



September 7, 2018

Via e-Filing

The Honorable Anna Sanyal  
Administrative Law Judge  
Ohio Power Siting Board  
180 East Broad Street, 12<sup>th</sup> Floor  
Columbus, OH 43215-3793

**RE: PUCO Case No. 18-1259-EL-BTX  
West Milton-Eldean 138 kV Transmission Line Project  
Response to Staff Letter of September 4, 2018 Regarding Waivers**

Dear Administrative Law Judge Sanyal:

The Dayton Power and Light Company (DP&L) has reviewed the Ohio Power Siting Board ("OPSB") Staff Letter of September 4, 2018, providing Staff's recommendations regarding DP&L's request for certain waivers of specified filing requirements related to this Case and Transmission Line Project. This letter is in response to those recommendations.

DP&L thanks Staff and agrees with its recommendation that a waiver be granted with respect to the percentage of the alternative route that is in common with the preferred route.

DP&L understands Staff's position in opposition to a waiver concerning access roads and structure locations. DP&L does not oppose Staff's recommendation and will provide the information that Staff has indicated that it needs to determine minimum adverse impacts.

Staff has also taken a position in opposition to what Staff terms a blanket waiver on a specific type of study regarding cultural and archaeological resources. As DP&L understands Staff's position it is that: 1) the application that DP&L files should contain the results of a literature review and consultation with Ohio Historic Preservation Office ("OHPO"); and 2) after those results are obtained and reviewed, a decision would be made as to whether a detailed Phase I archaeological study would be necessary. Given that understanding, DP&L does not oppose Staff's proposal in opposition to the proposed waiver. DP&L will submit the results of a literature review and consultation with OHPO and a future decision regarding a Phase I study will be made after reviewing those results.

If you have any questions or require further information, please contact me.

Respectfully submitted,

ss:/ *Randall V. Griffin*

Randall V. Griffin  
Chief Regulatory Counsel  
The Dayton Power and Light  
Company

cc: Steven L. Beeler, Ass't Atty. Gen.  
Jon Whitis, OPSB Staff  
Michael Russ, DP&L

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**Case No(s). 18-1259-EL-BTX**

Summary: Response of The Dayton Power and Light Company to Staff Recommendations on Waivers electronically filed by Mr. Randall V Griffin on behalf of The Dayton Power and Light Company