

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)	Case No. 20-650-EL-AAM
Dayton Power and Light Company for Approval of)	
Certain Accounting Authority)	
)	
In the Matter of the Application of The)	Case No. 20-651-EL-UNC
Dayton Power and Light Company for Approval of)	
its Temporary Plan for Addressing the COVID-19)	
State of Emergency)	
)	
In the Matter of the Application of The Dayton)	Case No. 20-652-EL-WVR
Power and Light Company for Waiver of Tariffs)	
and Rules Related to the COVID-19 State of)	
Emergency)	
)	
In the Matter of the Application of The)	Case No. 20-755-EL-AEC
Dayton Power and Light Company for Approval of)	
Revised Contract with Certain Customers and)	
Reasonable Arrangement Related to the COVID-19)	
State of Emergency)	

**SUPPLEMENTAL APPLICATION OF
THE DAYTON POWER AND LIGHT COMPANY**

I. INTRODUCTION

On March 23, 2020, The Dayton Power and Light Company (“DP&L” or “the Company”) filed an Application in response to the Public Utilities Commission of Ohio (“PUCO” or “the Commission”) Orders in Case No. 20-591-AU-UNC, setting forth its plan to minimize any service continuity hardship or service restoration hardship on the Company’s customers as well as avoiding unnecessary COVID-19 risks associated with social contact (“the Plan”). As described in that filing, DP&L continues to evaluate its policies and practices and has identified additional proposals to help its customers and communities weather the unprecedented health crisis with which we are faced. DP&L continues to coordinate and

collaborate with the Commission to minimize billing and service hardships for customers as well as avoid unnecessary COVID-19 risks associated with face-to-face contact. DP&L proposes to implement several billing modifications to reduce the financial burden of its commercial and industrial customers and seeks Commission approval of the plan and the associated relief set forth in this Application (“Supplemental Plan”).

II. DP&L’S BILLING PLAN FOR ITS COMMERCIAL AND INDUSTRIAL CUSTOMERS DURING THE COVID-19 STATE OF EMERGENCY

Pursuant to the Commission’s emergency ratemaking authority under R.C. 4909.16, DP&L seeks approval for the following Supplemental Plan to implement the Commission’s Entries in the *State of Emergency Proceeding* as it relates to its commercial and industrial customers’ billing. The Company requests prompt approval of this Supplemental Plan, including deferral as set forth in sub-section C, and will be implemented as soon as tariff waivers and deferrals are approved.

A. Temporary Billing Change to Secondary and Primary Class Customers to Appropriately Bill Customers During the State of Emergency Because of Limited Demand Meter Readings.

In DP&L’s first Application in these cases, DP&L explained its Plan to only attempt to conduct meter reads on interval and ERT meters that do not pose a risk of face-to-face contact during the existence of the “Stay at Home” Order. As a result, DP&L has approximately 43,000 customers in the Secondary Tariff Class and approximately 10 customers in the Primary Tariff Class whose meters are not currently being read. As soon as the “Stay at Home” Order is lifted and DP&L believes it has safe no-contact practices in place, DP&L will resume certain manual readings, but will still not include meters located inside a customer’s home or in a location that would require DP&L’s meter readers to come face-to-face with a customer during the term of the state-declared emergency. DP&L will estimate bills for those meters that cannot be read in

accordance with the Company's Plan. In order to facilitate for fewer estimated reads, DP&L is attempting to develop a self-reporting mechanism for customers to report kWh readings from their meter. This will allow for accurate kWh billing and minimize estimations; however, customers will not be able to reset and self-report demand readings.

After this time of estimated meter reads, the total energy (kWh) can be reconciled based on an actual read. Demand readings, however, are not able to be reconciled because DP&L's meters require a monthly demand reset at the meter to be conducted manually by the Company. Absent an alternative billing mechanism, these non-residential customers would be charged on a demand level set prior to the cessation of meter reading or the minimum demand set from the previous twelve months. Because of these circumstances, DP&L proposes to change the method of billing for those approximately 43,000 Secondary and Primary Tariff Class members that will not receive actual meter reads as a result of the Plan. Specifically, DP&L proposes to eliminate the need for the demand reading and instead charge an energy-only rate equivalent to the County Fair Rate for the duration of the Company's Plans. DP&L's current County Fair Rate provision is \$/kWh only and does not utilize a demand rate. This County Fair Rate provision is already approved in DP&L's tariffs that have demand components.

DP&L has approximately 18,000 Secondary Tariff Class customers and 500 Primary Tariff Class customers that do not require manual demand reads and will continue to be billed under both demand and energy. However, in order to assist these customers during this time of need, DP&L seeks approval to reduce the tariffed Maximum Charge Provision rates to be equivalent to the County Fair Rates for the duration of the Company's Plans. This will provide additional customer protections such that these customers will have a lower \$/kWh cap.

B. Temporary Waiver of Minimum Demand Provisions for Secondary, Primary, Primary Substation and High Voltage Class Customers

In addition to the waivers and tariff changes sought above, DP&L proposes to waive the minimum demand provisions for all of its non-residential customers and instead bill only according to an actual read of customers' current monthly demand (aside from those meters DP&L is unable to read, who will be billed as described above) for the duration of the Company's Plans. DP&L's non-residential billing demand is determined by the greatest of either (1) 75% of the greatest off-peak demand for the month, (2) 100% of the on-peak during the month, or (3) 75% of the greatest off-peak or on-peak demand for the months of June, July, August, December, January or February in the prior eleven months. This waiver will prevent demand charges from a minimum demand set in the prior 11 months and provides relief for customers that have reduced or temporarily ceased operations. Moreover, many customers are likely to have very different load profiles because of their efforts to support the COVID-19 fight.

C. Deferral Request

DP&L is working quickly to develop process and system modifications to implement the components of the Supplemental Plan. Pursuant to the Commission's emergency ratemaking authority under R.C. 4909.16, DP&L seeks authority to defer the resulting costs of charges avoided by customers for future recovery provided that those costs are not already included in the distribution decoupling deferral request filed by the Company on January 23, 2020 in Case No. 20-140-EL-AAM. The deferral request in this Supplemental Application includes amounts related to the Secondary class as well as the other non-residential tariff classes for the demand components that do not already have a true-up mechanism. To the extent this deferral request and the distribution decoupling deferral request are approved, DP&L

will ensure that there is no double-counting of the deferred costs.

Alternatively, DP&L seeks a reasonable arrangement pursuant to R.C. 4905.31, Ohio Admin. Code 4901:1-38-03 and/or Ohio Admin. Code 4901:1-38-05, whereby the delta revenues associated with these economic development provisions are recovered through DP&L's Economic Development Rider. Specifically, R.C. 4905.31 authorizes the establishment of a minimum charge or approval of a new schedule for a group of customers that varies from otherwise applicable tariffs, and expressly permits a "device to recover costs incurred in conjunction with any economic development and job retention program of the utility within its certified territory, including recovery of revenue foregone as a result of any such program." R.C. 4905.31(E). This can take the form of an economic development arrangement as described in Ohio Admin. Code 4901:1-38-03 and/or a unique arrangement under Ohio Adm. Code 4901:1-38-05.

It is reasonable to assume, under these unprecedented circumstances created by COVID-19, that these existing customers are likely to cease or reduce their operations. DP&L's Supplemental Plan to enable commercial and industrial customers to avoid minimum demand charges associated with reduced levels of their operations due to the COVID-19 crisis is an economic development program to help retain jobs and assist business customers in managing the impacts of the crisis. It is fair to conclude that business customers that otherwise would incur a minimum demand charge would benefit from the program. This will help protect at-risk populations (R.C. 4928.02(L)) and will help facilitate the state's effectiveness in the global economy (R.C. 4928.02(N)). To the extent the circumstances associated with the COVID-19 crisis and the need for expeditious solutions do not permit the Company to provide all filing requirements for reasonable arrangement filings found in Ohio Admin. Code 4901:1-38-03 or

Ohio Admin. Code 4901:1-38-05, the Company requests a waiver under Ohio Admin. Code 4901:1-38-02(B).

D. Communications to Customers and CRES Providers Regarding these Changes.

Upon approval, DP&L will communicate these changes to its affected customers and all CRES Providers. Additionally, DP&L will update its respective tariffs to reflect the Commission's Order(s) in these matters.

E. Reservation to Make Changes to the Plan, Including During the Remaining Period of the State of Emergency.

The Company reserves the right to modify or supplement its Supplemental Plan based on developing conditions during the declared state of emergency. DP&L looks forward to cooperatively working with the Commission and the State of Ohio to do its part in helping its customers manage this crisis.

III. REQUESTED RELIEF

WHEREFORE, DP&L requests that the Commission find and order, to the extent not already automatically approved, as follows:

1. That the Company's Supplemental Application and requested relief shall be granted;
2. That any provision of the Company's tariffs that is inconsistent with, or conflicts with, the Supplemental Plan shall be waived;
3. That any provision of the Ohio Administrative Code that is inconsistent with, or conflicts with, the Supplemental Plan shall be waived; and
4. That the Company be granted accounting authority to track all costs associated with the Supplemental Plan and to establish a regulatory asset for future recovery of those costs.

Respectfully submitted,

/s/ Michael J. Schuler

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CERTIFICATE OF SERVICE

I certify that on the 15th day of April, 2020, a copy of the foregoing was served on the persons stated below via electronic transmission:

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Case No(s). 20-0755-EL-AEC

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