April 24, 2019

Honorable
Rep. Dick Stein
77 S. High Street, 11th Floor
Columbus, OH 43215

Dear Representative Stein,

On behalf of The Dayton Power and Light Company, I am writing to express our concern with the as-introduced version of HB 6. The bill addresses a narrow solution by requiring DP&L customers to increase their payments into a statewide fund, while eliminating energy efficiency and peak demand programs that benefit those same customers. Today, in contrast, a local utility’s energy efficiency/peak demand plans are approved and overseen by the PUCO and require regular reporting to ensure the programs are cost effective and benefiting customers.

An LSC memo, dated April 10, 2019 (R-133-0948-1), states that the average DP&L residential customer pays $1.85 per month for the energy efficiency/peak demand programs. This figure is far below the proponents’ statewide average of $4.39 and even less than the new, proposed statewide charge of $2.50 per month. By this measure, DP&L’s current energy efficiency/peak demand program is reasonable, more affordable than the proposed program, and delivers benefits directly to our twenty-four-county service territory in west central Ohio. In fact, each year DP&L must demonstrate that its programs are prudent through an independent evaluation. Further, DP&L bids its energy efficiency into the PJM Capacity Market to offset program costs (an offsetting value of $1.78 million in 2018).

Customer benefits are the focus of our efforts. Since the energy efficiency/peak demand programs were initiated by the legislature in 2009, DP&L’s top ten customer participants have earned benefits exceeding $10.9 million. If this version of HB 6 is enacted, future energy efficiency/peak demand customer benefits would cease.
We welcome conversations regarding energy policy and believe that it is time for Ohio to develop a comprehensive energy strategy preparing our state for emerging energy technologies and innovations. At your convenience, the DP&L team and I are available to discuss HB 6 and any other industry related issues.

Sincerely,

Thomas A. Raga
Executive Vice President
DPL Inc.

cc: Chairman Vitale, Ohio House Energy and Natural Resources Committee
Members, Ohio House Energy and Natural Resources Committee
DP&L Service Territory State Representatives