BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE OVEC GENERATION PURCHASE RIDER AUDITS REQUIRED BY R.C. 4928.148 FOR DUKE ENERGY OHIO, INC., THE DAYTON POWER AND LIGHT COMPANY, AND AEP OHIO.	))))))	**Case No. 21-477-EL-RDR**

SIERRA CLUB'S INITIAL POST-HEARING BRIEF

Dated: February 12, 2024

Respectfully submitted,

/s/ Robert Dove

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I. Introduction

The Ohio Valley Electric Corporation ("OVEC") coal-burning plants are old, inefficient, and costly to maintain.[1] They continue to act as a drain on the Ohio economy.[2] The Commission should enforce Ohio law to protect customers from high costs and over-investment in these plants.

In this proceeding, the Commission is tasked with "determin[ing]," on the basis of the audit and record in this proceeding, ". . . the prudence and reasonableness of the actions of electric distribution utilities with ownership interests in the legacy generation resource . . . and exclude from recovery those costs that the commission determines imprudent and unreasonable."[3] There are at least two areas of actions and inactions of the electric distribution utilities ("EDUs") that warrant exclusion of costs from the LGR Riders.

First, there is no evidence in the audits or otherwise that the Ohio EDUs took reasonable actions to assure that only prudent capital spending occurs at the OVEC plants. The Ohio EDU OVEC Audits[4] correctly found that the current structure—unregulated capital spending decisions made by OVEC combined with an expectation of automatic recovery from Ohio customers—creates a risk of over-investment in the plants. Such over-investment is likely to occur in the face of environmental capital requirements, where a prudent utility would consider retiring coal units instead of making further investment in them. Because there is no evidence that any of the capital

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[1] CUB/UCS Exhibit 1, Direct Testimony of Devi Glick on behalf of Citizens Utility Board of Ohio and the Union of Concerned Scientists ("Glick Direct") at 15.

[2] OMAEG Exhibit 1, Direct Testimony of John Seryak on behalf of the Ohio Manufacturers' Association Energy Group ("Seryak Direct") at 8.

[3] Ohio Rev. Code § 4928.148(A)(1).

[4] "Audit of the Legacy Generation Resource Rider of AEP Ohio Final Report," ("AEP Ohio OVEC Audit"), "Audit of the Legacy Generation Resource Rider of Duke Energy Ohio Final Report," ("Duke Ohio OVEC Audit"), and "Audit of the Legacy Generation Resource Rider of AES Ohio Final Report," ("AES Ohio OVEC Audit") (collectively, "Ohio EDU OVEC Audits").

spending during 2020 was prudent—or that any of the Ohio EDUs took any action to scrutinize or restrain capital spending—the Commission should disallow all capital costs from the LGR Rider, i.e., impose a cap as recommended by the Auditor.

Second, the PJM energy market commitment strategy for the OVEC units was imprudent during 2020 and the Ohio EDUs largely failed to take action to restrain these losses. The OVEC plants lost millions of dollars in the energy markets in 2020 and Ohio customers would likely have been better off had the plants not operated at all that year. The audits found that these units should be committed based on economics. AEP and DP&L seem to have done nothing to restrain or limit losses in the energy market. Duke succeeded in tempering these losses during spring 2020 but seems to have done little to limit uneconomic self-scheduling for the remainder of the year. The Commission should disallow from the LGR Rider the costs associated with the energy market losses incurred during 2020.

Last, the Commission should put the Ohio EDUs on notice that adequate documentation will be required in future audits if any of their actions with respect to OVEC will be found to be prudent or reasonable. First, in all future audit cases, the Ohio EDUs should present an analysis of the net present value of retirement or retrofit decisions for the Effluent Limitations Guidelines ("ELG"), Coal Combustion Residuals ("CCR"), and any other environmental compliance capital spending at OVEC. Absent such analysis that shows further investment in the OVEC units is the least-cost alternative, the Commission must exclude capital spending from the LGR, as the Auditor has recommended. Second, the Commission should order the Ohio EDUs to present daily documentation of their actions with respect to commitment decisions for the eleven OVEC coal units. This documentation should be akin to the "Profit and Loss" documents that Duke performs for its generation that looks at the likely energy margin for each unit over a week or multi-week time scale, while also including the cost of startup and shutdown. If there are operational limits on economic commitment decision-making—e.g., one unit at each site must be in operation most of the time—those operational limits and decisions should be documented, clearly and transparently. While it is true that the OVEC coal units are inflexible and poorly suited to today's electric grid, the Commission cannot allow the Ohio EDUs to lose money in the energy market for weeks at a time without requiring action to protect Ohio customers.

In sum, during the year 2020 when the OVEC contract again had negative value and customers paid a charge in the LGR Rider in every month, the Ohio EDUs' point to little-to-no activity on their own part to reduce their customers' losses. If the OVEC coal plants—Clifty Creek and Kyger Creek—had been retired or did not operate at all during 2020, Ohio electric customers would have been better off, as the plants continued to lose money in the PJM market. The Commission should enforce Ohio law and disallow costs that resulted from the imprudent and unreasonable actions of AEP, Duke, and DP&L with respect to their ownership of OVEC.

II. The Commission Is Required to Determine the Prudence of the Ohio EDUs' "Actions" During 2020 With Respect to OVEC and to "Exclude" from Retail Recovery the Costs that the Commission Determines Imprudent and Unreasonable.

Under H.B. 6, the Commission must "determine," on the basis of the audit and record in this proceeding, ". . . the prudence and reasonableness of the actions of electric distribution utilities with ownership interests in the legacy generation resource . . . and exclude from recovery those costs that the commission determines imprudent and unreasonable."[5] This statute mandates two general actions of the Commission.

First, the Commission must rule on the actions of each of the utilities during the year 2020. Part of that analysis must also include determining the reasonableness of the *inactions* of the utilities, as it would defy logic for a utility to escape review by doing nothing to protect customers from unreasonable OVEC costs. Second, the Commission is required to "exclude from recovery those costs that the commission determines imprudent and unreasonable."[6] In other words, the duty to exclude costs is mandatory where the Commission finds that actions of the Ohio EDUs are imprudent or unreasonable.

In testimony, AEP contests the power of the Commission to exclude *any* OVEC costs from the LGR Rider. AEP witness Stegall states that he had been advised by counsel that "a State Commission may not alter the amount of FERC jurisdictional costs incurred for retail cost recovery purposes."[7] Mr. Stegall's legal theory is wrong. First, while FERC has authority to regulate wholesale contracts such as the Inter-Company Power Agreement ("ICPA") itself, retail rate

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[5] Ohio Rev. Code § 4928.148(A)(1).

[6] Ohio Rev. Code § 4928.148(A)(1).

[7] AEP Ohio Exhibit 1, Direst Testimony of Jason Stegall on behalf Ohio Power Company ("Stegall Direct") at 19.

recovery is within the exclusive jurisdiction of this Commission.[8] Second, AEP has waived this federal preemption argument by not challenging H.B. 6 in court by the deadlines imposed by Ohio law. On its face, H.B. 6 makes clear that the Commission has the authority to "*exclude from recovery* those costs that the [C]ommission determines imprudent and unreasonable."[9] If AEP is of the position that federal law precludes any exclusion of costs, then AEP should have challenged H.B. 6 in court, and, having failed to do so, that argument is now waived. Last, in January 2024, the Michigan Court of Appeals upheld the Michigan Commission's disallowance of OVEC ICPA costs from Michigan customers' bills and, in that case, AEP's lawyers do not appear to have even raised the idea of federal preemption.[10]

III. The Commission Must Exclude OVEC Capital Spending from the LGR Rider Because the Ohio EDUs' Actions With Respect to Capital Spending Were Imprudent and Unreasonable.

The Commission should impose a capital cost recovery cap of $0 related to capital spending. As the Auditor found in the Ohio EDU OVEC Audits, this Commission has no authority to review capital spending decisions at Clifty Creek or Kyger Creek, as these plants are unregulated merchant generators. This situation creates a moral hazard where OVEC and its owners have an incentive to over-invest capital spending in these plants, so that they can continue to have Ohio customers pay off their debt and for other advantages. There is no evidence in the record that AEP, Duke, or DP&L sought to restrain or scrutinize capital spending for these 1950s-era plants. To

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[8] *FERC v*. Electric Power Supply Association, 136 S. Ct. 760 (2016)

[9] Ohio Rev. Code § 4928.148(A)(1) (emphasis added).

[10] *See Michigan Public Service Commission & Attorney General vs. Indiana Michigan Power Company*, Court of Appeals, State of Michigan, LC No. 00-020530 (Jan. 18, 2024) (affirming Michigan PSC's application of affiliate transaction requirements to I&M's contract with OVEC and affirming disallowance of costs).

protect customers, the Commission should adopt the audits' recommendation and impose a cap of $0 on capital spending at these plants that is permitted to flow through to Ohio customers' bills.

The Ohio EDU OVEC Audits confirm that the OVEC plants have negative value. Specifically, the Auditor found that:

- From 2019 to 2020, "the average power cost (total power cost divided by net generation) increased by 17.54% from $57.04/MWh to $67.00/MWh."[11]
- "LEI's analysis indicates that a new combined cycle gas turbine ("CCGT") has an estimated levelized cost of energy ("LCOE") of $35.9/MWh for PJM West and $42.2/MWh for PJM East in 2021."[12]
- "The reported cost of the OVEC plants, at $67.00/MWh, is higher than the levelized cost of building a new CCGT. The LCOE analysis implies that the OVEC plants are not competitive with a new CCGT based on full-cycle costs."[13]
- "The OVEC plants cost more than they earn," which the Auditor referred to as "obvious."[14]

Testimony of intervenors' witnesses in this proceeding further confirms this "obvious" fact. As CUB/UBS witness Glick found, during the audit period, each Company's share of the above-market costs incurred by the OVEC plants (in $2020) was $69.0 million for AEP, $31.9 million for Duke, and $17.0 million for DP&L. Combined, the LGR Rider above-market cost to Ohio ratepayers for 2020 was $117.9 million ($2020).[15]

In 2020, AEP, Duke, and DP&L all failed to take any steps to retire OVEC coal units or limit capital spending. A prudent utility would retire a generator when its going-forward value is

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[11] Staff Exhibit 4, AEP Ohio Audit at13; Staff Exhibit 6, Duke Ohio Audit at 13; Staff Exhibit 2, AES Ohio Audit at13.

[12] AEP Ohio Audit at 22; Duke Ohio Audit at 21; AES Ohio Audit at 21.

[13] AEP Ohio Audit at 23; Duke Ohio Audit at 21; AES Ohio Audit at 21.

[14] AEP Ohio Audit at 31; Duke Ohio Audit at 29; AES Ohio Audit at 27.

[15] Glick Direct at 27.

negative and has been for years, especially when presented with new capital spending requirements from environmental regulations. A prudent utility would consider the net present value before making an environmental upgrade to extend the life of a power plant.

Both Clifty Creek and Kyger Creek face significant compliance costs associated with U.S. EPA's coal ash and surface water discharge requirements, and, potentially, the cross-state ozone rule.[16] But because OVEC owners have an incentive to continue to invest capital in the OVEC plants, as the Auditor concludes, there is no incentive for OVEC to avoid incurring this capital spending. Regardless of OVEC owners' decisions on whether to over-invest in these plants, Ohio customers should not pay these costs, which a utility with any concern for its customers would consider avoiding.

a. Ohio EDUs' actions with respect to capital spending were unreasonable during 2020.

The Ohio EDU OVEC Audits recommend a cap on capital spending that flows through the LGR Rider because of the risk of "over-investment in the plants, as the Commission does not review and/or approve the OVEC capital expenditures."[17] The Auditor's conclusion that the OVEC plants have negative value is unequivocal. And yet none of the Ohio EDUs took any documented steps to seek to retire an OVEC coal unit or even to restrain or scrutinize ongoing capital spending.

First, neither OVEC nor the Ohio EDUs appear to have completed any analysis to demonstrate that investing in additional environmental upgrades at these plants is economic relative to retiring the plants.[18] AEP witness Stegall testified that it is his understand that the OVEC

[16] E.g., AEP Ohio Audit at 70-72.

[17] E.g., AEP Ohio Audit Report at 10.

[18] Glick Direct at 51.

plants are on track for compliance with both the CCR and ELG regulations.[19] But there is no evidence in his testimony or otherwise in the record that these capital spending decisions were prudent or reasonable, through consideration of alternatives, such as retirement of some or all units.

Second, while the Ohio EDUs have authority to review and approve capital spending for the OVEC plants,[20] there is no evidence in the record of how they exercised that authority to assure that only prudent capital spending occurred at OVEC. Neither Duke witness Ziolkowski, nor Duke witness Swez discuss the prudence or reasonableness of capital spending at the OVEC plants at all.[21] AEP witness Stegall acknowledges that the OVEC Board, on which each of the Ohio EDUs have representation, reviews and approves capital spending for the plants, but states that OVEC should essentially be left alone to manage "their" own capital spending decisions.[22] DP&L witness Crusey states that there "were active discussions of those investments of the Board," but offers no evidence of what those discussions were or, more importantly, what analyses and data the Board purported to rely on; ultimately, Mr. Crusey can only offer his say-so assurance to this Commission that the OVEC Board would only approve prudent capital spending.[23] There is no evidence or reason to think that the OVEC Board's actions are in line with the interests of the Ohio electric

[19] Stegall Direct at 20.

[20] AES Ohio Ex. 4, Direct Testimony of David Crusey on behalf of Dayton Power & Light Company ("Crusey Direct") at 15 ("Typically, approvals over $750,000 are submitted to the Board and require majority approval at a Board meeting. There were active discussions of those investments of the Board, and the Board would approve them only if the Board concluded they were necessary and prudent.").

[21] *See* Duke Energy Ohio Exhibit 3, Direct Testimony of James Ziolkowski on behalf of Duke Energy Ohio ("Ziolkowski Direct"); *see also* Duke Energy Ohio Exhibit 6, Direct Testimony of John Swez on behalf of Duke Energy Ohio ("Swez Direct").

[22] Stegall Direct at 18-19 ("OVEC management should be able to make investments necessary to maintain their generating units.").

[23] Crusey Direct at 15 ("There were active discussions of those investments of the Board, and the Board would approve them only if the Board concluded they were necessary and prudent.")

customers and, in any case, the Commission must rely on reliable evidence to assure that only prudently incurred costs are included in the LGR Rider.

b. Imprudent and unreasonable capital costs should be excluded from Ohio customers' bills.

The Commission should impose a cap of $0 for environmental compliance spending. As the Auditor found:

> "the review and approval of the Commission is not needed for OVEC to engage in capital spending projects. Under such circumstances, a cap or ceiling on annual expenditures would be prudent, to prevent over-investment. LEI recommends that the Commission consider implementing such a cap."[24]

Absent any regulation of OVEC's capital spending decisions, there is no incentive to restrain capital investing, especially on ongoing environmental requirements. The Auditor's recommendation follows from the fact that neither this Commission, nor any public utilities commission, nor FERC reviews the capital spending decisions for Clifty Creek or Kyger Creek. These coal-burning plants are essentially 'merchant' plants from the perspective of major capital spending decisions, such as the decision to retire or spend capital in the face of environmental compliance requirements. The Commission should adopt the Auditor's recommendation and impose a cap on capital spending that can flow through the Legacy Generation Riders.

IV. The Commission Must Exclude OVEC Energy Market Losses from the LGR Rider Because the Ohio EDUs' Actions Regarding Energy Market Decisions Were Imprudent and Unreasonable.

The Commission should disallow all costs associated with OVEC's unreasonable and imprudent "must run" commitment decisions. Due to its persistent "must run" commitment strategy, OVEC continued to incur PJM energy market losses for weeks and even months at a time

[24] *E.g.*, AEP Ohio Audit at 87.

during 2020. Especially for coal units with such a high heat rate, like the OVEC ones,[25] a prudent utility would avoid persistent energy market losses by committing units as "must run" only when a projection of market prices showed a likelihood of earning money in the market, when including the costs of startup and shutdown in an analysis. The OVEC coal-burning units hemorrhaged money in the PJM energy market again during 2020, largely due to the failure to adopt a reasonable commitment strategy.

The Ohio EDUs are culpable in these energy market losses. AEP and DP&L failed to take any steps to end the imprudent and unreasonable strategy of committing these units as "must run" at all times. Duke appears to have succeeded in limiting energy market losses during the onset of the COVID-19 pandemic in spring 2020 by having OVEC cease committing units as "must run," but failed to limit energy market losses both before and after that. As a result, the Commission should find the Ohio EDUs' actions to be imprudent and unreasonable for their failure to take appropriate steps to end the "must run" strategy and should further relieve Ohio customers of the burden of paying for these unreasonably incurred losses.

a. OVEC commitment decisions were unreasonable during 2020.

During 2020, the OVEC coal units were not operated consistent with how merchant coal plant operators attempting to maximize revenues would bid their plants into the PJM Day-Ahead Energy Market, nor were the OVEC coal plants operated in a manner that was in the best interest of retail ratepayers.[26] In fact, OVEC incurred variable energy losses at Clifty Creek and Kyger

[25] AEP Ohio Audit, p. 100 ("Nearly all the OVEC units had higher heat rates (were less efficient) than the PJM average [in 2018, 2019, and 2020.]").

[26] OCC Exhibit 20, Direct Testimony of Joseph Perez on behalf of the Office of Ohio Consumers' Counsel ("Perez Direct") at 15.

Creek during ten out of the twelve months in 2020.[27] This means that ratepayers would have been better off if the plants had been offline during the majority of 2020. OVEC achieved these large energy market losses by committing its coal units as "must run" for weeks at a time regardless of anticipated market earnings.[28] These additional costs, which the Ohio EDUs seek to pass on to their consumers, could have been mitigated with more prudent unit commitment practices.

OVEC did not employ a rational economic market strategy during 2020. To make a prudent decision in a mature energy market like that operated by PJM, a generating unit operator should do a daily analysis of the costs and expected revenues from participating in the day-ahead energy market. The analysis should cover not only that day, but the next several days ahead for units that are not easily turned on and off, such as the OVEC coal units. The analysis should include consideration of startup and shutdown costs, and any operational limitations that apply in the given time period, such as the need to keep a particular unit online for testing. If the analysis shows that the expected market revenues will cover a unit's variable operating cost, then the operator can commit the unit as "must run" into the day-ahead market. If the unit's variable operating costs, including shutdown and startup costs, are projected to exceed expected revenues for several days or longer, then the operator should either designate the plant as "economic" or "not available" until prices rise.[29] OVEC did not employ a reasonable energy market strategy like this for most of 2020.

The losses occurred because OVEC's operating procedures dictate that, as a default, the plants must be self-committed into the market with a must-run status whenever they are available.[30] During the audit period, OVEC's variable costs exceeded market locational marginal

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[27] Glick Direct at 11.

[28] Glick Direct at 10-11.

[29] Perez Direct at 12-13.

[30] Glick Direct at 36.

prices 83 percent of the time the units were online during 2020.[31] These operating procedures, which the Ohio EDUs have helped establish as members of the Operating Committee for OVEC, mean the OVEC units are operated with indifference to prevailing market prices.

Because the OVEC plants have such high fixed costs, a prudent commitment strategy for these plants would involve seeking to create a large net energy margin to help defray some of the fixed costs. To achieve such positive energy market earnings, OVEC should elect to self-commit its units as "must run" on a forward-looking basis only if it expects to make positive energy market margins over a reasonable near-term period (incorporating consideration of startup and shutdown costs).[32] OVEC should commit its units as "economic" or "not available" when the units are expected not to run, or to operate at a loss if they do run. This is the standard practice followed by AEP and Duke for their own generating units.[33]

b. Ohio EDUs' actions with respect to OVEC's energy market decisions were imprudent and unreasonable during 2020.

The Ohio EDUs deserve blame for OVEC's energy market losses. During the audit period, AEP and DP&L conducted no daily energy market analyses for their shares of the OVEC units.[34] Neither AEP nor DP&L took any documented action to seek to end the "must run" scheduling process or otherwise make suggestions to limit energy market losses by, for example, advocating that OVEC use a daily analysis of expected revenues to determine when it commits units as "must run" or not.[35] Because AEP and DP&L took no documented steps to end OVEC's wasteful "must

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[31] Glick Direct at 34; Perez Direct at 3.

[32] Glick Direct at 46.

[33] Glick Direct at 46.

[34] Glick Direct at 43-44; *see also generally* Crusey Direct and Stegall Direct.

[35] *See generally* Crusey Direct and Stegall Direct.

run" strategy and because the Commission is required to determine the reasonableness of their actions, their customers cannot be charged for these losses under Ohio law.

Duke at least conducts a daily unit-commitment analysis called a Daily Profit and Loss Report and includes its share of the OVEC units in this report. At the onset of the COVID-19 pandemic, these reports showed a likelihood of significant energy market losses that Duke brought to the attention of the OVEC Operating Committee, which ultimately led to the OVEC units being committed economically from between April 14, 2020 and June 30, 2020.[36] Duke failed to achieve a change in OVEC's operating procedures to allow economically rational commitment of OVEC units at all times.

c. Imprudent and unreasonable energy costs should be excluded from Ohio customers' bills.

The Commission should rely on reliable evidence in the record of this proceeding to exclude costs from customers' bills related to OVEC's imprudent energy market decision-making. According to CUB/UCS witness Glick, OVEC's imprudent commitment strategy contributed $10.5 million to the total of $117.9 million in above-market costs across the two plants for AEP, Duke, and DP&L's consumers during the Audit period.[37] This amount should be apportioned between the utilities in setting the level of a disallowance.

V. The Commission Should Require the Ohio EDUs to Provide Documentation of Their Actions for Future OVEC Audits.

The Commission should require that Ohio EDUs maintain documentation of important decisions related to their OVEC entitlement. There are at least two categories of documentation

[36] Glick Direct at 36-37.

[37] Glick Direct at 34.

that the Commission should require so that it can rule on "the prudence and reasonableness of the actions of electric distribution utilities"[38] in future audit proceedings.

First, the Commission should require the Ohio EDUs to present documentation of forward-looking analysis of the prudence of major capital spending decisions. At a minimum, the Ohio EDUs should present an analysis of the net present value of retirement or retrofit decisions for the ELG, CCR, and any other environmental compliance capital spending at OVEC during a relevant audit period. The record of this proceeding makes clear that OVEC has decided to incur capital costs associated with environmental compliance. The record has no evidence to support the *prudence* of any of that spending. The Commission should put the Ohio EDUs on notice that it will continue to disallow in future audits any environmental capital costs incurred without robust forward-going analysis to justify the investment.[39]

Second, the Commission should require each of the Ohio EDUs to provide documentation of the daily unit-commitment decisions used for the OVEC plants whenever they are committed with a "must run" status.[40] This documentation should generally be akin to the documents that Duke and AEP use for committing their generation into PJM and MISO energy markets. The Commission should put the Ohio EDUs on notice that it will continue to disallow in future audits costs associated with "must run" commitment decisions that lack rational economic analysis supporting them.

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[38] Ohio Rev. Code § 4928.148(A)(1).

[39] Glick Direct at 12.

[40] Glick at 11.

VI. Conclusion

The Audits and the evidence in this record show that the Ohio EDUs failed to take reasonable actions with respect to their OVEC ownership or contract. The Commission should therefore disallow costs from Ohio customers' bills.

Dated: February 12, 2024

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been filed through the PUCO's electronic filing system, on this 12th day of February, 2024, which will serve notice of the filing of this document on the below parties.

/s/ Robert Dove
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Case No. 21-477-EL-RDR

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