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Statewide

PUCO Extends Emergency Order Authorizing Utilities to Suspend Disconnects (Case No. 20-591-AU-UNC)

Summary: On April 8, 2020, the PUCO extended its March 12, 2020 emergency Order by an additional 30 days. The Order directed utilities to file a plan to suspend for thirty days disconnections and other Ohio Administrative Code requirements that promote unnecessary contact or burden residential and nonresidential customers during the COVID-19 emergency. For a complete summary of the utilities' actions that will be extended, see the OMAEG weekly report dated March 27, 2020.

PUCO Authorizes Eligible Utilities to Participate in the Federal Paycheck Program (Case No. 20-591-AU-UNC)

Summary: On April 8, 2020, the PUCO authorized eligible utilities to obtain loans through the Federal Paycheck Program without receiving additional Commission approval. The program authorizes up to \$349 billion in forgivable loans to enable small businesses to retain employees during the COVID-19 emergency. Utilities with fewer than 500 employees are eligible.

Reply Comments Regarding Interconnection Services (Case No. 18-884-EL-ORD)

On April 3, 2020, stakeholders filed reply comments regarding Ohio's electric interconnection services and standards:

- **OMAEG:** Asserted that allocation of distribution system upgrade costs should take into consideration system benefits. Requested that more data from the interconnection process be accessible. Recommended the formation of a working group on interconnection issues and that the PUCO clarify that a DER is permitted on adjacent property.

- **AEP Ohio:** Opposed a system benefits analysis and incorporation of EDUs' Non-Wireless Alternative (NWA) into the interconnection process. AEP asserted that it does not charge for upgrades that benefit the interconnector's distribution system but rather the cost to interconnect their DER to the grid. Argued that a system benefits analysis would not properly account for intermittent use of DERs and the impact on the system.
- **DP&L:** Requested that if PUCO adopts OMAEG's proposal, specific criteria for a system benefit analysis for DER resources should be established and the PUCO should not implement rules that allow the interconnection process to conflict with or override the COSS process in distribution rate cases.
- **FirstEnergy Companies:** Stated that a working group should only address technical issues and not allocation of costs associated with DER interconnection. There is no agreed upon model for a systems benefits analysis. Asserted that EDUs need to explore pilot programs to determine if customers' decisions to install DERs provide an NWA benefit. Disagreed with OMAEG's proposal to publish non-confidential results from interconnection studies. The studies are private in nature and unique to each DER.
- **Ohio Consumers' Counsel (OCC):** Recommended that if the PUCO convenes a working group all stakeholders, including consumers, should be able to participate. Opposed OMAEG's proposal that all customers pay a portion of the upgrade costs to the distribution system, and incorrectly argued that OMAEG's proposal is inconsistent with the cost causation principles and that DERs' benefits to a distribution system are speculative.

Summary of Stakeholders' Reply Comments on Electric Vehicle Charging Service Investigation (Case No. 20-0434-EL-COI)

On April 7 and April 8, 2020, stakeholders filed reply comments regarding whether an entity providing electric vehicle (EV) charging service is a "public utility" subject to the PUCO's jurisdiction.

- **AEP Ohio & Duke:** Although the EDUs previously appeared to either not take a position on the jurisdictional question or state EV charging operators may be "public utilities" in certain scenarios, the EDUs are now encouraging EDU involvement in the development of the EV charging market and infrastructure.
- **Alliance for Transportation Electrification:** Disagreed with OCC that EDUs' participation in the EV market is bad public policy. Emphasized that EDUs'

- technical and financial capabilities and obligation to serve all customers can benefit the EV market by helping develop its infrastructure.
- **ChargePoint, Inc.:** Stated sufficient consumer safeguards exist and recommended direct EDU “make-ready” rate-based ownership and operation of infrastructure provided that the EDU selects at least two vendors for both hardware and software and site hosts have the ability to set alternative pricing to drivers.
 - **Environmental Advocates:** Disagreed with Duke that EV charging stations that use onsite generation and collect charging fees are “public utilities.” Regardless of electricity source, EV stations do not offer utility services. Separate rulemaking is unnecessary.
 - **Greenlots:** Requested that EV service providers be able to charge on a per-kWh basis and supported both third-party and utility ownership and operation of EV charging stations.
 - **Industrial Energy Users:** Stated that if the PUCO or EDUs participate in the EV charging market, their role should be limited to investment in in-front-of-meter, distribution system infrastructure and grid development.
 - **Interstate Gas Supply, Inc.:** Asserted that the PUCO should clarify that public utilities cannot conduct competitive services, like EV charging, and the Certified Territories Act does not prohibit EV charging service sales. Separate rulemaking is unnecessary.
 - **The Ohio Hospital Association:** Stated that facilities providing EV charging are not “public utilities.” Hospitals do not enjoy special benefits like EDUs. The PUCO should not apply the Relative Price Test in this context because the test is for submetering issues.
 - **Tesla, Inc.:** Recommended that the PUCO should clarify that EV charging providers may charge by the kWh and the PUCO should oversee utilities’ involvement in EV market.

AEP Ohio

Amendments to AEP Interruptible (IRP) Tariff Agreements (Case No. 16-1852-EL-SSO)

Reminder: Although amendments to Interruptible (IRP) agreements were originally due to AEP Ohio by April 1, 2020, AEP has agreed to allow OMAEG members to modify

their IRP contracts up through May 15, 2020 to give manufacturers an opportunity to assess the impact of the COVID-19 emergency on their electric load. Members anticipating a change in production and monthly demand should contact Ryan Schuessler at rschuessler@gosustainableenergy.com with any questions.

**PUCO Approves AEP Economic Development Cost Recovery Rider (EDR)
(Case No. 20-349-EL-RDR)**

Summary: On April 8, 2020, the PUCO approved AEP's EDR rider. Specifically, the Commission found that the proposed EDR rate of 2.09796% is reasonable. This is an increase from the current rate of 1.35371%. The Rider allows AEP to recover costs resulting from foregone revenues associated with reasonable arrangements approved by the PUCO. In addition, the EDR rider is associated with the costs of the Company's energy efficiency and peak demand reduction program, interruptible power credit, and automaker credit. The revised EDR rate becomes effective on May 1, 2020.

DP&L

**DP&L Withdraws Application to Extend Distribution Modernization Rider (DMR)
(Case No. 19-0162-EL-RDR)**

Summary: On January 23, 2019, the Dayton Power and Light Company (DP&L) filed an application to extend its DMR for two years and to set it at \$199 million. Given that OMAEG successfully argued that the DMR was an unlawful charge and the Supreme Court of Ohio overturned it, DP&L withdrew its application to extend its DMR on April 6, 2020.

**DP&L States that its Electricity Security Plan Passes SEET/MFA Tests
(Case No. 20-0680-EL-UNC)**

Summary: On April 1, 2020, DP&L asserted that its current Electric Security Plan passes the prospective significantly excessive earnings test (SEET) and the more favorable in the aggregate (MFA) test. DP&L claims its plan passes the SEET because the company is not expected to have significantly excessive earnings for the 2020-2023 forecast period. DP&L also states the plan passes the MFA test because the company's plan benefits customers more than a hypothetical market rate offer.

Dominion Energy

Dominion to Apply Tax Saving Credit to Service and Volumetric Charges (Case Nos. 18-1908-GAUNC, et. al)

Summary: On April 3, 2020, the East Ohio Gas Company (Dominion Energy) proposed to implement its Tax Savings Credit Rider (TSCR). Customers under the following rate schedules below will be issued a credit by applying a specified percentage to the service charge and volumetric base rate charges per account on each bill rendered:

- Large Volume Energy Choice Transportation (GTS): 15.29%
- Energy Choice Transportation Service Nonresidential (ECTS-NR): 33.76%

The credits are effective for bills rendered on or after April 6, 2020.

Duke Energy

Duke Seeks to Update Rider DSR (Case No. 14-841-EL-SSO)

Summary: Duke Energy applied to increase rates associated with its Distribution Storm Rider-Non-bypassable. If approved, the increase would affect Secondary Distribution Voltage (DS) and Primary Distribution Service (DP) customers.

Energy Harbor

PUCO Staff Recommends Approval of Energy Harbor's Certification as CRES Provider (Case No. 1742-EL-CRS)

Summary: On April 7, 2020, PUCO Staff filed its Staff Report recommending approval of Energy Harbor LLC's application for certification as a Competitive Retail Electric Service Provider.