



# Public Utilities Commission

Mike DeWine, Governor  
Jenifer French, Chair

## Commissioners

M. Beth Trombold  
Lawrence K. Friedman  
Dennis P. Deters  
Daniel R. Conway

May 6, 2022

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. 22-152-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. 22-152-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. 22-152-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 15, 2022, AES Ohio filed the annual update of its TCRR-N. On March 24, 2022 and April 29, 2022 AES Ohio filed amended applications to capture various corrections in the B-3 and B-4 schedules and in Workpaper C-1c.

**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 2021 through January 2022, Staff requested documentation as needed to determine that the costs were substantiated and jurisdictional or to conclude that an adjustment was warranted.

On May 7, 2021 in case 21-224-EL-RDR, Staff filed its initial review and recommendations letter stating, Staff continues to review certain charges including balancing operating reserves. Staff has concluded the review of certain charges including balancing operating reserves. Staff has found the inclusion of these charges are not unreasonable.

Pursuant to the Commission's Order in Case No. 16-395-EL-SSO, AES Ohio established a TCRR-N pilot program. Currently, there are two customers 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. In the Commission's Opinion and Order in Case No. 16-395-EL-SSO, the Commission ordered DP&L and Staff to review the actual results of the pilot program and periodically report their findings. As previously stated, the opt-out pilot program only has two participants. As a result, the Staff does not believe that an extensive study of the pilot program would be necessary or valuable at this time. A study of the pilot program would be performed in the future if the number of participants increases to a level where a study would be able to provide meaningful results.

## **Conclusion**

Staff recommends that the amended application filed April 29, 2022 be approved, subject to the above recommendations, and become effective on a bills rendered basis beginning on June 1, 2022.

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

**5/6/2022 10:30:53 AM**

**in**

**Case No(s). 22-0152-EL-RDR**

Summary: Staff Review and Recommendation electronically filed by Mrs. Tanika  
Hawkins on behalf of PUCO Staff