS) provided by DP&L in this case to determine how approved distribution cost should be classified and allocated among all rate classes, and determined what distribution costs are needed to serve customers by rate class. Costs are first classified as energy, demand, or customer related. Customer classes are allocated the functionalized and classified revenue requirements (cost of service) to the different customer rate classes. A customer rate class is a relatively homogeneous group of customers that possess similar characteristics and who face the same set of prices such as residential, industrial, and commercial.

In order to evaluate the costs contained in DP&L's distribution rates that may be necessary to provide SSO service, Staff needed to identify those costs related to servicing SSO customers that had not already been identified in bypassable riders and that could be tracked separately from those costs to serve non-SSO customers. Staff determined the best way to identify those costs was to have DP&L provide information that could separate distribution costs and services into those that served SSO customer and those that served non-SSO customers.

7. Q. Why did Staff take this approach?

A. Staff recognized that part of a distribution company's service is to deliver generation supply to customers whether those customers are SSO or non-SSO. The revenue requirement is for distribution related functions not generation or transmission. To fairly evaluate the cost to serve a SSO customer, Staff believed that it would have to take into account the costs and services to serve a non-SSO customer, because operational, administrative, and non-operating costs are embedded in DP&L's distribution cost.

Thus, Staff sought to determine whether SSO and non-SSO customers utilize the same services regarding the various costs within the customer service charge and whether DP&L tracks the cost for such services between SSO and non-SSO customers. The Company did not conduct a class COSS between SSO and non-SSO customers.

8. Q. Why did the Company not provide a COSS on SSO and non-SSO customers?

A. The Company in response to Staff Discovery Request #181 explained that "(b)ecause generation and transmission costs were excluded from the filing, DP&L did not further analyze costs to provide SSO service as part of its

COS study" and "DP&L did not further analyze cost to provide CRES as a part of its COS study."[1] In addition the company in response to Staff Discovery Request #187 explained that "(w)hile the Company may incur different cost associated with providing certain services to shopping and non-shopping customers, DP&L is unable to quantify those differences because its cost are not tracked with that level of granularity….It would be prohibitively expensive for the Company to track costs that are associated with each of these functions and any other functions that are associated with administering the competitive retail market and providing a standard service offer."[2]

9. Q. Did the Company believe that SSO and non-SSO customers use exactly the same distribution services?

A. No. while DP&L did not further analyze the costs to provide SSO service as part of its COSS, DP&L stated that while it may incur different costs associated with providing certain service to SSO and non-SSO customers, it is unable to quantify those differences because its cost are not tracked at such a granular level. The Company did believe that the cost differences between SSO and non-SSO customers did go both ways. The Company provided example of incurred costs associated with providing service to non-SSO customers that it does not also incur for SSO customers such as

[1] DR #181, Case No. 15-1830-EL-AIR.
[2] DR #187, Case No. 15-1830-EL-AIR.

interacting with competitive suppliers, calculating and collecting collateral, providing bill ready and rate ready billing, and administering the TCRR-N opt-out pilot program.[3]

10. Q. Did Staff consider another approach to evaluating the cost to support SSO service?

A. Staff did consider an allocation methodology using an assumption that there are costs imbedded to service SSO customers. However, Staff did not have enough information such as a supplemental COSS on the true cost to serve each set of customers to make such an assumption. Based on Staff's own interaction with DP&L and other electric distribution utilities (EDU) on competitive and non-competitive issues, Staff could not make an assumption that DP&L's cost to serve SSO customers is significant enough to justify a shift in cost allocation methodology.

For example, Staff participates in the Ohio Electronic Data Interchange (EDI) Working Group which is comprised of the four Ohio EDUs, competitive retail service providers (CRES), third party EDI providers, and Staff. This group works specifically on electronic data exchange procedures to ensure customers' data is transmitted in order to allow

[3] DR #187, Case No. 15-1830-EL-AIR.

customer to be served by a CRES provider. The Company call center interactive voice response (IVR)[4] recorded 29,921 contacts for electric choice through the first 10 months of 2017. There is no similar option for SSO customers. The Company also received 83 formal customer complaints in 2017 regarding electric choice.

One could assume that SSO customers who are proportionally disconnected more than Choice customers, incur more administrative costs.[5] However, due to payment priority as authorized in Case No. 03-2245-EL-UNC, partial payments are posted to past due CRES charges first, and remaining balances are then applied to DP&L's past due charges.[6] In addition, when a customer is returned to the SSO, either by their choice or by CRES action, the CRES charges remain on the customer bill for the earlier of 1) at least three billing cycles; 2) the date the customer is disconnected; or 3) when a final bill is issued. The partial payment priority will still apply while the CRES charges are on the customer's bill, even when the customer is returned to the SSO. Finally, Percentage of Income Payment Plan Plus (PIPP) customer pre-PIPP arrears which may include CRES charges are

[4] The IVR is the call tree that gives callers approximately 17 options for the purposes of servicing their needs. One of those Options is electric choice.
[5] DR #181, Case no. 16-0395-EL-SSO.
[6] *See* Ohio Adm.Code 4901:1-10-22(G).

collected through the Universal Service Fund and remain with the customer as pre-PIPP debt.

11. Q. Could Staff determine whether SSO customer's choice of default service incurred increased or required different levels of service based on this choice?

A. No, upon inquiry with the Company through data request, Staff determined that both SSO and non-SSO customers utilized similar services. Whether a customer is SSO or non-SSO, the costs to administer the competitive retail market and the SSO are similar. All customers utilize the call center, communication channels, accounting resources, IT, legal, and administrative and regulatory resources.

12. Q. What are the objections of IGS to the SSO section of the Staff Report?

A. IGS's objection is that the Staff report fails to recommend that DP&L unbundle from distribution rates all costs related to provisions of the SSO and that the Staff Report further incorrectly proposes an avoided cost analysis to unbundle distribution rates.[7]

[7] *In the Matter of the Application of The Dayton Power and Light Company for an Increase in Electric Distribution Rates*, Case No. 15-1830-EL-AIR, et al., Objections to Staff Report of Investigation and Summary of Major Issues of Interstate Gas Supply, Inc. at 4-9 (Apr.11, 2018) (*DPL Rate Case*).

13. Q. What are the Objections of the RESA to the SSO section of the Staff report?

A. RESA's Objection #7 objects to Staff's acceptance of DP&L's COSS, stating that the COSS does not properly identify DP&L's total costs and does not properly functionalize, classify, or allocate those costs.[8] RESA's Objection #6 objects to Staff's recommendation that only the PUCO/OCC assessment expense be recovered through a bypassable charge.[9]

14. Q. What costs do IGS and RESA seek to unbundle?

A. The administrative, operating and non-operating costs related to provision of the SSO.[10] Based on the pre-filed testimony of J. Edward Hess the costs that should be unbundled include such items as printing and postage, accounting, administrative salaries, and legal personnel.[11]

15. Q. Has the Company included any direct generation costs in distribution rates?

[8] *DPL Rate Case*, Objections to the Staff Report and Summary of Major Issues of Retail Energy Supply Association at 2-3 (Apr. 11, 2018).
[9] *DPL Rate Case*, Objections to the Staff Report and Summary of Major Issues of Retail Energy Supply Association at 2 (Apr. 11, 2018).
[10] *DPL Rate Case*, Objections to the Staff Report and Summary of Major Issues of Retail Energy Supply Association at 3 (Apr. 11, 2018); *DPL Rate Case*, Objections to Staff Report of Investigation and Summary of Major Issues of Interstate Gas Supply, Inc. at 4-9 (Apr.11, 2018).
[11] *DPL Rate Case*, Direct Testimony of J Edward Hess on Behalf of Retail Energy Supply Association and Interstate Gas Supply, Inc. at 14-15 (Apr. 11, 2018).

A. No, whether a customer is on a SSO or a non-SSO choice offer, the direct costs of energy, capacity, and alternative energy requirements are excluded from distribution rates.

16. Q. Does the Company admit that all costs in the provision of generation for SSO customers are included in the rates SSO customers pay for default service?

A. Yes, the Company has expressed that all of the default SSO service costs are included in SSO rates.[12]

17. Q. If there are no direct costs of generation service then what costs could be included in distribution rates?

A. Administrative, operating, or non-operating costs. Administrative costs are expenses incurred in controlling and directing an organization but not directly identifiable with business operations such as accounting. Operating costs are expenses related to the operation of a business segment. They are the resources used by an organization just to maintain existence. Non-operating costs are expenses incurred by a business that are unrelated to its core operations such as borrowing costs.

[12] DR # 187, Case No. 15-1830-EL-AIR.

18. Q. Do you have concerns with the methodology for the cost allocation between SSO and non-SSO customers put forth by IGS and RESA?

A. RESA and IGS, through the direct testimony of J. Edward Hess, recommend a cost of service allocation methodology that approximates the costs incurred by DP&L in providing SSO service.

RESA and IGS did not conduct a process review, time studies, or any other data-driven analysis to assign costs to SSO customers. Rather, RESA and IGS reviewed Federal Energy Regulatory Commission (FERC) accounts and arbitrarily identified accounts that might have an embedded SSO operational or administrative cost. There was no investigation of the embedded costs. Furthermore, RESA and IGS make the unsupported assumption that either Choice customers do not have similar embedded costs as SSO customers, or the SSO proportion of embedded costs is greater than the Choice customer's proportion.

RESA's and IGS's analysis errs by further basing the allocation methodology on revenue. Lacking a cost causation study, RESA's and IGS's revenue allocation assigns one third of the estimated distribution costs to SSO customers and one third of the customer allocation to SSO customers. Furthermore, based on RESA's and IGS's recommendation, the provision of SSO service is equal in cost to distribution service itself.

The Commission most recently addressed this topic in the April 25, 2018 Opinion and Order for Case No. 16-1852-EL-SSO. The Commission directed the Ohio Power Company to analyze actual costs for providing both SSO service and choice service before the Commission will determine it is necessary to reallocate costs between SSO and non-SSO customers.[13]

19. Q. Does Staff agree with IGS's and RESA's objections regarding the COSS? If not, please explain why.

A. Staff does not agree with any of IGS's or RESA's objections to the SSO section of the Staff Report. The stipulation in the DP&L SSO case stated that there will be an evaluation of costs contained in distribution rates that may be necessary to provide SSO service. Although the Stipulation did not direct any one party to evaluate the costs, Staff did evaluate the costs based on the data provided by DP&L. However, Staff did not use the evaluation methodology that IGS or RESA described in their testimony.

The last objection by IGS and RESA is the suggestion that Choice customers pay these costs twice through distribution rates and again in the CRES supplier's charges. Choice customers do not pay these costs twice. All customers pay for the Company's distribution costs in distribution rates.

Choice customers do not pay for the company's distribution costs in the CRES supplier's charges. Rather, Choice customers pay for generation service through the CRES supplier's charges

20. Q. What are the results of Staff's evaluation of costs contained in distribution rates that may be necessary to provide SSO service?

A. Although it is likely that the provision of SSO service utilizes shared administrative and operating expenses, it is also likely that the provision of non-SSO Choice services utilize similar if not greater amounts of administrative and operating expenses.

All customers are distribution customers to the Company not just SSO or non-SSO customers. The proposed new classification is inconsistent with regulatory principles of rate design as well as with the Company's accounting systems. Each customer of the Company may be a SSO or a non-SSO customer at any given time as the choice of generation service is fluid from month to month. As such, the distinction of which generation service a customer chooses does not provide a definable class for allocation when a customer can choose a new supplier or default service multiple times per year. The Company is required to provide a SSO of all competitive retail electric services necessary to maintain essential electric service to consumers as well as the ability for customers to choose a competitive electric retail provider.[14] The embedded costs to the distribution utility to maintain SSO and Choice service are assets used jointly and should be recovered by contributions from all customers.

21. Q. What is IGS's objection to the Staff Report regarding Supplier Tariffs?

A. IGS stated that the Staff Report fails to propose changes to the credit and collateral requirements contained in the DP&L Supplier Tariff.[15] IGS argued that the stipulation and Opinion and Order in the DP&L SSO case "expressly permitted parties to raise additional matters related to the Supplier Tariff in this proceeding."[16]

22. Q. Does Staff agree with IGS's objection?

A. No. Staff was under no obligation to propose changes IGS proposes to DP&L's Supplier Tariff. The Staff Report is based on a review of DP&L's application for an increase in distribution rates. Staff takes no position on IGS' objection to the modification of the tariff language.

23. Q. Does this conclude your testimony?

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[14] R.C. 4928.141.

[15] *DPL Rate Case*, Objections to Staff Report of Investigation and Summary of Major Issues of Interstate Gas Supply, Inc. at 9 (Apr. 11, 2018).

[16] *DPL Rate Case* at 9.

A. Yes, it does. However, I reserve the right to submit supplemental testimony as described herein, as new information subsequently becomes available or in response to positions taken by other parties.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Testimony of **Craig Smith** submitted on behalf of the Staff of the Public Utilities Commission of Ohio via electronic mail upon the following parties of record, this 16th day of July, 2018.

/s/Thomas W. McNamee
Thomas W. McNamee
Assistant Attorney General

Parties of Record:

Michael J. Schuler
Dayton Power & Light Company
1065 Woodman Drive
Dayton, OH 45432
michael.schuler@aes.com

Ellis Jacobs
Advocates for Basic Legal Equality
130 West Second Street, Suite 700 East
Dayton, OH 45402
ejacobs@ablelaw.org

Trent A. Dougherty
Ohio Environmental Council
1145 Chesapeake Avenue, Suite 1
Columbus, OH 43212
tdougherty@theoec.org

Robert Dove
The Law Office of Robert Dove
P.O. Box 13442
Columbus, OH 43213
rdove@attorneydrove.com

Charles J. Faruki
Jeffrey S. Sharkey
Faruki Ireland & Cox
500 Courthouse Plaza, S.W.
10 North Ludlow Street
Dayton, OH 45402
cfaruki@ficlaw.com
jsharkey@ficlaw.com

Colleen L. Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
P.O. Box 1793
Findlay, OH 45839-1793
cmooney@ohioipartners.org

David F. Boehm
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
dboehm@bkllawfirm.com

Kimberly W. Bojko
Carpenter Lipps & Leland
280 North High Street, Suite 1300
Columbus, OH 43215
bojko@carpenterlipps.com

Joseph E. Oliker
IGS Energy
6100 Emerald Parkway
Dublin, OH 43016
joliker@igsenergy.com

Justin Vickers
Environmental Law and Policy Center
35 East Wacker Drive, Suite 1600
Chicago, IL 60601
jvickers@elpc.org

Matthew R. Pritchard
Frank P. Darr
McNees Wallace & Nurick
21 East State Street, #1700
Columbus, OH 43215
mpritchard@mwncmh.com
fdarr@mwncmh.com

Madeline Fleisher
Environmental Law and Policy Center
21 West Broad Street, Suite 500
Columbus, OH 43215
mfleisher@elpc.org

John Finnigan
Environmental Defense Fund
128 Winding Brook Lane
Terrace Park, OH 45174
jfinnigan@edf.org

David D. Parram
Taft Stettinius & Hollister
65 East State Street, Suite 100
Columbus, OH 43215
dparram@taftlaw.com

Stephen M. Chmiel
Michael Austin
Thompson Hine
41 South High Street, Suite 1700
Columbus, OH 43215
stephanie.chmiel@thompsonhine.com
michael.austin@thompsonhine.com

John R. Doll
Doll Jansen & Ford
111 West First Street, Suite 1100
Dayton, OH 45402-1156
jdoll@djflawfirm.com

Beren S. Argetsinger
Keyes Fox & Wiedman
401 Harrison Oaks Boulevard
Suite 100
Cary, NC 27513
bargetsinger@kfwlaw.com

Thomas A. Jernigan
AFCEC/JA-ULFSC
139 Barnes Drive, Suite 1
Tyndall AFB, FL 32403
thomas.jernigan.3@us.af.mil

Lisa M. Hawrot
Spilman Thomas & Battle
Century Centre Building
1233 Main Street, Suite 4000
Wheeling, WV 26003
lhawrot@spilmanlaw.com

Steven D. Lesser
James F. Lang
N. Trevor Alexander
Calfee, Halter & Griswold
41 South High Street
1200 Huntington Center
Columbus, OH 43215
slesser@calfee.com
jlang@calfee.com
talexander@calfee.com

Attorney Examiners:

Greg Price
gregory.price@puco.ohio.gov

Derrick Price Williamson
Spilman Thomas & Battle
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com

Carrie M. Harris
Spilman Thomas & Battle
310 First Street, Suite 1100
P.O. Box 90
Roanoke, VA 24002-0090
charris@spilmanlaw.com

Dylan F. Borchers
Bricker & Eckler
100 South Third Street
Columbus, OH 43215-4291
dborchers@bricker.com

PUCO Staff Data Request #181
Case No. 15-1830-EL-AIR
DP&L Distribution Rate Case

From:	Barbara Bossart
To:	DP&L
Date Sent:	6/23/17

Cost of Service Study

1. Based upon DP&L's current distribution rate case filing, please provide the cost of service identifying the actual customer related costs required to provide SSO service.

   Response: DP&L's Standard Service Offer (SSO) provides bypassable transmission and generation services to DP&L customers who choose this option. These customers also receive non-bypassable transmission and distribution services from DP&L. The rate application and its supporting Cost-of-Service (COS) Study apply to distribution costs only. Thus, the customer-related costs, as analyzed in this application, are related to distribution service provided by DP&L under tariffs other than the SSO tariff. These customer-related costs can be found in Schedule E-3.2b of the application. Because generation and transmission costs were excluded from the filing, DP&L did not further analyze costs to provide SSO service as a part of its COS study.

   Witness Responsible: Bruce Chapman

2. Based upon DPL's current distribution rate case filing, please provide the cost of service identifying the actual customer related costs required to provide CRES service.

   Response: Competitive Retail Electric Service (CRES) provides bypassable transmission and generation service to the DP&L customer. The rate application and its supporting Cost-of-Service (COS) Study apply to distribution costs only. Thus, the customer-related costs, as analyzed in this application, are related to distribution service provided by DP&L under tariffs other than the CRES tariff. These customer-related costs can be found in Schedule E-3.2b of the application. Because generation and transmission costs were excluded from the filing, DP&L did not further analyze costs to provide CRES as a part of its COS study.

   Witness Responsible: Bruce Chapman

Collections

3. Please provide by rate class the total number and dollar amounts of unpaid final bills that were charged-off for the years 2015 and 2016. Exclude accounts that include and the Percentage of Payment Plan Plus (PIPP) arrearages.

Response: Please see below the total number and dollar amounts of unpaid final bills that were charged-off for years 2015 and 2016 by revenue class, excluding PIPP arrearages. DP&L does not have this information by Tariff class.

2015

Rate Class	Qty	Amount ($)
COM	434	244,484.65
GOV	2	267.27
IND	16	53,610.17
RES	10,505	5,637,316.46

2016

Rate Class	Qty	Amount ($)
COM	601	420,450.95
GOV	3	12,813.33
IND	9	5,184.08
RES	15,709	8,070,056.77

Witness Responsible: Barry J. Bentley

4. Of those accounts reference in question 1, please provide a breakdown on dollar amount by Standard Service Offer (SSO) generation and distribution charge-offs.

   Response: DP&L does not track charge-offs by generation or distribution, or more specifically, by tariff separately. When a payment is made by a customer, that payment is applied to the current outstanding balance as a whole and is not directly allocated to the specific tariff charges.

   Witness Responsible: Barry J. Bentley

5. Please provide the dollar amount returned to Competitive Retail Electric Service (CRES) provider as a result of customer's disconnection for non-payment for each of the years 2015 and 2016.

   Response:
   2015: $51,206.83
   2016: $70,782.92

   Witness Responsible: Barry J. Bentley

6. Please provide Dayton Power and Lights' (DP&L) Collection policies and procedures.

   Response: Please see PUCO DR 181-06 Attachment 1 – CONFIDENTIAL.

   Witness Responsible: Barry J. Bentley

7. Does DP&L have a dollar amount threshold to trigger a disconnection order? If so, please provide.

   Response: Yes. Please see PUCO DR 181-07 Attachment 1 – CONFIDENTIAL.

   Witness Responsible: Barry J. Bentley

8. Please provide the total number of customers disconnected for non-payment by rate class for each of the years 2015 and 2016. If possible, please separate by shopping customer and non-shopping customer. Please exclude PIPP customers, if possible.

   Response: Please see below the number of customer accounts that were disconnected for non-payment of electric charges and subsequently final billed and the charged-off dollars for years 2015 and 2016 separated by shopping and non-shopping customers by revenue class, excluding PIPP arrearages. DP&L does not have this information by Tariff class.

2015 Non-Shopping Totals

Rate Class	Qty	Amount ($)
COM	220	118,700.75
GOV	0	0
IND	2	1,319.67
RES	4,697	3,211,150.72

2016 Non-Shopping Totals

Rate Class	Qty	Amount ($)
COM	136	72,774.20
GOV	1	110.63
IND	3	1,482.34
RES	4,801	4,456,360.91

2015 Shopping Totals

Rate Class	Qty	Amount ($)
COM	76	32,286.91
GOV	0	0
IND	0	0
RES	1,145	471,657.71

2016 Shopping Totals

Rate Class	Qty	Amount ($)
COM	67	34,583.76
GOV	0	0
IND	2	5,019.28
RES	1,393	528,035.25

Witness Responsible: Barry J. Bentley

9. Please provide the number of disconnection notices DP&L issued for each of the years 2015 and 2016. Please separate the number of disconnection notices by shopping and non-shopping customers.

Response:
2015 Non-Shopping: 433,851
2016 Non-Shopping: 389,981

2015 Shopping: 138,414
2016 Shopping: 154,094

Witness Responsible: Barry J. Bentley

10. Please provide your partial payment priority process for consolidated billing.

Response: DP&L follows the payment posting included in Ohio Administrative Code Section 4901:1-10-33(H) and in its Stipulation and Recommendation in Case No. 03-2245-EL-UNC:

EDU Security Deposits and Reconnect Fees
CRES Past Due
EDU Past Due
EDU Current
CRES Current

Witness Responsible: Barry J. Bentley

11. Please provide the disconnection dollar amount and number of customer accounts by the years 2015 and 2016 separated by shopping and non-shopping customers. Please exclude PIPP Customers.

Response: Please see the response to Question #8 above.

Witness Responsible: Barry J. Bentley

12. Please provide all cost categories that DPL identifies as FERC 904 Uncollectible accounts.

Response:
1) Utility Uncollectible Expense
2) Universal Service Fund Revenue
3) Damage Claims

Witness Responsible: Karin M. Nyhuis

Call Center

13. Please provide a list of call codes used by DP&L's call center to identify the reason for the customer call.

Response: On April 10, 2017 DP&L switched to a new phone system. The IVR options on this phone system are: outage, billing and payment, start or stop service, electric choice, and speak with an agent.

Witness Responsible: Barry J. Bentley

14. Please provide a list of all DP&L's call center reports.

Response: Please see the list of reports that DP&L uses in the call center below:

- Agent productivity Report
- Agent availability Report
- Tardy Report
- Occupancy Report
- Attendance Report
- AES IVR Containment by Area for Date Range
- AES QA Trend Summary Report
- DPL Feedback Survey Summary
- DPL Agent Performance Scorecard
- DPL Queue Period Statistics Response Report (Accumulated Percentage)
- DPL Queue Period Statistics Response Report with IVR (Accumulated Percentage)
- User Productivity Summary
- AES IVR Duplicate Caller Report
- Corrective Action Report
- Coaching Report
- Agent Monthly Scorecard

Witness Responsible: Barry J. Bentley

15. Does DPL track customer complaints? If so, does DPL identify the type of complaint by an identifier or code? If so, please provide those identifiers or codes.

Response: DP&L considers customers complaints to be formal inquiries from the PUCO or the Better Business Bureau. DP&L tracks customer complaints and categorizes them by the categories/codes shown below.

- Billing
- Credit and collection
- Deposits
- Customer service
- Accessibility
- Construction
- Outages
- IVRU/Outage line
- Service
- Tree trimming
- Meter reading
- Claims
- Maintenance
- Revenue protection
- Electric choice
- Miscellaneous
- PIPP

Witness Responsible: Barry J. Bentley

PUCO Staff Data Request #187
Case No. 15-1830-EL-AIR
DP&L Distribution Rate Case

From:	Craig Smith
To:	DP&L
Date Sent:	11/8/17

All references to the "Company" refer to Dayton Power and Light. Please call if you have any questions. Please provide staff with the following information:

Call Center:

6. Please provide the number of CRES contacts received by the Company for years 2015, 2016, and 2017.

   Response: Please see below for the number of customers who selected electric choice in the IVR for 2015 - 2017.

2015	18,935
2016	15,947
2017	29,921

   Witness Responsible: Barry J. Bentley

7. Please provide the number of customers who selected electric choice as an IVR option for each month in 2017.

   Response: Please see below for the 2017 monthly number of electric choice calls.

Jan-17	897
Feb-17	1,004
Mar-17	1,279
Apr-17	2,646
May-17	1,521
Jun-17	3,605
Jul-17	7,331
Aug-17	4,046
Sep-17	3,465
Oct-17	4,127

   Witness Responsible: Barry J. Bentley

8. Please provide the total number of customers who selected an IVR option for each month in 2017.

Response: Please see below for number of customers who selected an IVR option for each month in 2017.

Jan-17	195,344
Feb-17	183,439
Mar-17	209,991
Apr-17	195,433
May-17	232,725
Jun-17	233,338
Jul-17	308,363
Aug-17	200,573
Sep-17	182,972
Oct-17	195,222

Witness Responsible: Barry J. Bentley

9. Please provide number of customer complaints (Better Business Bureau and PUCO) received in 2015, 2016, and 2017 for electric choice.

Response: Please see below for the number of customer complaints received in 2015-2017 from Better Business Bureau and the PUCO. Referrals are when the PUCO sends the customer to DP&L in hopes of resolving the issue before it escalates to a formal complaint.

	2015	2016	2017
PUCO Complaints	22	20	23
BBB	3	2	2
PUCO Referrals	0	23	58
Total	25	45	83

Witness Responsible: Barry J. Bentley

PUCO Staff Data Request #187
Case No. 15-1830-EL-AIR
DP&L Distribution Rate Case

From:	Craig Smith
To:	DP&L
Date Sent:	11/8/17

All references to the "Company" refer to Dayton Power and Light. Please call if you have any questions. Please provide staff with the following information:

Cost of Service:

1. Please provide the difference in cost between shopping and non-shopping customers to the Company in the provision of distribution service.

   Response: While the Company may incur different costs associated with providing certain services to shopping and non-shopping customers, DP&L is unable to quantify those differences because its costs are not tracked with that level of granularity. For instance, the Company incurs costs associated with providing services to shopping customers that it does not incur for non-shopping customers (e.g., interacting with competitive suppliers, calculating and collecting collateral; providing bill ready and rate ready billing; and administering the TCRR-N opt-out pilot program). It would be prohibitively expensive for the Company to track costs that are associated with each of these functions and any other functions that are associated with administering the competitive retail market and providing a standard service offer. All of the costs that DP&L incurs to provide particular services to or on behalf of shopping and non-shopping customers are appropriately assigned to the distribution function of DP&L because a distribution utility is required by law to offer a standard service offer and has obligations with regard to administering aspects of the competitive market.

   Witness Responsible: Nathan C. Parke.

2. Please detail if any, the difference in distribution services between shopping and non-shopping customers.

   Response: Please see the Company's response to PUCO DR 187-01.

   Witness Responsible: Nathan C. Parke

3. Does the Company provide differing levels or amount of services between shopping and non-shopping customers?

   Response: DP&L offers the same services to all customers regardless of shopping or non-shopping. However, DP&L provides SSO service to non-shopping customers and administers competitive services for shopping customers (including costs incurred to provide services to CRES providers).

Witness Responsible: Nathan C. Parke.

4. Has the Company included all costs in the provision of transmission and generation for non-shopping customers in the rates non-shopping customers pay for default services? If not, please describe and quantify costs not included in default service rates.

   Response: Yes.

   Witness Responsible: Nathan C. Parke.

5. Does the Company subsidize SSO service in distribution base rates? If so, please detail these items.

   Response: No.

   Witness Responsible: Nathan C. Parke

Call Center:

6. Please provide the number of CRES contacts received by the Company for years 2015, 2016, and 2017.

   Response: To be supplemented.

   Witness Responsible:

7. Please provide the number of customers who selected electric choice as an IVR option for each month in 2017.

   Response: To be supplemented.

   Witness Responsible:

8. Please provide the total number of customers who selected an IVR option for each month in 2017.

   Response: To be supplemented.

   Witness Responsible:

9. Please provide number of customer complaints (Better Business Bureau and PUCO) received in 2015, 2016, and 2017 for electric choice.

Response: To be supplemented.

Witness Responsible: