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Via E-File

October 4, 2013

Public Utilities Commission of Ohio
PUCO Docketing
180 E. Broad Street, 10th Floor
Columbus, Ohio 43215

**In re: Case Nos. 12-426-EL-SSO, 12-427-EL-ATA, 12-428-EL-AAM, 12-429-EL-WVR,
12-672-EL-RDR**

Dear Sir/Madam:

Please find attached the OHIO ENERGY GROUP's APPLICATION FOR REHEARING AND MEMORANDUM IN SUPPORT for filing in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,

A handwritten signature in blue ink, appearing to read 'D. Boehm', is written over the typed name.

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DFB/kew

Encl.

Cc: ALJ Bryce McKenney
ALJ Gregory Price
Certificate of Service

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Dayton Power And Light Company For Approval of its Market Rate Offer	:	Case No. 12-426-EL-SSO
	:	
	:	
In the Matter of the Application of Dayton Power And Light Company For Approval of Revised Tariffs	:	Case No. 12-427-EL-ATA
	:	
	:	
In the Matter of the Application of Dayton Power And Light Company For Approval of Certain Accounting Authority	:	Case No. 12-428-EL-AAM
	:	
	:	
In the Matter of the Application of Dayton Power And Light Company For Waiver of Certain Commission Rules	:	Case No. 12-429-EL-WVR
	:	
	:	
In the Matter of the Application of Dayton Power And Light Company to Establish Tariff Riders	:	Case No. 12-672-EL-RDR
	:	

APPLICATION FOR REHEARING OF THE OHIO ENERGY GROUP

Pursuant to R.C. 4903.10 and Ohio Adm. Code 4901-1-35, the Ohio Energy Group ("OEG") submits this Application for Rehearing of the September 4, 2013 Opinion and Order ("Order") of the Public Utilities Commission of Ohio ("Commission"). OEG submits that the Order is unreasonable because the Commission failed to instruct The Dayton Power and Light Company ("DP&L" or "Company") to group the Primary and Primary-Substation rate classes together for purposes of allocating the Service Stability Rider rate charged to those classes.

A memorandum in support of this Application for Rehearing is attached.

Respectfully submitted,



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October 4, 2013

COUNSEL FOR OHIO ENERGY GROUP

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Dayton Power And Light Company For Approval of its Market Rate Offer	:	Case No. 12-426-EL-SSO
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In the Matter of the Application of Dayton Power And Light Company For Waiver of Certain Commission Rules	:	Case No. 12-429-EL-WVR
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In the Matter of the Application of Dayton Power And Light Company to Establish Tariff Riders	:	Case No. 12-672-EL-RDR
	:	

MEMORANDUM IN SUPPORT

I. The Commission erred by not instructing DP&L to group the Primary and Primary-Substation rate classes together for purposes of calculating the Service Stability Rider rate charged to those classes.

In its Order, the Commission held that DP&L could establish a Service Stability Rider (“SSR”), which would be allocated using a one coincident peak (“1 CP”) demand allocation method in order to reflect the underlying demand-related character of the SSR charges.¹ OEG supports the Commission’s finding to use the 1 CP method to allocate the SSR charges, but seeks one additional clarification related to that finding.

Specifically, OEG requests that the Commission clarify that the Primary and Primary-Substation rate classes should be grouped together for purposes of allocating the SSR charges. If the Commission does not make this clarification, the Primary-Substation rate class would pay higher SSR charges than the Primary rate class. This result is unreasonable. Primary-Substation customers are served at a higher voltage than Primary customers. This means that Primary-Substation customers are less costly to serve since they have fewer line losses and require fewer equipment costs than Primary customers, all else being equal. It would therefore not make sense for

¹ Order at 26.

Primary-Substation customers to pay higher costs through the SSR than Primary customers. In addition, charging Primary-Substation customers higher SSR rates could provide perverse price signals for customers who would otherwise qualify as Primary-Substation to choose to take service under the Primary rate schedule instead.

The Commission can easily solve this issue by grouping the Primary and Primary-Substation classes together for purposes of allocating the SSR charges, resulting in a single SSR charge for both rate classes. OEG's recommendation is limited to only the Primary and Primary-Substation rate classes and would not impact any other DP&L rate classes. Nor should OEG's recommendation impact the Commission's decision to allocate the SSR charges on a 1 CP basis. OEG's recommendation is merely intended to remove the current anomaly between the Primary and Primary-Substation rates.

Respectfully submitted,

A handwritten signature in blue ink that reads "David F. Boehm". The signature is written in a cursive style and is positioned above a horizontal line.

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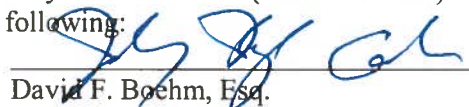
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October 4, 2013

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CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 4th day of October, 2013 to the following:


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in

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Summary: App for Rehearing Ohio Energy Group (OEG) Application for Rehearing and Memorandum in Support electronically filed by Mr. David F. Boehm on behalf of Ohio Energy Group