

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's :
Investigation into Electric Vehicle Charging : Case No. 20-434-EL-COI
Service in this State. :

**REPLY COMMENTS OF
THE DAYTON POWER AND LIGHT COMPANY**

On February 26, 2020, the Public Utilities Commission (“PUCO” or “the Commission”) issue an Entry in this matter seeking comments from interested parties “on whether any person, firm, copartnership, voluntary association, joint-stock association, company, or corporation, wherever organized or incorporated, which is providing Electric Vehicle charging service in this state, is ‘engaged in the business of supplying electricity for light, heat, or power purposes to consumers within this state.’” Many different viewpoints were shared in the thirteen different sets of Comments that were filed on March 23, 2020. To the extent those Comments went beyond the scope of the original Entry, The Dayton Power and Light Company (“DP&L” or “the Company”) files these Reply Comments out of an abundance of caution. Rather than individually address each set, DP&L lends its support to a balanced approach of all Comments.

As stated by Duke Energy Ohio, Inc. (“Duke”), the utilities play a necessary role in a number of different facets related to electric vehicles (“EVs”) – “[developing] possible incentives/rebates, preparing infrastructure to enable growth, and investing in utility-owned and -operated facilities.”¹ The utility is necessary to ensure that there is adequate planning for the distribution infrastructure needed to support electric vehicle charging stations and manage the

¹ Comments of Duke Energy Ohio, Inc. (“Duke Comments”) at p. 3 (March 23, 2020).

grid impacts from increased EV adoption. But the utility should also be able to play a part in making sure that charging stations proliferate in our state. DP&L recognizes that a nascent competitive market exists for electric vehicle chargers and could be encouraged through rebate programs as well as a complimentary regulated environment where utilities are not precluded from owning and operating EV charging stations as well. Utility ownership would be done in accordance with regulations set forth by the Public Utilities Commission of Ohio (“PUCO” or “the Commission”).² Like the other utilities in this state, DP&L has an interstate corridor that includes both Interstate 70 and 75 running through the heart of its service territory, so the Company should be seen as a partner and enabler of EV charging and adoption in the state of Ohio. DP&L encourages the Commission not to foreclose the utility from playing vital roles in developing the EV market.

Respectfully submitted,

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² See also, Duke Comments at p. 4.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Comments of The Dayton Power and Light Company has been served via electronic mail upon the following counsel of record, this 7th day of April, 2020:

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Summary: Reply Comments of The Dayton Power and Light Company electronically filed by Mr. Michael J Schuler on behalf of The Dayton Power and Light Company