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Statewide

OPSB Announces Stakeholder Meeting's New Date

Summary: The Ohio Power Siting Board (OPSB) issued an Entry announcing that its informal stakeholder meeting scheduled for March 25, 2020 regarding improvement to the stakeholder and public process will now take place virtually on May 12, 2020. The meeting is the third in a series of workshops providing OPSB feedback as it reviews its Ohio Administrative Code rules.

AEP Ohio

PUCO Staff Recommends Approval of AEP Cost Recovery for Emergency Plan (Case No. 20-0604-EL-AAM)

Summary: On April 15, 2020, the PUCO staff recommended that the PUCO grant the Ohio Power Company's (AEP) request for recovery of expenses and revenues related to its Plan during the COVID-19 emergency. AEP has not yet submitted an amount to recover. If granted deferral authority, the PUCO would review the prudence of the proposed amounts to be collected and the allocation of those costs in a future proceeding. Except for deferral authority, the Plan is deemed effective upon filing.

AEP Applies to Increase Rider PTBAR kWh Rate (Case No. 20-0530-EL-RDR)

Summary: On April 15, 2020, AEP applied to increase its Pilot Throughput Balancing Adjustment Rider (Rider PTBAR) rate. AEP is proposing the following rates:

For the Ohio Power Zone Rate: 0.020720 cents/kWh instead of 0.01055 cents/kWh for GS-1 customers.

For the Columbus Southern Power Zone Rate: 0.11897 cents/kWh instead of 0.06685 cents/kWh for GS-1, GS-1, and TOD customers

If approved, rates would become effective July 1, 2020.

Columbia Gas of Ohio

Columbia Applies to Decrease Rider UEX Rates (Case No. 20-0321-GA-UEX)

Summary: On April 10, 2020, Columbia Gas of Ohio (Columbia) applied to decrease its Uncollectible Expense Rider (Rider UEX) rate by \$0.0189 per Mcf for the following customer classes: SGS, GS, SGTS, GTS, FRSGTS, and FRGTS. Columbia stated this is to offset \$495,141 that it projects it will have over collected. If approved, the rate decrease would become effective May 31, 2020.

Columbia Applies to Decrease Rider PIPP Rates (Case No. 20-042-GA-PIP)

Summary: On April 10, 2020, Columbia applied to decrease its Percentage of Income Payment Plan Rider (Rider PIPP) by \$0.0818 per Mcf for the following customers: SGS, GS, SGTS, GTS, FRSGTS, and FRGTS. If approved, the rate decrease would become effective May 31, 2020.

DP&L

DP&L Revised Demand Charges During Emergency (Case No. 20-0650-EL-AAM)

Summary: On April 15, 2020, the Dayton Power and Light Company (DP&L) filed a Plan to revise demand charges during the COVID-19 emergency. For Primary and Secondary Customers whose demand meters are temporarily not being read, DP&L's Plan is to charge these customers an energy-only rate equivalent to the County Fair Rate. For commercial and industrial customers whose meters can be read, DP&L's Plan is to waive the minimum demand provisions and instead bill only according to an actual read of customers' current monthly demand. DP&L is also requesting deferral authority for costs associated with its emergency plan. Except for deferral authority, the Plans are deemed effective upon filing.

Duke Energy Ohio

Duke Updates its Emergency Plan (Case No. 20-0856-EL-AEC)

Summary: On April 16, 2020, Duke Energy Ohio, Inc. (Duke) filed to update its Plan for the COVID-19 state of emergency. Specifically, Duke's Plan is to reduce the currently approved demand ratchet in applicable non-residential rates during summer 2020 and proposes to recover the lost revenue from those classes of customers. DS, DP, and TS customers would have the applicable ratchet lowered from 85% to 50% of the summer

peak for 2019. The demand ratchet reduction would last until the September 2020 billing cycle, at which time Duke would revert to its currently effective rates. Duke is also requesting to defer and recover the costs associated with the reduction through its Economic Competitiveness Fund Rider (Rider ECF). Unlike the other utilities, Duke is requesting approval of the reduction in the demand ratchet as a reasonable arrangement, and therefore requests immediate deferral authority and cost recovery through Rider ECF. Therefore, it is unclear whether Duke's demand ratchet reduction proposal is immediately effective.

Summary of Comments on Duke's Application to Adjust Rider PF (Case No. 19-1750-EL-UNC)

On April 15, stakeholders submitted the following comments on Duke's application to include costs of its Infrastructure Modernization Plan in its Power Forward Rider (Rider PF).

- **OMAEG:** Stated Duke's request to defer costs does not meet the PUCO's required criteria; argued that Duke unlawfully seeks authority to recover past operation and management (O&M) costs; argued that Duke cannot defer O&M costs that incurred before the rate case order was issued because rates are deemed sufficient at that time; argued that Duke's ownership of competitive Electric Vehicle (EV) charging stations would be against Ohio's public policy and Duke's customers should not subsidize the electric distribution utility's (EDU) investment in the EV market; asserted that requesting mandatory new service and separate meters for Commercial Level II program would unnecessarily increase rates for customers; and recommended that load management and related revenue from the EV Charging Pilot Program should be reported and returned to ratepayers.
- **Ohio Energy Group:** Stated that Duke's plan lacked clear cost allocation or rate design associated with the \$111.2 million in electric costs that Duke seeks to include in Rider PF; and recommended that the PUCO look to cost allocations/rate designs of already-approved utility grid modernization riders for guidance.
- **The Ohio Hospital Association:** Supported Duke modernizing its electricity distribution system but expressed concern about the potential rate increase for customers during the pandemic.
- **Kroger:** Stated that the company opposed any proposal of Duke to own or operate competitive EV services as this would promote anticompetitive behavior; and asserted that Duke's request to recover past costs would be similar to retroactive ratemaking and violate Supreme Court of Ohio precedent.
- **Office of the Ohio Consumers' Counsel:** Stated that Customer Connect and Land Mobile Radio are not grid modernization but are Duke's investments to

provide basic EDU service and should be addressed in a different proceeding; recommended that the PUCO not allow Duke's customers to subsidize the EDU's investment in an already competitive EV industry; and asserted that the PUCO approving Duke's request to charge customers for past incurred costs would be unlawful retroactive ratemaking.

- **Armada Power:** Recommended that the PUCO approve Duke's filing with the addition of Armada's Percent of Income Payment Plan Reduction Program, time of use rates design, and smart technology rebate program as Armada claims the additional programs achieve grid modernization while providing more benefits to customers.
- **ChargePoint, Inc.:** Stated that EDUs, like Duke, are well-situated to assist with deployment of EV supply equipment and to provide effective utility investment in EV market; and stated that EV Pilot's Direct Current Fast Charging infrastructure size requirement should be clarified to maximize EV adoption.
- **Direct Energy Business & Direct Energy Services:** Asserted that, according to past PUCO orders, the PUCO must require Duke to make Customer Energy Usage Data available to competitive retail electric service (CRES) suppliers; and recommended that Duke clarify that the EDU will not be owning EV charging stations when it states it supports utility ownership EV "infrastructure."
- **Environmental Law & Policy Center:** Supported Duke's proposed EV pilot as a starting point to stimulate EV market in the EDU's territory; asserted that Duke's Fast Charge and Level II Programs are designed to produce valuable information; and claimed that EV bus programs can deliver value to customers and the grid but should be strengthened by prioritizing low-income school districts and requiring Duke to test dispatch of power from bus batteries to distribution grid.
- **Interstate Gas Supply, Inc.:** Argued that, despite a direct PUCO order, Duke failed to accommodate supplier consolidated billing in its new customer information system; recommended that Duke's application be modified to include capability for CRES and competitive retail natural gas service (CRNGS) suppliers to include non-commodity charges on Duke-issued utility bills; stated Duke should be prohibited from using customers' granular energy usage data for marketing; asserted that Duke's residential EV Charging Rebate program is unreasonable and unnecessary since Duke would be providing a ratepayer funded subsidy without the ability to control or manage participating customers' charging behavior; and requested that Duke establish a Grid Modernization Collaborative to promote transparency during the plan's implementation.
- **The Ohio Environmental Council & Sierra Club:** Stated that Duke's investment in EV market will benefit Duke's customers and Ohioans; suggested Duke's Commercial EV Charging Program require site hosts to report information related to electricity pricing as a precondition for program participation; stated that Duke should also commit to informing site hosts about its available tariffs and rates,

including time-of-use rates; and stated that the PUCO should direct Duke to develop a suitable electricity rate for charging electric school buses to ensure the program is not a one-off pilot.

Duke Applies to Increase Rider EE-PDR kWh Rates (Case No. 20-0613-EL-RDR)

Summary: On April 14, 2020, Duke submitted an application with the PUCO to adjust its Energy Efficiency and Peak Distribution Response Rider (Rider EE-PDR). The application follows a Supreme Court of Ohio ruling that the PUCO cannot cap utilities' recovery on costs for compliance with statutory energy efficiency benchmarks. If approved, the application would result in a kWh rate increase for DS, DP, TS, and RPT customers.