

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of Ohio Adm.)	
Code Chapter 4901:1-36, Electric)	Case No. 13-953-EL-ORD
Transmission Cost Recovery Riders.)	
)	
In the Matter of the Review of Ohio Adm.)	Case No. 13-954-EL-ORD
Code Chapter 4901:1-37, Corporate)	
Separation for Electric Utilities and)	
Affiliates.)	
)	
In the Matter of the Review of Ohio Adm.)	Case No. 13-955-EL-ORD
Code Chapter 4901:1-38, Reasonable)	
Arrangements for Electric Utility)	
Customers.)	

**INITIAL COMMENTS OF
THE DAYTON POWER AND LIGHT COMPANY**

The Dayton Power and Light Company (“DP&L” or “the Company”) appreciates the opportunity to provide comments in response to the Entry dated December 18, 2013, in which the Public Utilities Commission of Ohio (“Commission” or “PUCO”) solicited interested parties’ comments on proposed changes relating to the Commission’s Electric rules. The Commission solicited general comments on policy questions as set forth in the Entry itself, as well as invited feedback on the proposed changes to the text of the existing rules. DP&L’s comments with respect to changes to the rules are presented by Section.

4901:1-36 Electric Transmission Cost Recovery Riders

The Appendix to rule 4901:1-36-03 requires that the Company’s filing include a Schedule B-4 that graphically represents each cost component included within the application. DP&L suggests eliminating Schedule B-4, as it provides no new information

and this would aid in streamlining the application for both the preparer and the users. Given the many cost components in transmission cost recovery riders, creating these graphs requires a great deal of effort for little to no benefit as this information is available in the schedules.

Additionally, DP&L suggests eliminating Section 4901:1-36-04(B).

~~(B) The transmission cost recovery rider shall be avoidable by all customers who choose alternative generation suppliers and the electric utility no longer bears the responsibility of providing generation and transmission service to the customers.~~

Three out of four Ohio utilities have Commission-approved non-bypassable transmission cost recovery riders in place that necessitated the waiver of this rule. The fourth has requested a similar non-bypassable rider. Even if this request is not ultimately implemented, the fourth utility already has a bypassable transmission cost recovery in place that will continue on a bypassable basis until the Commission orders otherwise. The bypassable nature of the rider is subject to the Commission's determination of what is reasonable on a case-by-case basis. Therefore this element of the rule is no longer pertinent.

4901:1-38 Reasonable Arrangements for Electric Utility Customers

Section 4901:1-38-03 (C) should be modified to propose a time period by which customers that are seeking a unique arrangement can be assured the Commission will rule on their application. Specifically, DP&L suggests the following changes to section (C):

(C) Upon filing of an economic development application, the commission may determine that ~~fix a time and place for a hearing~~ is not necessary if the application is found ~~appears to be unjust and unreasonable.~~ If a hearing is necessary it shall be held no later than 60 days after the application is filed. Regardless of whether a hearing is held, the commission shall endeavor to issue an order as timely as possible, but shall be no later than 120 after the application is filed.

Section 4901:1-38-06(A) states that an electric utility shall require each of its customers served under any reasonable arrangement to submit an annual report to the electric utility and staff. DP&L proposes the following amendment:

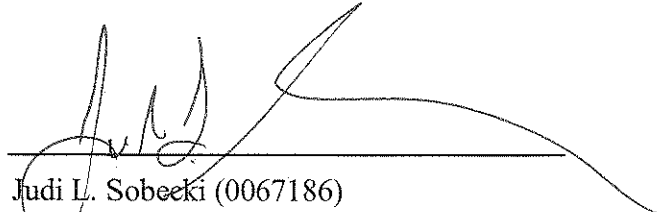
- (A) Each electric utility shall **coordinate with** ~~require~~ each of its customers served under any reasonable arrangement established pursuant to this chapter to submit an annual report to the electric utility and staff no later than April thirtieth of each year. The format of that report shall be determined by staff such that a determination of the compliance with the eligibility criteria can be determined, the value of any incentives received by the customer(s) is identified, and the potential impact on other customers can be calculated.

DP&L argues that this modification best represents the utility-customer relationship that has developed as a result of implementing reasonable arrangements.

Conclusion

DP&L appreciates the opportunity to provide comments and urges the Commission to adopt the recommendations set forth above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Judi L. Sobecki', is written over a horizontal line.

Judi L. Sobecki (0067186)
Attorney for the Dayton Power and Light
Company
1065 Woodman Drive
Dayton, OH 45432
Telephone: (937) 259-7171
Facsimile: (937) 259-7178
Email: Judi.Sobecki@dplinc.com

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Summary: Comments of the Dayton Power and Light Company electronically filed by Mr. Robert J Adams on behalf of The Dayton Power and Light Company