

FILE

2
RECEIVED-DOCKETING DIV
2009 SEP -2 PM 1:53
PUCO

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Thomas M. Poulton

Case No. 09-566-EL-CSS

v.

REQUEST FOR DISCOVERY

The Dayton Power and Light Company

Now comes the Complainant in this matter and submits the following requests for discovery pursuant to OAC 4901-1-16 and OAC 4901-1-17:

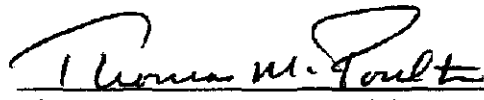
1. A copy of all account records for electric service provided by The Dayton Power and Light Company to Thomas M. Poulton for the period from January 1, 1975 to present.
2. The names and addresses of all customers of The Dayton Power and Light Company who have been required to post a deposit in the past 24 months for having paid after the due date twice in a twelve-month period, specifying the date the customer was first provided service by The Dayton Power and Light Company (regardless of service address.
3. Copies of any and all internal policies, procedures, processes, training manuals, operations manuals or the like, regardless of the form of media, which directly or indirectly relate to the handling of accounts that have filed a complaint with the Commission.
4. Copies of all memoranda, letters, notices, notes, and the like, both internal and sent to third parties, that are related to account number 3103675779 8 since September 1, 2008 to present.
5. Copies of all information related to account number 3103675779 8 that has been reported to any credit bureau since September 1, 2008 to present.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.

Technician JMA Date Processed SEP 02 2009

6. Records, letters, memoranda, notes and the like of all contacts and conversations between the Customer Resource Center of The Dayton Power and Light Company and the Complainant.


Complainant respectfully requests delivery of such discovery no later than September 11, 2009.



Thomas M. Poulton, Complainant
391 Copper Beech Court
Dayton, Ohio 45459
937-297-9364

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been sent via ordinary U.S. Mail to Edward N. Rizer, The Dayton Power and Light Company, PO Box 8825, Dayton , Ohio 45401, on August 31, 2009.



Thomas M. Poulton