



June 18, 2019

Via Electronic Filing

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

Re: Case Nos. 15-1830-EL-AIR, 15-1831-EL-AAM and 15-1832-EL-ATA

Dear Sir/Madam:

Pursuant to Section IV.3 of the June 18, 2018 Stipulation and Recommendation ("Stipulation"), The Dayton Power and Light Company ("DP&L") submits this final report to describe the status of the efforts made by DP&L, the Environmental Parties (i.e., Environmental Law & Policy Center, Natural Resources Defense Council, Ohio Environmental Council, and Environmental Defense Fund) and other interested stakeholders in developing a pilot plan with a goal of identifying for potential implementation non-wires alternatives ("NWA") that could cost-effectively result in the deferral or avoidance of a distribution investment project.

On August 15, 2018, within 60 days of the filing of the Stipulation, DP&L met at the Commission's offices with representatives of Staff, the Environmental Parties, customer groups, marketers, and other interested stakeholders to begin this collaborative process ("Collaborative"). Some of this initially broad cross-section of interested parties met again by phone on December 14, 2018, and agreed that DP&L should work with the Environmental Parties prior to reconvening the whole Collaborative. DP&L received related information from the Environmental Parties and had multiple follow-up meetings to explore criteria for identifying potential projects, developing appropriate NWA alternatives, and evaluating the effectiveness of NWAs. In addition, since the filing of the Stipulation, three significant events have taken place.

First, on August 29, 2018, the Commission released its vision for certain aspects of Ohio's energy future in a document entitled "PowerForward: A Roadmap to Ohio's Electricity Future" ("the Roadmap"). In the Roadmap, the Commission indicated an intent to develop a Distribution System Planning Workgroup ("PWG") that would be administered by Staff or a third-party facilitator. One of the specific issues to be addressed by the PWG included "[d]evelopment of NWA suitability criteria, processes and timeline for implementing NWA opportunities, . . . [and] [e]valuation of options for procuring NWA." Roadmap at p. 19.

Second, consistent with the Roadmap, in the fall of 2018, the Commission opened Case No. 18-1596-EL-GRD, and issued an RFP to select a third-party facilitator of the PWG, Entry at pp. 2-3 (November 28, 2018), later selecting Enernex, LLC ("Enernex"). Entry at p. 3 (January 23, 2019). Enernex conducted five meetings about NWAs beginning on April 23, 2019, where all utilities (including DP&L), the Environmental Advocates and other interested parties were active participants. The PWG still continues to meet to discuss specifics of NWAs and to finalize recommendations for the Commission's review.

Third, on December 21, 2018, consistent with Section II.3 of the Amended Stipulation and Recommendation approved in Case No. 16-395-EL-SSO, DP&L filed a comprehensive distribution infrastructure modernization plan in Case No. 18-1875-EL-GRD ("Distribution Modernization Plan"). DP&L's Distribution Modernization Plan includes an NWA demonstration project. Specifically, DP&L proposes 750 kilowatts of battery storage to free up needed circuit capacity in lieu of investment in traditional electric distribution infrastructure. *See*, Case No. 18-1875-EL-GRD, Testimony of Kevin Hall at p. 29 (December 21, 2018). As part of its DMP filing, DP&L further "commits to continue the NWA Collaborative as set forth in that Stipulation to help inform this demonstration project." *Id.*

Based on these developments, much of the same information, research, disclosures, and conversations taking place in DP&L's Collaborative have simultaneously been taking place in the PWG with the further assistance of Commission-selected, paid consultant, Enernex. Both the Collaborative and the PWG have discovered that the implementation of NWAs is a very complex issue. There is a lack of consensus on sensitive issues regarding ownership and the process to facilitate and implement NWAs. There is also no universally accepted view on how to appropriately measure the success of NWAs. Finally, DP&L has also discovered that some of the information helpful to determine ideal NWA opportunities require more granular information than is currently available to DP&L given its lack of a modernized grid and related supporting infrastructure. For instance, full rollout of SCADA, Advanced Metering Infrastructure, localized load research, and more robust long-term forecasting of circuit-specific load are key to unlocking the full potential of NWAs.

DP&L has expressed its support in exploring and implementing NWAs under the appropriate conditions and safeguards. As discussed in the final Collaborative meeting held on June 11, 2019, DP&L believes it will be most efficient to allow time for the PWG to continue its mission and report its findings, which is expected by January 2020. In the meantime, DP&L expects the participating parties may continue discussions related to the NWA demonstration project DP&L has already proposed in its Distribution Modernization Plan filing. DP&L believes that the two pending Commission actions will be the most appropriate venues to provide for robust discussion and broad stakeholder input into the NWA process prior to implementation. For these reasons, at this time, DP&L does not intend to file an additional NWA pilot beyond the demonstration project already filed in the Distribution Modernization Plan. Unless otherwise agreed or ordered in the Distribution Modernization Plan, DP&L plans to reconvene the Collaborative at an appropriate time after approval to help inform its NWA proposed in that filing.

Very truly yours,

/s/ Michael J. Schuler

Michael J. Schuler

cc. All Counsel of Record

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document has been served via electronic mail

upon the following counsel of record, this 18th day of June, 2018:

Thomas McNamee
Public Utilities Commission of Ohio
30 East Broad Street, 16th Floor
Columbus, OH 43215-3793
Email:
thomas.mcnamee@ohioattorneygeneral.gov

Attorney for PUCO Staff

Christopher Healey (Counsel of Record)
Terry Etter
Assistant Consumers' Counsel
Office of The Ohio Consumers' Counsel
65 East State Street, 7th Floor
Columbus, OH 43215-4203
Email: christopher.healey@occ.ohio.gov
terry.etter@occ.ohio.gov

Attorneys for Appellant
Office of the Ohio Consumers' Counsel

Frank P. Darr (Counsel of Record)
Matthew R. Pritchard
McNees Wallace & Nurick
21 East State Street, 17th Floor
Columbus, OH 43215
Email: fdarr@mwncmh.com
mpritchard@mwncmh.com

Attorneys for Appellant
Industrial Energy Users - Ohio

Angela Paul Whitfield
Stephen E. Dutton
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, OH 43215
Email: paul@carpenterlipps.com
dutton@carpenterlipps.com

Attorneys for The Kroger Company

David F. Boehm
Michael L. Kurtz
Kurt J. Boehm
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
Email: dboehm@BKLawfirm.com
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com

Attorneys for Ohio Energy Group

Kimberly W. Bojko (Counsel of Record)
Brian W. Dressel
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, OH 43215
Email: bojko@carpenterlipps.com
dressel@carpenterlipps.com

Attorneys for The Ohio Manufacturers'
Association Energy Group

Madeline Fleisher
Kristin Field
Environmental Law & Policy Center
21 West Broad Street, Suite 500
Columbus, OH 43215
Email: mfleisher@elpc.org
kfield@elpc.org

Robert Kelter (Senior Attorney)
Justin Vickers (Staff Attorney)
Environmental Law & Policy Center
55 East Wacker Drive, Suite 1600
Chicago, IL 60601
Email: rkelter@elpc.org
jvickers@elpc.org

Attorneys for the Environmental Law &
Policy Center

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

Attorneys for Honda America Mfg., Inc. and
The City of Dayton

Stephanie M. Chmiel
Thompson Hine LLP
41 South High Street, Suite 1700
Columbus, OH 43215-6101
Email: stephanie.chmiel@thompsonhine.com

Attorneys for Buckeye Power, Inc.

Trent Dougherty (Counsel of Record)
Miranda Leppla
1145 Chesapeake Avenue, Suite 1
Columbus, OH 43212-3449
Email: tdougherty@theoec.org
mleppla@theoec.org

John Finnigan
Senior Regulatory Attorney
Environmental Defense Fund
128 Winding Brook Lane
Terrace Park, OH 45174
Email: jfinnigan@edf.com

Attorneys for the Ohio Environmental Council
and Environmental Defense Fund

Robert T. Dove
KEGLER BROWN HILL RITTER CO., LPA
65 East State Street, Suite 1800
Columbus, OH 43213-4295
Email: rdove@keglerbrown.com

Samantha Williams (Staff Attorney)
Natural Resources Defense Council
20 N. Wacker Drive, Suite 1600
Chicago, IL 60606
Email: swilliams@nrdc.org

Attorneys for Natural Resources
Defense Council

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

Attorney for Ohio Partners for
Affordable Energy

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

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

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

Steve W. Chriss
Senior Manager, Energy Regulatory Analysis
Greg Tillman
Senior Manager, Energy Regulatory Analysis
Wal-Mart Stores, Inc.
2001 SE 10th Street
Bentonville, AR 72716-0550
Email: stephen.chriss@walmart.com
greg.tillman@walmart.com

Attorneys for Wal-Mart Stores East, LP
and Sam's East, Inc.

Matthew W. Warnock
Dylan F. Borchers
Devin D. Parram
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215-4291
Email: mwarnock@bricker.com
dborchers@bricker.com
dparram@bricker.com

Attorneys for The Ohio Hospital Association

Joseph Olikier
Michael Nugent
Interstate Gas Supply, Inc.
6100 Emerald Parkway
Dublin, OH 43016
Email: joliker@igsenergy.com
mnugent@igsenergy.com

Attorneys for Interstate Gas Supply, Inc.

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

Attorney for The Edgemont Neighborhood
Coalition

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

Attorneys for Utility Workers of
America Local 175

Michael J. Settineri (Counsel of Record)
Gretchen L. Petrucci
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008
Email: mjsettineri@vorys.com
glpetrucci@vorys.com

Attorneys for Constellation NewEnergy, Inc.

Mark A. Whitt
Christopher T. Kennedy
Rebekah J. Glover
Whitt Sturtevant LLP
The KeyBank Building, Suite 1590
88 East Broad Street
Columbus, OH 43215
Email: whitt@whitt-sturtevant.com
kennedy@whitt-sturtevant.com
glover@whitt-sturtevantat.com

Attorneys for Retail Energy Supply Association

Katie Johnson Treadway
One Energy Enterprises, LLC
12385 Township Rd. 215
Findley, OH 45840
Email: ktreadway@oneenergylc.com

Attorney for One Energy Enterprises, LLC

/s/ Christopher C. Hollon
Christopher C. Hollon

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Case No(s). 15-1830-EL-AIR, 15-1831-EL-AAM, 15-1832-EL-ATA

Summary: Letter of Notification Letter Regarding The Dayton Power and Light Company's Final Report on the Status of Efforts to Develop a Non-Wires Alternatives Pilot Plan electronically filed by Mr. Jeffrey S Sharkey on behalf of The Dayton Power and Light Company