BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of the Dayton)	
Power and Light Company for Authority to Recover)	Case No. 18-0077-EL-RDR
Certain Storm-Related Service Restoration Costs)	

COMMENTS OF THE DAYTON POWER AND LIGHT COMPANY

I. INTRODUCTION

On February 2, 2018, the Dayton Power and Light Company ("DP&L" or "the Company") filed an application seeking authority to recover 2016 storm-related service restoration O&M costs through its Storm Cost Recovery Rider ("SCRR"), Tariff No. D30. The Storm Cost Recovery Rider, as approved by the Commission in Case No. 16-395-EL-SSO, permits DP&L to seek recovery of O&M expenses incurred for all storms that are determined to be "Major Events" as determined by Ohio Adm.Code 4901:1-10-01, as well as carrying charges at the last approved cost of debt accrued from the point of deferral until recovery begins. As part of the Opinion and Order in Case No. 16-395- EL-SSO, prior to resolution of the rate case in Case No. 15-1830-EL-AIR, storm cost recovery is offset by the three-year average of major storm repair expense (less any outlier storms).

The rate design for the storm rider will be based on the Company's most recent annual distribution revenues. Further, each class will be assigned a fixed monthly rate based on that class' annual billing units. DP&L proposes to recover the 2016 Storm revenue requirement over a 12-month period.

II. **COMMENTS**

On July 26, 2018, the Staff of the Public Utilities Commission of Ohio ("Staff") filed

its Review and Recommendation in this case. In its review, Staff found the Company has

appropriately included in its SCRR only those restoration costs incurred due to major

storms in Ohio, with the exception of recommended adjustments totaling \$63,371. These

adjustments are for expenses relating to meals, labor, stock issuance, stock returns, and

stores handling.

The Company does not oppose the Staff's recommended adjustments totaling \$63,371.

This would reduce the annual revenue requirement from \$1,768,590 to \$1,705,219. As

such, the monthly billed amount for residential customers will be reduced to \$0.20 from

\$0.21; the non-residential customers will see a reduction to \$0.81 from \$0.84; and the rate

for private outdoor lighting will remain unchanged at \$0.06.

III. **CONCLUSION**

DP&L appreciates the opportunity to provide comments and requests that the Commission

approve the recovery mechanism requested in the Application with the adjustments listed in

Staff's Review and Recommendations.

Respectfully submitted,

/s/ Michael J. Schuler

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2

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Summary: Comments of the Dayton Power and Light Company electronically filed by Eric R Brown on behalf of The Dayton Power and Light Company