



Public Utilities Commission

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May 11, 2020

Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus OH 43215

RE: *In the Matter of the Application of The Dayton Power and Light Company to update its Standard Offer Rate Tariff, Case No. 20-790-EL-RDR.*

Dear Docketing Division:

Enclosed please find the Staff's Review and Recommendations in regard to the application filed by The Dayton Power and Light Company to update its Standard Offer Rate Tariff, Case No. 20-790-EL-RDR.

A handwritten signature in black ink that reads "Tamara S. Turkenton".

Tamara S. Turkenton
Director, Rates and Analysis Dept.
Public Utilities Commission of Ohio

Enclosure
Cc: Parties of Record

Dayton Power and Light Company

Case No. 20-790-EL-RDR

Background

On April 16, 2020, The Dayton Power and Light Company (DP&L or Company) filed proposed tariffs to modify its Standard Offer Rates (SOR) Tariff. On April 30, the Company filed a revised application to correct calculation errors included in the April 16, 2020 filing. The proposed tariffs include SOR and Percentage of Income Payment Plan (PIPP) generation rates.

The proposed SOR rates include the results of the most recent auction held on March 9, 2020 and approved by the Commission on March 11, 2020, in Case No. 17-957-EL-UNC. The proposed PIPP generation rates reflect the results of the PIPP auction held on April 7, 2020 and approved by the Commission on April 8, 2020 in Case No. 17-1163-EL-UNC.

In addition to the auction, the proposed rates include an alternative energy rate (AER) component, a reconciliation component and an unbilled fuel component.

The Company requests that the proposed SOR rates become effective on June 1, 2020.

Staff Review and Recommendations

Staff has reviewed the updated proposed SOR tariff and workpapers filed on April 30, 2020 and finds that the proposed tariff appears to accurately reflect the appropriate auction results including the March 9, 2020 and April 7, 2020 auction results.

Given the short timeframe to review the reconciliation component of the generation rates Staff has not been able to complete its review at this time. Therefore, Staff recommends that the rates proposed in the April 30, 2020 filing be approved by the Commission, effective June 1, 2020, subject to Staff's supplemental letter to be filed in this docket once the review has concluded.

Staff conducted a preliminary review of the Company's proposed AER rate component. Based on its review, Staff does not oppose the rate becoming effective as proposed. However, it is Staff's expectation that the Company's AER component would be subject to a subsequent audit, performed at the direction of the Commission, which would inform the Commission's ultimate decision as to the reasonableness of the AER component in this proceeding.¹

At the time of this writing, the Company's proposed tariff does not appear to include language that would exempt self-assessing purchasers from the AER pursuant to ORC 4928.644(B). Staff recommends that such language be added consistent with the Commission decision in Case No. [19-2031-EL-UNC](#).

¹ See PUCO [Case No. 20-0553-EL-RDR](#).

Staff has reviewed the unbilled fuel component and finds that its inclusion in the SOR accurately reflects the Commission orders.

Conclusion

The Staff recommends that the amended application filed April 30, 2020, be approved, and become effective June 1, 2020, subject to potential further adjustments that may be addressed in Staff's supplemental review and recommendations letter.

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in

Case No(s). 20-0790-EL-RDR

Summary: Staff Review and Recommendation in regard to the application filed by The Dayton Power and Light Company to update its Standard Offer Rate Tariff electronically filed by Zee Molter on behalf of PUCO Staff