

March 30, 2022

Docketing Division
Public Utilities Commission of Ohio
180 E Broad St., 11th Flr,
Columbus, OH 43215

Re: Case No. 20-1651-EL-AIR et al.

Dear Ms. Troupe:

Ohio Partners for Affordable Energy (“OPAE”) provides this correspondence to inform the Commission that OPAE would like to reiterate its position as filed in these proceedings on August 27, 2021, in its Reply in Support of the Office of the Ohio Consumers’ Counsel’s Motion to Dismiss Dayton Power and Light Company’s Application to Increase Rates.

In the interest of efficiency, OPAE will not restate the entirety of its previously filed arguments. OPAE agrees with both OCC and Staff that the distribution rate freeze is a term of ESP I, which DP&L voluntarily reverted to, and DP&L should not be allowed to enjoy the benefits of ESP I without regard to its restrictions.

OPAE will not file any other Reply Brief beyond this correspondence.

Respectfully,

/s/ Robert Dove
Robert Dove (0092019)
Kegler Brown Hill + Ritter Co., L.P.A.
65 E State St., Ste. 1800
Columbus, OH 43215-4295
Office: (614) 462-5443
rdove@keglerbrown.com

Counsel for Ohio Partners for Affordable Energy



CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served on all parties of record via the Public Utilities Commission of Ohio's DIS system on March 30, 2022.

/s/ Robert Dove
Robert Dove

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

3/30/2022 3:45:40 PM

in

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

Summary: Text Reply Correspondence electronically filed by Mr. Robert Dove on
behalf of Ohio Partners for Affordable Energy