

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of :
The Dayton Power and Light Company for : Case No. 19-334-EL-UNC
Approval of an Energy Efficiency Pilot :
Program :

**COMMENTS OF THE DAYTON POWER AND LIGHT COMPANY
FOR APPROVAL OF AN ENERGY EFFICIENCY PILOT PROGRAM**

I. INTRODUCTION

DP&L’s Residential Demand Response Pilot is a carefully crafted program that seeks to explore a potentially valuable energy efficiency and peak demand reduction (“EE/PDR”) program while ensuring customer safeguards and minimal investment that will still permit a sample of sufficient size to yield valuable data for DP&L, the Public Utilities Commission of Ohio (“PUCO” or “the Commission”), and DP&L’s Collaborative participants, including those that filed objections. DP&L files these Comments to address issues that were raised in the Objections filed by Interstate Gas Supply, Inc. (“IGS”) and the Office of the Ohio Consumers’ Counsel (“OCC”). For the reasons more fully explained below, the Commission should grant DP&L’s Application to implement the Residential Demand Response Pilot program without any modifications.

II. BACKGROUND

Electric distribution utilities (“EDUs”) are required to implement energy efficiency and peak demand (“EE/PDR”) programs to meet, at a minimum, the benchmarks set forth in R.C. 4928.66(A). DP&L has operated successful EE/PDR programs since 2009, as designed and implemented through multiple portfolios over the past decade. DP&L is operating under its

fourth Energy Efficiency Program Portfolio for the 2018-2020 period (“Fourth EE/PDR Portfolio”) as set forth in the Stipulation and Recommendation that was filed and approved without modification in Case No. 17-1398-EL-POR, *et al.* DP&L’s Fourth EE/PDR Portfolio contained multiple provisions, including a specific listing of the programs that will be offered and a budget for pilot programs.¹ In the approved Stipulation, however, DP&L is required to seek approval of any proposed pilot program prior to implementation.² The Stipulation provides for a ninety-day automatic approval of a proposed pilot program if no objections are filed within 60 days of the application, and if no order is issued by the Commission within 30 days thereafter.³

On January 31, 2019, DP&L filed an Application to implement a Residential Demand Response Pilot program. On the sixtieth day, both OCC and IGS filed objections. Accordingly, on April 18, 2019, the Attorney Examiners issued a procedural schedule formally suspending the automatic approval process and setting a Comment and Reply Comment period “in order to provide additional time to obtain further input and information to assist the Commission in its review of DP&L’s application for the Residential DR pilot program.”⁴

III. LAW AND ARGUMENT

A. DP&L’s Residential Demand Response Pilot Program is Consistent with State Policy and Ohio Law.

In this proceeding, DP&L seeks approval of a specific EE/PDR program, that is very limited in time and scope, as part of and consistent with the Company’s approved Fourth

¹ *In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Energy Efficiency and Peak Demand Reduction Program Portfolio Plan for 2018 through 2020 (“Fourth Portfolio Plan”),* Case No. 17-1398-EL-POR, Stipulation and Recommendation at Exhibit 1 (October 27, 2017).

² *Id.* at p. 10.

³ *Id.* at p. 11.

⁴ Entry at p. 3 (April 18, 2019).

EE/PDR Portfolio plan. DP&L's Fourth EE/PDR Portfolio plan, to which OCC is a Signatory Party and IGS is a Non-Opposing Party, contained a \$1.8MM budget for pilot programs. DP&L is seeking to use a portion (less than half) of that previously-approved budget to conduct a Residential Demand Response Pilot. The Commission should reject any assertion that DP&L's Residential Demand Response Pilot program is either unlawful or contrary to state policy.

For nearly a decade, EDUs have been required to maintain energy-efficiency and peak-demand reduction programs pursuant to R.C. 4928.66(A)(1)(a) and (b). Such programs are authorized to include: (1) "[d]emand-response programs" and (2) "[c]ustomer-sited programs."⁵ There is no question that the Residential Demand Response Pilot program constitutes "demand response" and/or a "[c]ustomer-sited program[]."

The Commission should, likewise, reject IGS's argument that the Residential Demand Response Pilot program is an improper "behind the meter generation service."⁶ IGS points to no statutory authority establishing that this limited EE/PDR program is a "generation-related service,"⁷ a concept that is inconsistent with R.C. 4928.66. Instead, IGS points to a specific excerpt from the PowerForward Roadmap as the sole source of support to argue that DP&L "is attempting to obfuscate the line of demarcation for behind the meter applications . . . that should be offered to customers in the retail market."⁸ But no such "line of demarcation" exists; in fact, Ohio law makes it clear that an EE/PDR program like this pilot is authorized to be administered by DP&L.

⁵ R.C. 4928.66(a)(2)(d).

⁶ Objections of Interstate Gas Supply, Inc. ("IGS Objections") at pp. 3 (April 1, 2019).

⁷ Id. at p. 5.

⁸ Id. at pp. 2-6.

Indeed, Ohio law defines “competitive retail electric service” as “a component of retail electric service that is competitive as provided under division (B) of this section.”⁹ R.C.

4928.01(B) goes on to state that:

a retail electric service component shall be deemed a competitive retail electric service if the service component is competitive pursuant to a declaration by a provision of the Revised Code or pursuant to an order of the public utilities commission authorized under division (A) of section 4928.04 of the Revised Code. Otherwise, the service component shall be deemed a noncompetitive retail electric service.

Neither the Revised Code nor the Commission have declared that energy efficiency programs such as the Residential Demand Response Pilot program are competitive retail electric services that may not be offered by an EDU. To the contrary, Ohio law expressly permits EDUs to offer EE/PDR programs and even requires EDUs to meet minimum energy efficiency and peak demand reduction requirements.¹⁰ This Commission has consistently approved EE/PDR programs administered by all six electric distribution utilities for the past decade.

IGS also appears to argue that CRES providers should be the only market participants who can offer innovative solutions to customers.¹¹ But that is contrary to state policy, which seeks to “[e]ncourage innovation and market access for cost-effective supply- and demand-side retail electric service including, but not limited to, demand-side management,” without any limitation on who should be providing those innovative services.¹² The Commission has further held:

Section 4928.02, Revised Code, establishes state policy objectives, of which the Commission should be mindful when making its decision. However, the state policies contained in Section 4928.02, Revised Code, ***should not be viewed in isolation. Many other goals and***

⁹ R.C. 4928.01(A)(4).

¹⁰ R.C. 4928.66(A)

¹¹ IGS Objections at p. 3.

¹² R.C. 4928.02(D).

policies are contained throughout the code, including the energy efficiency benchmarks contained in Section 4928.66, Revised Code.¹³

For these reasons, the Commission should find that the proposed Residential Demand Response Pilot is legally permissible and promotes state policy by granting DP&L's application.

B. DP&L's Residential Demand Response Pilot Program Provides Appropriate Incentives, Customer Protections, and Controls.

1. The ability to opt-out of the Residential Demand Response Pilot program is an important customer protection that affords control and will induce adoption.

Both IGS and OCC question the validity of the program where customers can choose to exercise the option to override and "opt-out" of the demand response events.¹⁴ Specifically, OCC argues that "[n]o economically rational customer would participate in any events because they receive zero compensation for doing so," and, "basic economic theory suggests that there should be incentives to participate on an event-by-event basis so that customers have an incentive to participate in each event, not just one."¹⁵ To the contrary, customers cannot participate in the demand response program unless they: (1) have a smart thermostat; and (2) have agreed to allow curtailments.

DP&L recognizes that cost and concern of program penalties could be a barrier to entry for customers desiring to purchase and install a qualifying smart thermostat, much less participate in a demand response program. Offering a rebate toward a portion of the cost of a smart thermostat makes it more economically feasible for customers to purchase the smart

¹³ *In the Matter of the Application of Duke Energy Ohio, Inc. for an Energy Efficiency Cost Recovery Mechanism for Approval of Additional Programs for Inclusion in its Existing Portfolio*, Case No. 11-4393-EL-RDR, Opinion and Order, p. 18 (Aug. 15, 2012) (emphasis added).

¹⁴ Objections to the Dayton Power and Light Company's Proposed Pilot Program by The Office of the Ohio Consumers' Counsel ("OCC Objections") at pp. 2-4 (April 1, 2019); IGS Objections at p. 6.

¹⁵ OCC Objections at p. 4.

thermostat which is necessary to participate in the pilot program. DP&L deliberately proposes running events with no customer consequences for opting out in the initial year of the Residential Demand Response Pilot program for a number of reasons. Adding complexity to the initial program design, like penalizing a customer for opting out of an event, dissuades customers from enrolling and continuing participation. DP&L's objective was to eliminate barriers to participation and to give customers choice and control. Typically, the point of enrollment is the last time a customer actively contemplates the inner workings of curtailment events. Thus, the program is designed to increase uptake rates while providing enhanced customer protections and giving customers ultimate control. Moreover, the effectiveness of pre-cooling algorithms offered by Nest and Ecobee is such that customers often are not aware an event is underway, reducing the likelihood of override.¹⁶

The design for the DP&L pilot program model was based on best-practices from other midwestern utilities and is similar to other/existing utility demand response programs, including permitting unlimited opt-outs from curtailment events. For instance, the ComEd Central Air Conditioning Cycling program, which provides \$40/season compensation to customers, also allows customers to opt out of curtailment events throughout the program season – without additional incentives for customers who elect to participate in an event and without penalties for customers who elect to opt out of an event.¹⁷ Kansas City Power and Light Company offers a

¹⁶ *Southern Indiana Gas and Electric Company d/b/a/ Vectren Energy Delivery of Indiana Inc. for Approval of a Demand Side Management Adjustment for Electric Service*, IURC Cause No. 43405-DSMA 15, Direct Testimony of Rina H. Harris, Attachment RHH-5 at p. 249, available at <https://iurc.portal.in.gov/legal-case-details/?id=f6bd7658-1c8f-e711-8110-1458d04ed778> (stating “the majority (78%) recalled fewer events than actually occurred (less than 10),” and when asked about the primary methods of notification that events were called “were notification on the thermostat (54%) or the cell phone (47%), **noticing that that the home temperature had increased (18%)**, and a notification from Vectren other than on the utility bill (17%)”).

¹⁷ “Rush Hour Rewards Program Agreement for Comed Customers,” available at <https://nest.com/legal/energy-partner/ce/> (stating “[a]t any time that you desire, you may override this temperature set point simply by turning your Nest Thermostat to a different temperature.”).

similar demand response program where customers receive a participation incentive irrespective of whether they participate in a called event.¹⁸ Nevertheless, in a single program year, from 2016 to 2017, KCP&L grew their Residential Thermostat DR program from 5 MW to 20 MW.¹⁹ This supports that a program that is easy to understand and provides customers the control to opt out has led to higher enrollment by reducing friction in the customer experience, without meaningfully sacrificing demand reductions.

The purpose of the pilot program is “to allow DP&L the flexibility to research or pilot programs to test their feasibility for cost-effective savings and potential inclusion in future portfolio plans.”²⁰ Opt-out results for pilot curtailment events will be used to inform future design of the incentive structure of the program if it continues into the next portfolio plan cycle. Thus, DP&L’s Demand Response Pilot program should remain unaltered from how it is proposed in the Company’s Application.

2. DP&L’s Residential Demand Response Pilot program design ensures that customers will receive an appropriate incentive to encourage adoption.

While unclear, OCC appears to argue that DP&L’s Residential Demand Response Pilot program is flawed because customers can receive three rebates for a single thermostat thus permitting customers to “receive free—i.e. 100% subsidized – thermostats, paid by other

re or using the Nest website or mobile application); *See also*, https://www.comed.com/News/Documents/newsroomreleases_05122015.pdf.

¹⁸ “KCP&L Thermostat Program Agreement” available at <https://nest.com/legal/energy-partner/kcpl/> (stating “[a]t any time that you desire, you may override this temperature setpoint simply by turning your Nest Thermostat to a different temperature or using the Nest website or mobile application”)

¹⁹ Kansas City Power and Light , GMO Evaluation, Measurement, and Verification Report – FINAL Program Year 2017, page 160, available at: <https://www.efis.psc.mo.gov/mpsc/commoncomponents/viewdocument.asp?DocId=936200384>

²⁰ *Fourth Portfolio Plan*, Case No. 17-1398-EL-POR, Application at p. 75 (June 15, 2017).

customers.”²¹ As an initial matter, OCC insinuates that DP&L could somehow control manufacturer-issued rebates and those of other third parties. Nevertheless, DP&L has not proposed to provide free thermostats to customers as part of its energy efficiency programs.

Even assuming no changes to current programs and a customer can and does stack all possible rebates – the current DP&L Residential Smart Thermostat program rebate (\$50), the current Vectren Smart Thermostat program rebate (\$50), and the proposed Demand Response Pilot rebate (\$50) – a customer would pay at least \$19.00 for the most basic models of smart thermostats absent manufacturer-provided incentives. Therefore, a free smart thermostat would only be available through smart thermostat manufacturer subsidies, not rate-payer dollars.

Moreover, results of the DP&L Residential Smart Thermostat program reflect customers prefer to purchase a higher-end model of smart thermostat. Only 18% of 2018 Nest thermostat sales through the DP&L Residential Smart Thermostat program were customers purchasing a Nest Thermostat E, the basic Nest model. Eighty-two percent of Nest purchases were for the Nest 3rd Gen series thermostat, which has a starting retail price of \$249, whereby the customer would be paying over 40% of the cost of the thermostat if all rebates were stacked. Similarly, only 35% of Ecobee smart thermostat sales through the 2018 DP&L Smart Thermostat program were customers purchasing an Ecobee 3 Lite, the basic Ecobee model. Sixty-five percent of Ecobee purchases were Ecobee 4’s, also with a starting retail price of \$249. Thus, on the majority of thermostats sold, if the customer stacks all possible incentives, they are still paying over 40% of the cost absent manufacturer incentives, which is not materially out of range with the window suggested by OCC. But the range suggested by OCC relies upon testimony of The Environmental Law and Policy Center witness John Jewell was from a completely separate case

²¹ OCC Objections at pp. 5-6.

(Case No. 16-1309-GA-UNC) and taken out of context. Moreover, it appears as though Mr. Jewell's testimony was in support of a Smart Thermostat program that did not include a demand response component.²² Thus, it would stand to reason that an additional incentive, in line with what is suggested by DP&L in this matter, would be necessary to induce adoption.

OCC's assumptions, while flawed for the reasons described above, also overlook the fact that DP&L has the ability to change its underlying Residential Smart Thermostat rebate at any time. Thus, while DP&L's Residential Smart Thermostat program rebate is currently set at \$50, DP&L can amend that amount at any time if it is deemed unnecessary to induce customers to participate in the programs. After all, it is in DP&L's interest to maximize penetration for savings with the least amount of dollars to ensure cost effectiveness.

C. DP&L's Customers Will Benefit from the Demand Response Pilot Program Irrespective of the Requirements Set Forth in R.C. 4928.64(B)(1)(b).

Both OCC and IGS argue that DP&L has not proposed to and is not required to offer demand response beyond 2020 such that the Residential Demand Response Pilot program may not be necessary.²³ While DP&L may have met the peak demand reduction requirements set forth in R.C. 4928.66(A)(1)(b) by the conclusion of its current 2018-2020 program portfolio, DP&L may still elect to conduct energy efficiency programs that reduce peak demand. The Commission has repeatedly held that those benchmarks should be seen as a floor, not a ceiling.²⁴

²² See, OCC Objections at p. 5.

²³ OCC Objections at pp. 6-7; IGS Objections at p. 3.

²⁴ *In the Matter of the Adoption of Rules for Alternative and Renewable Energy Technology, Resources, and Climate Regulations, and Review of Chapters 4901:5-1, 4901:5-3, 4901:5-5, and 4901:5-7 of the Ohio Administrative Code, Pursuant to Amended Senate Bill No. 221*, Case No. 08-888-EL-ORD, Entry on Rehearing (June 17, 2009) ("Our belief is that the statutory benchmarks represent **the minimum requirement**") (emphasis added); *In the Matter of the Commission's Review of the Participation of The Cleveland Electric Illuminating Company, the Ohio Edison Company, and The Toledo Edison Company in the May 2012 PJM Reliability Pricing Model Auction*, Case No. 12-814-EL-UNC, Entry, p. 2 (Feb. 29, 2012) ("These annual benchmarks [of R.C. 4928.66] are cumulative and **represent statutory minimums**") (emphasis added).

The Commission should, therefore, not penalize DP&L for exceeding those mandates. Moreover, DP&L still has not met the energy efficiency requirements set forth in R.C. 4928.66(A)(1)(a), which would necessitate future portfolio programs. The majority of DP&L's energy efficiency programs have coincident peak demand savings associated with them because a KW saved over a span of time produces kWh reductions.

To that end, one of the stated objectives in DP&L's pilot program filing is "Can a DR component make DP&L's Smart Thermostat program more cost-effective?" This hypothesis addresses if adding the benefits associated with avoided capacity costs would improve the cost-effectiveness of a Smart Thermostat program. By definition, if a program is cost-effective, customers are enjoying more benefits than the program costs. Thus, if this pilot program proves to be successful, it could result in further savings to the benefit of DP&L's customers.

Therefore, DP&L should be permitted to pursue this Pilot, which is provided for in the context of the current portfolio.

D. DP&L's Customers are the Primary Beneficiary of this Program Because DP&L Struck an Appropriate Balance of Scale and Costs.

Despite OCC's suggestion otherwise,²⁵ DP&L has maximized the incentive costs and minimized the administrative costs for the Residential Demand Response Pilot program. Any new pilot programs lack scale, include start-up costs, and have disproportionately high impact and process evaluation costs, particularly in the first year. DP&L reasonably established start-up costs when constructing the pilot program, and appropriately including these costs as one-time costs within the program budget. Costs in the second year, which drop by nearly 28% because of the removal of startup costs, are far more indicative of the minimal administrative costs

²⁵ OCC Objections at pp. 7-8.

associated with the program going forward. DP&L believes this pilot program will ultimately prove to be cost-effective at scale based upon other experiences of other utilities across the country. Kansas City Power and Light Company commenced a similar program in 2016 and yielded a TRC score of 2.29 and a UCT score of 4.88 by 2017.²⁶

But OCC seems to be focused on form over substance by pointing out the percentage of costs allocated between incentives and administration of the program.²⁷ This could easily be rectified by boosting the amount of incentives offered under this program. By definition, however, a pilot is limited in design and scale; otherwise, the proposed program would swallow the concept of a “pilot.” Thus, DP&L struck an appropriate balance of costs with size of program while still exploring proof of concept. The proposed pilot will then provide the information necessary to perform an examination of whether the program merits continuation and scale in the future – the primary purpose of the Residential Demand Response Pilot.

Similarly, IGS suggests that the costs for the Residential Demand Response Pilot program should be shifted to the Smart Thermostat program and that the associated rebate should be increased.²⁸ To support this self-serving argument, IGS points to the number of customers impacted by this pilot as compared to if those same dollars were used in the Smart Thermostat program.²⁹ For the reasons stated above, however, startup costs skew the impact on customers. Moreover, per the Stipulation and Recommendation in DP&L’s current approved portfolio plan,

²⁶ Kansas City Power and Light , GMO Evaluation, Measurement, and Verification Report – FINAL Program Year 2017, Table 11 on page xxxi, available at: <https://www.efis.psc.mo.gov/mpsc/commoncomponents/viewdocument.asp?DocId=936200384>

²⁷ Id.

²⁸ IGS Objections at pp. 8-9.

²⁹ IGS Objections at p. 8.

“DP&L will not exceed any of the individual program budgets set forth on Exhibit 1.”³⁰ DP&L projects to use the entire Smart Thermostat budget without having to shift additional dollars from the Pilot budget approved as part of that same Exhibit 1. The enrollment incentive proposed in the Residential Demand Response Pilot not only encourages more thermostats in the field, it provides consent from customers to utilize their device as a curtailment instrument, thus maximizing the thermostats’ savings capabilities. This pilot will no doubt increase the adoption of smart thermostats, but also begin to create the platform for the peak demand value for the distribution utility and the customer.

IGS also points to the fact that DP&L lacks smart meters to fully harness the benefits and information from the Residential Demand Response Pilot program.³¹ DP&L certainly agrees that AMI is a fundamental enabling activity for many solutions in Ohio, including EE and PDR offerings that can benefit from more granular and accurate data. Hence, DP&L filed a comprehensive grid modernization plan that includes full roll-out of AMI in PUCO Case No. 18-1875-EL-GRD, *et al.* But given the limited scope and purpose, this Residential Demand Response Pilot can still be administered without AMI. The program is designed to track the number of customers that participate in the program as well as which events in which they participated or did not participate. As proposed, the plan will be evaluated by a third-party evaluator to determine benefits for the program to determine savings similar to what is done in other DP&L energy efficiency programs. As a pilot, the Residential Demand Response Pilot program is designed to gather information that will then be shared in DP&L’s Collaborative.

³⁰ *In Re the Application of the Dayton Power and Light Company for Approval of Its Energy Efficiency and Peak Demand Reduction Program Portfolio Plan for 2018 through 2020*, Case No. 17-1398-EL-POR, *et al.*, Stipulation and Recommendation at p. 6 (October 27, 2017).

³¹ IGS Objections at p. 4-6.

Certainly, AMI will unlock additional benefits and options. In the meantime, however, the Residential Demand Response Pilot is uniquely timed to assess and inform the additional benefits that may be gleaned from administering the program in conjunction with the AMI that DP&L is currently seeking to deploy.

E. DP&L Already Provides the Necessary Reporting Information that OCC Seeks.

OCC suggests that the PUCO should require DP&L answer certain questions and file an annual report related to the proposed Residential Demand Response Pilot program.³² DP&L already files annual reports detailing costs, savings, cost-effectiveness, and evaluation results of every program, including pilots. These reports are in addition to the Stipulation Agreement for the current portfolio plan which states DP&L will include the pilot program “on the agenda for each of [our] quarterly Energy Efficiency Collaborative meetings where it and pilot program implementers will discuss the previous quarter’s activities and the upcoming quarter’s plans.”³³

With respect to OCC’s proposed list of questions, the majority of these hypotheses are already contemplated within the objectives of the pilot program. By way of example, DP&L will be monitoring customer incentives with respect to customer participation in the program, researching whether savings generated through the pilot program are impactful to congested circuits, and establishing whether the pilot program can have a positive impact on the cost effectiveness of the Smart Thermostat program. Several of the questions posed are not directly addressed by a stated pilot program objective. Quite simply, these hypotheses cannot be effectively tested given the proposed population size and budget of the pilot program. By way of

³² OCC Objections at pp. 8-9.

³³ *In Re the Application of the Dayton Power and Light Company for Approval of Its Energy Efficiency and Peak Demand Reduction Program Portfolio Plan for 2018 through 2020*, Case No. 17-1398-EL-POR, et al., Stipulation and Recommendation at pp. 10-11 (October 27, 2017).

example, the population size for the pilot program is not large enough to be considered statistically valid for purposes of testing hypotheses such as whether incentive amounts should vary by event, or if varying incentive amounts impacts participation rates. Pilot programs of any variety need to balance the volume of factors being tested against the overall impact of those factors. Essentially, testing a handful of variables enables DP&L to clearly establish which variables are most meaningful in the context of the pilot program. Testing too many variables decreases DP&L's ability to discern which factors are contributing the greatest impact, whether positive or negative. Nevertheless, DP&L will share the necessary information as previously described; thus, rendering OCC's suggestions unnecessary.

IV. CONCLUSION

For the reasons stated above, the Commission should grant DP&L's Application to implement the Residential Demand Response Pilot program with no changes.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Comments of The Dayton Power And Light Company In Support of Its Application has been served via electronic mail upon the following counsel of record, this 2nd day of May, 2019:

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Summary: Comments of the Dayton Power and Light Company for Approval of an Energy Efficiency Pilot Program electronically filed by Mr. Tyler A. Teuscher on behalf of The Dayton Power and Light Company