

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

THE DAYTON POWER AND LIGHT COMPANY

**CASE NOS. 18-1875-EL-GRD
18-1876-EL-WVR
18-1877-EL-AAM**

20-0680-EL-UNC

**19-1121-EL-UNC
20-1041-EL-UNC**

**TESTIMONY OF
SHARON R. SCHRODER
IN SUPPORT OF THE STIPULATION AND RECOMMENDATION**

- ☐ **MANAGEMENT POLICIES, PRACTICES, AND ORGANIZATION**
- ☐ **OPERATING INCOME**
- ☐ **RATE BASE**
- ☐ **ALLOCATIONS**
- ☐ **RATE OF RETURN**
- ☐ **RATES AND TARIFFS**
- ☒ **OTHER**

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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Sharon Schroder. My business address is 1065 Woodman Drive, Dayton,
4 Ohio 45432.

5 **Q. By whom and in what capacity are you employed?**

6 A. I am employed by AES US Services LLC as Managing Director of Regulatory Affairs
7 for The Dayton Power and Light Company ("DP&L" or "Company"), as well as
8 Indianapolis Power & Light Company.

9 **Q. How long have you been in your present position?**

10 A. I assumed my present position in February 2018. Prior to that, I served as Director of
11 Regulatory Affairs for DP&L and in several leadership roles within DPL Energy
12 Resources, Inc. ("DPLER"), including Director of Community Relations, Director of
13 Sales, and Director of Business Development & Regulatory Affairs.

14 **Q. What are your responsibilities in your current position?**

15 A. In my current position, my responsibilities include evaluating regulatory and
16 legislative initiatives, the Company's retail and wholesale rates, and overall regulatory
17 operations.

18 **Q. Will you describe briefly your educational and business background?**

19 A. I received a Bachelor of Science degree in International Business from Miami
20 University in Oxford, Ohio in 1989. I earned a Master of Science in Social and
21 Applied Economics from Wright State University in Dayton, Ohio in 1990.

1 Additionally, I earned a Master of Arts in Economics from The Ohio State University
2 in Columbus, Ohio in 1994. Prior to my roles within DPLER, I was Director of Major
3 Accounts for the Service Operations team and Manager of Federal Energy Regulatory
4 Commission ("FERC") Pricing and Policy, both for DP&L. Prior to that, I was a
5 Pricing Analyst in the DP&L Regulatory Operations department. I have been
6 employed by DPL Inc. since 1996.

7 **Q. Have you previously provided testimony before the Public Utilities Commission**
8 **of Ohio ("PUCO" or the "Commission"), any other state commission or the**
9 **FERC?**

10 A. Yes. Before the PUCO, I most recently sponsored testimony in Pub. Util. Comm.
11 Case No. 15-1830-EL-AIR, *et al.*, in support of the June 18, 2018 Stipulation and
12 Recommendation regarding DP&L's base distribution rates. I also sponsored
13 testimony in Pub. Util. Comm. Case No. 16-395-EL-SSO, *et al.* in support of the
14 March 14, 2017 Amended Stipulation and Recommendation regarding DP&L's third
15 Electric Security Plan. I further sponsored testimony in Pub. Util. Comm. Case No.
16 09-256-EL-UNC regarding the establishment of the Company's Transmission Cost
17 Recovery Rider.

18 Before FERC, I submitted testimony on behalf of DP&L (i) on August 31, 2001
19 regarding the Federal Power Act ("FPA") Section 205 filing of the former Alliance
20 Companies in Docket No. RT01-88-006; (ii) on December 11, 2002 regarding the
21 FPA Section 205 filing of the Alliance Companies in Docket No. ER03-262-000;
22 (iii) on October 14, 2003 regarding the elimination of through-and-out rates in Docket

Nos. EL03-212, *et al.*; (iv) on July 30, 2004 regarding the FPA Section 205 filing of AEP and Dayton to join PJM in Docket No. ER04-1068-000; and (v) on April 29, 2005, May 13, 2005, and August 29, 2005 regarding the FPA Section 205 filing to support Dayton's lost revenues in the Seams Elimination Charge/Cost Adjustment/Assignment ("SECA") proceedings, Docket Nos. ER05-6, *et al.* Also before FERC, I sponsored testimony on behalf of the Responsible Pricing Alliance ("RPA") on November 22, 2005 in Docket No. EL05-121-000, to review competing proposals for a new PJM transmission rate design, and to present my conclusions concerning the cost shifts and related cost of service issues involved in their proposals. I also sponsored testimony supporting DPL Energy, LLC's revenue requirement for Reactive Supply under PJM's Tariff in Docket ER08-1039 in May 2008.

Q. What is the purpose of this testimony?

A. The purpose of this testimony is to provide the facts showing that the Commission should approve the Stipulation and Recommendation ("Stipulation") filed in these matters on October 23, 2020, because it is the product of serious negotiations among knowledgeable parties, benefits customers and the public interest, and does not violate any important regulatory principles or practices.

II. OVERVIEW OF THE STIPULATION AND RECOMMENDATION

Q. Can you identify the matters that the Stipulation resolves?

A. Yes. The Stipulation resolves all of the issues in the following proceedings:

1. DP&L's pending application to implement Smart Grid in DP&L's service territory, which are Pub. Util. Comm. Case No. 18-1875-EL-GRD, 18-1876-EL-WVR, and 18-1877-EL-AAM;
2. DP&L's pending application for a finding that its current Electric Security Plan, as approved by the Commission in its December 18, 2019 Second Finding and Order in Pub. Util. Comm. case No. 08-1094-EL-SSO, *et al.*, which I refer to in this testimony as "ESP I," passes the more favorable in the aggregate ("MFA") test and the prospective significantly excessive earnings test ("SEET") in R.C. 4928.143(E), which is Pub. Util. Comm. Case No. 20-0680-EL-UNC; and
3. DP&L's pending applications for findings that its earnings in 2018 and 2019 were not significantly excessive under R.C. 4928.143(F), which are Pub. Util. Comm. Case No. 19-1121-EL-UNC and 20-1041-EL-UNC, respectively.

Q. Can you describe the principal terms of the Stipulation?

A. Yes. The principal terms of the Stipulation include:

1. Approval of DP&L's Smart Grid Plan ("SGP"), including the application, testimony, and schedules filed in Pub. Util. Comm. Case Nos. 18-1875-EL-GRD, *et al.*, except as modified by the Stipulation. The Stipulation provides that the SGP shall be divided into phases and identifies the projects for the first phase ("SGP Phase 1") in Exhibit 1. Stipulation, ¶¶ 1-2.

2. Authorization to spend up to \$267,600,000 on SGP Phase 1 capital investments and associated operational and maintenance expenses. DP&L's SGP Phase 1 will be four years from the date of the Commission Order approving the Stipulation, and DP&L plans to file an application for a second phase ("SGP Phase 2") on or before three years from the date of the Commission Order approving the Stipulation. Stipulation, ¶ 2.
3. DP&L will recover a return on and of its prudently-incurred capital investments and expenses associated with the SGP through the Infrastructure Investment Rider ("IIR"). Stipulation, ¶ 3.a.
4. Estimated savings that the parties agree will be generated by SGP Phase 1 expenditures will be used to offset the IIR. Stipulation, ¶ 3.b.
5. DP&L's investments and expenses will be subject to an annual audit, which will review DP&L's expenditures. Stipulation, ¶ 5.a.
6. Install approximately 95% of AMI meters. Stipulation, ¶ 6.a.
7. Implement Distribution Automation investment on approximately 20% (88) of DP&L's circuits. Stipulation, ¶ 6.b.
8. Implement Substation Automation investment on approximately 30 substations. Stipulation, ¶ 6.c.

- 1 9. Acceleration of the implementation of Conservation Voltage
2 Reduction/Voltage and VAR Optimization ("CVR/VVO"), which is expected
3 to create significant cost savings for customers. Stipulation, ¶ 6.d.
- 4 10. Implementation of an Electric Vehicle ("EV") Rebate Program, which is
5 expected to generate significant cost savings for customers while also reducing
6 greenhouse gases. Stipulation, ¶ 8.
- 7 11. Implementation of a Smart Thermostat rebate program, which is expected to
8 generate significant energy savings for customers, while reducing greenhouse
9 gasses. The Smart Thermostat rebate program will be paid for by DP&L's
10 shareholders. Stipulation, ¶ 9.
- 11 12. Development of a new Customer Information System, which is necessary to
12 implement DP&L's SGP, which will be recovered through a future base
13 distribution rate case. Stipulation, ¶ 10.
- 14 13. Provisions regarding data access, which will:
 - 15 a. Allow DP&L's customers to access data regarding their usage and
16 determine ways to save costs; Stipulation, ¶ 11.a;
 - 17 b. With a customer's approval, allow competitive retail electric service
18 ("CRES") providers to access customer usage data, so that CRES
19 providers can offer rates to customers that are tailored to the customer's
20 usage; Stipulation, ¶ 11.b; and

- 1 c. With a customer's approval, allow third parties to access customer
2 usage data, so the third party can advise the customer on ways to
3 reduce and/or optimize usage and save money. Stipulation, ¶ 11.b.

4 14. Additional Benefits for residential customers:

- 5 a. DP&L shareholder contribution of \$900,000 over two years to provide
6 weatherization for customers at or below 200% of the federal poverty
7 line. Stipulation, ¶ 12.a.

- 8 b. DP&L shareholder contribution of \$200,000 over the four years of
9 Phase 1, toward the marketing and education of residential customers
10 about the Smart Thermostat Rebate Program in conjunction with the
11 deployment of residential AMI meters. Stipulation, ¶ 12.b.

- 12 c. A shareholder-funded water heater pilot program directed at low-
13 income residential customers, designed to determine whether those
14 customers can save money by lowering their aggregate peak load
15 resulting in a better price for the PIPP auction. Stipulation, ¶ 12.c.

16 15. Additional Benefits for the City of Dayton and its residents, including:

- 17 a. Prioritize the installation of the SGP in economically disadvantaged
18 areas of the City, many of which were struck by tornados last year.
19 Stipulation, ¶ 13.a.i.

- 1 b. Explore a joint partnership with the City of Dayton and the University
2 of Dayton's Hanley Sustainability Institute for a program supporting
3 mutual goals for all three organizations. Stipulation, ¶ 13.a.ii.
- 4 c. Financial contribution of \$100,000 per year with DP&L shareholder
5 dollars to the Property Assessed Clean Energy program ("PACE") for
6 qualifying projects in the City. These contributions will benefit and
7 support a portion of a property owner's escrowed reserve requirement.
8 Additionally, DP&L will contribute \$50,000 per year to support energy
9 upgrades for small and micro businesses within the City that are not
10 eligible for PACE funding. Stipulation, ¶ 13.a.iii.
- 11 d. Waiver of fees for alternative feed service for City of Dayton accounts
12 that currently have redundant service. Stipulation, ¶ 13.a.iv.
- 13 e. Financial contribution of \$200,000 per year with DP&L shareholder
14 dollars to provide economic development programs and assist low-
15 income City residents. Stipulation, ¶ 13.a.v.
- 16 f. Commitment by DP&L to provide non-financial technical support
17 relating to an interconnection of net metering systems for two City of
18 Dayton Solar Projects. Stipulation, ¶ 16.b.
- 19 16. Additional benefits for DP&L's commercial and industrial customers:

1 a. Waiver of fees for alternative feed service for hospitals. Stipulation,
2 ¶ 14.a.

3 b. Continuation of DP&L's TCRR Opt Out Pilot Program. Stipulation,
4 ¶ 14.b.

5 c. Dedication of a portion of the SGP Phase 1 customer education funds
6 to certain business organizations and the City of Dayton to allow them
7 to educate their members/residents about how to benefit from the SGP.
8 Stipulation, ¶ 14.c.

9 d. Financial contribution of \$150,000 in 2023 and 2024 with DP&L
10 shareholder dollars to the Ohio Hospital Association as an education
11 grant. Stipulation, ¶ 14.d.

12 17. Significant economic development incentives and grants for hospitals and
13 manufacturers in DP&L's service territory, which are intended to assist those
14 entities in responding to the financial consequences of COVID-19 and
15 restarting Ohio's economy. The costs of the incentives and grants will be
16 borne by DP&L and not recovered from customers. Stipulation, ¶¶ 15.a and b.

17 18. Support for developing an energy resiliency project in or near the Wright-
18 Patterson Air Force Base, through \$250,000 contributed by DP&L
19 shareholders. Stipulation, ¶ 16.d.

- 1 19. Commitment by DP&L of \$1 million to encourage solar development within
2 its service territory. That amount will be paid by DP&L and not its customers,
3 and will be applied toward the design, construction, and deployment of the
4 solar project(s) that IGS Solar, LLC shall own and operate. Stipulation, ¶ 16.c.
- 5 20. Agreement that the benefits of DP&L's SGP Phase 1 exceed the costs on both a
6 nominal and net-present-value basis. Stipulation, ¶ 17 and Exhibit 4.
- 7 21. Agreement that DP&L's ESP I passes the SEET and MFA test in
8 R.C. 4928.143(E), which resolves Pub. Util. Comm. No. 20-0680-EL-UNC.
9 Stipulation, ¶ 19.a.
- 10 22. Agreement that the Signatory Parties will not challenge DP&L's right to
11 operate under ESP I. Stipulation, ¶ 19.c.i.
- 12 23. Agreement that the Commission shall approve DP&L's applications that it did
13 not have significantly excessive earnings in 2018 and 2019 under R.C.
14 4928.143(F), which resolves Pub. Util. Case Nos. 19-1121-EL-UNC and 20-
15 1041-EL-UNC. Stipulation, ¶ 19.c.iii.
- 16 24. Agreement that DP&L will file an application to implement its fourth electric
17 security plan ("ESP IV") by October 1, 2023. That application shall not
18 include a request for a nonbypassable charge to customers related to provider
19 of last resort risks, stability, financial integrity, or any other charge that is
20 substantially calculated based on the credit ratings, debt, or financial
21 performance of any parent or affiliated company of DP&L. DP&L may,

1 however, propose riders that recover actual costs that DP&L has incurred or
2 will incur, distribution or transmission related revenue that DP&L has foregone
3 or will forego, or distribution or transmission related investments (including a
4 return on and of the investments) that DP&L has made or will make.
5 Stipulation, ¶ 20.a.

6 **Q. Can you summarize the principal customer benefits of the Stipulation?**

7 A. Yes. As described in more detail below, the customer benefits in the Stipulation fall
8 principally within the following categories:

9 1. Smart Grid Benefits: Implementing Smart Grid in DP&L's service territory
10 will provide tremendous benefits for customers, and the value of those benefits
11 exceeds their costs.

12 2. Safe and Reliable Service: As discussed in the testimony of DP&L witness
13 Malinak, DP&L could not maintain its financial integrity during the 2020-2023
14 forecast period without a continuation of the terms of DP&L's ESP I, and
15 DP&L's ability to provide safe and reliable service would be jeopardized if
16 ESP I were terminated. The Stipulation allows for a continuation of ESP I,
17 which is a significant benefit for customers.

18 3. Additional Customer Benefits: The Stipulation contains a wide range of
19 additional customer benefits. Significantly, as also discussed below, many of
20 those benefits will be funded by DP&L and their costs will not be recovered
21 from customers.

1 **III. THE COMMISSION'S CRITERIA FOR EVALUATING**
2 **STIPULATIONS**

3 **Q. What criteria does the Commission use to decide whether to approve a**
4 **Stipulation?**

5 A. The Commission has applied the following three criteria: First, is the Stipulation a
6 product of serious bargaining among capable, knowledgeable parties? Second, taken
7 as a package, does the Stipulation benefit customers and the public interest? Third,
8 does the Stipulation violate any important regulatory principle or practice?

9 **A. The Stipulation is the Product of Serious Bargaining**
10 **Among Knowledgeable Parties**

11 **Q. Can you identify the parties to the Stipulation?**

12 A. Yes. The parties to the Stipulation are:

- 13 1. Commission Staff
- 14 2. DP&L
- 15 3. City of Dayton
- 16 4. Industrial Energy Users-Ohio
- 17 5. Ohio Energy Group
- 18 6. Ohio Manufacturers' Association Energy Group
- 19 7. Ohio Hospital Association
- 20 8. Ohio Partners for Affordable Energy
- 21 9. University of Dayton
- 22 10. Honda of America Mfg., Inc.
- 23 11. The Kroger Company
- 24 12. Interstate Gas Supply, Inc. and IGS Solar, LLC
- 25 13. Sierra Club
- 26 14. Ohio Environmental Council
- 27 15. Environmental Law & Policy Center
- 28 16. Natural Resources Defense Council
- 29 17. The Smart Thermostat Coalition
- 30 18. ChargePoint, Inc.
- 31 19. Armada Power, LLC

1 20. Mission:data Coalition

2 **Q. Can you describe the interests of the parties that signed the Stipulation?**

3 A. Yes. The Stipulation is supported by parties representing a wide range of interests,
4 including the interests of DP&L, the largest municipality in DP&L's service territory
5 (which represents itself and its residents), a representative of residential low-income
6 customers, three state-wide organizations of large industrial customers, one large
7 industrial customer, one of the largest supermarket chains in the country, a state-wide
8 organization representing hospitals in DP&L's service territory, a large, local
9 university, four environmental groups, a provider of competitive retail electric service,
10 and four other parties that do business and represent interests in the smart grid field.

11 In addition, the Commission's Staff signed the Stipulation. The Commission's Staff is
12 charged with balancing the interests of all parties and the public.

13 **Q. Was the Stipulation the product of serious bargaining among capable,**
14 **knowledgeable parties?**

15 A. Yes. All of the intervening parties in the matters participated in the negotiations, and
16 all but two of them support it.

17 The settlement negotiations involved a diverse group of experienced parties. Eight
18 bargaining sessions, including one technical conference, were held, at which DP&L
19 explained the Stipulation, and all parties could make comments or ask questions. All
20 parties that intervened in these proceedings were invited to participate in those

1 sessions. A telephone bridge or video conference line was established for each
2 session. All sessions following the outbreak of COVID-19 were held by video
3 conference.

4 At the beginning or in advance of most of these sessions, DP&L circulated to the
5 parties either a settlement term sheet or draft Stipulation. At each session, DP&L
6 answered questions from the parties and asked for feedback on DP&L's proposed
7 settlement terms. Staff and other parties made extensive changes to DP&L's
8 proposals, and all Signatory Parties made compromises.

9 In addition, DP&L contacted every party to discuss their individual interests. DP&L
10 had extensive conversations with individual parties, who offered significant comments
11 and revisions to the draft Stipulation. All of the Signatory Parties were represented by
12 attorneys, most if not all of whom have years of experience in regulatory matters
13 before this Commission and who possess extensive information. All of the
14 negotiations were at arm's length. Numerous hours were devoted to the negotiating
15 process and to the exchange of language and information associated with the terms of
16 the Stipulation.

17 The result of the negotiations was a compromise, as explained more fully below.
18 Many parties receive benefits under the Stipulation, but neither DP&L nor any other
19 Signatory Party received everything that it wanted. The Stipulation strikes a
20 reasonable balance that benefits customers and the public interest.

B. The Stipulation Benefits the Public Interest

Q. Turning to the second criterion or principle, does the Stipulation benefit customers and the public interest?

A. Yes. As mentioned above, the three principal benefits of the Stipulation are that it will (1) allow DP&L to modernize its distribution grid; (2) allow DP&L to restore its financial integrity and continue to provide safe and reliable service; and (3) provide numerous additional benefits to customers.

1. The Stipulation Will Allow DP&L to Modernize Its Distribution Grid

Q. What are the principal components of DP&L's SGP Phase 1 under the Stipulation?

A. The principal components of DP&L's SGP Phase 1 are:

1. Smart Meters – DP&L will invest \$77.6 million in the installation of smart meters, also known as Advanced Metering Infrastructure ("AMI"), such that nearly every customer will receive an advanced meter.
2. Self-Healing Grid – DP&L will invest \$109 million in self-healing grid technologies, including but not limited to distribution automation, substation automation, advanced distribution management system, and conservation voltage reduction and Volt/Var Optimization.
3. Customer Engagement – DP&L's SGP Phase 1 will enable its customers to interact with the utility and the grid in new and improved ways and provide education regarding all of its SGP components.

4. Telecommunications – Expansion of DP&L's telecommunications capabilities will ensure reliable and robust communication with all of the field devices that are proposed as part of SGP Phase 1.

5. Cyber Security – Implementing and improving cybersecurity will ensure the appropriate security measures and upgrades necessary to protect customer data.

6. Governance and Analytics –Rigorous systems and integration and testing that links the various systems and software that will be necessary for successful execution of the SGP.

Q. Are there any other significant commitments in the Stipulation for DP&L to modernize its distribution grid?

A. Yes. In the Stipulation, DP&L commits to investing in the development of a new Customer Information System ("CIS") that will be needed for DP&L to provide and support many of benefits identified in my testimony.

Q. Can you describe the benefits provided by smart meters?

A. The benefits of smart meters will include:

1. Enabling implementation of demand response and time-of-use rates, which will enable customers to save money on their bill.
2. Accelerating DP&L's restoration response, using data from smart meters to provide additional information to DP&L about outages.
3. Reducing DP&L's operational expenses. Decreased expenses result from a variety of factors, including the reduction of meter-reading expenses, remote reconnects and disconnects, and fewer billing disputes.

- 1 4. Improving safety with the elimination of travel and entering customer locations
2 to read meters.

3 **Q. What benefits flow from modernizing DP&L's grid system?**

4 A. Modernization of DP&L's distribution system will make portions of DP&L's
5 distribution system self-healing, which in turn will provide significant customer
6 benefits, including but not limited to:

- 7 1. Improving reliability for customers by automatically identifying issues with the
8 grid and either correcting those issues automatically by either re-routing power
9 flows or providing information to DP&L about the issues so DP&L can send
10 crews to fix them more quickly and efficiently than they are currently able.
11 2. Reducing operational expenses because crews will be able to more quickly
12 identify and resolve issues across the grid.
13 3. Reducing line losses due to the enhanced and more efficient grid system.
14 4. Enabling and encouraging distributed energy and demand response resources
15 to be more easily integrated into the grid.

16 **Q. How will DP&L's SGP Phase 1 improve customer engagement?**

17 A. DP&L's SGP Phase 1 contains many innovations designed to improve the customer
18 experience, including:

- 19 1. Implementing an online customer portal, through which customers can review
20 detailed information about their account, including but not limited to usage
21 comparisons and projected costs. This portal will give customers greater
22 control over their usage and experience with DP&L.

2. Improving communications about outage events, through a customer's preferred communication method, such as text message, email or phone message.

3. Improving billing accuracy, through the elimination of estimated bills.

Q. Are there customer benefits associated with DP&L's planned telecommunications expenditures?

A. Yes. The AMI and self-healing grid investments require new telecommunications infrastructure to function properly. Additionally, the AMI and self-healing grid investments will generate large amounts of data that DP&L's current telecommunications infrastructure is not capable of utilizing in its operations and not capable of sharing with customers, CRES providers, or other third parties. DP&L, therefore, needs to improve and upgrade its telecommunications network to implement its SGP and unlock the benefits of this data.

Q. Are there customer benefits associated with DP&L's planned cyber security expenditures?

A. Yes. Since DP&L's SGP will generate significant amounts of additional customer and operational-related data, cyber security investments and are necessary to protect that data.

Q. Are there customer benefits associated with DP&L's plan to implement a new CIS?

A. Yes. DP&L will also invest in and implement a new CIS, which will provide the following customer benefits:

1. Establishing the foundation for providing flexible rate structures for customers.

2. Driving operational efficiencies across a cross-section of DP&L customer service functions, which means that customer service and operations functions will not be siloed, but rather will work directly with each other.
3. Providing for an open architecture that will create the flexibility necessary to adapt to future markets.
4. Enabling customers, as well as CRES providers and third parties (with customer consent), to access customer data.

DP&L will recover a return on and of its prudently incurred capital investment in the new CIS and associated systems and its incremental operation and maintenance expenses associated with the new CIS through base distribution rates and not through the IIR, thus promoting gradualism in rates.

Q. Does the SGP Phase 1 have additional benefits?

A. Yes. In addition to the benefits identified above, other broader, societal benefits will be realized, including:

1. Reduced energy usage and truck rolls in DP&L's service territory associated with the SGP will reduce greenhouse gas emissions.
2. DP&L's SGP investments associated will have multiplier effects on the economy, creating additional jobs and other economic benefits inside and outside of DP&L's service territory.

1 3. DP&L is the only electric utility in Ohio that has not implemented an SGP.
2 Economic development in its service territory, as well as the availability of
3 grid modernization throughout the state, will benefit everyone in Ohio.

4 **Q. Does DP&L's Smart Grid Plan have other benefits that are difficult to quantify?**

5 A. Yes. The SGP will significantly improve the ability of customers to understand their
6 energy usage and make decisions about their usage. The SGP and the data it will
7 unlock will foster innovation in the competitive marketplace, providing customers
8 with new energy choices and solutions unavailable today. Also, the SGP will
9 significantly improve safety, since it will reduce the time, travel and potential risks
10 associated with: (1) reading meters; (2) responding to outages; and (3) the installation
11 and removal of meters.

12 **Q. Have you quantified whether the benefits of DP&L's SGP exceed the costs?**

13 A. Yes. Figure 1 in Exhibit 4 to the Stipulation & Recommendation demonstrates that
14 DP&L's SGP Phase 1 investments and expenditures (as modified by the Stipulation)
15 will have net benefits exceeding \$425 million on a nominal basis over 20 years and
16 \$63 million on a net present value basis over the same time period, without taking into
17 account societal benefits. Figure 2 in Exhibit 4 incorporates the societal benefits of
18 those investments and expenditures, raising the net benefits to more than \$867 million
19 on a nominal basis over 20 years and more than \$413 million on a net present value
20 basis over the same time period.

1 **Q. Can you describe how the expenditures associated with SGP Phase 1 were**
2 **estimated?**

3 A. Yes. DP&L estimated those expenditures using a variety of methods, including
4 reviewing publicly available pricing information, reviewing smart grid filings of other
5 utilities and consulting with vendors. DP&L also engaged West Monroe ("WM") to
6 assist in its analysis. WM is a knowledgeable and respected consultant in the smart
7 grid field.

8 **Q. Can you describe how the benefits of SGP Phase 1 were estimated?**

9 A. Yes. At a high level, with the assistance of WM, DP&L estimated the benefits as
10 follows:

11 1. Energy and Demand: DP&L's SGP Phase 1 is projected to reduce customer
12 energy usage and demand for a variety of reasons, including: (1) Conservation
13 Voltage Reduction/Voltage and VAR optimization will allow DP&L to reduce
14 energy consumption by regulating voltage on its system; and (2) time-of-use
15 rates will incentivize customers to use generation at off-peak hours. DP&L
16 estimated the reduction in energy and demand by leveraging technical studies
17 and applying benchmarks to DP&L's planned deployment and customers
18 impacted, and quantified that benefit by using a forecast of future generation
19 rates.

20 2. Reliability: DP&L estimated the benefits of improved reliability using the
21 Department of Energy's Interruption Cost Estimate model.

- 1 3. O&M Savings: DP&L's SGP will significantly reduce DP&L's O&M costs for
2 a variety of reasons, including but not limited to reduced meter reading
3 expenses, reduced time associated with repairing downed lines, and fewer call
4 center calls. DP&L estimated the reduction in those expenditures based upon
5 its experience and the historical level of those expenses.
- 6 4. Deferred Capital: The SGP provides a proactive and planned approach for
7 DP&L for its capital investments, ultimately benefiting customers. DP&L
8 estimated the amounts saved based upon its experience and its projections for
9 future expenditures.
- 10 5. Customer EV Savings: In response to expected growth in EV adoption,
11 DP&L's SGP Phase 1 is projected to contribute to customers' transition to EVs
12 from traditional internal combustion engine vehicles. With EV adoption,
13 customers will be able to save money on the energy source used to power their
14 vehicles.
- 15 6. Greenhouse Gases: DP&L's SGP is expected to reduce greenhouse gases for
16 three reasons: (1) reduced energy consumption will lessen the need to burn
17 fossil fuels to generate electricity; (2) fewer operations and maintenance-
18 related truck rolls will reduce the vehicles miles driven and their associated
19 GHG emissions; and (3) the EV charging stations incentivized by the EV
20 Rebate Program will encourage adoption of EVs, which will reduce use of
21 gasoline. DP&L estimated the value of each ton of greenhouse gases by using
22 estimates of the societal costs of carbon promulgated by the United States
23 Environmental Protection Agency.

7. Economic Development: DP&L's investments in its SGP are expected to generate over \$400 million in nominal dollars of economic benefit and create over 400 direct jobs and nearly 2,000 indirect jobs over a period of 20 years. DP&L estimated the economic value of those jobs using the Bureau of Economic Analysis Regional Input-Output Modeling System II.

It is worth repeating that DP&L has not attempted to quantify all of the benefits of the SGP, including improved safety, an improved customer experience, and other economic development benefits. Setting those benefits aside, however, the benefits of DP&L's SGP Phase 1 exceed its costs on a net present value basis, as shown in Exhibit 4 to the Stipulation.

2. The Stipulation Will Allow DP&L to Continue to Restore its Financial Integrity and Continue to Provide Safe and Reliable Service

Q. Are you the witness who addresses DP&L's financial integrity and ability to provide safe and reliable service?

A. No. DP&L Witness Malinak addresses those subjects. His testimony demonstrates that the continuation of DP&L's existing Electric Security Plan will allow DP&L to provide safe and reliable service to its customers.

1 **3. The Stipulation Will Provide Additional**
2 **Benefits to Customers**

3 **Q. What other benefits to customers does the Stipulation provide?**

4 **A. Other benefits of the Stipulation include:**

- 5 1. DP&L's Application in Pub. Util. Case Nos. 18-1875-EL-GRD, *et al.*
6 ("SmartGrid Application") sought Commission approval to make investments
7 and operations and maintenance expenditures associated with its SGP totaling
8 \$866.9 million over 20 years. SmartGrid Application, ¶ 9. In the interest of
9 minimizing customer impacts and expediting the benefits of the initial benefits
10 of grid modernization, DP&L reached a broad-based compromise with a
11 diverse group of Signatory Parties to cap those expenditures at \$267.6 million
12 over four years and to propose an SGP Phase 2. Stipulation, ¶ 2, 4.
- 13 2. DP&L's SmartGrid Application proposed that a portion of estimated
14 operational cost savings associated with grid modernization would be passed
15 through to customers when DP&L filed future rate cases. The Stipulation now
16 guarantees that the updated estimated amount of total savings, which includes
17 all categories of operational savings, will be passed back to customers through
18 the IIR, which will allow customers to benefit from those savings more
19 quickly. Stipulation, ¶ 3.b.

- 1 3. The Stipulation establishes stringent procedures for the auditing of DP&L's
2 SGP Phase 1 investments and expenditures. Stipulation, ¶ 5.a. There was no
3 such requirement in DP&L's SmartGrid Application.
- 4 4. The Stipulation establishes procedures for DP&L to update the Commission
5 and interested parties regarding the status of grid modernization. Stipulation,
6 ¶¶ 5.b & 5.c. There were no such procedures in DP&L's SmartGrid
7 Application.
- 8 5. The Stipulation establishes a Smart Thermostat Program, which will be funded
9 by DP&L with shareholder dollars. Stipulation, ¶ 9. There were no such
10 provisions in DP&L's SmartGrid Application.
- 11 6. DP&L's SmartGrid Application provided for recovery of investments and
12 expenditures associated with a new CIS. SmartGrid Application, ¶¶ 2.c and
13 13. The Stipulation provides that investments and expenditures associated
14 with the CIS will be recovered through base rates instead of through the IIR
15 like other SGP Phase 1 components. Stipulation, ¶ 10.g. That provision will
16 benefit customers because it will ensure that the CIS system is fully functional,
17 including the numerous functionality commitments, prior to DP&L seeking
18 recovery of invested dollars.
- 19 7. The Stipulation contains detailed provisions regarding the appropriate and
20 timely access of customer data to customers, CRES providers and third parties.
21 Id. ¶ 11.

1 8. The Stipulation contains the additional benefits for residential customers, as
2 described above, including but not limited to funding a weatherization program
3 for low-income customers, and a water heater pilot program directed at low-
4 income residential customers. Stipulation, ¶ 12. These provisions will
5 encourage residential customers to lower their energy usage and reduce their
6 risk of disconnection.

7 The Stipulation contains additional benefits for the City of Dayton, as
8 described above, including but not limited to prioritization of the installation of
9 the SGP in economically disadvantaged areas of the City; \$350,000 in annual
10 financial contributions of DP&L shareholder dollars to the PACE program,
11 economic development, and low-income residents; and a commitment to
12 provide support relating to an interconnection of net metering systems for two
13 City of Dayton Solar Projects. Stipulation, ¶¶ 13 and 16.b. In addition, the
14 Stipulation contains a waiver of fees for alternative feed service for City of
15 Dayton accounts that have redundant service. Stipulation, ¶ 13.a.iv. These
16 provisions lend significant support to the largest municipality in DP&L's
17 service territory and its residents.

18 9. The Stipulation contains additional benefits for DP&L's commercial and
19 industrial customers, as described above, including but not limited to a waiver
20 of fees for alternative feed service for hospitals, the dedication of SGP Phase 1
21 customer education funds to certain business organizations and the City of
22 Dayton to allow them to educate their members and residents about the

1 benefits of SGP, and \$300,000 in DP&L shareholder funding directed to the
2 Ohio Hospital Association as an education grant. Stipulation, ¶ 14. These
3 provisions support hospitals and local businesses in DP&L's service territory as
4 they face a global pandemic and ensure they and other Ohio businesses are
5 equipped to take full advantage of the benefits of SGP Phase 1.

- 6 10. The Stipulation contains additional economic development incentives and
7 grants for hospitals and manufacturers in DP&L's service territory. These
8 benefits are intended to assist those organizations in responding to the financial
9 consequences of COVID-19 and restarting Ohio's economy by supporting
10 large employers that are key drivers of economic development in the region,
11 thereby benefiting the region and State more broadly. Stipulation, ¶ 15.
12 Moreover, DP&L will bear the cost of these incentives and grants and will not
13 recover that cost from customers. Stipulation, ¶ 15.

- 14 11. The Stipulation further provides \$250,000 of support toward analyzing the
15 technical aspects of an energy resiliency project in or near the Wright-
16 Patterson Air Force Base. The projects may include renewable energy and
17 distributed energy resources, energy storage, advanced control systems, and
18 reduction of energy consumption through lighting and water upgrades, and
19 HVAC improvements. Stipulation, ¶ 16.a. DP&L will also bear this cost and
20 will not recover that cost from customers. Stipulation, ¶ 16.a.

- 1 12. The Stipulation further provides that DP&L will provide \$1 million in
2 shareholder dollars toward a solar project to be owned by IGS. Stipulation,
3 ¶ 16.c. This provision will benefit customers by increasing the availability of
4 clean and renewable energy in DP&L's service territory and provide important
5 data regarding any distribution or transmissions costs saved or avoided as a
6 result of the project.
- 7 13. SGP Phase 1 will provide benefits that exceed their costs on both a nominal
8 and net-present-value basis. Stipulation, ¶ 17 and Exhibit 4.
- 9 14. The Stipulation further provides that DP&L's ESP I passes the SEET and MFA
10 test in R.C. 4928.143(E) and the SEET in R.C. 4928.143(F), and the Signatory
11 Parties agree not to challenge DP&L's right to operate under ESP I.
12 Stipulation ¶¶ 19.a, 19.c.i., and 19.c.iii. These provisions reduce regulatory
13 uncertainty, and as Witness Malinak explains, bolster DP&L's financial
14 integrity and ability to provide safe and reliable service. The Stipulation
15 further reduces litigation expense by consolidating these proceedings and
16 narrowing the contested issues before the Commission.
- 17 15. The Stipulation further benefits customers by providing that DP&L will file an
18 application for approval of ESP IV by October 1, 2023, which will create a
19 period of rate stability for DP&L. Stipulation, ¶ 20. DP&L's rate plans and
20 associated rates have been subject to significant changes in recent years:
21 DP&L implemented ESP II in 2013; reverted to ESP I in 2016; implemented

ESP III in 2017; and again reverted to ESP I in 2019. The Stipulation benefits customers and DP&L by creating a period of rate certainty until ESP IV is approved.

16. The Stipulation also benefits customers by providing that DP&L will file an application for an ESP, not an MRO, in 2023. Stipulation, ¶ 20. The Commission repeatedly has found that ESPs were more favorable in the aggregate than MROs, so DP&L's commitment to file for an ESP benefits customers.

17. The Stipulation further benefits customers by prohibiting DP&L from proposing in ESP IV a nonbypassable charge related to provider of last resort risks, stability, financial integrity, or any other charge that is substantially calculated based on the credit ratings, debt, or financial performance of any parent or affiliated company of DP&L, thus eliminating customer exposure to such charges in DP&L's next electric security plan. Stipulation ¶ 20.

Q. Can you describe the rate impacts that the Stipulation will have on DP&L's customers?

A. Yes. Exhibit 2 to the Stipulation provides the anticipated Revenue Requirement for the IIR during SGP Phase 1. An end of year incremental rate increase for a typical residential customer using 1,000 kWh/month would be:

	Year 1	Year 2	Year 3	Year 4
\$ / Month	\$0.94	\$1.37	\$1.91	\$1.88
% of Total Bill	0.98%	1.42%	1.95%	1.88%

Q. How do the rate impacts that the Stipulation will have on DP&L's customers compare to rates paid by customers of other electric distribution utilities in the State of Ohio?

A. Exhibit SRS-1 to my testimony shows that DP&L's bills are the lowest in the State of Ohio. As of October 2020, DP&L's typical residential customer bills are more than \$17 lower than those of the next lowest Ohio electric distribution utility. Even after the amounts identified above are added, DP&L's rates for a typical residential customer would remain lower than the rates currently charged by other Ohio utilities.

Q. Does the Stipulation represent a compromise from DP&L's filed application?

A. Yes. The Stipulation is the product of compromise, and none of the parties received everything that they wanted. The principal compromises made by DP&L include but are not limited to:

1. DP&L's SmartGrid Application proposed capital and O&M expenditures totaling \$678,400,000 over 10 years. DP&L agreed to significantly reduce the scope of the program to \$267,600,000 over four years. Stipulation, ¶ 2. That reduction in scope will significantly reduce the customer bill impacts, while still allowing them to receive tremendous benefits of Smart Grid.
2. DP&L agreed to use its own funds to pay for the following programs:

- a. The Smart Thermostat program described in Stipulation, ¶ 9;
 - b. The low-income weatherization program described in Stipulation
¶ 12.a;
 - c. The PIPP water heater pilot program described in Stipulation ¶ 12.c.;
 - d. The PACE program and similar programs described in Stipulation,
¶ 13.a.iii;
 - e. The City of Dayton economic development programs described in
Stipulation, ¶ 14.a.v;
 - f. The hospital education grant described in in Stipulation, ¶ 14.d;
 - g. The economic development grants and incentives described in in
Stipulation, ¶ 15;
 - h. The resiliency projects described in Stipulation, ¶ 16a; and
 - i. The solar project described in Stipulation, ¶ 16.c.
3. DP&L agreed that the costs of its CIS and related components, a significant
component of its SGP, would be recovered through distribution rates instead of
the IIR.
 4. DP&L agreed not to own EV charging stations, but instead will implement a
rebate program to promote the installation of such stations.

1 5. DP&L agreed to file for ESP IV by October 30, 2023, and that its ESP IV
2 Application will not include a request for a nonbypassable charge to customers
3 related to provider of last resort risks, stability, financial integrity, or any other
4 charge that is substantially calculated based on the credit ratings, debt, or
5 financial performance of any parent or affiliated company of DP&L.

6 **C. The Stipulation Does Not Violate Any Important**
7 **Regulatory Principle or Practice**

8 **Q. With respect to the third criterion or principle, does the Stipulation violate any**
9 **important regulatory principle or practice?**

10 **A. No. The Stipulation does not violate any regulatory principle or practice. On the**
11 contrary, it encourages compromise as an alternative to litigation and allows DP&L to
12 recover just and reasonable rates while implementing smart grid technologies that
13 benefit its customers. The Stipulation further promotes DP&L's financial condition
14 and its ability to provide safe and reliable service to its customers.

15 **Q. Does the Stipulation advance the state policy to "[e]nsure the availability to**
16 **consumers of adequate, reliable, safe, efficient, nondiscriminatory, and**
17 **reasonably priced retail electric service," as set forth in R.C. 4928.02(A)?**

18 **A. Yes. The Stipulation provides significant support for DP&L's ability to provide**
19 reliable and safe electric service. As demonstrated in the testimony of DP&L Witness
20 Malinak, DP&L's ability to provide reliable and safe service would be jeopardized if
21 ESP I were terminated. And the deployment of smartgrid will increase the reliability,

1 safety, and efficiency of the distribution system while still maintaining typical
2 residential bills that are lower than any other electric utility in the state.

3 **Q. Does the Stipulation advance the state policy to "[e]nsure diversity of electricity**
4 **supplies and suppliers, by giving consumers effective choices over the selection of**
5 **those supplies and suppliers and by encouraging the development of distributed**
6 **and small generation facilities," as set forth in R.C. 4928.02(C)?**

7 A. Yes. DP&L commits to providing data to CRES providers that will allow them to
8 offer new and innovative products and services to customers. Stipulation, ¶ 11. The
9 Stipulation also encourages diversity of electricity supplies and suppliers by
10 encouraging the development of distributed facilities through the resiliency project
11 described in Stipulation, ¶ 16.a, and the solar projects identified in Stipulation, ¶ 16.b.
12 DP&L has committed to filing with the Commission a status report for the resiliency
13 project Stipulation, ¶ 16.a .iv and a report describing any distribution and transmission
14 costs saved or avoided as a result the solar project identified in Stipulation, ¶ 16.c.
15 The deployment of smartgrid, coupled with the implementation of CIS, will also
16 provide additional opportunities for integration of distributed and small generation
17 facilities.

18 **Q. Does the Stipulation advance the state policy to "[e]ncourage innovation and**
19 **market access for cost-effective supply-and demand-side retail electric service**
20 **including, but not limited to, demand-side management, time-differentiated**
21 **pricing, waste energy recovery systems, smart grid programs, and**

1 **implementation of advanced metering infrastructure," as set forth in R.C.**

2 **4928.02(D)?**

3 A. Yes. The Stipulation provides for significant investment in AMI, distribution
4 automation, substation automation, and CRV/VVO technologies, and ensures the
5 availability of time-of-use rates for customers, including on an opt-in basis through the
6 SSO until at least three different suppliers offer time-varying products utilizing AMI.
7 Stipulation, ¶¶ 6.a, 6.b., 6.c, 6.d, 6.e and Exhibit 1. Moreover, as stated above, the
8 Stipulation encourages innovation by ensuring that customers, CRES providers, and
9 third parties have access to the most current data available for both prospective and
10 existing customers, with their authorization, which is unavailable today. Stipulation,
11 ¶ 11.b.iv.

12 **Q. Does the Stipulation advance the state policy to "[e]ncourage cost-effective and**
13 **efficient access to information regarding the operation of the transmission and**
14 **distribution systems of electric utilities in order to promote both effective**
15 **customer choice of retail electric service and the development of performance**
16 **standards and targets for service quality for all consumers, including annual**
17 **achievement reports written in plain language," as set forth in R.C. 4928.02(E)?**

18 A. Yes. In the Stipulation, DP&L commits to providing annual reporting for the metrics
19 identified in Exhibit 3, including metrics relating to AMI, meter reading, data access
20 and utilization, billing, customer impact, distribution automation, and CVR/VVO.
21 Stipulation, ¶ 5.b and Exhibit 3. These metrics will enable the development of
22 performance standards and targets for service quality for DP&L's customers.

1 **Q. Does the Stipulation advance the state policy to "[p]rotect at-risk populations,**
2 **including, but not limited to, when considering the implementation of any new**
3 **advanced energy or renewable energy resource," as set forth in R.C. 4928.02(L)?**

4 A. Yes. The Stipulation protects at-risk populations in several ways. First, DP&L
5 commits in the Stipulation to contribute \$900,000 in shareholder dollars to support a
6 weatherization program for low-income residents. Stipulation, ¶ 12.a. Second, DP&L
7 agrees in the Stipulation to support a water-heater pilot program for Percentage of
8 Income Program ("PIPP") customers in the City of Dayton to reduce their peak load
9 contribution following installation of smart meters. Stipulation, ¶ 12.c. Third, DP&L
10 further commits in the Stipulation not to implement any form of prepay program as
11 part of SGP Phase 1 and not to use AMI to unlawfully limit the electric usage of
12 residential customers. Stipulation, ¶¶ 12.d and 12.e. Fourth, DP&L agrees in the
13 Stipulation to contribute \$200,000 in shareholder dollars annually to assist the City of
14 Dayton in providing economic development programs and providing essential city
15 services to residents, including low-income residents during ESP I. Stipulation,
16 ¶ 13.a.v. Fifth, under the Stipulation, DP&L will prioritize residential customers in
17 the historically disadvantaged Western and Northwestern areas of the City of Dayton
18 when implementing SGP Phase 1. Stipulation, ¶ 13.a.i.

19 **Q. Does the Stipulation advance the state policy to "[e]ncourage the education of**
20 **small business owners in this state regarding the use of, and encourage the use of,**
21 **energy efficiency programs and alternative energy resources in their businesses,"**
22 **as set forth in R.C. 4928.02(M)?**

1 A. Yes. DP&L has committed to spending \$6.1 million during SGP Phase 1 for customer
2 education programs regarding the benefits of SGP Phase 1 components. Stipulation,
3 ¶ 2, Exhibit 1. In each year of SGP Phase 1, \$50,000 of those customer education
4 funds will be paid to each of IEU, OHA, OMAEG, and the City of Dayton to educate
5 and engage hospitals, manufacturers, and residents regarding the potential benefits of
6 grid modernization, such as assisting with accessing and analyzing energy usage and
7 rate information that will become available upon the installation of CIS. Stipulation,
8 ¶ 14(c). An additional \$50,000 per year will be applied toward marketing and
9 education for residential customers about the Smart Thermostat Rebate Program in
10 conjunction with its deployment of residential AMI meters. Stipulation, ¶ 12(b).
11 Further, DP&L commits to pay \$150,000 in shareholder dollars to OHA in 2023 and
12 2024 as an energy education grant.

13 **Q. Does the Stipulation advance the state policy to "[f]acilitate the state's**
14 **effectiveness in the global economy," as set forth in R.C. 4928.02(N)?**

15 A. Yes. As explained above, grid modernization will improve reliability for customers,
16 reduce operational expenses and line losses, and enable new innovative products and
17 services for DP&L's customers, including but not limited to integrated distributed
18 energy and demand response resources and time-varying products. These significant
19 benefits will foster economic development in the Miami Valley and the State of Ohio.
20 Moreover, under the Stipulation, DP&L has committed significant shareholder dollars
21 to economic development, including \$200,000 in annual payments to the City of
22 Dayton for economic development programs and providing essential city services to

1 residents (Stipulation, ¶ 13.a.v), various economic development incentives for DP&L
2 customers (Stipulation, ¶ 15.a), \$750,000 in annual economic development grants for
3 DP&L customers (Stipulation, ¶ 15.b), and \$1 million for a solar project in DP&L's
4 service territory (Stipulation, ¶ 16.c).

5 **Q. Does the Stipulation advance the state policy to "[e]ncourage cost-effective,**
6 **timely, and efficient access to and sharing of customer usage data with customers**
7 **and competitive suppliers to promote customer choice and grid modernization,"**
8 **as set forth in R.C. 4928.02(O)?**

9 A. Yes. The Stipulation encourages cost-effective, timely, and efficient access to and
10 sharing of customer data with robust provisions allowing access to such data at no fee
11 for customers and at no fee during SGP Phase 1 for CRES providers and other third
12 parties. Stipulation, ¶¶ 10, 11, 11a.vii. and 11.e. Moreover, DP&L will offer Electric
13 Data Interchange and data access for CRES providers as part of its new Customer
14 Information System ("CIS") for billing and scheduling purposes (Stipulation, ¶¶ 10.e
15 and 11.b.iv) and through Green Button Connect My Data ("GBC") for prospective and
16 existing customers (Stipulation, ¶ 11.b).

17 **Q. Does the Stipulation advance the state policy to "[e]nsure that a customer's data**
18 **is provided in a standard format and provided to third parties in as close to real**
19 **time as is economically justifiable in order to spur economic investment and**
20 **improve the energy options of individual customers," as set forth in R.C.**
21 **4928.02(P)?**

1 A. Yes. In the Stipulation, DP&L commits to releasing customer energy-usage data only
2 in accordance with applicable North American Energy Standards Board Energy
3 Services Provider Interface standards and in compliance with all Ohio law.
4 Stipulation, ¶ 11.b.i. Moreover, as stated above, DP&L will provide GBC data access
5 to any authorized CRES or third party in the timeline associated with DP&L's new
6 CIS. Stipulation, ¶ 11.b. These provisions will allow CRES providers and other third
7 parties to access the most current customer data available, subject to authorization by
8 the customer, so as to encourage development in innovative products and services for
9 energy users. Stipulation, ¶ 11.b.iv.

10 **IV. CONCLUSION**

11 **Q. Does this conclude your testimony in support of the Stipulation?**

12 A. Yes, it does.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Testimony of Sharon R. Schroder in Support of the Stipulation and Recommendation has been served via electronic mail upon the following counsel of record, this 30th day of November, 2020:

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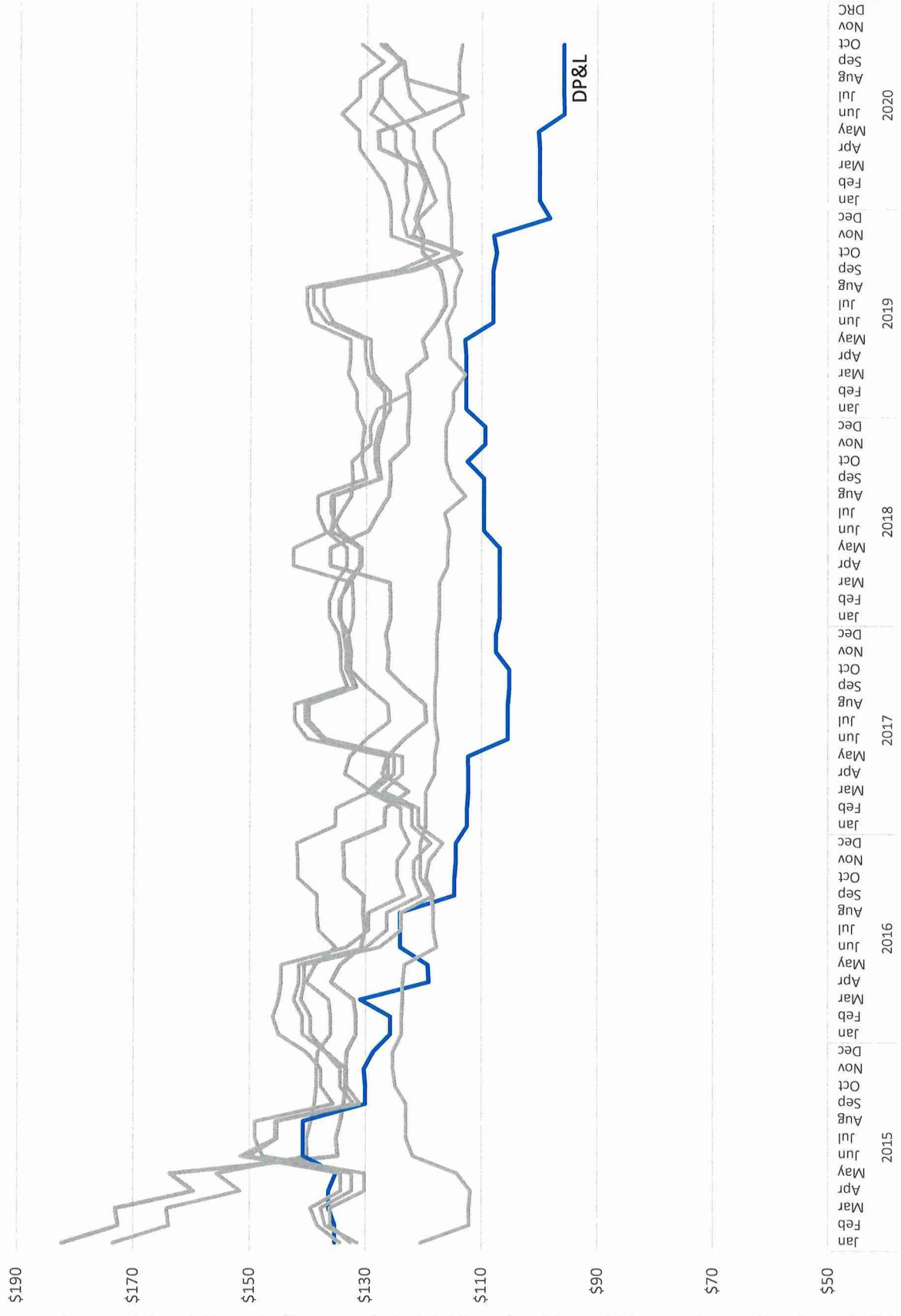
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Ohio EDU Residential Bill (1,000 kWh)



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Summary: Testimony Testimony of Sharon R. Schroder in Support of the Stipulation and Recommendation electronically filed by Mr. Jeffrey S Sharkey on behalf of The Dayton Power and Light Company