

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the Ohio	)	
Department of Development for an Order	)	
Approving Adjustments to the Universal	)	Case No. 21-659-EL-USF
Service Fund Riders of Jurisdictional Ohio	)	
Electric Distribution Utilities.	)	

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**AMENDED APPLICATION**

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By its application in this docket of October 29, 2021, the Ohio Department of Development (“Development”), by its Director, Lydia Mihalik, petitioned the Public Utilities Commission of Ohio (“Commission”), pursuant to Section 4928.52(B), Revised Code, for an order approving adjustments to the Universal Service Fund ("USF") riders of all jurisdictional Ohio electric distribution utilities ("EDUs"). Pursuant to Rule 4901-1-06, Ohio Administrative Code, Development hereby moves to amend its application as set forth below. As more fully described in the supplemental testimony of Megan Meadows submitted herewith, this amended application reflects information that was not available to Development at the time the original application was prepared. Accordingly, Development respectfully requests the Commission to accept this amended application for filing.

As its amended application, Development states as follows:

1. Under the legislative scheme embodied in SB 3, the 1999 legislation that restructured Ohio's electric utility industry and transferred administration of the electric percentage of income payment plan ("PIPP") program to Development, the USF riders replaced the EDUs' existing PIPP riders. The USF riders were to be calculated so as to generate the same

level of revenue as the PIPP riders they replaced,<sup>1</sup> plus an amount equal to the level of funding for low-income customer energy efficiency programs reflected in the electric rates in effect on the effective date of the statute,<sup>2</sup> plus the amount necessary to pay the administrative costs associated with the low-income customer assistance programs and the consumer education program created by Section 4928.56, Revised Code.<sup>3</sup>

2. Pursuant to Section 4928.51(A), Revised Code, all USF rider revenues collected by the EDUs are remitted to Development for deposit in the state treasury's USF. Development then makes disbursements from the USF to fund the low-income customer assistance programs (including PIPP and the low-income customer energy efficiency programs) and the consumer education program, and to pay their related administrative costs.

3. Section 4928.52(B), Revised Code, provides that, if Development, after consultation with the Public Benefits Advisory Board ("PBAB"), determines that the revenues in the USF, together with revenues from federal and other sources of funding,<sup>4</sup> will be insufficient to cover the cost of the low-income customer assistance and consumer education programs and their related administrative costs, Development shall file a petition with the Commission for an increase in the USF rider rates. The statute further provides that, after providing reasonable notice and opportunity for hearing, the Commission may adjust the USF rider by the minimum amount necessary to generate the additional revenues required; provided, however, that the Commission

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<sup>1</sup> See Section 4928.52(A)(1), Revised Code.

<sup>2</sup> See Section 4928.52(A)(2), Revised Code.

<sup>3</sup> See Section 4928.52(A)(3), Revised Code.

<sup>4</sup> Section 4928.52(B), Revised Code, specifically identifies the Ohio Energy Credit Program as a funding source. However, this program was discontinued as of July 1, 2003.

may not decrease a USF rider without the approval of the Development Director, after consultation by the Director with the PBAB.

4. Unlike traditional ratemaking, where the objective is to establish rates that will provide the applicant utility with a reasonable earnings opportunity, the USF riders must actually generate sufficient revenues during the collection period to enable Development to meet its USF-related statutory and contractual obligations on an ongoing basis. In recognition of this fact, the stipulations adopted by the Commission in all prior USF rider rate adjustment proceedings have required that Development file a Section 4928.52(B), Revised Code, application with the Commission each year, proposing such adjustments to the USF rider rates as may be necessary to assure, to the extent possible, that each EDU's rider will generate its associated revenue requirement — but not more than its associated revenue requirement — during the annual collection period following Commission approval of such adjustments..

5. By its opinion and order of December 16, 2020, in Case No. 20-1103-EL-USF, this Commission granted Development's 2020 application for approval of adjustments to the USF riders of all Ohio EDUs based on its acceptance of a stipulation and recommendation submitted jointly by the parties to that proceeding. The new USF riders replaced the USF riders approved by the Commission in Case No. 19-1270-EL-USF, and became effective on a bills-rendered basis with the January 2021 EDU billing cycles.

6. The Commission's opinion and order of December 16, 2020 in Case No. 20-1103-EL-USF provided for the continuation of the notice of intent (“NOI”) process first approved by the Commission in Case No. 04-1616-EL-UNC. Under this process, Development was required to make a preliminary filing by May 31 setting out the methodology it would employ in developing

the USF rider revenue requirements and rate design for its subsequent annual USF rider adjustment application. The purpose of this procedure is to permit the Commission to resolve any issues relating to methodology prior to the preparation and filing of the application itself, so as to limit the number of potential issues in the second phase of the case and thereby permit the Commission to act on the application in time for the new USF rider rates to take effect on January 1 of the following year. Development filed its NOI in this case on May 30, 2021. Hearing and cross-examination were waived by agreement of the parties, and the NOI Application was submitted on the basis of the parties' Stipulation and Recommendation and Development's prefiled direct testimony. See Opinion and Order (October 6, 2021) ¶¶ 16-17. The Commission approved the methodology proposed by Development in the NOI by its opinion and order of October 6, 2021 (the "*NOI Order*").

7. Based on the methodology approved in the *NOI Order* as described below, Development has determined that, on an aggregated basis, the 2022 revenue requirement will be more than the 2021 revenue requirement, by some \$69,123,848 required to fulfill the objectives identified in Section 4928.52(A), Revised Code, during the 2022 collection period. On an electric distribution utility ("EDU") specific basis, Development's analysis shows that the 2022 revenue requirement of all EDUs (AEP Ohio ("OP"), Dayton Power and Light Company, now known as AES Ohio ("AES"), Duke Energy Ohio ("Duke"), The Cleveland Electric Illuminating Company ("CEI"), Ohio Edison Company ("OE"), and The Toledo Edison Company ("TE")) would increase over their 2021 revenue requirement. Accordingly, Development, having consulted with the PBAB, proposes that the rider rates for each EDU be increased, so as to generate the required annual revenue indicated in the following table so as to generate their respective indicated revenue targets.

**Table I**

	<b>2021 Revenue Requirement</b>	<b>2022 Revenue Requirement</b>	<b>Surplus/Deficiency</b>
<b>OP</b>	\$60,765,801	\$80,600,646	-\$19,834,844.69
<b>AES</b>	\$5,752,389	\$9,547,863	-\$3,795,473.57
<b>Duke</b>	\$6,730,228	\$11,485,776	-\$4,755,547.82
<b>CEI</b>	\$13,235,211	\$23,243,736	-\$10,008,524.55
<b>OE</b>	\$24,180,200	\$47,307,588	-\$23,127,387.71
<b>TE</b>	\$7,471,013	\$15,073,083	-\$7,602,069.71
<b>Totals</b>	\$118,134,842	\$187,258,690	-\$69,123,848.05

8. As described in further detail in the written testimony of Development witness Megan Meadows filed with this application, the revenue requirement that the proposed USF riders are designed to generate consists of the elements identified below.

a. Cost of PIPP. The cost of PIPP component of the USF rider revenue requirement is intended to reflect the total cost of electricity consumed by the EDU's PIPP customers for the 12-month period January 2021 through December 2021 (the “test period”), plus pre-PIPP balances, less the monthly installment payments billed to PIPP customers, less payments made by or on behalf of PIPP customers, including agency payments, to the extent that these payments are applied to outstanding PIPP arrearages over the same period. Because actual data for September through December 2021 was not available at the time the application was prepared, information from the corresponding months of 2020 was combined with actual data from January through August of 2021 to determine the test-period cost of PIPP for each EDU as displayed in Exhibit A hereto. As explained in Development witness Meadow’s written testimony, and consistent with the *NOI Order*, Development adjusted the test-period cost of PIPP to recognize the impact of

Commission-approved EDU rate changes that took effect during the 2021 test period and to annualize the impact of Commission-approved EDU rate changes that will take effect in 2022. The calculations of these adjustments are shown in attached Exhibits A.1.a through A.1.d. The net impact of these adjustments is shown in Exhibit A.1. As explained in Ms. Meadow's testimony, and consistent with the *NOI Order*, the totals shown in Exhibit A.1 were then adjusted to reflect the projected decrease in PIPP enrollments during the 2022 collection period. The projections are shown in attached Exhibit A.2. The cumulative effect of the foregoing adjustments is shown in the Total Adjusted Test-Period Cost of PIPP column (Column F) in Exhibit A.2.

b. Electric Partnership Program and Consumer Education Program Costs.

This element of the USF rider revenue requirement reflects the cost of the low-income customer energy efficiency programs and the consumer education program, referred to collectively by Development as the "Electric Partnership Program" ("EPP"), and their associated administrative costs, which are recovered through the USF riders pursuant to Section 4928.52(A)(2) and (3), Revised Code. In the NOI, Development projected its EPP costs to be \$14,946,196, but indicated it would review and amend the projection, if required, when filing its Application. Development has reviewed its projections and now proposes a \$13,141,665 allowance for these items. The allowance will fully fund the program based on current costs needed. Consistent with the *NOI Order*, this component of the USF rider revenue requirement is allocated to the EDUs based on the ratio of their respective costs of PIPP to the total cost of PIPP. The results of the allocation are shown in attached Exhibit B.

c. Administrative Costs. This USF rider revenue requirement element represents an allowance for the costs Development incurs in connection with its administration of the PIPP program and is included as a revenue requirement component pursuant to Section 4928.52(A)(3), Revised Code. As explained in the testimony of Development witness Megan Meadows filed with the application, the proposed allowance for administrative costs of \$4,749,241 has been determined in accordance with the standard approved by the Commission in the *NOI Order*. The requested allowance for administrative costs has been allocated to the EDUs based on the number of PIPP customer accounts as of June 2021, the test-period month exhibiting the highest PIPP customer account totals. The results of the allocation are shown in attached Exhibit C.

d. December 31, 2021 USF PIPP Account Balances. Because the USF rider rate is based on historical sales and historical PIPP enrollment patterns, the cost of PIPP component of an EDU's USF rider rate will, in actual practice, either over-recover or under-recover its associated annual revenue requirement over the collection period. Over-recovery creates a positive USF PIPP account balance for the company in question, thereby reducing the amount needed on a forward-going basis to satisfy the USF rider revenue requirement. Conversely, where under-recovery has created a negative USF PIPP account balance as of the effective date of the new riders, there will be a shortfall in the cash available to Development, which will impair its ability to make the PIPP reimbursement payments due the EDUs on a timely basis. Thus, the amount of any existing positive USF PIPP account balance must be deducted in determining the target revenue level the adjusted USF rider is to generate, while the deficit represented by a negative USF PIPP account balance must be added to the associated revenue requirement. In this case, Development

is requesting that its proposed USF riders be implemented on a bills-rendered basis effective January 1, 2022. Accordingly, the USF rider revenue requirement of each EDU has been adjusted by the amount of the EDU's projected December 31, 2021 USF PIPP account balance so as to synchronize the new riders with the EDU's USF PIPP account balance as of their effective date. This conforms to the methodology approved by the Commission in the *NOI Order*. The adjusted projected December 31, 2021 USF PIPP account balance for each EDU is shown in Exhibit H. In case number 1:21-cr-86 for the United States District Court Southern District of Ohio Western Division, FirstEnergy Corp was required to pay \$115,000,000 to Development's "Percentage of Income Payment Plan Plus for the benefit of Ohio electric customers." The \$115,000,000 was included in the account balance calculation and, therefore, reduced the overall revenue requirement by this amount

e. Reserve. PIPP-related cash flows can fluctuate significantly throughout the year, due, in large measure, to the weather-sensitive nature of electricity sales and PIPP enrollment patterns. As shown on the test-period graph attached hereto as Exhibit E, the month-to-month cash flow fluctuations had, in the past resulted in negative USF PIPP account balances, which mean that, in those months, Development had insufficient cash to satisfy its reimbursement obligations to the EDUs on a timely basis. To address this problem, Development traditionally has included an allowance to create a cash reserve as an element of the USF rider revenue requirement, based upon each EDU's largest monthly deficit during the test period. In the NOI approved in this case, and Case No. 16-1223-EL-USF and subsequent cases, the PUCO approved a modification to the calculation to allow more flexibility. The modification permitted consideration of the highest monthly



deficit during the test period for the EDUs in the aggregate, because the funds are deposited in one USF account. The modification also permitted consideration of the aggregate projected year end account balance to determine whether a reserve allowance is needed. Development considered the projected aggregate account balance of \$112,710,934 as shown in Exhibit H. Each EDU's largest monthly deficit occurred in September, making the sum of the individual highest monthly reserves the same as the aggregate amount, \$51,386,772. Development adopted the full reserve amount, and did not reduce it by the projected account balance, considering the potential effects of the Special Reconnect Order and the ongoing pandemic. The proposed reserve component is forth in attached Exhibit F.

f. Allowance for Undercollection. This component of the USF rider revenue requirement is an adjustment to recognize that, due to the difference between amounts billed through the USF rider and the amounts actually collected from EDU customers, the rider will not generate the target revenues. In accordance with the methodology approved in the *NOI Order*, the allowance for undercollection for each company is based on the collection experience of that company. The allowance for undercollection for each EDU is shown in attached Exhibit G.

g. PIPP Plus Program Audit Costs. In the NOI Application, Development recognized that the Commission has permitted audits<sup>5</sup> to be conducted of each EDU's PIPP-related accounting and reporting to assure that the Development-EDU interface was functioning in accordance with Development's expectations and to identify any systemic

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<sup>5</sup> Although characterized as an "audit" in the initial RFP, the work performed by the firm awarded the contract was actually an "application of agreed-upon procedures" designed to test the subject EDU's performance in specific areas. However, the terms are used interchangeably herein.

problems that could indicate that the cost of PIPP recovered from ratepayers through the USF riders of the respective EDUs had been overstated.

In the NOI in this proceeding, Development proposed an allowance of \$99,000 to conduct the similar audits of CEI, OE and TE. Based upon the costs of the 2021 audits, Development estimates the cost to be \$69,000. Each EDU (CEI, OE and TE) will be charged based on a fixed cost. This allocated audit cost for the 2022 collection period also is shown on Exhibit D.

h. Aggregation of PIPP Plus Customers. Pursuant to Section 4928.544(B) of the Ohio Revised Code, the reimbursement of the Commission's costs incurred for aggregation are administrative costs of the program and will be included in the Administrative Costs set forth in paragraph 8.c.

9. A summary schedule showing the USF rider component costs by EDU and their revenue requirements is attached as Exhibit I. Development proposes to recover the annual USF rider revenue requirement for each EDU through a USF rider that incorporates the same two-step declining block rate design approved by the Commission in all prior USF rider rate adjustment cases and the *NOI Order* in this proceeding. The first block of the rate applies to all monthly consumption up to and including 833,000 Kwh. The second rate block applies to all consumption above 833,000 Kwh per month. For each EDU, the rate per Kwh for the second block is set at the lower of the PIPP charge in effect in October 1999 or the per Kwh rate that would apply if the EDU's annual USF rider revenue requirement were to be recovered through a single block per Kwh rate. The rate for the first block rate is set at the level necessary to produce the remainder of the EDU's annual USF rider revenue requirement. Thus, if the EDU's October 1999 PIPP charge exceeds the per Kwh rate that would apply if the EDU's annual USF rider revenue requirement

were to be recovered through a single block per Kwh rate, a calculation shown in Exhibit J, the rate for both consumption blocks would be the same. As discussed in the testimony of Development witness Meadows, in this case, the October 1999 PIPP charge cap has been triggered for each of the EDUs. Thus, all the new USF rider rates proposed herein have the declining block feature for all EDUs. The following table compares the resulting proposed USF riders for each EDU with the EDU's current USF rider.

**Table II**

<b>2022 USF Riders</b>				
<b>Current 2021 USF Rider</b>			<b>Proposed 2022 USF Rider</b>	
	<b>First 833,000 Kwh</b>	<b>Above 833,000 Kwh</b>	<b>First 833,000 Kwh</b>	<b>Above 833,000 Kwh</b>
<b>OP</b>	\$0.0018471	\$0.0001756	\$0.0024127	\$0.0001756
<b>AES</b>	\$0.0004213	\$0.0004213	\$0.0007223	\$0.0005700
<b>Duke</b>	\$0.0003477	\$0.0003477	\$0.0006075	\$0.0004690
<b>CEI</b>	\$0.0008122	\$0.0005680	\$0.0015450	\$0.0005680
<b>OE</b>	\$0.0010744	\$0.0010461	\$0.0022477	\$0.0010461
<b>TE</b>	\$0.0008607	\$0.0005610	\$0.0021160	\$0.0005610

11. Consistent with Section 4928.52(B), Revised Code, the proposed USF rider rates set forth above for all EDUs represent the minimum rates necessary to satisfy their respective USF rider revenue responsibilities.

12. In calculating the USF rider revenue requirement, Development has relied on certain information reported by the EDUs. Although Development believes this information to be reliable, Development has not performed an audit to verify the accuracy of this information. If any party questions or wishes to challenge the accuracy of this information, Development requests that the Commission require such party to direct its inquiries to the EDU in question,

either informally or through formal discovery.

13. The adjustments to the USF riders proposed in this application are based on the most recent information available to Development at the time the application was prepared and includes actual data for the calendar 2021 test period through the month of September 2021. In previous Development USF rider rate adjustment applications, Development has reserved the right to amend its application by updating its test-period calculations to incorporate additional actual data as it became available. Thus, Development again reserves the right to amend its application to incorporate additional actual test-period data that becomes available subsequent to the preparation of this amended Application.

13. Development requests that, as a part of its order in this proceeding, the Commission require that Development file its 2022 USF rider rate adjustment application no later than October 31, 2022 and provide that the NOI procedure again be used in connection with the 2022 application.

WHEREFORE, Development respectfully requests that the Commission, after providing such notice as it deems reasonable, affording interested parties the opportunity to be heard, and conducting a hearing, if a hearing is deemed to be required, issue an order (1) finding that USF rider rate adjustments proposed in the application represent the minimum adjustments necessary to provide the revenues necessary to satisfy the respective USF rider revenue requirements; (2) granting the application; and (3) directing the EDU's to incorporate the new USF rider rates approved herein in their filed tariffs, to be effective January 1, 2022 on a bills-rendered basis.

Respectively submitted,



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## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Amended Application has been served upon the following parties by first class mail, postage prepaid, and/or electronic mail this 22<sup>nd</sup> day of November 2021.



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**Exhibit A**

Merged Cost of PIPP					
October 2020 through September 2021					
	Electrical Service A	Pre-PIPP B	PIPP Customer Portion C	Payments to PIPP Arrears D	Cost of PIPP (A+B)-C-D
OP	\$175,014,739.58	\$7,163,803.87	\$76,913,476.71	\$8,381,924.05	\$ 96,883,142.69
DPL	\$24,283,756.17	\$1,653,011.96	\$14,366,671.21	\$2,055,154.08	\$ 9,514,942.84
Duke	\$26,855,133.79	\$3,126,886.87	\$13,386,760.77	\$3,398,316.58	\$ 13,196,943.31
CEI	\$43,263,076.79	\$5,758,011.26	\$21,665,357.37	\$1,261,871.06	\$ 26,093,859.62
OE	\$82,318,257.96	\$7,536,118.54	\$39,085,120.33	\$2,360,417.09	\$ 48,408,839.08
TE	\$25,333,748.67	\$3,490,855.61	\$12,409,221.67	\$845,301.72	\$ 15,570,080.89
Total:	\$377,068,712.96	\$28,728,688.11	\$177,826,608.06	\$18,302,984.58	\$209,667,808.43

**Exhibit A.1****Adjusted Test-Period Cost of PIPP**

	<b>10/1/20 to 9/30/21 Cost of PIPP Plus</b>	<b>2020 EDU Rate Changes</b>	<b>2021 EDU Rate Changes</b>	<b>Adjusted Test-Period Cost of PIPP</b>
<b>OP</b>	\$96,883,142.69	\$0.00	\$6,213,023.26	\$103,096,165.95
<b>DPL</b>	\$9,514,942.84	\$0.00	\$3,961,893.00	\$13,476,835.84
<b>Duke</b>	\$13,196,943.31	(\$10,423.02)	\$813,092.23	\$13,999,612.52
<b>CEI</b>	\$26,093,859.62	\$0.00	\$2,552,521.53	\$28,646,381.15
<b>OE</b>	\$48,408,839.08	\$0.00	\$5,062,572.86	\$53,471,411.94
<b>TE</b>	\$15,570,080.89	\$0.00	\$1,112,151.57	\$16,682,232.46
<b>Total</b>	<b>\$209,667,808.43</b>	<b>(\$10,423.02)</b>	<b>\$19,715,254.45</b>	<b>\$229,372,639.85</b>



**Exhibit A.1.a**

<b>American Electric Power (Ohio Power)</b>				
<b>Billing Cycle Dates</b>	<b>Cost of Electricity</b>	<b>2021/2022 Rate Adjustment 3.55%</b>	<b>Total</b>	<b>For 2021- 2022</b>
Oct-20	\$10,911,861.27	\$387,371.08	\$ 11,299,232.35	Oct-21
Nov-20	\$11,682,862.87	\$414,741.63	\$ 12,097,604.50	Nov-21
Dec-20	\$16,582,710.74	\$588,686.23	\$ 17,171,396.97	Dec-21
Jan-21	\$18,710,049.28	\$664,206.75	\$ 19,374,256.03	Jan-22
Feb-21	\$18,402,496.79	\$653,288.64	\$ 19,055,785.43	Feb-22
Mar-21	\$16,388,224.53	\$581,781.97	\$ 16,970,006.50	Mar-22
Apr-21	\$12,928,452.51	\$458,960.06	\$ 13,387,412.57	Apr-22
May-21	\$11,422,019.20	\$405,481.68	\$ 11,827,500.88	May-22
Jun-21	\$13,169,256.38	\$467,508.60	\$ 13,636,764.98	Jun-22
Jul-21	\$14,911,278.09	\$529,350.37	\$ 15,440,628.46	Jul-22
Aug-21	\$14,825,653.98	\$526,310.72	\$ 15,351,964.70	Aug-22
Sep-21	\$15,079,873.94	\$535,335.52	\$15,615,209.46	Sep-22
<b>Total</b>	<b>\$ 175,014,739.58</b>	<b>\$ 6,213,023.26</b>	<b>\$ 181,227,762.84</b>	

**Exhibit A.1.b**

<b>Dayton Power and Light</b>				
<b>Billing Cycle Dates</b>	<b>Cost of Electricity</b>	<b>2021 Rate Adjustment</b>	<b>Total</b>	<b>For 2021-2022</b>
Oct-20	\$ 1,613,188.76	\$ 259,395.00	\$ 1,872,583.76	Oct-21
Nov-20	\$ 1,606,051.89	\$ 271,346.00	\$ 1,877,397.89	Nov-21
Dec-20	\$ 2,117,587.12	\$ 378,820.00	\$ 2,496,407.12	Dec-21
Jan-21	\$ 2,502,626.55	\$ 597,573.00	\$ 3,100,199.55	Jan-22
Feb-21	\$ 2,379,114.02	\$ 572,779.00	\$ 2,951,893.02	Feb-22
Mar-21	\$ 2,288,989.39	\$ 546,625.00	\$ 2,835,614.39	Mar-22
Apr-21	\$ 1,711,109.41	\$ 387,472.00	\$ 2,098,581.41	Apr-22
May-21	\$ 1,427,731.69	\$ 316,856.00	\$ 1,744,587.69	May-22
Jun-21	\$ 1,878,598.80	\$ 90,275.00	\$ 1,968,873.80	Jun-22
Jul-21	\$ 2,259,409.53	\$ 104,093.00	\$ 2,363,502.53	Jul-22
Aug-21	\$ 2,280,857.37	\$ 105,677.00	\$ 2,386,534.37	Aug-22
Sep-21	\$ 2,218,491.64	\$ 330,982.00	\$ 2,549,473.64	Sep-22
<b>Total</b>	<b>\$ 24,283,756.17</b>	<b>\$ 3,961,893.00</b>	<b>\$ 28,245,649.17</b>	

Exhibit A.1.c

Duke Energy Ohio					
Billing Cycle Dates	Cost of Electricity	Rate Adjustment (.18)%	Rate Adjustment 3.86%	Total	For 2021-2022
Oct-20	\$ 1,700,729.78	\$ (3,061.31)		\$ 1,697,668.47	Oct-21
Nov-20	\$ 1,783,952.26	\$ (3,211.11)		\$ 1,780,741.15	Nov-21
Dec-20	\$ 2,305,886.21	\$ (4,150.60)		\$ 2,301,735.61	Dec-21
Jan-21	\$ 2,706,933.98		\$ 104,487.65	\$ 2,811,421.63	Jan-22
Feb-21	\$ 2,529,250.03		\$ 97,629.05	\$ 2,626,879.08	Feb-22
Mar-21	\$ 2,467,874.02		\$ 95,259.94	\$ 2,563,133.96	Mar-22
Apr-21	\$ 1,912,910.70		\$ 73,838.35	\$ 1,986,749.05	Apr-22
May-21	\$ 1,689,101.72		\$ 65,199.33	\$ 1,754,301.05	May-22
Jun-21	\$ 2,148,895.66		\$ 82,947.37	\$ 2,231,843.03	Jun-22
Jul-21	\$ 2,544,652.04		\$ 98,223.57	\$ 2,642,875.61	Jul-22
Aug-21	\$ 2,554,540.90		\$ 98,605.28	\$ 2,653,146.18	Aug-22
Sep-21	\$ 2,510,406.49		\$ 96,901.69	\$ 2,607,308.18	Sep-22
<b>Total</b>	<b>\$ 26,855,133.79</b>	<b>\$ (10,423.02)</b>	<b>\$ 813,092.23</b>	<b>\$ 27,657,803.00</b>	

First Energy- Cleveland Electric Illuminating Company				
Billing Cycle Dates	Cost of Electricity	2021 Rate Adjustment 5.90%	Total	For 2021-2022
Oct-20	\$ 2,965,152.45	\$ 174,943.99	\$ 3,140,096.44	Oct-21
Nov-20	\$ 3,070,373.69	\$ 181,152.05	\$ 3,251,525.74	Nov-21
Dec-20	\$ 3,472,072.23	\$ 204,852.26	\$ 3,676,924.49	Dec-21
Jan-21	\$ 3,993,068.29	\$ 235,591.03	\$ 4,228,659.32	Jan-22
Feb-21	\$ 4,030,294.99	\$ 237,787.40	\$ 4,268,082.39	Feb-22
Mar-21	\$ 3,820,342.31	\$ 225,400.20	\$ 4,045,742.51	Mar-22
Apr-21	\$ 3,277,356.94	\$ 193,364.06	\$ 3,470,721.00	Apr-22
May-21	\$ 3,198,592.27	\$ 188,716.94	\$ 3,387,309.21	May-22
Jun-21	\$ 3,569,951.88	\$ 210,627.16	\$ 3,780,579.04	Jun-22
Jul-21	\$ 4,142,665.72	\$ 244,417.28	\$ 4,387,083.00	Jul-22
Aug-21	\$ 3,847,323.77	\$ 226,992.10	\$ 4,074,315.87	Aug-22
Sep-21	\$ 3,875,882.25	\$ 228,677.05	\$ 4,104,559.30	Sep-22
<b>Total</b>	<b>\$ 43,263,076.79</b>	<b>\$ 2,552,521.53</b>	<b>\$ 45,815,598.32</b>	

First Energy- Ohio Edison				
Billing Cycle Dates	Cost of Electricity	2021 Rate Adjustment 6.15%	Total	For 2021-2022
Oct-20	\$ 5,478,827.48	\$ 336,947.89	\$ 5,815,775.37	Oct-21
Nov-20	\$ 5,654,293.74	\$ 347,739.07	\$ 6,002,032.81	Nov-21
Dec-20	\$ 6,560,427.11	\$ 403,466.27	\$ 6,963,893.38	Dec-21
Jan-21	\$ 7,887,541.87	\$ 485,083.83	\$ 8,372,625.70	Jan-22
Feb-21	\$ 7,901,005.67	\$ 485,911.85	\$ 8,386,917.52	Feb-22
Mar-21	\$ 7,393,784.26	\$ 454,717.73	\$ 7,848,501.99	Mar-22
Apr-21	\$ 6,110,759.71	\$ 375,811.72	\$ 6,486,571.43	Apr-22
May-21	\$ 5,929,418.66	\$ 364,659.25	\$ 6,294,077.91	May-22
Jun-21	\$ 6,570,388.03	\$ 404,078.86	\$ 6,974,466.89	Jun-22
Jul-21	\$ 7,823,976.60	\$ 481,174.56	\$ 8,305,151.16	Jul-22
Aug-21	\$ 7,611,275.17	\$ 468,093.42	\$ 8,079,368.59	Aug-22
Sep-21	\$ 7,396,559.66	\$ 454,888.42	\$ 7,851,448.08	Sep-22
<b>Total</b>	<b>\$ 82,318,257.96</b>	<b>\$ 5,062,572.86</b>	<b>\$ 87,380,830.82</b>	

First Energy- Toledo Edison				
Billing Cycle Dates	Cost of Electricity	2021 Rate Adjustment 4.39%	Total	For 2021-2022
Oct-20	\$ 1,680,966.92	\$ 73,794.45	\$ 1,754,761.37	Oct-21
Nov-20	\$ 1,746,659.66	\$ 76,678.36	\$ 1,823,338.02	Nov-21
Dec-20	\$ 2,050,278.93	\$ 90,007.25	\$ 2,140,286.18	Dec-21
Jan-21	\$ 2,390,753.70	\$ 104,954.09	\$ 2,495,707.79	Jan-22
Feb-21	\$ 2,415,507.19	\$ 106,040.77	\$ 2,521,547.96	Feb-22
Mar-21	\$ 2,288,637.01	\$ 100,471.16	\$ 2,389,108.17	Mar-22
Apr-21	\$ 1,899,661.98	\$ 83,395.16	\$ 1,983,057.14	Apr-22
May-21	\$ 1,821,245.79	\$ 79,952.69	\$ 1,901,198.48	May-22
Jun-21	\$ 2,029,637.71	\$ 89,101.10	\$ 2,118,738.81	Jun-22
Jul-21	\$ 2,425,811.97	\$ 106,493.15	\$ 2,532,305.12	Jul-22
Aug-21	\$ 2,321,017.56	\$ 101,892.67	\$ 2,422,910.23	Aug-22
Sep-21	\$ 2,263,570.25	\$ 99,370.73	\$ 2,362,940.98	Sep-22
<b>Total</b>	<b>\$ 25,333,748.67</b>	<b>\$ 1,112,151.57</b>	<b>\$ 26,445,900.24</b>	

## Exhibit A.2

Cost of PIPP Adjustment for Projected Enrollment						
	Average Enrollment 10/20-9/21	Adjusted Test Cost of PIPP	Average Cost of PIPP 10/20-9/21 B/A	Projected Annual Enrollment	Additional Cost of PIPP (D-A)X C	Total Adjusted Cost of PIPP B+E
	A	B	C	D	E	F
OP	97,816	\$103,096,165.95	\$1,054	99,470	\$ 1,743,666	\$104,839,831.94
DPL	19,452	\$13,476,835.84	\$693	20,401	\$ 657,780	\$14,134,615.63
Duke	17,248	\$13,999,612.52	\$812	17,515	\$ 216,687	\$14,216,299.52
CEI	35,555	\$28,646,381.15	\$806	35,525	\$ (23,992)	\$28,622,389.32
OE	59,781	\$53,471,411.94	\$894	58,558	\$ (1,093,996)	\$52,377,415.94
TE	18,056	\$16,682,232.46	\$924	17,639	\$ (384,938)	\$16,297,294.78
Total	247,908	\$229,372,639.85		249,109	\$ 1,115,207	\$230,487,847.13

Average Annual PIPP Enrollment							
	10/2015-9/2016	10/2016-9/2017	10/2017-9/2018	10/2018-9/2019	10/2019-9/2020	10/2020-9/2021	Projected 2021
CSP	59,399	53,148	49,337				
OP	67,820	61,715	57,824	104,162	96,433	97,816	99,470
DPL	32,530	26,251	22,714	21,824	19,928	19,452	20,401
Duke	24,995	21,631	19,516	18,791	16,507	17,248	17,515
CEI	51,248	43,434	40,732	37,521	33,499	35,555	35,525
OE	69,755	61,909	60,258	59,156	56,736	59,781	58,558
TE	21,734	18,581	18,227	17,773	17,089	18,056	17,639
Total	327,481	286,669	268,608	259,227	240,193	247,908	249,109

**Exhibit B**

<b>Electric Partnership Program Allocation</b>				
	<b>2022 Cost of PIPP</b>	<b>Percent Cost of PIPP</b>		<b>Allocated For EPP</b>
<b>OP</b>	\$104,839,831.94	45.49%	\$ 13,141,665	\$5,977,625
<b>DPL</b>	\$14,134,615.63	6.13%	\$ 13,141,665	\$805,910
<b>Duke</b>	\$14,216,299.52	6.17%	\$ 13,141,665	\$810,567
<b>CEI</b>	\$28,622,389.32	12.42%	\$ 13,141,665	\$1,631,955
<b>OE</b>	\$52,377,415.94	22.72%	\$ 13,141,665	\$2,986,389
<b>TE</b>	\$16,297,294.78	7.07%	\$ 13,141,665	\$929,219
<b>Total</b>	<b>\$230,487,847.13</b>			<b>\$13,141,665</b>

**Exhibit C**

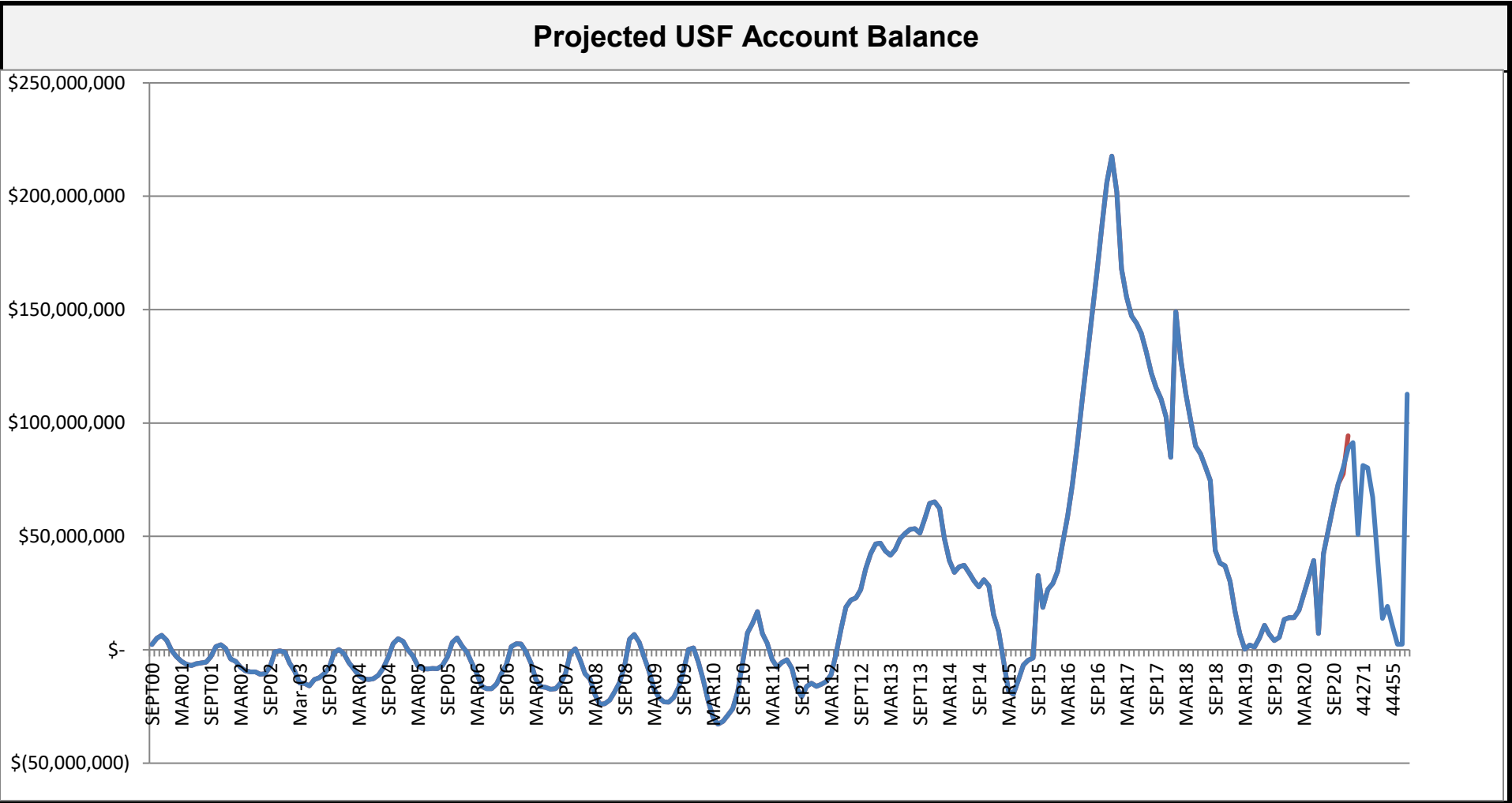
<b>Allocation of Administrative Costs</b>			
	<b>Customers June 2021</b>	<b>Admin Costs per Customer</b>	<b>Administrative Costs</b>
<b>OP</b>	98,851	\$18.90	\$1,868,749.39
<b>DPL</b>	19,296	\$18.90	\$364,785.27
<b>Duke</b>	17,594	\$18.90	\$332,609.45
<b>CEI</b>	36,403	\$18.90	\$688,188.12
<b>OE</b>	60,778	\$18.90	\$1,148,990.40
<b>TE</b>	18,298	\$18.90	\$345,918.37
<b>Total</b>	<b>251,220</b>		<b>\$4,749,241.00</b>

**Exhibit D**

<b>USF Agreed Upon Procedures</b>			
<b>2021 Total USF Audit Cost</b>		<b>Actual</b>	<b>Difference</b>
<b>OP</b>	\$33,000.00	\$22,380.00	-\$10,620.00
<b>DPL</b>	\$33,000.00	\$22,380.00	-\$10,620.00
<b>Duke</b>	\$33,000.00	\$22,380.00	-\$10,620.00
<b>Total</b>	<b>\$99,000.00</b>	<b>\$67,140.00</b>	<b>-\$31,860.00</b>

<b>2022 Total USF Audit Cost</b>	
<b>CEI</b>	\$23,000.00
<b>OE</b>	\$23,000.00
<b>TE</b>	\$23,000.00
<b>Total</b>	<b>\$69,000.00</b>





Calculation of Annual Reserve Component		
	Largest Monthly Cash Deficit	Reserve Required
OP	21-Sep	(\$16,438,330)
DPL	N/A	\$0
Duke	21-Sep	(\$2,883,739)
CEI	21-Sep	(\$6,268,533)
OE	21-Sep	(\$19,246,078)
TE	21-Sep	(\$6,550,091)
<b>Total</b>		<b>(\$51,386,772)</b>

Allowance for Undercollection	
OP	\$0
DPL	\$0
Duke	\$166,958
CEI	\$0
OE	\$0
TE	\$0
Total	\$166,958

**Exhibit H**

<b>Projected Universal Service Fund Account Balance</b>	
	<b>Balance 12/31/2021</b>
<b>OP</b>	\$48,513,271.48
<b>DPL</b>	\$5,746,828.02
<b>Duke</b>	\$6,913,777.65
<b>CEI</b>	\$13,990,330.27
<b>OE</b>	\$28,474,286.10
<b>TE</b>	\$9,072,440.39
<b>Total</b>	<b>\$112,710,933.91</b>

Exhibit I

Revenue Requirement Summary							
	OP	DPL	Duke	CEI	OE	TE	USF Revenue Requirements
<b>Cost of PIPP Plus</b>	\$104,839,831.94	\$14,134,615.63	\$14,216,299.52	\$28,622,389.32	\$52,377,415.94	\$16,297,294.78	<b>\$230,487,847</b>
<b>EPP/CE</b>	\$5,977,625.34	\$805,909.69	\$810,567.04	\$1,631,955.30	\$2,986,389.46	\$929,218.60	<b>\$13,141,665</b>
<b>Administration</b>	\$1,868,749.39	\$364,785.27	\$332,609.45	\$688,188.12	\$1,148,990.40	\$345,918.37	<b>\$4,749,241</b>
<b>Agreed Upon Procedures</b>	-\$10,620.00	-\$10,620.00	-\$10,620.00	\$23,000.00	\$23,000.00	\$23,000.00	<b>\$37,140</b>
<b>Reserve</b>	\$16,438,330.49	\$0.00	\$2,883,739.30	\$6,268,533.07	\$19,246,078.01	\$6,550,091.36	<b>\$51,386,772</b>
<b>Adjustment for Undercollection</b>	\$0.00	\$0.00	\$166,958.16	\$0.00	\$0.00	\$0.00	<b>\$166,958</b>
<b>Subtotal</b>	\$129,113,917.16	\$15,294,690.59	\$18,399,553.47	\$37,234,065.82	\$75,781,873.81	\$24,145,523.11	<b>\$299,969,624</b>
<b>Account Balance 12/31</b>	(\$48,513,271.48)	(\$5,746,828.02)	(\$6,913,777.65)	(\$13,990,330.27)	(\$28,474,286.10)	(\$9,072,440.39)	<b>(\$112,710,934)</b>
<b>Total</b>	<b>\$80,600,645.69</b>	<b>\$9,547,862.57</b>	<b>\$11,485,775.82</b>	<b>\$23,243,735.55</b>	<b>\$47,307,587.71</b>	<b>\$15,073,082.71</b>	<b>\$187,258,690</b>
Subtotal Percentage Amount	43.042%	5.099%	6.134%	12.413%	25.263%	8.049%	100%
Account Balance Based on Subtotal	\$48,513,271.48	\$5,746,828.02	\$6,913,777.65	\$13,990,330.27	\$28,474,286.10	\$9,072,440.39	<b>\$112,710,933.91</b>

Exhibit J

Uniform kWh Rate			
	KWH Sales	Required Revenue	Indicated Costs/KWH
<b>OP</b>	43,612,762,418	\$ 80,600,646	\$ 0.0018481
<b>DPL</b>	13,786,678,454	\$ 9,547,863	\$ 0.0006925
<b>Duke</b>	19,802,176,422	\$ 11,485,776	\$ 0.0005800
<b>CEI</b>	17,387,385,158	\$ 23,243,736	\$ 0.0013368
<b>OE</b>	22,914,080,943	\$ 47,307,588	\$ 0.0020646
<b>TE</b>	10,634,687,934	\$ 15,073,083	\$ 0.0014174
<b>Total</b>	<b>128,137,771,329</b>	<b>\$ 187,258,690</b>	

kWh sales were sales reported for the last twelve months  
(October 2020-September 2021)

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**in**

**Case No(s). 21-0659-EL-USF**

Summary: Amended Application of The Ohio Department of Development  
electronically filed by Teresa Orahod on behalf of Dane Stinson