

Large Filing Separator Sheet

Case Number : 09-1939-EL-UNC

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Description of Document :
Application

39	1,529,633	2.32% of equipment & 0.50% of duct/manhole system components
40	1,529,633	2.32% of equipment & 0.50% of duct/manhole system components
41	1,529,633	2.32% of equipment & 0.50% of duct/manhole system components
42	1,529,633	2.32% of equipment & 0.50% of duct/manhole system components
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49	1,529,633	2.32% of equipment & 0.50% of duct/manhole system components
50	1,529,633	2.32% of equipment & 0.50% of duct/manhole system components

J7.7 UPGRADE AND RECAPITALIZATION RESPONSIBILITIES

DP&L Responsibilities. DP&L will be responsible for installing and financing all capital costs associated with future upgrades, renewals, and replacements to the privatized system. The Government's financial responsibility will be limited to paying the Contract Rate Charge. All capital work during the performance of the utility service contract will be in accordance with the terms and conditions of this Contract and required to:

- Comply with applicable laws, regulations, and standards. For example, a modification to line clearances may be needed due to a change in the PUCO's regulations.
- Protect the health and safety of Government and DP&L personnel and the general public (e.g., to replace a power pole that is unsound and in risk of toppling).
- Provide reliable service consistent with DP&L's standard method of service. An example would be to replace underground cabling that was the cause of excessive faults or replace a transformer that, based on inspections or diagnostics, is at risk of failure. This also would address equipment that has failed or is no longer operating within acceptable performance parameters.

There are a number of existing controls that assure that capital improvements and replacements are proper and performed on a least-cost basis. The privatized service will be provided in accordance with DP&L's standard operating practices that are applicable to all of the Company's more than 500,000 retail service customers. These relate to maintenance standards, methods of service, accounting procedures, equipment inventory pricing, and more.

Installation Responsibilities. DP&L's standard procedure is that capital improvements that are for the customer's convenience will be installed only at the discretion of the Government. This would generally apply to mission changes within the Base that require new or relocated service connections. It also would apply to improvements that a Base may desire in order to achieve a level of service that is more reliable, or otherwise different, than it would be under DP&L's standard method of service. Examples are:

- Installing special surveillance systems at switch stations for enhanced security.

- Installing redundant and/or oversized transformers and lines to serve selected mission-critical loads.
- Installing capacitors or other power quality conditioning equipment to provide a greater level of voltage control (over and above standard voltage drop ranges).
- Relocating existing overhead or installing new lines underground.

After authorization to proceed with a discretionary project is obtained, the installed cost will similarly be added to the contract ratebase, with reductions to account for net book value of removed or abandoned equipment and additions for its removal costs.

The above responsibilities for capital projects are the same as those that are applied by virtually every regulated public utility in the United States. DP&L is not aware of any utility that delegates its responsibilities concerning health, safety, and reliability matters to its jurisdictional retail service customers. This is due in part to the industry's regulated status and its unique obligation to provide service to all customers within authorized service territories.

Coordination and Consultation. Notwithstanding the above division of responsibility, DP&L will regularly consult with the Base regarding the need for and the scope and timing of capital upgrades and replacements. The consultative process will be a combination of mandated activities (the submittal of the required Annual Plan) and as-required formal meetings and informal day-to-day contacts.

Very close coordination will be required for major system work. Examples of such work include substation transformer replacements or other upgrades and reconductoring an underground circuit. Coordination is needed for DP&L to properly prioritize the work and to assure that replacement facilities are properly sized and sited to meet the Base's current and future service requirements. On the other hand, advance notice to and coordination with the Base will necessarily be much more limited for emergency replacements, such as the need to replace a blown line transformer or replace poles damaged by a storm event. The emphasis here instead will be on ensuring the safety of Base and DP&L personnel and restoring service as expeditiously as possible.

The need for close coordination is especially important to ensure integration with the Base's on-going construction activities. Obtaining information on the scope and current status of these activities is a specific agenda topic for the first formal transition period kickoff meeting (see Table 4-2 checklist). DP&L will promptly review all provided information and inform the Base of any special planning requirements or unique concerns.

J7.8 ENERGY EFFICIENCY AND CONSERVATION PROJECTS

DP&L will not take any action that will negatively impact energy conservation efforts without prior approval (see also Section 3.6). Distribution system energy efficiency can be best promoted by properly sizing the system and using energy-efficient transformers for new or replacement units. As previously noted, regulated public utilities, such as DP&L, have a unique exemption from the NEC that allows electric distribution systems to be sized based on demand instead of connected load. This exemption is not available either to the Government or to contractors that

provide O&M services on a customer-owned system. Likewise, it is not available to energy-service affiliates of public utilities.

Attachment J8

Operational Transition Plan

J8 Operational Transition Plan

The Operational Transition Plan presented in this section builds upon DP&L's extensive local area experience in expanding its electric distribution system to meet the needs of current customers as well as the hundreds of new residential, commercial, and industrial customers, and the many miles of new power lines DP&L adds each year.

Many of the new customers are homeowners in the region's new residential developments. DP&L is responsible for the electric utility infrastructure in these developments, which range from a few dozen homes to thousands of home sites. The subdivisions are similar to the privatization initiative, especially with respect to transitional planning and implementation. DP&L initially works with site developers to lay out the utility system consistent with the pace and scope of site work. DP&L then must carefully time the connection to the house service lines as the customer changes from the developer to the new homeowner. DP&L assumes full ownership, operations, and maintenance responsibilities for the installed distribution facilities. (See also discussion in Attachment B to the Volume II Past Performance Proposal.)

Because of extensive experience with customers who are individually and collectively comparable in size and scope to the Wright-Patterson AFB electric distribution system, the Base can be assured that this plan is predicated on sound principles and established procedures. The Company also has ample local and regional personnel, equipment, and other resources to manage and implement the plan. This means the Base should have confidence that the transition from Government to DP&L of operational responsibility for and ownership of the system will be seamless, efficient, and on schedule.

Section L.8.2 of the Solicitation states that it is acceptable for a regulated utility to submit an offer that is contingent upon regulatory approval. Regulatory approval by the Public Utilities Commission of Ohio is a necessary prerequisite to the finalization of the privatized service contract award. This plan accordingly provides for an initial contingent contract award and then a final contract award after the PUCO's approval is obtained and the contingency is removed.

4.1 TRANSITIONAL PHILOSOPHY

The Operational Transition Plan will be implemented consistent with a set of clearly defined objectives that collectively embody DP&L's transitional philosophy (see Table 4-1). That philosophy is built upon two fundamental objectives: a commitment to safe and reliable service, and an orderly transition of ownership of and responsibility for the Base's utility system. Because DP&L's upstream distribution system is currently used to deliver power to the Base, and there are existing local personnel and other resources, the operation of the privatized facilities can be readily integrated into DP&L's existing system.

Referencing Table ES-1, the privatized system will represent only about a 0.2 percent incremental expansion of DP&L's existing 18,880-mile utility system. The 750 non-residential service

connections within the Base represent only a small fraction of the 3,900 new customers added to the DP&L system each year, and less than a 0.2 percent increase in the number of total system customer connections. DP&L also has existing full service yards within a few miles of the Base. The acquisition therefore can be easily accommodated without the need for appreciable new facilities, equipment, or personnel. The only exception is a requirement for a small yard facility and assigned spare equipment inventory to be located within the Airway Substation.

Table 4-2. Operational Transition Plan Objectives	
Primary Objectives:	<ul style="list-style-type: none">✓ Commitment to sustainable safe and reliable service✓ Orderly transition from Government to DP&L ownership
Supporting Objectives:	<ul style="list-style-type: none">✓ Operational integration into DP&L's local distribution system✓ Eliminate safety hazards✓ Foundation for sustainable system improvements✓ Open and frequent communication with the Base

System integration means that the same exacting standards and procedures used off-Base will be applied on-Base. These standards and procedures will be applied to the short-term transitional capital upgrades and the ongoing operation, maintenance, and recapitalization of the privatized system.

Applying well-established comprehensive operational standards will ensure that the acquired system is frequently inspected and its operations are monitored continually. Sound principles of sustainable preventive maintenance will be applied to minimize unplanned outages and the need for emergency repairs. By performing a load flow analysis and preparing fault and coordination studies as part of the initial upgrade projects, the information needed to review and, as necessary, update the required five-year capital improvement plan will be obtained. This will be part of the foundation for sustainable upgrades, which, when coupled with an active preventive maintenance program, will keep the acquired system in sound operating condition.

The final element of the plan is frequent and open communication. Communication should be two-way. DP&L will inform the Base of its activities and solicit information from the Base on its evolving service requirements. Open dialogue will inevitably lead to better planning and lower costs. A corporate commitment to open communication with all customers is one of the reasons why periodic surveys have shown consistently high customer satisfaction levels.

4.2 OPERATIONAL TRANSITION PLAN MILESTONES

Table 4-2 presents DP&L's milestone schedule for the Operational Transition Plan. A transition checklist also is provided in Table 4-3. It is recognized, however, that the schedule is subject to change to reflect the transitional objectives and schedules of the Base. Changes also may be required to reflect PUCO regulatory review timelines and requirements. The availability of existing local resources should allow us to accelerate the initial activities of the transition process if desired by the Government.

The one-year term is the maximum time to complete all transition requirements. However, DP&L will apply all reasonable means to accelerate the process, with the objective of completing the transition period within nine months of final contract award.

<u>Pre-Notice of Award Activities:</u>	
Monitor Air Force / DESC / DoD Privatization Policy	On-going
<u>Phase 1: Regulatory Approval:</u>	<u>Months from Date of Final Contract Award</u>
Notice of Contract Award	To be determined
Pre-award Negotiations	To be determined
Initiate PUCO Regulatory Review Application	To be determined
Request Security Clearances	To be determined
Contract Award (contingent)	- 5
Submit PUCO Regulatory Review Application	- 4
PUCO Regulatory Approval / Final Contract Award (estimated)	0
<u>Phase 2: Ownership Transition Process:</u>	
Transition Kickoff Meeting	1
Preliminary System Inspection and Initiate System Inventory	1
Apply for Security Clearances	1
Transfer Government Records and Documents	3
Prepare Fire Protection MOU	4
Prepare Emergency Response Plan	5
Complete Repair of Critical NESC Safety Infractions	6
Begin DP&L Interim Emergency Repair Service	6
Prepare Draft System Inventory and Checklist	9
Finalize System Inventory and Checklist	10
Complete System Map and Tag	11
Initiate On-site Familiarization	11
Joint Meter Reading	12
Transfer System Ownership / Contract Start Date	12
Government Hire Decision	12
<u>Upgrade Project Schedule:</u>	
Project C-1 (Replace Existing Secondary Meters)	3 - 6
Project C-2 (Replace Power Poles)	4 - 10
Project C-3 (Add Neutrals)	4 - 10
Project C-4 (SPCC Compliance)	4 - 10
Project C-5 (Zig Zag Transformer)	4 - 10
Project C-6 (SCADA System)	4 - 10
Project C-7 (Substation Upgrades)	4 - 10
Project C-8 (Airways Yard and Spares)	8 - 12
Project C-9 (Replace Orangeburg Duct Bank)	6 - 240
Project C-10 (Underground Conversion)	84 - 444
Project C-11 (69 kV Replacement)	84 - 564
Project C-12 (Automation)	tbd
Project T-1 (Transition Planning and Management)	0 - 12
Project T-2 (System Inspection, Inventory, and Minor Repairs)	0 - 10
Project T-3 (System Map and Tag)	1 - 11
Project T-4 (Deferred ROW Maintenance)	1 - 11
Project T-5 (Pole Testing and Treatment)	1 - 5
Project T-6 (Strategic Plan)	13 - 24
Project T-7 (Substation Documentation)	6 - 11
Project T-8 (Nitrogen Leaks)	1 - 6
Project T-9 (Oil Leaks)	1 - 6
Project T-10 (Environmental Reconnaissance Study)	6 - 11
Project T-11 (System Studies)	8 - 11

Recurring Activities:

Weekly Coordination Meetings
Monthly Coordination Meetings
Special Contract Service Invoicing

60 days before to 30 after CSD
From Notice of Award as Required by Parties
Monthly from CSD

- ☐ Schedule formal transition kick-off meeting
 - ☐ DP&L to notify AF of meeting agenda additions or modifications
 - ☐ AF to notify DP&L of meeting agenda additions or modifications
- ☐ Kick-off meeting agenda items
 - ☐ Review transition objectives and timelines
 - ☐ Provide transition points of contact
 - ☐ Table 1-2 service response POCs
 - ☐ AF Fire Department
 - ☐ AF Security
 - ☐ Contracting Officer's Representative
 - ☐ Provide and discuss system documentation (as available)
 - ☐ Electric distribution system drawings
 - ☐ As-built drawings
 - ☐ Service logs
 - ☐ System inspection, test, or diagnostics
 - ☐ Review site plan status
 - ☐ Environmental baseline survey and record of decision
 - ☐ Available information related to hazardous substances and contamination
 - ☐ Identify and discuss major system changes since contract negotiation
 - ☐ New or modified service connections
 - ☐ New or modified secondary meter connections
 - ☐ Completed or funded system upgrades, replacements, or expansions
 - ☐ Identify and discuss special AF service requirements
 - ☐ New or modified service connections
 - ☐ New or modified secondary meter connections
 - ☐ AF funded upgrades or replacements during transition period
 - ☐ Buildings or loads with special power quality / reliability requirements
 - ☐ Mission-critical circuits and / or building loads
 - ☐ Initiate discussion of procedures for Government operation of privatized system
 - ☐ Joint and/sole operation of Substations C and E
 - ☐ Confirmation / modification of the points of demarcation for Substation C
 - ☐ Protocols and safety procedures for emergency, mobilization, or other special needs

<input type="checkbox"/> Review security procedures <ul style="list-style-type: none"> <input type="checkbox"/> Explain access requirements under various threat levels <input type="checkbox"/> Explain National Agency Check and other personnel security processes <input type="checkbox"/> Determine appropriate number / type of DP&L personnel requiring ID badges
<input type="checkbox"/> Prepare and Submit Site Plan for Approval
<input type="checkbox"/> Review radio frequencies <ul style="list-style-type: none"> <input type="checkbox"/> Submit DP&L frequencies to Installation Communication Group(s) <input type="checkbox"/> Discuss radio use IAW DFARS 252.235-7003, <i>Frequency Authorization</i>
<input type="checkbox"/> Schedule follow-on actions and meetings
<input type="checkbox"/> Review plans for initial system familiarization <ul style="list-style-type: none"> <input type="checkbox"/> Review special system characteristics (e.g., problem transformers/special switch schemes) <input type="checkbox"/> Inspect non-standard equipment <input type="checkbox"/> Inspect areas / equipment with special service requirement <input type="checkbox"/> Field verify or modify spare equipment to be transferred (if any) <input type="checkbox"/> Field verify or modify special tools to be transferred (if any) <input type="checkbox"/> Document results and schedule follow-on inspection(s), as required
<input type="checkbox"/> Submit applications for National Agency Checks
<input type="checkbox"/> Develop emergency response plan <ul style="list-style-type: none"> <input type="checkbox"/> Identity AF restoration priorities <input type="checkbox"/> Integrate restoration priorities into DP&L system response plan <input type="checkbox"/> Execute memorandum of understanding (MOU) with fire department
<input type="checkbox"/> System inspection and inventory <ul style="list-style-type: none"> <input type="checkbox"/> Detailed inspection of entire distribution (DP&L) <input type="checkbox"/> Prepare draft system inventory (DP&L) <input type="checkbox"/> Review inventory with AF <input type="checkbox"/> Develop and submit final inventory to the AF
<input type="checkbox"/> Prepare final bill of sale (AF) <ul style="list-style-type: none"> <input type="checkbox"/> Incorporate final inventory <input type="checkbox"/> Incorporate purchase of spare equipment <input type="checkbox"/> Adjust FMV purchase price (as / if required)
<input type="checkbox"/> Joint meter reading (prior to transition)
<input type="checkbox"/> Ownership transfer <ul style="list-style-type: none"> <input type="checkbox"/> Execute bill of sale <input type="checkbox"/> Install locks
<input type="checkbox"/> Initiate DP&L system ownership and operational responsibilities

4.2.1 Pre-Award Activities

DP&L plans to initiate a dialogue with the staff of the PUCO related to the privatized service upon notification of the (contingent) contract award. This will involve providing information on such matters as privatization program goals and procedures, the scope of the privatized service, unique contract provisions required under the Federal Acquisition Regulations (FAR) and the terms and conditions of the Solicitation, and the structure of the proposed special contract rate. The PUCO staff will be informed of when the special service contract and rate might be formally filed with the PUCO for review and approval. DP&L also intends to continue monitoring the Air Force, DESC, and DoD privatization programs to identify policy changes that may affect the nature of DP&L's service for the Base.

4.2.2 Recurring Activities

Consistent with the objective of open and frequent dialogue with the Base, DP&L proposes to meet with the Administrative Contracting Officer (ACO) and other involved Installation personnel on at least a weekly basis during the critical period from 60 days before CSD to 30 days after. Topics to be addressed at the meetings will include transition preparation, implementation, and coordination with Government functions. The meetings will be coordinated with the Contracting Officer's Representative (COR).

DP&L proposes thereafter to continue to meet at least monthly for as long as the parties feel that formal, pre-scheduled meetings remain desirable or useful. Privatized service invoices also will be submitted monthly.

4.2.3 Phase 1: Contingent Contract Award and Regulatory Approval

Contract award is expected to occur after the contract terms and conditions are finalized. The requirement for regulatory approval means that DP&L's proposal is contingent upon securing such approval.

The Government should note that, notwithstanding prior informal contacts and discussions, DP&L will not be able to submit the special contract and tariff for formal review until it is finalized and signed by both parties. The transfer plan therefore provides for initiating the formal regulatory approval process at the date of contingent contract award. Formal contract performance necessarily would be deferred until PUCO regulatory approval is obtained and the contract award is finalized (i.e., the contingency is satisfied). The transition plan assumes that three to five months will be required to prepare the regulatory filing and to secure PUCO approval.

It is further assumed that the Government will support DP&L's PUCO filing. This is because the contract would be based on mutually agreed terms and the Government, therefore, presumably would not agree to a contract award unless the terms and conditions were mutually acceptable. Further discussions with the PUCO staff also may identify the need for the Government to prepare a brief affidavit or other document that provides background on the privatization program and perhaps evidence of its acceptance of the special contract. DP&L would work closely with the Base to coordinate any needed PUCO filings and the Government will file such affidavits or other documents as deemed reasonably necessary by DP&L. In the unexpected event that the PUCO imposes substantive conditions on its regulatory approval that are unacceptable to the

Government or to DP&L, the proposed contract may be renegotiated to alleviate objectionable provisions.

The Government elsewhere expressed concerns regarding the possibility that securing the requisite regulatory approval might be unreasonably delayed and that unacceptable conditions might be imposed by the cognizant regulatory authority. DP&L accordingly proposes the following additional contract clause to ameliorate the Government's concerns (see exceptions in Volume III, Contract Documentation):

Regulatory Approval. The contract award shall be contingent upon the Public Utilities Commission of Ohio's (PUCO) review and approval of the privatized service contract. Upon the receipt of a bilaterally executed copy of the privatized service contract, the Contractor shall expeditiously prepare a filing with the PUCO for such review and approval. The Government shall cooperate by providing an affidavit or other such reasonable documentation that might be needed to support the regulatory-approval process; provided that the Contractor shall provide appropriate guidance on the need for and content of such documentation. The contingency shall be removed and the contract award shall be finalized on the effective date of the PUCO's approval. Should the PUCO impose any substantive conditions on its regulatory approval that are unacceptable to either the Government or the Contractor, the parties shall negotiate in good faith to modify the contingent contract to alleviate any objectionable provisions. Either party may terminate the contingent contract, upon 30 days written notice, without penalty or added costs, in the event (i) PUCO approval is not obtained within ten (10) months from the date of contingent contract award or (ii) the parties are unable to alleviate any objectionable provisions imposed incidental to the PUCO's approval within five (5) months from the date of the PUCO's final approval of the privatized service contract.

The contingent nature of the initial contract award means that the Government would not have the authorization to pay DP&L for contract services until the contract is finalized. This necessarily would limit the scope of substantive system work that DP&L would be willing to perform (i.e., without compensation) until the regulatory approval contingency has been satisfied and the contract award is finalized.

While the contract is pending approval from the PUCO, DP&L proposes to meet with Government officials and initiate the requisite security application and approval processes. DP&L also will work with the Government to develop workable interim site access procedures that will facilitate transition activities.

DP&L provided a discussion of transition activities that would occur prior to final contract award to present a complete road map that extends from proposal submission through to the system ownership transfer. DP&L understands and accepts that the Government will not be responsible, nor will DP&L make a claim, for any or all transitional activity that occurs prior to final contract award. DP&L also is aware of the conditions in the Anti-Deficiency Act and will not seek ratification for any pre-final award work or associated costs.

4.2.4 On-site Familiarization and Joint Operations

Phase 2 of the transition will begin with a transition kickoff meeting. A proposed agenda for the meeting is provided in Table 4.3. There also will be a preliminary inspection of the entire system.

The primary purpose of this activity is to determine if there are any recent changes in the Base's service requirements and to identify any changes from the pre-bid scope and condition of the electric distribution system. DP&L also will use this period to review system maps for changes. The proposed Project Manager will head the familiarization effort and will endeavor to minimize the number of DP&L employees involved in the process.

Here as well, knowledge of the system and the availability of local resources enable a relatively short period of joint operation of the system. This transition activity would begin shortly after the service contract is finalized, and continue for no more than one month. During this time, DP&L will focus on identifying any unique or unusual service requirements for any of the service locations connected to the privatized system. It is understood, however, that Government employees may not be available after contract award due to work transfers, retirements, or other reasons. For this reason, DP&L can reduce the time for on-site familiarization.

In accordance with the requirements at Section C.13.7 of the Solicitation, DP&L personnel will be available to accompany designated Government personnel to jointly read the Base's secondary meters within 10 days of final contract award. It is suggested, however, that the Government consider deferring or eliminating this requirement because many of the existing secondary meters will be replaced during the transition period and DP&L would not be responsible for meter readings until after the Contract Start Date.

In accordance with the Solicitation requirements, no more than five DP&L personnel will participate in on-site familiarization efforts. It is not possible to indicate the number of employees that will be on-Base at any particular time. At times, there will be no employees. At other times, DP&L might have a relatively large contingent of employees and contractors that are performing different transition functions as follows:

- The Project Manager, other members of the management team, engineers, planners, and others might be attending a coordination meeting;
- Substation and relay personnel may be inspecting the substations;
- Distribution engineers might be inspecting the distribution system;
- Pole testers might be testing poles;
- Mapping experts might be tagging the system; and
- Meter specialists might be calibrating or replacing meters.

Although first response troublemen tend to be generalists, the transition work would be performed by specialists. The number of people within the Base would thus depend on the nature of the work. Utilities such as DP&L also prefer to perform routine system maintenance, such as generally would be involved during the transition phase, during periods when there are no storms or other events that create a large number of emergency service requests. Depending on availability, DP&L may dispatch multiple crews to a work site.

Based on the above, it is possible that DP&L might at times have a dozen or more personnel within the Base during the transition period. DP&L intends to be somewhat flexible regarding the allocation of resources during the Transition Period in order to integrate the needs of both parties.

DP&L does not envision the need for joint operation of the system. Rather, the Government would have operational responsibility for the electric system prior to the Contract Start Date (i.e. during the transition period) and DP&L will assume operational responsibility thereafter (i.e., when DP&L acquires ownership of the system).

4.2.5 Operation Responsibility During the Transition Period

DP&L will be prepared to provide an optional emergency repair service, if desired by the Government, beginning three months from the date of final contract award (if not sooner). The service would be available after the most critical safety-related system deficiencies are corrected.

These would primarily relate to such matters as line clearances and grounding.⁸ The scope of this service would be in accordance with the Project T-12 work description provided in Section 3.1.2.8. As discussed therein, the Government would maintain ownership and operational responsibility for the system until such time as the system has been adequately mapped and tagged and ownership is then transferred to DP&L.

4.2.6 Inventory and System Transfer

The system inventory developed under this activity will be incorporated into the Bill of Sale. It therefore will have a more limited scope and level of detail than the system inventory, mapping, and tagging efforts to be accomplished under Upgrade Projects T-2 and T-3.

The system inventory will be accomplished by a combination of a review of the information provided in the Tables 1, 5, and 6 inventories included in Attachment J1 to the Solicitation and available system maps, the physical inspection of selected components of the electric distribution system, and discussions with Government personnel. DP&L will focus in particular on any changes to the scope of the privatized system that may have occurred during the interregnum between proposal submittal and CSD that were not addressed during pre-award discussions. A draft inventory will be prepared. It will be finalized during discussions with the Government, with a projected completion date within nine months from the date of final contract award.

The formal transfer of system ownership can be accomplished at the Base or DP&L's headquarters facility in Dayton. The Government should transfer the following documents or equipment to DP&L on or before the time operational responsibility for the system is assumed:

- Wright-Patterson AFB Electric Distribution System Drawings;
- As-Built Drawings for the Electric Distribution System;
- Pertinent Operation and Maintenance Manuals and records for the Electric Distribution System equipment;
- Spare parts for the Electric Distribution System;
- Funded MILCON project descriptions, specifications, progress reports, and other pertinent information related to electric system upgrades or expansions;
- Load flow, coordination, and fault studies, if available and reasonably current;

⁸ Although no such issues were identified by the pre-proposal system evaluations, it is possible that clearance or other problems might be found during the initial system familiarization process.

- Documentation regarding surveys of transformers and other equipment related to the presence of PCBs and/or removal of equipment that contained PCBs
- Environmental Baseline Survey (if one has been prepared) and Record of Decision for the Electric Distribution System; and
- The following available information related to hazardous substances and contamination (if any):
 - Maps showing where contaminants exist in relation to the underground components of the electric distribution system;
 - Identify the type and location of specific contaminants of concern and the source of the release(s);
 - Contaminant concentrations (soil and / or groundwater);
 - Vertical and horizontal extent of the contamination (soil and / or groundwater);
 - Depth to groundwater in each area; and
 - Information regarding the actual length and depth of system sections that are potentially impacted in each area of concern.
- The following available information related to easements for privatized facilities outside Wright-Patterson AFB (if any):
 - Location of privatized facilities outside of Wright-Patterson AFB;
 - Existing easements for said facilities, or if none, metes and bounds data of the boundaries of Wright-Patterson AFB so that easement maps can be prepared. DP&L will begin the process of obtaining these easements after final contract award.

4.2.7 Consideration of Employees for Hire

DP&L has sufficient personnel resources to accommodate the operational integration of the privatized facilities into its system without expanding the existing workforce. Workforce changes instead would be based on the totality of new service requirements, which would include the privatized service as well as the thousands of other new customer connections added to the DP&L system each year.

The Company nonetheless is fully receptive to hiring qualified applicants to fill job openings as they might occur. Interested Government personnel should submit resumes to the Project Manager as soon as possible during the transition period. All qualified employment offers will promptly be evaluated and a response will be provided by the later of the CSD or 10 business days from the receipt of a resume and employment request. The evaluation and hiring of qualified applicants will be in accordance with DP&L's hiring policies.

DP&L will not knowingly hire any person if to do so would create a conflict of interest, nor will the Company hire Quality Assurance Representatives. DP&L will fully comply with National Agency Check investigations. DP&L does not envision hiring any active duty Military personnel on a part-time basis.

4.2.8 Permits and Procedures

Other than PUCO regulatory approval and the acquisition of the easements noted above, DP&L does not anticipate that any permits or certifications are required for DP&L to acquire ownership of the privatized system.

4.2.9 System Upgrades

DP&L proposes a number of initial upgrades to the privatized electric distribution system. These projects are described in Section 3 of this proposal.