

FILE

PUCO EXHIBIT FILING

Date of Hearing: April 3, 2019

Case No. 16-395-EL-SSO, 16-396-ATA, 16-397-EL-AAM

PUCO Case Caption: In the Matter of the Application of The Dayton
Power and Light Company for Approval of its Electric
Security Plan

Volume VIII

List of exhibits being filed:

DP&L 1001, 1002

PUCO

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Reporter's Signature: Karen Sue Gibson
Date Submitted: _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

- - -

In the Matter of the :
Application of The Dayton :
Power and Light Company : Case No. 16-395-EL-SSO
for Approval of its :
Electric Security Plan. :

:

In the Matter of the :
Application of The Dayton :
Power and Light Company : Case No. 16-396-EL-ATA
for Approval of Revised :
Tariffs. :

:

In the Matter of the :
Application of The Dayton :
Power and Light Company :
for Approval of Certain : Case No. 16-397-EL-AAM
Accounting Authority :
Pursuant to Ohio Rev. Code:
§4904.13. :

- - -

PROCEEDINGS

before Mr. Gregory Price and Ms. Patricia Schabo,
Attorney Examiners, at the Public Utilities
Commission of Ohio, 180 East Broad Street, Room 11-A,
Columbus, Ohio, called at 9:09 a.m. on Wednesday,
April 3, 2019.

- - -

VOLUME VIII

- - -

ARMSTRONG & OKEY, INC.
222 East Town Street, Second Floor
Columbus, Ohio 43215-5201
(614) 224-9481 - (800) 223-9481

- - -

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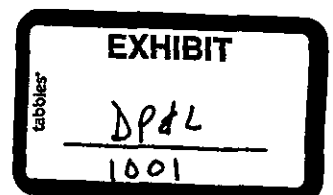
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- ☐ New Hampshire
- ☐ New Jersey
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- ☒ Ohio
- ☐ Pennsylvania
- ☐ Rhode Island
- ☐ Texas

Service Type

- ☐ Gas
- ☐ Electric



- ☐ Virginia
- ☐ Washington DC
- ☐ Wisconsin

Members

The Retail Energy Supply Association is a broad and diverse group of retail energy suppliers operating throughout the United States delivering competitively priced electricity and natural gas to residential, commercial and industrial energy customers at retail.

RESA's members in Ohio are:



AEP Energy

Delaware, Illinois, Maryland, Michigan, New Jersey, New York, Ohio, Pennsylvania, Washington DC



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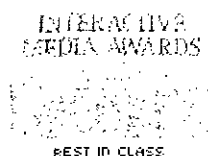
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Contact Us

tmccormick@resausa.org

About RESA

The Retail Energy Supply Association is a broad and diverse group of retail energy suppliers who share the common vision that competitive retail energy markets deliver a more efficient, customer-oriented outcome than a regulated utility structure. RESA is devoted to working with all stakeholders to promote vibrant and sustainable competitive retail energy markets for residential, commercial and industrial consumers.



- [Our Structure](#)

- Who We Are
- RESA Principles
- Antitrust Policy

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THE DAYTON POWER AND LIGHT COMPANY
MacGregor Park
1065 Woodman Drive
Dayton, Ohio 45432

Tenth Revised Sheet No. G8
Cancels
Ninth Revised Sheet No. G8
Page 1 of 30

P.U.C.O. No. 17
ELECTRIC GENERATION SERVICE
ALTERNATE GENERATION SUPPLIER COORDINATION TARIFF

APPLICABLE:

Available to any Alternate Generation Supplier ("AGS") certified by the PUCO to provide electric power to customers connected to the DP&L transmission and/or distribution system and any PJM Demand Response Curtailment Service Provider ("CSP"). This Tariff sets forth the basic requirements for interactions and coordination between the Electric Distribution Company and an AGS necessary for ensuring the delivery of Competitive Energy Supply from an AGS to Customers. A Customer cannot act as their own AGS. This Tariff also sets forth applicable requirements for interactions and coordination between the Electric Distribution Company, the Regional Transmission Organization ("RTO"), and a CSP.

The Tariff provisions apply to any AGS providing Competitive Energy Supply to Customers located in the Company's Certified Territory, including an affiliate or division of the Company that provides Competitive Energy Supply, and with whom the Company has executed an AGS Coordination Agreement as required herein. In addition, the charges herein shall apply to anyone receiving service unlawfully or to any unauthorized receipt of Coordination Services. The Customers of an AGS subject to coordination terms and conditions of this Tariff must take Generation Service under the Competitive Retail Generation Service Schedule G9.

The inclusion of FERC-jurisdictional matters within the scope of this Tariff is intended solely for informational purposes and is not intended to accord any jurisdictional authority over such matters to the PUCO. Further, to the extent that anything stated herein is in conflict or inconsistent with any provision of the Federal Power Act ("FPA"), or any tariff, rule, regulation, order or determination of the FERC under the FPA, then such provision of the FPA, tariff, rule, regulation, order or determination shall control. To the extent required under any provision of the FPA, or any FERC tariff, rule, regulation, order or determination, the Company shall secure, from time to time, all necessary orders, approvals, and determinations from the FERC necessary to implement this Tariff.

This Tariff operates and is subject to PUCO Orders, rules and regulations.

DEFINITION OF TERMS AND EXPLANATION OF ABBREVIATIONS:

Alternate Generation Supplier or AGS – a person, corporation, broker, marketer, aggregator, generator or any other entity approved by the Commission to sell electricity to End-use Customers, utilizing the jurisdictional transmission and distribution facilities of the Company and registered in the Company's Electric Choice Program.

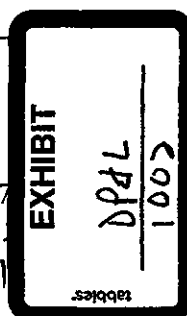
AGS Coordination Agreement – The Agreement entered into between the AGS and the Company.

Filed pursuant to the Opinion and Order in Case No. 16-395-EL-SSO dated October 20, 2017 of the Public Utilities Commission of Ohio.

Issued October 31, 2017

Effective November 1, 2017

Issued by
THOMAS A. RAGA, President and Chief Executive Officer



P.U.C.O. No. 17
ELECTRIC GENERATION SERVICE
ALTERNATE GENERATION SUPPLIER COORDINATION TARIFF

12.2 AGS Failure to Pay Obligations to the Company

In the event the AGS fails to make payment to the Company of all amounts not in bona fide dispute on or before the due date as described above, and such failure of payment is not corrected within two (2) calendar days after the Company notifies the AGS to cure such failure, the AGS shall be deemed to be delinquent. In the event an AGS is deemed to be delinquent, the Company, may at its sole discretion, reduce the reimbursement to the AGS for amounts collected by the Company by the amount owed to the Company or exercise its rights under the AGS's collateral posted pursuant to Section 12.4.

In the event of a billing dispute between the Company and the AGS, the Company will continue to provide service pursuant to the AGS Coordination Agreement and the Tariff as long as the AGS continues to make all payments including disputed amounts. A billing dispute shall be dealt with promptly in accordance with the dispute resolution procedures set forth in this Tariff.

12.3 Billing for Supplier Obligations to Other Parties

The Company will assume no responsibility for billing between an AGS and any energy source or accept responsibility to negotiate with a defaulting supplier to the AGS for damages resulting from such supplier's failure to perform. The AGS is responsible to collect any damages from wholesale suppliers that fail to deliver to the AGS. Any such supplier default does not alter AGS's financial obligation to pay the Company in accordance with the terms and conditions of this tariff. The Company will not accept any delayed payment from an AGS while the AGS is settling or litigating any disputes with the AGS' supplier(s) or PJM OI.

12.4 Guarantee of Payments

The Company will apply, on a non-discriminatory and consistent basis, reasonable financial standards to assess and examine a supplier's creditworthiness. These standards will take into consideration the scope of operations of each supplier and the level of risk to the Company. This determination will be aided by appropriate data concerning the supplier, including load data or reasonable estimates thereof, where applicable.

A supplier shall satisfy its creditworthiness requirement and receive an unsecured credit limit by demonstrating that it has, and maintains, investment grade long-term bond ratings from any two (2) of the following three (3) rating agencies:

AGENCY	SENIOR SECURITIES RATING (BONDS)
Standard & Poors	BBB- or higher
Moody's Investors' Services	Baa3 or higher
Fitch IBCA	BBB- or higher

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ELECTRIC GENERATION SERVICE
ALTERNATE GENERATION SUPPLIER COORDINATION TARIFF

The supplier will provide the Company with its, or its parent company's, most recent independently-audited financial statements, (if applicable) and, its or its parent's most recent Form 10-K and Form 10-Q (if applicable).

The Company shall make reasonable alternative credit arrangements with a supplier that is unable to meet the *aforementioned criteria* and with those suppliers whose credit requirements exceed their allowed unsecured credit limit. The supplier may choose from any of the following credit arrangements in a format acceptable to the Company: a guarantee of payment; an irrevocable Letter of Credit; a Prepayment Account established with the Company; a Surety Bond, including the Company as a beneficiary; or other mutually agreeable security or arrangement. The alternate credit arrangements may be provided by a party other than the AGS, including one or more ultimate customers. The fact that a guarantee of payment, irrevocable Letter of Credit, Prepayment Account, or Surety Bond is provided by a party other than the AGS shall not be a factor in the determination of the reasonableness of any alternative credit arrangement, as long as such party and the related credit arrangements meet the Company's standard credit requirements. The amount of the security required must be and remain commensurate with the financial risks placed on the Company by that supplier, including recognition of that supplier's performance.

The Company will make available on request its credit requirements. A supplier may appeal the Company's determination of credit requirements to the Commission or seek Staff mediation as to any dispute.

The following collateral calculation applies to AGSs who serve retail customers in DP&L's service territory and is intended to cover DP&L's risk as the default supplier:

DP&L will calculate the amount of collateral to cover its risk as the default supplier by multiplying thirty (30) days of DP&L's estimate of the summer usage of the AGS's customers by a price set at the highest monthly average megawatt-hour price from the prior summer's PJM Day Ahead market and by multiplying thirty (30) days of DP&L's estimate of the AGS's capacity obligation by the final Dayton zonal capacity megawatt-day price for the upcoming delivery year.

In addition to information required otherwise hereunder, an AGS shall be required to provide to the Company such credit information as the Company reasonably requires. The Company may report to a national credit bureau the AGS's credit history with the Company. The Company agrees to keep all information supplied by the AGS confidential if required by the AGS.