

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Annual Verification of the )	
Energy Efficiency and Peak Demand )	
Reductions Achieved by the Electric )	Case No. 12-665-EL-UNC
Distribution Utilities Pursuant to Section )	
4928.66, Revised Code )	

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**REPLY COMMENTS OF THE DAYTON POWER & LIGHT COMPANY ON THE  
REPORT OF OHIO INDEPENDENT EVALUATOR ON THE ANNUAL  
VERIFICATION OF THE ENERGY EFFICIENCY AND PEAK DEMAND  
REDUCTIONS ACHIEVED BY THE ELECTRIC DISTRIBUTION UTILITIES**

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For its reply comments, The Dayton Power and Light Company ("DP&L" or "the Company") seeks only to make a correction to a misstatement of facts by the Office of the Ohio Consumers' Counsel ("OCC") in its comments filed on November 2, 2012. In its comments, the OCC wrote:

Evergreen pointed to Ohio's draft energy efficiency TRM prepared for the PUCO, which recommends an installation factor of 86% for CFLs purchased by customers or 81% for CFLs installed at customers' premises by an EDU.

But the EDUs were inconsistent in calculating energy savings from CFLs. Both Duke and AEP Ohio assumed that 100% of CFLs obtained by customers remained installed for the entire year. FirstEnergy used an adjustment factor of 89% and DP&L adjusted savings by 86%, but neither EDU differentiated between those purchased by customers and those installed by the EDUs. Thus, all the EDUs may have overstated savings derived from CFLs.<sup>1</sup>

DP&L did not overstate savings derived from CFLs. No CFLs were installed by the utility on customers' premises as a part of DP&L's residential lighting program. Therefore the TRM value of 86% was the appropriate installation rate as the 81% installation rate referenced by the OCC does not apply to DP&L.

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<sup>1</sup> Comments of the Office of the Ohio Consumers' Counsel, pages 3-4.

Respectfully submitted:



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**Case No(s). 12-0665-EL-UNC**

Summary: Reply Comments of The Dayton Power and Light Company, electronically filed by  
Irda Hoxha Hinders on behalf of The Dayton Power and Light Company