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Federal

Ohio FEA Files Comments on Proposed Amendments to PJM Operating Agreement (Case No. ER-20-2308-000)

Summary: On July 23, 2020, the PUCO's Federal Energy Advocate (Ohio FEA) submitted comments in response to the proposed amendments to the Operating Agreement of PJM Interconnection, LLC developed by PJM Joint Stakeholders. Ohio FEA recommended that the Federal Energy Regulatory Commission (FERC) accept the joint stakeholders' proposed revisions with a few modifications, such as granting PJM sole jurisdiction over the planning of end of life (EOL) projects, subjecting EOL projects to the regional transmission expansion planning (RTEP) process, requiring transmission owners (TOs) to provide both a physical and cost-based analysis as part of its non-binding ten-year EOL Look-Ahead program, and requiring TOs to provide forecasted indicative transmission service prices so customers can budget and plan accordingly.

Statewide

OMAEG Files Comments on PUCO Staff Proposal for New HB 6 Rider (Case No. 20-1143-EL-UNC)

Summary: As you know, House Bill 6 provides electric distribution utilities (EDUs) a \$170 million annual revenue requirement. On July 17, 2020, OMAEG filed [comments](#) on the PUCO staff's proposal for the allocation of the revenue requirement and the rate design of the HB 6 recovery mechanism. OMAEG explained that the PUCO should allocate the annual revenue requirement to each EDU based on kWh sold up to 833,000 per month per customer, with a separate allocation for residential customers. OMAEG asserted that this approach would help prevent similar customers from incurring disparate charges. Further, OMAEG urged the PUCO to eliminate the inclusion of the Commercial Activity Taxes (CAT) from Rider CAF to prevent ratepayers from incurring unreasonable and unlawful costs, and to restrict the cost cap to industrial customers only, as specified in Ohio law. OMAEG commented that the PUCO should provide bill impact analysis for each EDU and solicit comments on the results before a final methodology for revenue recovery

is selected. Finally, OMAEG argued that the PUCO should require the HB 6 rider to be subject to reconciliation and refund, consistent with Ohio law.

DP&L

OMAEG Submits Reply Comments on DP&L Request to Defer Decoupling Amounts (Case No. 20-0140-EL-AAM)

Summary: On July 20, 2020, OMAEG submitted [reply comments](#) on DP&L's request to defer distribution decoupling revenues and collect carrying costs on the deferred amount. OMAEG responded to DP&L's incorrect assertion that it is entitled to defer decoupling amounts pursuant to a previous settlement agreement that DP&L voluntarily withdrew. OMAEG explained that while the PUCO has granted other EDUs decoupling authority, the other EDUs – unlike DP&L – made their decoupling requests pursuant to an electric security plan or HB 6. OMAEG further commented that DP&L failed to satisfy the applicable accounting standards and should be denied on those grounds alone. Lastly, OMAEG responded that DP&L failed to meet its burden of proof in this case and could not provide any valid source of authority for its request.

Duke

PUCO Staff Recommends Disallowance for Duke's Rider MGP (Case No. 20-0053-GA-RDR)

Summary: PUCO staff filed its report regarding Duke's application to adjust its Manufactured Gas Plant Rider (Rider MGP). Duke submitted a total of \$85.2 million for ongoing MGP recovery from 2013 to 2019. After conducting its investigation, staff recommended a total disallowance of \$27.1 million.