

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton Power and Light Company for an Increase in its Electric Distribution Rates	:	Case No. 20-1651-EL-AIR
	:	
In the Matter of the Application of The Dayton Power and Light Company for Accounting Authority	:	Case No. 20-1652-EL-AAM
	:	
In the Matter of the Application of Dayton Power and Light Company for Approval of Revised Tariffs	:	Case No. 20-1653-EL-ATA
	:	

**OBJECTIONS TO STAFF REPORT
OF THE OHIO ENERGY GROUP**

Pursuant to R.C. 4909.19 and Ohio Admin. Code 4901-1-28, the Ohio Energy Group (“OEG”) submits its Objections to the Staff Report filed on July 26, 2021, in the above-captioned proceedings.

1. OEG objects to Staff’s proposal regarding the “*Low Load Factor Provision*” for Primary customers.¹ The costs being recovered through base distribution rates are primarily demand driven and recovering these costs through demand charges is appropriate. A capped or modified rate for lower load factor customers is a subsidy as it transfers cost responsibility from lower load factor customers to higher load factor customers. OEG objects to Staff’s proposal to the extent that it would preserve this subsidy in rates. OEG further objects to Staff’s proposal on the basis that it has not provided a rate impact analysis in support of its position.

¹ Staff Report, pp. 31-32.

2. OEG objects to the Staff Report to the extent that it does not address whether the base rate freeze agreed to by Dayton Power and Light Company in its first Electric Security Plan (“ESP 1”)² prevents AES from increasing rates for as long as ESP 1 remains in effect.
3. OEG objects to the amount of the increases/decreases in distribution rates outlined in the Staff Report for Primary, Primary Substation and High Voltage customers.³

Respectfully submitted,

/s/ Michael L. Kurtz

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August 25, 2021

² In re Application of the Dayton Power & Light Co. for Approval of its Elec. Sec. Plan, Case No. 08-1094-EL-SSO, Stipulation & Recommendation at 10 (February 24, 2009) (the “ESP 1 Settlement”); Opinion & Order at 5, 9 (June 24, 2009) (“ESP 1 2009 Opinion”).

³ Staff Report, p. 28.

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing OBJECTIONS TO STAFF REPORT OF THE OHIO ENERGY GROUP was served upon the persons listed below via electronic transmission this 25th day of August, 2021.

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Case No(s). 20-1651-EL-AIR, 20-1652-EL-AAM, 20-1653-EL-ATA

Summary: Objection Ohio Energy Group (OEG) Objections to Staff Report electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group