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Via E-File

May 15, 2019

Public Utilities Commission of Ohio
PUCO Docketing
180 E. Broad Street, 10th Floor
Columbus, OH 43215

In re: Case Nos. 16-0395-EL-SSO, 16-0396-EL-ATA and 16-0397-EL-AAM

Dear Sir/Madam:

Please find attached the INITIAL POST-HEARING BRIEF OF THE OHIO ENERGY GROUP (OEG) e-filed today in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



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MLKkew

Encl.

Cc:

Certificate of Service
Bryce McKenney, Attorney Examiner
Gregory Price, Attorney Examiner

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter Of The Application Of Dayton Power And Light Company For Approval of its Electric Security Plan.	:	Case No. 16-0395-EL-SSO
	:	
	:	
In The Matter Of The Application Of The Dayton Power And Light Company For Approval of Revised Tariffs.	:	Case No. 16-0396-EL-ATA
	:	
	:	
In The Matter Of The Application Of Dayton Power And Light Company For Approval Of Certain Accounting Authority Pursuant to Ohio Rev. Code §4905.13.	:	Case No. 16-0397-EL-AAM

**INITIAL POST-HEARING BRIEF OF THE
THE OHIO ENERGY GROUP**

The Ohio Energy Group (“OEG”) submits this Initial Post-Hearing Brief in support of its recommendations to the Public Utilities Commission of Ohio (“Commission”) in these proceedings. OEG’s members who are participating in these proceedings and who take service on The Dayton Power and Light Company (“DP&L” or “Company”) system are: Cargill, Incorporated, General Motors LLC and TimkenSteel Corporation. OEG’s recommendations are set forth below.

INTRODUCTION

On February 22, 2016, DP&L filed its initial application for an Electric Security Plan (“ESP”). Nearly a year later, on January 30, 2017, the Company submitted the first Stipulation and Recommendation that was filed in these proceedings. That Stipulation and Recommendation did not have consensus support from the parties and was eventually replaced with an Amended Stipulation and Recommendation filed on March 14, 2017 (“Amended Stipulation”). The Amended Stipulation resolved DP&L’s proposed ESP in a manner that was either explicitly supported by or, at minimum, not opposed by a multitude of entities, including: the Company, DPL Inc., Commission Staff, the City of Dayton, the Retail Energy Supply

Association, Edgemont Neighborhood Coalition, Interstate Gas Supply, Inc./IGS Energy (“IGS”), People Working Cooperatively, the Ohio Hospital Association, OEG, Ohio Partners for Affordable Energy, the Kroger Company, Enernoc, Inc, Honda of America, Mfg. Inc., Industrial Energy Users-Ohio, the Ohio Manufacturers’ Association Energy Group, and Mid-Atlantic Renewable Energy Coalition. In its Brief in support of the Amended Stipulation OEG argued that the Amended Stipulation satisfies the Commission’s traditional standard for reviewing proposed settlements and should be adopted.¹

On October 20, 2017 the Commission approved the Amended Stipulation with modifications. Most notably, the Commission rejected the Amended Stipulation’s recommendation that the Reconciliation Rider (“RR”), which is the mechanism that recovers or credits the net proceeds of selling OVEC capacity and energy into PJM, be assigned exclusively to non-shopping customers. The Commission instead ordered that the RR be non-bypassable so that it is charged or credited to all distribution customers including distribution customers served by CRES providers.

The Commission’s Order was the subject of several rounds of rehearing by several parties.² On September 19, 2018, the Commission issued a Third Entry on Rehearing granting, in part, and denying, in part, DP&L’s application for rehearing and denying all other applications for rehearing.

On October 19, 2018, IGS filed a notice of withdrawal from the Amended Stipulation (“Notice of Withdrawal”) and a motion for a procedural schedule citing a provision in the Amended Stipulation that allows any signatory party to contest the Amended Stipulation if it is materially modified.³ The motion to modify the procedural schedule was granted, allowing IGS the opportunity to file testimony in opposition to the Amended Stipulation.

¹ OEG Brief (May 5, 2017), pp. 2-4.

² Numerous Applications for Rehearing were filed in this case. They were filed by the The Dayton Power and Light Company; Ohio Environmental Council and Environmental Defense Fund; Murray Energy Corporation and Citizens to Protect DP&L Jobs; The Office of the Ohio Consumers' Counsel; Industrial Energy Users-Ohio; Retail Energy Supply Association; The Ohio Manufacturers' Association Energy Group; The Kroger Co; and IGS Energy.

³ Amended Stipulation and Recommendation at Section XI(5).

On February 12, 2019, IGS filed the testimony of four witnesses in opposition to the Amended Stipulation and an evidentiary hearing was conducted beginning on April 1, 2019. OEG submits this Brief in support of the Amended Stipulation.

II. ARGUMENT

1. **The Amended Stipulation Continues To Satisfy the Commission’s Three-Prong Test For Determining Whether A Settlement Is Reasonable And Should Be Adopted.**

a. **The Amended Stipulation Is The Product Of Serious Bargaining Among Capable And Knowledgeable Parties.**

The parties either explicitly supporting or not opposing the Amended Stipulation represent a wide variety of diverse interests, including the interests of the Company, Commission Staff, municipal customers, low-income advocates, industrial customers, commercial customers, demand response providers, hospitals, and renewable energy advocates. Most if not all of those parties have significant experience in Commission proceedings and each was represented by competent counsel. The Amended Stipulation therefore satisfies the first prong of the Commission’s three-prong test.

b. **The Amended Stipulation As A Package Benefits Customers And The Public Interest.**

In several ways, the Amended Stipulation is superior to DP&L’s litigation position in this hearing. It reduces the Company’s requested Distribution Modernization Rider (“DMR”) from \$145 million per year for seven years (totaling \$1.015 billion) to \$105 million for three years with the possibility of two additional years (totaling \$525 million, at most).⁴ The Amended Stipulation is also superior to the January 30, 2017 Stipulation and Recommendation that DP&L submitted in this proceeding. Staff’s rejection of the proposed DIR-B, which would have cost customers \$610 million over 33 years for \$175 million of unnecessary capital expenditures was critical in ensuring that the Amended Stipulation was reasonable. Therefore the Amended Stipulation satisfies the second prong of the Commission’s three-prong test.

⁴ Joint Ex. 1 at 4-5.

c. The Stipulation Does Not Violate Any Important Regulatory Principle Or Practice.

None of the individual provisions of the Amended Stipulation is inconsistent with or violates any important Commission principle or practice. The Amended Stipulation advances important policies and principles, including facilitating the state's effectiveness in the global economy, ensuring the availability to customers of adequate and reliable service, protecting at-risk populations, promoting innovation in technology for infrastructure, and facilitating retail shopping. The Amended Stipulation therefore satisfies the third prong of the Commission's three-prong test.

2. The Commission Rejected A Bypassable Reconciliation Rider In Its Third Entry On Rehearing.

As summarized above, IGS withdrew from the Amended Stipulation citing the Commission's Order making the RR non-bypassable to customers served by CRES providers. Through its supplemental testimony IGS again urges "*the Commission to establish the RR as a bypassable rider, which will ensure that shopping customers are not responsible for paying costs associated with DP&L's legacy investment in aging generation assets.*"⁵ While OEG continues to support the Amended Stipulation and its Paragraph VI.1.a.ii., which states that the RR should be charged on a bypassable basis, the Commission has already addressed the non-bypassability of the RR in the Commission's Third Entry on Rehearing and denied the arguments made by IGS and others.⁶ IGS has not introduced any arguments that were not considered by the Commission at the time of its October 20, 2017 Order approving the Amended Stipulation with modifications or its Third Entry on Rehearing again declining to approve a bypassable RR.

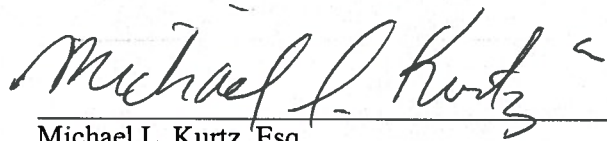
⁵ Supplemental Testimony of Mathew White, p. 3.

⁶ Third Entry on Rehearing (September 19, 2019) beginning on page 18.

CONCLUSION

WHEREFORE, for the foregoing reasons, the Commission should approve the Amended Stipulation.

Respectfully submitted,



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May 15, 2019

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I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 15th day of May, 2019 to the following:


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Summary: Brief Ohio Energy Group (OEG) Initial Post Hearing Brief electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group