



# Public Utilities Commission

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## Commissioners

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May 7, 2021

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

RE: *In the Matter of the Application of Dayton Power and Light Company d/b/a AES Ohio (AES Ohio), to Update its Transmission Cost Recovery Rider – Non-bypassable (TCRR-N), Case No. 21-224-EL-RDR*

Dear Docketing Division:

Enclosed please find the Staff's Review and Recommendations in regard to the application filed by AES Ohio to update its TCRR-N in Case No. 21-224-EL-RDR

Sincerely,

Marianne Townsend  
Chief, Regulatory Utility Services  
Rates and Analysis, Dept.  
Public Utilities Commission of Ohio

Dorothy Bremer  
Section Chief, Regulatory Utility Services  
Rates and Analysis, Dept.  
Public Utilities Commission of Ohio

Enclosure  
Cc: Parties of Record

**Dayton Power and Light Company d/b/a AES Ohio**  
**Case No. 21-224-EL-RDR (TCRR-N)**

**Overview**

Pursuant to the Commission's Opinion & Order approved on September 4, 2013, in Case No. 12-426-EL-SSO, et al., the Dayton Power and Light Company d/b/a AES Ohio (AES Ohio or Company) was authorized to separate its Transmission Cost Recovery Rider (TCRR) into a market based bypassable rider (TCRR-B) and a non-market based rider (TCRR-N). In Case No. 15-361-EL-RDR the Commission authorized DP&L to recover operating reserve costs through the TCRR-N, but limited recovery to just the Balancing Operating Reserve Local Constraint Charges. On October 20, 2017 in Case No. 16-395-EL-SSO, et al., the Commission authorized AES Ohio to amend the TCRR-N and establish a pilot program, which allows certain customers to opt out of the TCRR-N and purchase transmission services directly from the regional transmission operator.

On November 26, 2019, AES Ohio filed a notice of withdrawal to exercise its statutory right to withdraw its application for an electric security plan (ESP) in Case No. 16-395-EL-SSO, et al., and to implement its most recent ESP in Case No. 08-1094-EL-SSO, et al. (ESP I). On December 18, 2019, the Commission found that AES Ohio's withdrawal terminated the ESP approved in Case No. 16-395-EL-SSO and dismissed the case. The Commission also found that AES Ohio's TCRR-N is authorized under ESP I and should be continued.

On March 16, 2021, AES Ohio filed the annual update of its TCRR-N. On May 5, 2021, AES Ohio filed an amended application to capture various corrections in the B-2 and D-1 schedules.

**Staff Review**

Staff completed its review of AES Ohio's filings. Staff conducted this audit through a combination of document review, interview, and interrogatories. For the audit period February of 2020 through January 2021, Staff requested documentation as needed to determine that the costs were substantiated and jurisdictional or to conclude that an adjustment was warranted. Staff has confirmed that the Company corrected the beginning balance error that was identified in Case No. 20-547-EL-RDR.

Staff continues to review certain charges including balancing operating reserves. Therefore, Staff recommends that the rates proposed in the May 5, 2021 amended application be approved by the Commission subject to Staff's supplemental letter to be filed in this docket once the review has concluded.

Pursuant to the Commission's Order in Case No. 16-395-EL-SSO, AES Ohio established a TCRR-N pilot program. Currently, there is one customer enrolled in the pilot program. Customers served under the pilot program are billed directly by PJM or their Competitive Retail Electric Service (CRES) provider and are no longer subject to the TCRR-N rider rates. This allows the customer

or their CRES to be billed directly for certain costs such as NITS based on the customer's specific Network Service Peak Load (NSPL), as opposed to the customer being billed by the utility under the TCRR-N rider based on their monthly metered billing demand. This provides an opportunity for these customers to control their transmission related costs by controlling their NSPL.

## **Conclusion**

Staff recommends that the amended application filed May 5, 2021 be approved, subject to the above recommendations, and become effective on a bills rendered basis beginning on June 1, 2020.

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Summary: Staff Report Filed electronically filed by Mrs. Tanika Hawkins on behalf of PUCO Staff