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April 27, 2007

Reneé J. Jenkins
Docketing Division
The Public Utilities Commission of Ohio
180 East Broad Street, 13th Floor
Columbus, Ohio 43215

Re: Case No. 05-1500-EL-COI

Dear Ms. Jenkins:

The Commission issued a Finding and Order on March 28, 2007 ("Order") in the above captioned case that required all electric utilities to submit information relating to: (1) distributed generation ("DG"), (2) time sensitive rates, and (3) advanced metering infrastructure ("AMI") technologies and corresponding costs. DP&L hereby submits its response to the requested information.

The Order required all electric utilities to file copies of any studies that have been performed which address the impacts of DG on their transmission and distribution systems. DP&L has not performed engineering studies for this purpose. In order to capture any of the reactive or reduced line loss benefits as suggested in the Staff Report, the utility would need to have close to real-time or daily knowledge of the availability of the DG unit(s) and the Company would need to have dispatch rights to those units. In the absence of such real-time knowledge and dispatch rights, the utility would be unable to rely upon the DG unit to be available during critical times to obtain the theoretical benefits and, therefore, could not recognize the potential benefits in its distribution planning or design process.

All electric utilities were also required to file a copy of the sections of their tariffs which include daily time sensitive rates. DP&L does not have daily time sensitive rates. However, DP&L's non-residential tariffs contain an off-peak metering provision. This allows a customer that has a monthly kilowatt demand greater than 1,000 kW to request metering equipment to measure its peak demand during off peak hours of 8:00 pm to 8:00 am. If a customer's monthly demand occurs during off peak hours, the customer's demand is set at only 75%

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of the actual demand and therefore the customer saves money. With respect to AMI technologies, DP&L currently utilizes Automated Meter Reading technology that allows for remote meter reading, but that technology is limited in scope and may not meet the Commission's standard for AMI technologies.

DP&L looks forward to further discussions with Staff and interested stakeholders regarding the suggested benefits of DG and AMI technology.

Sincerely,

A handwritten signature in black ink, appearing to read "Dona R. Seger-Lawson". The signature is fluid and cursive, with the first name "Dona" being the most prominent.

Dona R. Seger-Lawson
Director, Regulatory Operations