

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	:	Case No. 16-0395-EL-SSO
The Dayton Power and Light Company for		
Approval of Its Electric Security Plan	:	
 In the Matter of the Application of	:	Case No. 16-0396-EL-ATA
The Dayton Power and Light Company for		
Approval of Revised Tariffs	:	
 In the Matter of the Application of	:	Case No. 16-0397-EL-AAM
The Dayton Power and Light Company for		
Approval of Certain Accounting Authority	:	
Pursuant to Ohio Rev. Code § 4905.13		

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**THE DAYTON POWER AND LIGHT COMPANY'S  
MOTION FOR AN EXTENSION OF TIME TO FILE ITS  
DISTRIBUTION INFRASTRUCTURE MODERNIZATION PLAN**

**(EXPEDITED RULING REQUESTED)**

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Pursuant to Ohio Admin. Code § 4901-1-13 and the March 14, 2017 Amended Stipulation and Recommendation ("Stipulation"), as modified and approved by the Commission, and for good cause shown, The Dayton Power and Light Company ("DP&L") moves for an extension of time to file its comprehensive Distribution Infrastructure Modernization Plan ("Plan") until and including December 28, 2018. DP&L's Plan is currently due November 29, 2018. July 12, 2018 Entry, ¶ 8. A short, one month extension of time is necessary to comport DP&L's Plan with the Commission's recent guidance, as set forth in its report, *PowerForward: A Roadmap to Ohio's Electricity Future*.

Pursuant to Ohio Admin. Code § 4901-1-12(C), DP&L requests an expedited ruling on this Motion. At approximately noon on the date of this filing, DP&L contacted all other parties to determine whether any party objects to the issuance of such a ruling. As of the submission of this filing, DP&L did not receive any objection, and several parties affirmatively stated that they do not object, including Staff, Industrial Energy Users – Ohio, The Ohio Energy Group, The Ohio Manufacturers' Association Energy Group, the City of Dayton, Honda of America Mfg., Inc., The Kroger Company, The Environmental Law & Policy Center, Sierra Club, Wal-Mart Stores East LP and Sam's East, Inc.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT OF THE DAYTON POWER  
AND LIGHT COMPANY'S MOTION FOR AN EXTENSION OF TIME  
TO FILE ITS DISTRIBUTION INFRASTRUCTURE MODERNIZATION PLAN**

Pursuant to Section II.3.a of the Stipulation, as modified and approved by the Commission's October 20, 2017 Opinion and Order and July 12, 2018 Entry, DP&L must file a comprehensive Distribution Infrastructure Modernization Plan ("Plan") within three months of the completion of the Commission's PowerForward initiative or December 3, 2018, whichever is earlier, "unless an extension is recommended by Staff or granted by the Commission." Given the Commission's August 29, 2018 report, *PowerForward: A Roadmap to Ohio's Electricity Future*, the current deadline for DP&L to file its Plan is November 29, 2018.

DP&L has diligently been preparing its Plan; however, an extension of time until and including December 28, 2018 is necessary for DP&L to more fully align its Plan with the Commission's PowerForward guidance. As the Commission has recognized, "DP&L should have a full opportunity to incorporate the results of the [PowerForward] initiative into its comprehensive infrastructure modernization plan." July 12, 2018 Entry, ¶ 6. The extension is for good cause, and given the intervening holidays, will not prejudice the Commission or the parties. Ohio Admin. Code § 4901-1-13(A).

DP&L further requests an expedited ruling on this Motion given the impending deadline to file its Plan. Pursuant to Ohio Admin. Code § 4901-1-12(C), at approximately noon on the date of this filing, DP&L contacted all other parties to determine whether any party objects to the issuance of such a ruling. As of the submission of this filing, DP&L did not receive any objection, and several parties affirmatively stated that they do not object, including Staff, Industrial Energy Users – Ohio, The Ohio Energy Group, The Ohio Manufacturers'

Association Energy Group, the City of Dayton, Honda of America Mfg., Inc., The Kroger Company, The Environmental Law & Policy Center, Sierra Club, Wal-Mart Stores East LP and Sam's East, Inc.

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## CERTIFICATE OF SERVICE

I certify that a copy of the foregoing The Dayton Power and Light Company's Motion for an Extension of Time to File Distribution Modernization Plan has been served via electronic mail upon the following counsel of record, this 16th day of November, 2018:

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Summary: Motion The Dayton Power and Light Company's Motion for an Extension of Time to File Its Distribution Infrastructure Modernization Plan (Expedited Ruling Requested) electronically filed by Mr. Jeffrey S Sharkey on behalf of The Dayton Power and Light Company