

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the)	
PowerForward Distribution System)	Case No. 18-1596-EL-GRD
Planning Workshop)	

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

The Dayton Power and Light Company (“DP&L” or the “Company”), consistent with paragraph 6 of the Public Utilities Commission of Ohio’s (“PUCO” or “Commission”) Entry of November 14, 2018 (“Entry”) hereby submits its Comments with respect to the Commission’s proposed current-state assessment of the electric distribution utilities’ (“EDU”) respective distribution systems.

As recapped in the Entry in this docket, the Commission’s PowerForward Roadmap recommended that the regulated utilities “conduct a current-state assessment of their respective distribution system’s present capability to integrate and accommodate the broad array of EDU and non-EDU initiatives which are likely to occur.” Entry at ¶5. Specifically, the EDUs are to “include an evaluation of an EDU’s current system characteristics, overview of the distribution planning process and projects resulting from the planning process, as well as the software tools used for planning” as set forth in “The Platform: Distribution System Planning” section of the PowerForward Roadmap. Entry at ¶¶5-6. This will provide the necessary baseline in order to understand the unique requirements for each utility to provide distribution system planning to integrate and accommodate technological innovations in the electric industry. *See*, Power Forward Roadmap at p. 18. While DP&L finds itself in the challenging position of having a distribution system that has limited and untested capability to integrate the broad array of

innovative advances likely to occur, the Company is currently required to file a comprehensive Distribution Modernization Plan by December 28, 2018. Therefore, DP&L believes the recommended proposed content and deadline of April 1, 2019 by which to file the current state planning assessment is timely and reasonable.

DP&L looks forward to sharing the current state of its distribution system planning and participating in the PowerForward Collaborative and related Workshops.

Respectfully submitted,

/s/ Michael J. Schuler

Michael J. Schuler (0082390)

*Counsel of Record

The Dayton Power and Light Company

1065 Woodman Drive

Dayton, OH 45432

Telephone: (937) 259-7358 (Schuler)

Facsimile: (937) 259-7178

Email: michael.schuler@aes.com

Counsel for The Dayton Power and Light Company

(willing to accept electronic service)

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the interested parties on December 4, 2018.

/s/ Michael J. Schuler

Michael J. Schuler

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/4/2018 4:15:34 PM

in

Case No(s). 18-1596-EL-GRD

Summary: Comments of The Dayton Power and Light Company electronically filed by Mrs. Jessica E Kellie on behalf of The Dayton Power and Light Company