

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The)
Dayton Power and Light Company for) Case No 11-4504-EL-ATA
Approval of Revisions to its Existing G8,)
D4 and D5 Tariffs)
)
)

COMMENTS OF FIRSTENERGY SOLUTIONS CORP.

I. INTRODUCTION

FirstEnergy Solutions Corp. (“FES”) hereby submits its comments to the Amended Application of The Dayton Power and Light Company (“DP&L”) for Approval of Revisions to its Existing G8, D4, D5 and D26 Tariffs (the “Application”) filed on November 29, 2011. Specifically, the supplier tariff has a significant impact on the retail market in DP&L’s service territory. Certain aspects of the proposed tariff and DP&L’s practices are anti-competitive, inconsistent with Ohio law, and simply do not make sense. Moreover, these provisions are inconsistent with the practice of every other EDC in the state, and are well outside the norm. Accordingly, FES respectfully requests that the Commission address these issues within the course of the Application proceedings and order that the proposed tariffs be revised.¹

¹ DP&L argues that “FES has already had the opportunity to communicate its concerns regarding competitive issues in the context of DP&L’s merger proceeding in Case No. 11-3002-EL-MER.” DP&L Mem. In Opp., filed Jan. 4, 2012 at 1 (Case No. 11-3002 is hereafter referred to as the “Merger Proceeding.”) DP&L further argues that it did not expect FES to comment in this case since it filed comments (but did not join in the stipulation) in the Merger Proceeding. *Id.* at 2. This is disingenuous given the reply comments of DP&L in the Merger Proceeding that specifically responded to FES’s competitive concerns:

“As an initial matter, DP&L’s switching-related charges and practices are entirely irrelevant to whether the Commission should approve the proposed merger. . . . Indeed, DP&L has recently filed a proposed revision to its Supplier Coordination Tariff (G8 Tariff) in which DP&L has proposed various modifications to its tariff provisions to comply with changes to the Ohio Administrative Code and to implement operational and business practice changes. Case No. 11-4504-EL-ATA. FES’s concerns relating to DP&L’s retail customer choice program are more

II. BACKGROUND

The Application seeks Commission approval of certain amendments to Tariff G8, and claims that the proposed amendments are necessary to correct clerical errors, reflect changes in the marketplace, bring the tariffs more closely in line with specific provisions of Ohio law, and to incorporate commitments from the stipulation in the Merger Proceeding. See Amended Application, filed November 29, 2011 at ¶¶ 1, 8. However, as discussed in detail below, the proposed tariff goes well beyond these laudatory goals and will inhibit competitive choice in DP&L's service territory.

III. COMMENTS

DP&L is required to “coordinate with CRES providers to promote nondiscriminatory access to electric services, to ensure timely enrollment with CRES providers to maintain a customer's electric service, and to timely and correctly switch the customer's electric service between CRES providers.” O.A.C. 4901:1-10-29(A). The proposed Application may significantly impact the retail market in DP&L's service territory, including issues relating to nondiscriminatory access, timely enrollment, and the ability to correctly switch between providers. Accordingly, the following comments are designed to illustrate specific current practices of DP&L which should be amended in order to promote competition in the service territory of DP&L, consistent with Ohio state policy.

A. Customer Information Issues.

1. Shopping Flags Should Be Included In The Customer Information List.

appropriately raised in that proceeding.” DP&L Reply Brief, filed August 18, 2011 at 19-20 (emphasis added).

DP&L's practices and proposals should be evaluated by this Commission, and by DP&L's own admission this is the appropriate proceeding to raise these concerns.

Unlike Ohio Edison, Toledo Edison, CEI and Duke Energy Ohio (per its recent Stipulation), DP&L does not provide a “shopping flag” on their eligibility file, even though it did so as recently as June of 2011. Proposed ¶ 4.1 does nothing to remedy this deficiency, and continues DP&L’s current practice of failing to provide this essential information to CRES providers. As such, CRES providers unknowingly spend time and money marketing to residential and non-residential customers who have already made the choice to switch. This leads to customer confusion and increased CRES marketing costs, which ultimately yields higher CRES rates and less customer savings.

DP&L’s failure to provide shopping flag information is particularly interesting in light of the government aggregation provisions of Proposed ¶ 4.1. In the revisions made to comply with O.A.C. 4901:1-10-32(A), DP&L agrees to provide CRES providers with a government aggregator list. This government aggregator list includes, among other things, “an identification of customers who are currently in contract with an electric services company or in a special agreement with the electric utility.” Proposed ¶ 4.1. If DP&L can provide this information to government aggregators when so required by Rule, then its system can also provide this essential information for non-government aggregation customers as part of the customer information list. As such, there is no reason why this same information should not be provided to CRES providers who receive an End-use Customer Information List in Proposed ¶ 4.1.

B. Customer metering issues.

1. The 100 kW Interval Meter Threshold Should Be Raised To 200 kW.

DP&L’s interval meter threshold is lower than all other Ohio utilities. Specifically, all DP&L customers that exceed an annual peak demand of 100 kW must have an interval meter when shopping. See Proposed ¶ 8.1. However, there is a 200 kW threshold in the service

territories of Duke Energy Ohio, Columbus Southern Power Company, Ohio Power Company, Ohio Edison, Toledo Edison and CEI. There is no reason for such a low threshold in only DP&L's service territory, and the threshold should accordingly be raised to 200 kW in order to minimize customer costs and increase consistency throughout the state. In addition, raising the threshold level to 200 kW will remove a financial penalty associated with installing a \$550 interval meter for the group of customers between 100 and 200 kW, which will promote competition by allowing them to shop for the best available electricity rates.

2. Customers Who Exceed The 100 kW Threshold While Shopping Should Not Be Forced To Install An Interval Meter Mid-Contract.

DP&L requires customers in its service territory, while shopping with a CRES provider, to install an interval meter at the CRES provider's cost if they exceed the 100 kW threshold at any point while receiving generation service from a CRES provider. See Proposed ¶ 8.1. This is inequitable as it changes the economics mid-stream for customers and CRES providers by reducing, or completely eliminating, the savings that a customer may realize from shopping. *DP&L is the only EDU in Ohio who engages in this practice.* If the CRES provider fails to install the interval meter at its cost, then the customer is returned to the SSO rate. Id. Interestingly, once the customer returns to SSO pricing there is no corresponding requirement that DP&L install at its cost the interval meter it required of the CRES provider. Distorting shopping options in this fashion should not be permitted, and discriminatory metering practices between shopping and non-shopping customers is completely inappropriate. This paragraph should be revised to remove the mid-contract requirement that customers install an interval meter if they pass the 100 kW threshold.

Finally, while FES has received notice of customers that require interval meters, *i.e.*, that have exceeded the 100 kW threshold, FES has not received notice of a customer that has dropped

below the threshold, thereby no longer requiring a meter. If this practice continues, DP&L should be required to refund the meter fee to any customer that drops below 100 kW.

3. The Interval Meter Enrollment Period Should Be 24 Hours.

When an interval meter request form is required (due to the customer being over the 100 kW threshold), a CRES provider cannot enroll the customer for 3 business days for a single account or 5 days for an account with multiple locations. See Proposed ¶ 8.2. Any attempt to enroll a customer during the 3- or 5-business-day period results in a rejected enrollment. In the only other Ohio EDU service territory where a similar form is required, the processing window is only 24 hours. There is no need for this lengthy enrollment period, as Proposed ¶ 8.2 specifically provides a billing procedure for use in the period starting when the meter is ordered and ending when the meter is installed. As there is no legitimate need for the lengthy enrollment period sought by DP&L, DP&L should adhere to the same 24 hour schedule utilized by the other utility.

C. Billing Issues.

1. DP&L Should Accommodate “Percent Off” Billing

Unlike every other EDC in Ohio, DP&L does not offer percentage off billing in its territory. See Proposed ¶ 10.1. Duke and the FirstEnergy Ohio Utilities offer percentage off price-to-compare (“PTC”) rate-ready calculations on billing in their service territories, and AEP Ohio is in the process of implementing this practice. In contrast, a CRES provider in DP&L’s service territory is unable to serve a customer on a true percent off PTC basis. DP&L has previously suggested that suppliers can change rates and mimic the DP&L price structure to achieve a percent off PTC calculation. This process is unduly burdensome on the CRES and makes a true % off PTC impossible for a CRES to accurately calculate. This limits the types of

discounts and pricing options that CRES providers are able to offer DP&L's customers, and directly conflicts with Ohio's policy of ensuring that customers are able to choose the electricity supplier that provides them with the "price, terms, conditions, and quality options ... to meet their [] needs." O.R.C. § 4928.02(B). DP&L should be required to create a true percentage off billing capability in its system as is the standard practice throughout Ohio.

2. The Proposed Charge For Rate Ready Consolidated Bills Is Inappropriate.

Unlike every other EDC in Ohio, DP&L proposes to charge suppliers to issue a "rate-ready" consolidated bill. Proposed ¶ 10.1. Specifically, DP&L charges 20 cents per consolidated bill issued on behalf of a CRES. Id. There is no charge for any rate-ready consolidated bill in the FirstEnergy Ohio utilities, Duke Energy Ohio or AEP Ohio. DP&L's unjustified addition of 20 cents per bill is cost-prohibitive for many providers and inhibits retail shopping, especially at the residential level. DP&L should not charge providers for consolidated bills, and FES submits that this practice should be disallowed.

3. The Proposed Charge For Electronic Data Interchange Related To Dual Billing Is Inappropriate.

DP&L is also the only EDC in Ohio to charge CRES for monthly billing data necessary to perform monthly charge calculations in event of a CRES issuing a separate bill or "dual-bill" of their charges. Specifically, DP&L charges 12 cents per monthly EDI transaction per customer to CRES to simply receive data electronically. Proposed ¶ 10.3. DP&L should not charge providers for receiving data that is free in every other EDC in Ohio, and FES submits that this practice should be disallowed.

4. The Proposed Charge For Registering Rate Codes Is Inappropriate.

In addition, it is cost-prohibitive to register rate codes in DP&L's consolidated billing system. Specifically, DP&L proposes to charge \$5,000 to set up Rate Ready Billing, and \$1,000 for each change to its billing system – even where only a single rate code is added. Proposed ¶ 10.1. No other EDU in Ohio applies this charge, and it should be completely eliminated.

D. Enrollment issues.

1. Enrollment Should Be Accomplished With The Customer Account Number Only.

DP&L requires that the first 4 characters of EDI for enrollment from CRES Suppliers “Account Name” field must match what is in DP&L's billing system for the enrollment to be accepted. Absent a perfect match, the enrollment is rejected. See generally, Proposed ¶4.3. *No other Ohio utility rejects enrollments from CRES providers on this basis.* Simply put, the customer account number should suffice to establish customer enrollment, and this unnecessary procedural hurdle should be eliminated.

2. Switching Should Be Permitted On A Per-Meter, Rather Than Per-Account, Basis.

DP&L has accounts with both a residential and a commercial meter. However, DP&L does not allow CRES providers to enroll individual meter accounts. Proposed ¶ 3.2. Because rules and pricing are substantially different for these customer groups, the prohibition against individual meter enrollment by a CRES provider erects an undue barrier to customer switching. Switching should be permitted on either a per-meter basis, or meter customers should be split into two accounts, thereby allowing these customers to enjoy one of the fundamental benefits of competition.

3. There Is No Justification For The 12-Month Minimum Stay For Large Customers.

Large load commercial and industrial customers, *i.e.*, over 700,000 kW, have a 12-month minimum stay. Proposed ¶ 4.5. By forcing large load customers to abide by a 12-month minimum stay or possibly face fees for participating in the retail market, DP&L limits competition within its service territory.

E. Customer switching fees.

While all Ohio EDUs charge a switching fee, DP&L charges its \$5 switching fee directly to all of its non-governmental aggregation customers rather than the provider. See DP&L Alternative Generation Supplier Handbook, p. 19 (attached hereto as Exhibit A). Charging this fee directly to customers hinders competition by making it more expensive for DP&L's customers to switch to a CRES provider. In order to remedy this deficiency, the switching fee should be charged directly to CRES providers rather than the customer, as is done in the majority of other Ohio service territories.

F. CRES payments.

1. Security Deposits Should Be Treated The Same As Other Partial Payments.

DP&L has changed their supplier tariff to allow for any security deposits to be applied first to DP&L, then to CRES past-due charges. Proposed ¶ 10.9. This violates 4901:1-10-33(h)(1)(a-e) of the Ohio Administrative Code which clearly require that:

“(1) A customer's partial payment shall be credited in the following order:

(a) Billed and past due CRES provider charges, or, if applicable, CRES provider payment arrangement or past due CRES provider budget billing.

(b) Billed and past due electric utility distribution, standard offer generation, and transmission charges or, if applicable, electric utility payment arrangement or past due electric utility budget billing.

(c) Billed and due current electric utility distribution and transmission charges or current electric utility budget billing.

(d) Billed and due current CRES provider charges or current CRES provider budget billing.

(e) Other past due and current non-regulated charges, excluding CRES charges.”

As shown by the foregoing, this Rule does not permit DP&L to alter the credit procedure for security deposits, through Stipulation or otherwise. DP&L should adhere to the Ohio Administrative Code and not treat security deposits any differently from any other partial payment.

2. There Is No Justification For Limiting The Amount Of Time CRES Past-Due Charges Appear On Customers’ Bills.

DP&L is attempting to limit the length of time that a CRES past-due charge can appear on a customers bill to at most 3 months, and possibly shorter. Proposed ¶ 10.10. O.A.C. 4901:1-10-33(h)(1)(a) does not contain the limitation sought by DP&L, and references only “Billed and past due CRES provider charges.” O.A.C. 4901:1-10-33(h)(1)(a). There is no caveat on how long those CRES charges remain on a customer bill. *Id.* The Rule also does not contain any distinction between current or former CRES providers charges. *Id.* DP&L should be required to keep CRES past due charges on a customer bill until they are fully paid off.

IV. CONCLUSION

FES seeks to ensure that competition and a level playing field exists in the DP&L service territory. DP&L’s Application seeks to impose new restrictions and fees which are unwarranted and inappropriate, such as interval meter thresholds, consolidated billing charges, EDI data charges for dual bills, and percent off billing availability. In each of these areas, DP&L operates far outside the norm in this state, and is the *only* EDC which operates in this fashion. FES

therefore requests that each of its aforementioned comments be accepted, and that DP&L be required to revise Tariff G8 accordingly. By doing so, customer choice and competition will be furthered in Ohio, thereby promoting the public convenience and the provision of adequate service for a reasonable rate.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Comments of FirstEnergy Solutions Corp.* was filed this 6th day of January, 2012 with the Public Utilities Commission of Ohio Docketing Information System and was served via email upon the parties below.

/s/ Colleen Moran O'Neil
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The Dayton Power & Light Company

Alternate Generation Supplier Handbook

Updated 08/01/2011

Alternate Generation Supplier Handbook

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Preface

This Alternate Generation Supplier Handbook has been developed by The Dayton Power & Light Company (DP&L or the Company) for Alternate Generation Suppliers (suppliers or AGS) interested in providing generation service to retail customers located within DP&L's service area. An Alternate Generation Supplier is any person, corporation, broker, marketer, aggregator, utility, generator or any other entity approved by the Public Utilities Commission of Ohio (PUCO) to sell electricity to end-use customers, which is registered in DP&L's Electric Choice program. This Handbook is intended to provide an AGS with an overview of DP&L's procedures so that the proper interactions can take place between each AGS and DP&L.

The Alternate Generation Supplier Handbook serves as one source of guidance to an AGS interested in providing generation service as well as information and procedures necessary for a supplier to interact with DP&L. This Handbook is a working document designed to address the challenging issues raised while establishing the new competitive electric marketplace in Ohio. DP&L reserves the right to modify this Handbook, as necessary, to reflect regulatory and/or business process changes.

All suppliers interested in providing generation service in the state of Ohio should develop an understanding of the Ohio electric industry restructuring process. We recommend a review of the Public Utilities Commission of Ohio's (PUCO) web site to obtain background information on electric industry restructuring and the specific regulations for Ohio.

Please refer to the appendix for a definition of terms used in this document.

Disclaimer

DP&L has provided this Handbook for informational purposes only. In the event of any conflict between the guidelines contained within this Handbook and DP&L's approved PUCO Alternate Generation Supplier Coordination Tariff, the PJM Operating Agreement and Reliability Assurance Agreement, , or other filed tariffs, the tariff(s) will take precedence.

Chapter 1:

The New Electric Marketplace

Introduction

As a result of electric industry restructuring in Ohio, DP&L's role and relationships in the electricity market will change. Chapter 1 provides a brief overview of those roles and relationships in the new marketplace.

The Dayton Power & Light Company's Role in Generation

DPL Inc. is a diversified energy Company that supplies energy services to customers in the Midwest through its subsidiaries, including The Dayton Power & Light Company (DP&L). DPL's operating companies will continue to own and operate generation facilities. DP&L, the regulated distribution utility, will continue to provide generation and generation-related services to retail customers in its service area on a regulated (tariffed) basis. In the new electricity marketplace, DP&L will provide services to Alternate Generation Suppliers (AGSs) who are DP&L customers under the Alternate Generation Supplier Coordination Tariff.

The Dayton Power & Light Company's Role in Distribution

DP&L is a member of PJM and any AGS that serves load in DP&L's area, must use the PJM Network to serve retail load, which requires the AGS or its Scheduling Coordinator as signatory to the Operating Agreement and Reliability Assurance Agreement of the PJM.

DP&L will continue to own and operate the regulated distribution facilities in its service area and will continue to be responsible for the reliable and safe delivery of electricity to retail customers. DP&L will provide AGSs with impartial information on distribution services to ensure that energy suppliers have the appropriate resources for participating in the new market. As part of its distribution role, DP&L will continue to provide the following services to customers:

- Distribution transportation services;
- Metering services (ownership, purchase, installation, removal, calibration, testing, and maintenance of meters);
- Meter reading and usage data management; and
- Billing and related services.

The Role of Alternate Generation Suppliers

In the competitive electricity marketplace, retail customers will have a choice of purchasing electricity from their current utility or retail suppliers known as Alternate Generation Suppliers or Competitive Retail Electric Service (CRES) Providers. Energy will continue to be delivered to retail customers in the DP&L service area using DP&L's distribution network and the PJM network for transmission service.

An AGS providing generation service to retail customers must enter into a service agreement with DP&L under the terms and conditions of DP&L's Alternate Generation Supplier Coordination Tariff, No. G8 of PUCO Vol. 17. The supplier must then designate a Scheduling Coordinator, who will contract with PJM for transmission service in accordance with the requirements of PJM regulations. .

Alternate Generation Supplier Interaction with End-Use Customers

It is expected that an AGS will interact with end-use customers as specified in the PUCO CRES rules. Failure to comply with section 4928 of the Ohio Revised Code or the PUCO CRES rules may result in fines or revocation of CRES certification. Per Ohio law, a list of eligible customers who have approved the release of their account information will be available on DP&L's supplier information web site to suppliers who have met PUCO certification requirements.

Pre-Enrollment End-Use Customer Information List

Upon request, the Company will electronically provide to any Alternate Generation Supplier the most recent end-use customer information list. The Alternate Generation Supplier will be billed for access to this list according to the payment schedule listed in the AGS Coordination Tariff.

The Company provides an end-use customer information list, with updates available monthly throughout the Market Development Period. Once the list has been updated, a supplier may not use an end-use customer information list from a prior month to contact end-use customers.

The Company will provide end-use customers the option to have all their information removed from the Pre-Enrollment List. At the same time, the Company will also provide an end-use customer the option to have its information reinstated on the Pre-Enrollment List. The end-use customer will be notified of his or her options quarterly throughout the Market Development Period. (Please see **Chapter 4: Obtaining End-Use Customer Historical Usage** for further details on the end-use customer information list).

Chapter 2:

General Information for Alternate Generation Suppliers

Introduction

This chapter summarizes the resources that DP&L will provide to Alternate Generation Suppliers participating in the Electric Choice program. The Control Area Services department of The Dayton Power & Light Company is responsible for managing AGS-related issues within the Electric Choice program. The staff will be responsible for daily communications with suppliers, including supplier certification, enrollment, energy scheduling, settlements and other tariff or contractual issues.

Additional Resources for Alternate Generation Suppliers

Alternate Generation Supplier Handbook

This Alternate Generation Supplier Handbook provides guidance to AGSs interested in providing competitive generation services in DP&L's service area. An electronic copy of this Handbook and other Electric Choice documents is available on DP&L's supplier web site.

Company Contact

Alternate Generation Suppliers may contact the Control Area Services Department at DP&L for assistance or to obtain additional information pertaining to this document or other DP&L business practices and procedures.

Phone: 937-331-4431 (8:00 a.m. to 5:00 p.m.)

Fax: 937-331-4216

E-mail: retailsupplier.information@dplinc.com

DP&L Supplier Web Site

Dayton Power & Light has established a web site to supply information to Alternate Generation Suppliers that will serve customers within DP&L's territory. Upon request by a supplier, DP&L will provide that supplier a login and password to access the web site. The web site contains load profile information that will be accessible to the supplier upon successful registration with DP&L. The Pre-Enrollment Customer List is also accessible via this web site and will be made available monthly to those suppliers requesting such list in accordance with the AGS Coordination Tariff. Suppliers can access the web site at <http://www.electricchoicesuppliersite.com>.

Chapter 3:

Supplier Certification and Registration Process

Introduction

This chapter provides an Alternate Generation Supplier with an overview of the process for registering with DP&L, so that the supplier may provide competitive retail generation services within DP&L's service area. The purpose of registering is to initiate the business relationship between the Alternate Generation Supplier and DP&L. This chapter includes the following information:

- PUCO Requirements
- Summary of DP&L Registration Requirements
- Details of the DP&L Registration Process
- Approval Process

PUCO Requirements

As stated in the Amended Senate Bill 3 (S.B. 3), the Public Utilities Commission of Ohio (PUCO) is responsible for performing the financial, managerial, and technical certification for Alternate Generation Suppliers intending to sell electricity to end-use customers in Ohio. PUCO certification means that the AGS has met the PUCO requirements and has received PUCO approval to participate in Ohio's Electric Choice program. Detailed information regarding PUCO certification can be obtained through the PUCO web site.

Once the AGS has met the PUCO requirements, the PUCO will issue the supplier a numbered certificate that specifies the service(s) the supplier is certified to provide.

Summary of DP&L Registration Requirements

Alternate Generation Suppliers must register with DP&L to be eligible to operate in DP&L's Electric Choice program. The following is a summary of DP&L's registration requirements:

- (a) an Individual Coordination Agreement, fully executed in triplicate by a duly authorized representative of the supplier;
- (b) a copy of the supplier's Certification application submitted to the PUCO, subject to a confidentiality agreement;
- (c) written evidence that the AGS or its Scheduling Coordinator is a signatory to the Operating Agreement and Reliability Assurance Agreement of the PJM Interconnection LLC;
- (d) written affidavit that the AGS or its Scheduling Coordinator will use PJM Network Integration Service to serve retail load in DP&L's certified territory;
- (e) the supplier's Dun & Bradstreet Number;

- (f) an EDI Trading Partner Agreement
- (g) the supplier must demonstrate to the Company's satisfaction that it is fully capable of performing the necessary data transfer functions required to supply the Company with the data necessary to operate its business through EDI testing
- (h) collateral pursuant to Section 12.4 of the AGS Coordination Tariff
- (i) a \$250.00 registration fee
- (j) a Billing Service Agreement if DP&L is to provide CDRR billing services

Copies of the required forms and contractual agreements may be found by visiting DP&L's supplier web site.

Details of the DP&L Registration Process

The following completed forms, contractual agreements and business arrangements must be established with DP&L for all Alternate Generation Suppliers seeking to do business within the DP&L service area:

Proof of PUCO Certification

A supplier is responsible for certification by the PUCO. Information regarding this certification can be obtained at the PUCO web site. Prospective Alternate Generation Suppliers may begin DP&L's registration process before becoming certified with the PUCO. In this case, the Alternate Generation Supplier must submit documented proof of its PUCO certification application to the DP&L Control Area Services department before the supplier will be registered to participate in DP&L's Electric Choice program.

Alternate Generation Supplier Registration and Credit Application Forms

Each Alternate Generation Supplier must submit a registration and credit application form as part of the registration process. This form addresses credit information needed to establish the supplier's credit limit and potential collateral requirement with DP&L. This form also serves to provide contact and other information related to the Alternate Generation Supplier including the Alternate Generation Supplier's contact telephone numbers, business hours, e-mail address, and key functional contacts.

Credit Requirements

DP&L will conduct a creditworthiness review of each Alternate Generation Supplier prior to activation in DP&L's Electric Choice program. The credit review may result in a requirement for specific security to be provided as collateral by the Alternate Generation Supplier. (For more information regarding creditworthiness and security, please refer to **Chapter 10: Credit Requirements**).

Alternate Generation Supplier Individual Coordination Agreement

This agreement is the cornerstone of the legal relationship between the Alternate Generation Supplier and DP&L and is required prior to a supplier operating in the DP&L service area. It

establishes the supplier as a customer of DP&L under the terms and conditions of the AGS Coordination Tariff, as well as outlines the responsibilities of both parties.

EDI Trading Partner Agreement

This agreement establishes the general responsibilities of the electronic data interchange (EDI) partnership. The EDI Trading Partner Agreement (on the Supplier website) is required for an Alternate Generation Supplier to transact business directly with DP&L using EDI. Each trading partner shall establish a point of contact to resolve daily electronic data interchange issues.

Complete EDI Testing

Each AGS must successfully complete an operational test with DP&L to demonstrate that the proper EDI communication links are functional. (For more information regarding testing, please refer to **Chapter 5: Electronic Data Interchange (EDI)**).

Registration Fee

Each Alternate Generation Supplier must submit the registration fee identified in the DP&L AGS Coordination Tariff with the associated registration documents. Make checks payable to The Dayton Power & Light Company and submit by mail or via wire transfer to:

Mail:

Dayton Power & Light Co.
Attention: Electric Choice
1900 Dryden Rd.
Dayton, Ohio 45439

Wire:

JP Morgan Chase, Columbus, Ohio
ABA #021000021
Account #628705063
Attention: Felecia Brown

Billing Services Agreement

A Billing Services Agreement is required when the AGS desires DP&L to provide for Consolidated Rate Ready Billing. The purpose is to define specifics terms of billing and associated costs of providing the services. This would not be required until after Supplier Certification is complete.

Approval Process

The process of approval begins when DP&L receives the following completed registration materials:

- Alternate Generation Supplier Registration & Credit Application
- Individual AGS Coordination Agreement completed in triplicate
- EDI Trading Partner Agreement
- Provide written evidence that the AGS or its TSA is a signatory to the Operating Agreement and Reliability Assurance Agreement of the PJM LLC.
- Provide written affidavit that the AGS or its TSA will use PJM Network Integration Service to serve retail load in DP&L's territory
- Paid Registration Fee (\$250)

DP&L will acknowledge receipt of registration materials and notify the supplier of any incomplete information within ten calendar days of receipt.

In addition to the above items, the following must be completed within thirty days after submitting the completed registration materials:

- Submit proof of PUCO certification
- Submit a Billing Services Agreement (only for consolidated billing option)
- Complete EDI testing
- Post the appropriate collateral, as determined by DP&L.

DP&L will accept or reject the supplier's registration within thirty calendar days of receipt of the above completed registration materials. The thirty-day time period may be extended for up to thirty days for good cause, or until such other time as is mutually agreed to by the AGS and DP&L.

Chapter 4: Obtaining End-Use Customer Usage

Introduction

This chapter describes how Alternate Generation Suppliers can obtain interval and non-interval usage information. Included in this chapter are the following topics:

- Obtaining the Pre-Enrollment Customer List via the Internet
- Obtaining Individual End-Use Customer Historical Usage via EDI
- Obtaining Individual End-Use Customer Historical Usage via the Customer
- Monthly Energy and Demand Billing Data for End-Use Customer Billing
- Customer Authorization of Historical Usage

Obtaining the Pre-enrollment Customer List (Mass List) via the Internet

Competitive retail electric suppliers may obtain DP&L's Pre-Enrollment Customer List via the internet. This list is provided in a downloadable text file format on DP&L's supplier web site. Alternate Generation Suppliers that desire to download the Pre-Enrollment Customer List must be certified by the PUCO and must submit payment according to the AGS Coordination Tariff. Once all requirements have been satisfied, DP&L will authorize the supplier to access the Pre-Enrollment Customer List for a 5-day period. This list is updated monthly throughout the Market Development Period.

An AGS is required to use the most recent monthly Pre-Enrollment Customer List when marketing to potential customers.

Information provided on the Pre-Enrollment Customer List includes the following:

- End-use customer name(s)
- Service address
- Service address city, state, and zip code
- Mailing address
- Mailing address city, state, and zip code
- Budget Bill/PIPP indicator

- Interval meter indicator (will provide information at that is readily available)
- Meter type (will provide information that is readily available)
- Rate schedule under which service is rendered, including class and sub-class (if applicable) and Rider (if applicable)
- Meter Read Cycle
- Load profile code
- Most recent twelve months of historical usage (actual energy usage plus demand, if available)
- Meter Number

In accordance with S.B. 3, DP&L provides end-use customers the option of being taken off the Pre-Enrollment Customer List. Customers will be notified quarterly regarding their options throughout the Market Development Period.

Obtaining End-Use Customer Historical Usage via EDI

Prior to enrolling an account, Alternate Generation Suppliers certified by the PUCO and DP&L can obtain non-interval end-use customer historical usage through the EDI process (See **Chapter 5: Electronic Data Interchange (EDI)**). Historical usage is provided with customer authorization only. Customers will need to notify DP&L to have this usage data released. Non-interval meter data will display the most recent twelve months energy usage history (kWh) and actual demand (kW). This is the same information provided on the Pre-Enrollment Customer List available on the internet web site. Interval meter data will display the most recent twelve months of hourly energy usage (kWh), the hourly demand (kW), hourly kVAR, and hourly kVA. The data will be in 60 minute intervals.

Suppliers will be billed for preparation costs incurred in accordance with the Alternate Generation Supplier Coordination Tariff.

Monthly Energy and Demand Billing Data

For each billing cycle that an end-use customer is enrolled with an AGS, DP&L will provide to the supplier the current month's billing data. The data is provided for each account enrolled with an AGS.

Summarized meter data (monthly consumption) will consist of the current month's energy usage (kWh) and actual demand (if applicable).

Actual demand does not always equal billed demand due to rate structures within Dayton Power and Light's Distribution Tariff.

Detailed interval meter data can be obtained for a fee and will consist of the current month's hourly energy usage (kWh), hourly demand, hourly kVAR and hourly kVA. The data will be in 60 minute intervals. This information can only be transmitted manually prior to enrollment. Fees for this usage are detailed in the AGS Tariff. All requests for usage information should be sent by email to retailsupplier.information@dplinc.com.

PJM Capacity (PLC) and Transmission (NSPL) Data

The customer's capacity and transmission contributions can only be requested by email. The updated values will be available by January 1st of the delivery year.

Customer Authorization

Without the customer's authorization, usage information will not be released.

An AGS that has submitted a valid enrollment request for a DP&L account has authorization to receive usage information for monthly billing or, if requested, 12 months historical usage prior to the first billing.

In the event an AGS has enrolled a customer that has multiple accounts with DP&L, each account would be considered a separate transaction when requesting historical usage.

Chapter 5:

Electronic Data Interchange (EDI)

The PUCO, Ohio utilities, and interested stakeholders have determined that Electronic Data Interchange (EDI) will be utilized as the common communication method for exchanging data between utilities and Alternate Generation Suppliers. EDI is the standard communication vehicle between the AGS and DP&L for end-use customer enrollment, drop, reinstatement, customer billing, account maintenance, and transfer of usage information. This will serve to provide a common methodology for conducting business in an electronic environment in Ohio. EDI transactions are designed to automate and streamline repetitive transactions that occur between DP&L and the AGS.

This chapter includes the following information about establishing EDI communications:

- Summary of EDI Transactions
 - Primary Business Event Transactions
- Establishing EDI Communication with DP&L
- Testing Electronic Communications
 - EDI Testing Descriptions
 - EDI Testing Criteria
 - DP&L EDI Testing Schedule
 - Scheduling Suppliers for EDI Testing

Summary of EDI Transactions

DP&L will use EDI transaction implementation guidelines as outlined from the Data Exchange Working Group for the State of Ohio to identify how this communication mechanism will be used.

Primary business events between DP&L and the AGS are outlined on the table on the following page:

Business Events and Scenarios	EDI Transaction Set Types	
	Request	Response
Customer Enrollment	814E – Enrollment Request	814ER-Acknowledgment of acceptance or rejection of Enrollment Request
Customer’s Historical Usage Request	814HU – Historical Usage Request	814HUR-Acknowledgment of acceptance or rejection of Historical Usage Request 867HU-If accepted, Utility sends Historical Usage Information
Customer’s Historical Interval Request	814HI – Historical Interval Request	814HIR - Acknowledgment of acceptance or rejection of Historical Interval Request 867HI - If accepted, Utility sends Historical Interval Usage Information
Customer Drop Request	814D - Drop Request	814DR - Acknowledgement of acceptance or rejection of Drop Request
Customer Reinstate Request	814R – Reinstate Request	814RR - Acknowledgement of acceptance or rejection of Reinstate Request
Customer Account Information Change	814C – Change Request	814CR - Acknowledgement of acceptance or rejection of Change Information
Application Advice Transaction	No Request Required	824 - Rejection notice from supplier in response to any errors in 867 transaction
Customer Billing Usage Information	No Request Required	867M - Utility sends Monthly Usage Information 867M - Utility sends Monthly Interval Usage Information
Customer Payment/Remittance Information	No Request Required	820 – Payment/Remittance Detail
Customer Charge Write-Off Information	No Request Required	248 – AGS Charge Wipe Off

Business Events and Scenarios	EDI Transaction Set Types	
	Request	Response
Customer Invoice Information for Rate-Ready Billing	No Request Required	810 – Invoice Charges

EDI guidelines established by the Data Exchange Working Group for the State of Ohio are based upon Utility Industry Group guidelines but include modifications specifically tailored for use in Ohio.

Establishing EDI Communication with DP&L

The Public Utilities Commission of Ohio has established the ANSI ASC X12 – Version 4010 EDI as the standard throughout the State of Ohio. For transmission of data, a Value Added Network (VAN) is the default in Ohio. An AGS should begin to establish EDI capability with DP&L by contacting Control Area Services. Control Area Services will provide assistance with:

- understanding the requirements associated with establishing EDI with DP&L,
- completing the EDI Trading Partner Agreement, and
- obtaining the required electronic data interchange control information for EDI testing and processing.

Testing Electronic Communications

DP&L will conduct communication and compatibility tests with an AGS registered with DP&L. This will be performed in advance of the production use of the EDI transactions to ensure the functionality of the electronic infrastructure as well as to confirm the communication channels. The scope of these tests includes the EDI business transactions that an AGS and DP&L anticipate using. AGSs are encouraged to contact DP&L as soon as possible to arrange for testing as scheduling demands and conflicts may result in delays. Prior to contacting DP&L to initiate testing, the AGS should thoroughly review this Handbook and the supplier web site to ensure understanding of the EDI requirements. DP&L expects the AGS to use this information to establish its EDI capability and data conformity before testing begins.

EDI Testing Descriptions

The Data Exchange Working Group for the State of Ohio has developed testing transactions and procedures. The Ohio Test Plan for EDI Certification of suppliers has been modified to meet DP&L's business requirements. The testing transactions for DP&L can be viewed on DP&L's supplier web site.

EDI Testing Criteria

There will be 2 levels of required Electric Choice EDI testing for Ohio utilities.

During Level 1 testing, each utility must transmit an EDI translated flat file to a third party reviewer. This is done for each EDI transaction a utility would send to a supplier. The third party will review and approve each utility's document for compliance to State of Ohio format.

Level 2 testing consists of end to end testing for all inbound and outbound transaction sets between the utility and the supplier. This test includes connectivity, movement of data to and from each trading partner's VAN mailbox with DP&L's VAN mailbox, data translation by each trading partner, and response to pre-defined testing scenarios. Upon successful completion of Level 2 testing, DP&L will approve the supplier as EDI compliant for the transactions that were tested.

If any testing could not be completed or was completed unsatisfactorily, DP&L will notify the supplier with the reasons why they are not considered EDI compliant and work with the supplier to correct any problems. Upon correction of any deficiencies, testing will be resumed. A supplier requesting or performing multiple re-testing of EDI testing may be subject to administrative fees.

Scheduling Suppliers for EDI Testing

The following guidelines will be used to schedule suppliers for testing:

- Alternate Generation Suppliers will be scheduled in the order that their completed registration is received by DP&L.
- Supplier tests will be done independently of each other. Testing with one Alternate Generation Supplier will not be dependent on the progress of another. As an example, supplier A and supplier B can start testing on the same day. If testing for supplier A moves faster than testing for supplier B, supplier A can progress through the test even if supplier B is taking longer to complete.
- DP&L will support a maximum of 2 suppliers simultaneously.

DP&L will allow suppliers to take more than one week to complete EDI testing, as long as the supplier is proactively attempting to resolve issues and perform the testing.

Chapter 6:

End-Use Customer Enrollment and Direct Access Service Requests (DASRs)

Introduction

This chapter introduces the processing steps associated with the enrollment process and Direct Access Service Requests (DASRs). This chapter also defines how DASRs are prioritized for processing once received by DP&L and when service will be effective.

This chapter includes the following topics:

- DASR Definition
- AGS Prerequisites for Submitting a DASR to DP&L
- Procedures for Submitting DASRs
- Procedure for End-Use Customer Requests to Return to Standard Offer Rate
- DP&L's Procedure for Validating, Accepting, and Rejecting DASRs
- Enrollment and DASR Assistance

DASR Definition

A DASR is an electronic form of communication that will be exchanged between DP&L and an Alternate Generation Supplier for enrollment of an end-use customer. Data submitted through a DASR will be used as the source to establish a business relationship between DP&L and the Alternate Generation Supplier on behalf of the end-use customer. Information listed on the DASR will be retrieved via EDI (Electronic Data Interchange) as described in **Chapter 5: Electronic Data Interchange (EDI)**.

Alternate Generation Supplier Prerequisites for Submitting a DASR

Before a supplier is authorized to submit a DASR, the following items must be completed:

- The supplier must be certified by the PUCO and registered with DP&L for the DASR communication channels to be operational.
- DP&L must have found the supplier to be EDI compliant.
- An end-use customer must have an active electric service account established with DP&L (i.e., the meter must be set and the account must be open).

Procedures for Submitting DASRs

- A DASR may only be submitted by an AGS via an EDI file.
- DP&L will confirm with a functional acknowledgment (EDI 997 transaction) upon receipt of supplier's EDI transaction when it receives the in-bound transaction.
- A DASR will be effective on the next scheduled meter reading date provided that it is received by DP&L no more than 30 calendar days in advance of the next scheduled meter read date, and at least 12 calendar days prior to the next scheduled meter reading date.
- Each Alternate Generation Supplier must submit one DASR for each customer account number.
- DP&L will process all valid DASRs. Within two business days, end-use customers will be mailed a confirmation letter from DP&L. For residential and small commercial customers, the letter not only confirms the enrollment information, but also advises the customer of the 7 day rescission period. If the end-use customer rescinds within the 7 day period, the AGS will be sent a drop notice.
- Simultaneous with the sending of the confirmation to the end-use customer, DP&L will electronically advise the AGS of acceptance.
- Notice of rejection of the DASR to the AGS shall be sent within one business day, if possible, but no later than 4 business days, and will include the reason for the rejection.

Enrollment DASR Processing

An enrollment DASR will be processed on a "first-in" priority basis based on the received date. The earliest contract date will be used in the event that an enrollment DASR is received from 2 separate suppliers on the same day. If both DASRs have the same contract date, the customer will be enrolled with the supplier whose DASR was first received by DP&L. Any subsequent enrollment DASR received from another AGS for the same effective meter reading date will be rejected and returned to the AGS who submitted the DASR.

Customers will be assessed a switching fee of \$5. This charge will be tracked by the customer's account number.

Drop DASR Processing

A customer's Electric Choice contract may be terminated in any of the following scenarios:

- An AGS may "drop" its active customer by submitting a DASR. The drop DASR will be effective on the next valid scheduled meter reading date if received within the same timeline as an enrollment. The supplier must provide a valid drop reason code consistent with the EDI standard codes.

- DP&L will send a drop DASR to the supplier for any end-use customer being final billed.
- DP&L will send a drop DASR to the AGS if the end-use customer requests a return to standard offer service. The timing will be the same as the enrollment timeline.
- DP&L shall notify the customer of the applicable rescission period as per PUCO requirements. If the end-use customer rescinds, DP&L shall send a drop notice to the AGS via a drop DASR.
- DP&L may switch any customer with an AGS billing arrearage of more than sixty (60) day's back to the Company's Standard Offer Rate.

Account Maintenance DASR Processing

DP&L will notify the current Alternate Generation Supplier of any change in the following:

- Account number
- Meter number
- Billing cycle
- Load profile
- Mailing address
- Customer name
- Addition of an electric meter
- Deletion of an electric meter
- Meter exchange

The Alternate Generation Supplier will notify DP&L of any change in:

- Supplier account number, or
- Transmission Scheduling Agent

Procedures for End-Use Customer Requests to Return to Standard Offer

If an end-use customer returns to DP&L's Standard Offer due to supplier default or supplier withdrawal from DP&L's Electric Choice program, the end-use customer will be returned to DP&L's Standard Offer using the enrollment timeline. If an end-use customer chooses to return to DP&L's Standard Offer, the enrollment timeline will apply. DP&L will provide a 7 day rescission period.

Large commercial and industrial customers returning to standard service offer must remain on standard service office for a period of at least 12 months. The Company may be authorized by the Company to offer a come and go rate, an exit fee, or other options for the customers to

switch from the Company before the end of the Company's minimum stay requirement, if any. These options are at the discretion of the Company. A come and go rate offering will allow Customers to have a minimum stay of one (1) billing cycle and will contain market based rates, which shall in no event be below the standard offer price. An exit fee, which may vary based on Customer size or rate class, may be offered to allow the Customer to avoid meeting the minimum stay requirement. If such provisions are authorized by the commission they will be contained in the Company's Commission approved tariffs. End-use customer notification requirements to the Company would be required before returning to the Company. Such notification requirements will be contained in the Company's Commission approved tariffs.

DP&L's Procedure for Validating, Accepting, and Rejecting DASRs

DASR Validation

DP&L will electronically receive DASRs in EDI format at its EDI translator. The translator automatically reviews the DASR for valid syntax and Transmission Scheduling Agent identification number (Dun and Bradstreet number). An acceptance notice will be transmitted, confirming that the DASR has been submitted successfully. DASRs failing the basic accuracy validation will be rejected and sent back to the AGS for correction.

DASR Business Validation

There are many types of DASRs, as outlined in Chapter 5 of this Handbook. Prior to DASR acceptance, each DASR type is validated to determine that all business validation criteria have been met. Listed below are the validation criteria for each DASR type.

All DASR Types

The Alternate Generation Supplier submitting the DASR must be a DP&L approved supplier with a valid Dun and Bradstreet number.

The DASR shall include:

- the end-use customer's account number, and
- the first four digits of the customer name as identified on the Pre-Enrollment Customer List.

Enrollment DASR

In addition to the validation identified above, DASRs may be rejected for a variety of other reasons. These reasons include an invalid account number, the account being inactive, the electric service being inactive, etc.

Additionally, enrollment DASRs are subject to the enrollment window described previously.

Historical Usage Request DASR

- Monthly historical usage requests - see "All DASR Types" above
- When an AGS requests history for an account, DP&L will send history for all electric meters on the account as well as unmetered usage.
- Interval data history requests - requests accepted by account number
- If the AGS placing the historical usage request is not the customer's supplier of choice and the customer has a privacy block on the account, the request will be rejected.
- The historical data is provided at the account level.
- Historical Usage DASRs are not subject to the 30/12 day enrollment window

Drop DASR

Drop DASRs are subject to the 30/12 day enrollment window.

Customer Account Information Change Request

Customer Account Information change DASRs are not subject to the 30/12 day enrollment window.

DP&L Acceptance of DASR

DASR acceptance will be provided via an EDI transaction and will indicate the effective date of the transaction. The transaction will be effective on the customer's next scheduled meter reading date.

An EDI notice of the effective start date will be sent concurrently with the acceptance. The notice of acceptance of a DASR and the effective start date are the only notices an AGS will receive.

DASR Rejection

A rejection notice provides specific information on why a given DASR was rejected. DP&L will communicate the reason for rejecting a DASR with the use of a rejection code identified by the State of Ohio's EDI Working Group Standards.

For DASR and Enrollment Assistance

For technical or procedural assistance with DASRs or other EDI transactions, contact DP&L's Electric Choice Administration Group at 1-800-929-8646. To the extent assistance is requested, the supplier may be subject to technical support and assistance charges as outlined in DP&L AGS Coordination Tariff.

Chapter 7:

Load Profiling, Scheduling & Settlements

Load Profiling: Introduction to Load Profiling

This chapter describes the purpose and process of load profiling used by Dayton Power & Light. The following topics are included:

- Development of Load Profiles
- Load Profiling Resources
- Access to Load Profiles

Development of Load Profiles

Load profiles are the mechanism by which DP&L will assign usage on an hourly basis for non-interval (monthly consumption) metered customers. Each customer of an AGS with a non-interval meter has a profile class designation that corresponds to the profile template used for the settlement process. Class profiles are created using historical data collected by the utility.

Even though the AGS does not submit a daily schedule to PJM, it's the responsibility of the AGS or its TSA to work with DP&L to coordinate with the PJM OI to determine the magnitude and location of the actual or projected load as required by the PJM OI, for the purpose of calculating a Network Integration Transmission Service Reservation, an installed capacity obligation, or other requirements under the PJM Tariff.

Forecasting and actual weather are used to adjust the class profiles for future conditions or to reflect the actual conditions of previous days. Applying the AGS customer's monthly consumption to the appropriate profile class for the same period results in an hourly usage profile for the customer. DP&L's load profiling methodology can be found on the supplier web site.

These customer's usage profiles, as well as the AGS's interval meter customer's usage, are summed across all the AGS's customers for the hours of the settlement month. In this manner, an hour-by-hour Alternate Generation Supplier usage profile is created for settlement with PJM.

Load Profiling Resources

Load profile information and loss factors will be available on the DP&L supplier web site.

The load profile information posted on the supplier web site will consist of DP&L's load profile methodology, generic load profiles by rate class, load profiles by rate class adjusted for

next-day conditions and load profiles by rate class adjusted for the previous day's actual conditions.

The profiles posted for the previous day's actual conditions will be the profiles used to calculate the AGS's energy settlement with PJM.

The AGS is solely responsible for the use and interpretation of the load profile information. DP&L assumes no liability for a supplier's use of the load profile information provided by DP&L.

Access to Load Profiles

In order to obtain access to DP&L's load profile information on the supplier web site, an AGS must be certified by the PUCO and registered with DP&L.

Retail Load Responsibility (RLR)

DP&L calculates each AGS's RLR for each hour of each calendar day and submits the values to PJM in accordance with PJM's business practices. The RLR values that the Company submits to PJM are the basis for the settlement process.

Load Scheduling

Energy is delivered to the Company's electric distribution system using the PJM power scheduling policies and procedures.

- The AGS is responsible for forecasting its customer load. The AGS or its TSA must schedule electric power on behalf of the retail customers it supplies in accordance with the PJM Tariff and guidelines. The aggregate hourly load forecast shall define the hourly energy requirements for an AGS.
- An AGS or its TSA must also enter requests for Network Transmissions Services on the applicable PJM systems to service retail load in DP&L's certified territory. The AGS or its TSA must adhere to the applicable time frames in accordance with the PJM OATT and other PJM documents.

Energy Settlement

DP&L and the AGS will rely on PJM to determine the monetary value of reconciliation quantities and to bill and/or credit AGSs for oversupplies and undersupplies at an hourly price through the PJM grid accounting system.

The Company assists PJM in accounting for reconciliation quantities by 1) collecting all Customer usage data; (2) determining the hourly RLR for each TSA; and 3) submitting the RLR quantities to PJM.

DP&L also collects meter data to calculate the quantity of energy consumed by an AGS's customers for a particular reconciliation period. Such collection shall occur at the time of a customer's monthly meter reading. Thus, in order to measure the energy consumed by all customers on a particular day, the settlement, per PJM guidelines, occurs 60 days after the end of the month. Where hourly metered data is not available, load profiles adjusted for actual weather values will be applied to metered usage to derive an estimate for the hour-by-hour usage.

In the unlikely event that the PJM OI does not administer a LMP market, the tariff details the determination of consumption energy imbalance charge.

Chapter 8: Metering Services

Introduction

This chapter describes DP&L's metering obligations for customers choosing to select an AGS, meter installation procedures, and associated metering charges. This section includes the following information:

- Meter Ownership and Maintenance
- Meter Reading
- Metering Requirements
- Requests for Interval Metering
- Interval Meter Charges and Installation Process
- Pulse Equipment

Meter Ownership and Maintenance

DP&L will continue to own, furnish, install, program, calibrate, test and maintain all meters and all associated equipment used for customer billing and retail energy settlement purposes in the DP&L distribution service area.

Meter Reading

Regularly Scheduled Meter Reads

DP&L will continue to read all meters in its distribution service territory in accordance with the regularly scheduled meter reading dates or in the event DP&L deems a meter read is necessary. End-use customers must provide access to the meters for DP&L to obtain meter readings. A schedule of meter reading dates can be found on the supplier web site.

Estimated Reads

DP&L will continue to estimate the usage if metered data is lost due to failure of or damage to the metering equipment. Meter reads may also be estimated in the case of inclement weather, inaccessibility, etc. Residential customers may also be estimated as part of the bi-monthly meter read program. Actual reads would be obtained on any switch dates.

Meter Testing

DP&L will provide meter testing if requested by an AGS. The Alternate Generation Supplier may also contact DP&L's Control Area Services if this service is required at 937-331-4431. Please refer to DP&L's Electric Distribution Service Miscellaneous Charges Tariff, Sheet No. D26 for charges on meter testing.

Metering Requirements

Interval meters are required for customers who choose an AGS and have a maximum peak demand greater than or equal to 100 kW for the most recent twelve-month period.

End-use customers who are required to have an interval meter to participate in the DP&L Electric Choice program may begin service prior to having an interval meter installed, assuming the customer has authorized the installation of an interval meter. After the Interval Meter Request form has been executed and submitted, and prior to the meter's installation, DP&L will use a load profile and consumption meter reads for settlement and billing purposes.

End-use customers are responsible for the incremental costs of the interval meters and the incremental costs associated with the installation of required interval metering as specified in the AGS Coordination Tariff. While DP&L will install the meter, the AGS, on behalf of the customer, or the customer must arrange for the installation of the dedicated communication link (analog telephone line) and DP&L approved surge suppressor. DP&L will be permitted unlimited access to the communication link for meter interrogation.

The end-use customer or its AGS may communicate with the meter for the purpose of obtaining usage data, subject to the Company's communication protocol. The customer must make a request for read-only access to the meter. DP&L will then supply the customer the information needed for read-only access.

The most expedient manner to successfully enroll a customer that requires an interval meter is for the AGS, on behalf of the customer, to scan the request to the Retail Supplier Inbox or fax the customer-signed Interval Meter Request form to Control Area Services. An e-mail should follow-up any faxes to ensure they were received.

Requests for Interval Metering

An interval meter can be obtained by downloading an Interval Meter Request from the DP&L's Supplier web site and e-mailing the form to the supplier mail box (retailsupplier.information@dplinc.com). Please allow at least 5 days for processing of these requests.

PLEASE NOTE: An AGS, on behalf of the customer, or the customer, may request an interval meter be installed where one is not mandated (i.e., below the interval meter threshold of 100kW). The terms and conditions described in this chapter will apply to those customers voluntarily requesting an interval meter. The customer will be responsible for providing a dedicated communication link (analog telephone line) and DP&L approved surge suppressor to an interval meter per DP&L specifications. DP&L will be allowed unlimited access to the communication link for meter interrogation. The requested interval meter will be used for customer billing and settlement purposes. The customer is responsible for the incremental costs of the meter and the incremental costs associated with the installation of the meter.

Interval Meter Installation Schedule and Charges

Installation Schedule

DP&L's meter installation schedule is based on the existing capacity to install meters along with other metering work, such as meter maintenance and testing. Interval metering installation requests will normally be processed according to the date received. Meter workload is prioritized to address safety, new meter sets, maintenance, and operational efficiency. If no phone line is installed, an unscheduled interval meter read charge will be assessed each month until the required phone line is installed. Please refer to the AGS Coordination Tariff for unscheduled meter read charges.

Charges

The customer will be billed for the incremental costs of upgrading the present meter and the incremental costs associated with the installation of required or requested interval metering. The charge for an interval meter is based on the type of approved meter selected. The ownership of the interval meter will remain with DP&L. The AGS may choose to pay for an interval meter upgrade and installation on behalf of the customer. These charges will be a miscellaneous line item on the supplier's monthly invoice.

Additional Charges

The customer may be required to pay additional fees related to the installation of the meter and communication link including a Site Visit Charge. These charges are applicable if DP&L is required to make additional visits to the meter site due to the inability to gain access to the meter location, the necessary communication link not installed, or the installed communication link is not working properly.

Pulse Equipment

DP&L has meters with pulse outputs available to the customer or its supplier for a fee. The pulses provide real time information about the various metered quantities. The output pulses are dry contact and are dependent on the meter type. The available outputs and associated input requirements are as follows:

- Pulse Output - 3 wire form C contact, solid state, rated at 170 VDC or 120 VAC, 0.1 Amp.

All contacts have a 12 to 14 mΩ contact resistance with a 50 mΩ maximum contact resistance. The contacts typically operate and release in 1 to 2 milliseconds.

All customer-owned equipment connected to the DP&L metering equipment is required to fuse the common KYZ wire with a 1 Amp fuse.

All installations must meet the approval of the applicable local inspection bureau.

A DP&L pulse equipment request (same as DP&L Interval Meter Request) form can be obtained from DP&L's Supplier website.

Chapter 9: Customer Billing and Payment Processing

Introduction

This chapter contains information on end-use customer billing. This chapter includes the following information:

- Dual Billing and Associated Procedures
- Timeline for Other Billing Options
- Billing Cycles
- Bill Adjustments
- Usage Questions

Billing Options

Several billing options are available to the AGS---below is a summary of each:

Dual Billing: For customers choosing to purchase their generation from an AGS, DP&L will provide billing for regulated charges only. Each AGS will be responsible for providing end-use customer billing for those services provided by the AGS. The AGS will be billed \$0.12 per bill for associated EDI costs for dual billing (monthly).

DP&L will provide suppliers with usage data for end-use customer billing the day after the valid billing process takes place. Usage will be transmitted to suppliers via EDI. See **Chapter 4: Obtaining End-Use Customer Usage** for more detail regarding usage data to be used for billing.

The following is a description of consolidated billing options available to a supplier:

- **DP&L Consolidated (Rate-Ready) Billing:** The end-use customer can receive one bill for transmission, distribution, and generation charges. DP&L will provide billing for suppliers using DP&L rate structures with supplier generation pricing. There is initial set up fee of \$5,000 and each subsequent change will be billed at \$1,000, up to a maximum charge of \$5,000 for each request. No charges are imposed for changes that decrease or increase existing rate elements. The supplier will be charged \$0.20 for each bill monthly.

The AGS should contact the Electric Choice Group at 937-331-4431 regarding a Billing Services Agreement if consolidated billing is desired.

Billing Cycles

DP&L's current practice is to render bills regularly at monthly intervals, but bills may be rendered more or less frequently at DP&L's option. A copy of DP&L's meter reading schedule is available on the supplier web site.

Bill Adjustments

If DP&L finds it necessary to adjust an end-use customer's bill due to a usage adjustment, the corrected usage will be transmitted via EDI to the supplier.

Usage Questions

An Alternate Generation Supplier can contact the Electric Choice Administration Group for any questions regarding a customer's usage, including accuracy questions. Associated supplier fees for unscheduled meter readings can be found in DP&L's AGS Coordination Tariff. Also, if such assistance is requested, an AGS may be subject to technical support and assistance charges set forth in DP&L's AGS Coordination Tariff.

Reporting Requirements

To the extent DP&L performs reporting services at the request of the AGS to comply with PUCO Market Monitoring rules or any other reporting requests on behalf of the AGS, the AGS will reimburse DP&L for its costs to perform such reporting requirements. At the request of the AGS, the Company may also provide customers with environmental disclosure information that complies with the Minimum Competitive Retail Electric Service Standards. To the extent the Company provides this service, the AGS shall reimburse DP&L for its costs to provide such service.

Chapter 10: Credit Requirements

Introduction

This chapter describes the credit requirements and process for obtaining credit approval from DP&L. The chapter highlights these topics:

- Registration and Credit Application
- Determination of Creditworthiness
- Credit Arrangements and Collateral Options
- Ongoing Credit Evaluation

Registration and Credit Application

All Alternate Generation Suppliers must complete and sign a registration and credit application to be considered for participation in DP&L's Electric Choice program. A copy of the registration and credit application may be found by visiting DP&L's supplier web site.

Determination of Creditworthiness

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

A supplier shall satisfy its creditworthiness by demonstrating that it has and maintains investment-grade bond or issuer ratings from any two of the following rating agencies:

<u>Agency</u>	<u>Senior Securities Rating (Bonds)</u>
Standard & Poors	BBB- (or higher)
Moody's Investors' Services	Baa3 (or higher)
Fitch IBCA	BBB- (or higher)

If an AGS has an investment grade rating by two out of three rating agencies mentioned above, it will be granted an unsecured credit limit determined by DP&L through fundamental analysis of the AGS's financial and operational conditions.

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

DP&L shall make reasonable alternative credit arrangements with an AGS that is unable to meet the aforementioned criteria or who causes their credit risk to rise above the AGS's unsecured credit limit.

Credit Arrangements and Collateral Options

If DP&L deems that the AGS has exceeded its unsecured credit limit, the AGS may choose from any of the following credit arrangements in a format acceptable to DP&L:

A Guarantee of Payment

The entity providing the guaranty on behalf of the AGS must have an investment grade rating by two out of the three rating agencies listed previously and the guaranty must be in DP&L's prescribed format.

An Irrevocable Letter of Credit

If an irrevocable letter of credit is used, the letter of credit must be in DP&L's prescribed format and from a financial institution with at least an "A-" or higher rating as rated by two of the three previously mentioned rating agencies.

A Prepayment Account Established with DP&L

If a prepayment account is used, the AGS must make banking arrangements with DP&L.

A Surety Bond, in a Format Acceptable to DP&L, Including DP&L as a Beneficiary

The insurance Company issuing the bond must have ratings of at least "A" from AM Best and "AA" from Standard & Poors. The terms of an acceptable surety bond must allow for payment via Fedwire the business day after presentation of demand for payment.

Other Mutually Agreeable Security or Arrangement

The amount of the security required must be and remain commensurate with the financial risks placed on DP&L by that AGS, including recognition of that Alternate Generation Supplier's performance.

A supplier can contact DP&L Control Area Services for other arrangements.

The following collateral calculation applies to an AGS who serves retail customers in DP&L's service territory and is intended to cover DP&L's risk as the default supplier and supplier of Energy Imbalance Service.

DP&L will calculate the amount of collateral to cover its risk as the default supplier by multiplying 90 days of DP&L's estimate of the summer usage of the AGS's customers by a price set at the highest monthly megawatt hour price for DP&L off-system purchased power from the prior summer less the average residual generation revenue that DP&L will receive due to the defaulting AGS's customers returning to DP&L's standard service offer.

A "collateral calculator" is available to suppliers to determine the potential impact of varying load projections on the collateral calculation upon request.

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

Ongoing Credit Evaluation

DP&L reserves the right to review each AGS's creditworthiness at any time. The AGS must provide current financial and credit information as requested. In addition, the AGS may request re-evaluation at any time. Demand, unanticipated market movements, and economic reasons could result in the exposure of an AGS nearing or exceeding the prescribed credit limits or collateral originally in place. It is also noted that additional collateral may be required due to a degradation of credit rating or repayment ability of an AGS. Any subsequent review or re-evaluation of an AGS's creditworthiness may result in the AGS being required to post collateral not previously requested. The new addition or change in collateral requirement will be necessary to enhance, restore or maintain DP&L's credit protection. In the alternative, DP&L may limit an AGS's level of participation or remove the AGS from further participation in DP&L's Electric Choice program.

Chapter 11: Dispute Resolution

If any dispute arises between an end-use customer or AGS and DP&L regarding distribution services or the AGS Coordination Tariff, the end-use customer or AGS may file an informal or formal complaint with the PUCO according to PUCO procedures.

The dispute resolution mechanism is intended to be a voluntary alternative to the informal or formal complaint process at the PUCO. It is DP&L's hope that disputes arising from the distribution services tariffs or related to the provision of distribution services can be settled expeditiously through voluntary dispute resolution rather than through formal, litigated proceedings.

If a dispute arises between the AGS and DP&L relating to the AGS Coordination Tariff, the parties may agree to use the PUCO voluntary mediation or arbitration procedures.

Voluntary Alternate Dispute Resolution

If any dispute arises between an end-use customer or AGS and DP&L regarding delivery services or services for AGSs, the parties may choose to use the following Alternate Dispute Resolution procedure as an alternative to formal, litigated proceedings. This process is completely voluntary. Both parties to a dispute must agree to use this voluntary process before it may be implemented. First, the party raising a disputed issue should provide in writing a concise description as to the nature of the dispute. The disputed matter will be referred to designated senior representatives of each party for prompt resolution on an informal basis. In the event the designated representatives are unable to resolve the dispute within (30) days or time agreed to by the representatives, the parties may mutually agree to submit the dispute to binding arbitration in accordance with the arbitration procedures summarized below. This arbitration option can be elected by mutual agreement of the parties without exercising the remedy of the PUCO. (The procedures outlined in this section do not apply to matters dealing with applications for rate changes or any modifications to PUCO approved tariffs. Such matters should be presented directly to the PUCO for resolution.)

Any arbitration that is initiated will be conducted before a single neutral arbitrator that is appointed by the parties. If the parties fail to agree upon a single arbitrator within 10 days from the date that the dispute was referred to arbitration, then each party will choose one arbitrator. The two arbitrators so designated will select a third arbitrator to form a three member arbitration panel.

Arbitration Decisions

Unless specifically agreed by the parties, the arbitrator(s) will render a decision within 90 days of appointments and will notify the parties in writing of their decision and the reasons. The

arbitrator's authority on decisions and the rules governing decisions must be consistent with the related provisions of the AGS Coordination Tariff.

Any decision and award of the arbitrator(s) shall be binding upon the parties. The arbitrator(s) shall not award any indirect, special, incidental or consequential damages against either party. Judgement upon the award rendered may be entered into any court of competent jurisdiction.

Arbitration Costs

Each party will be responsible for its own costs incurred during the arbitration. If the dispute is heard by a single arbitrator, Dayton Power & Light and the complainant will each pay 50 percent of the fees and expenses of the single arbitrator. If the dispute is heard by a three member panel, the complainant and Dayton Power & Light will each pay the fees and expenses of the arbitrator selected by each party and 50 percent of the fees and expenses of the third arbitrator.

Chapter 12: Frequently Asked Questions by Suppliers

Will DP&L provide Customer account numbers to CRES providers?

No, DP&L is unable to provide account numbers unless the CRES provider has obtained a written release from the customer.

What is the format of the pre-enrollment list?

The file will be a zipped text file. A Supplier must download the zipped file and then use an unzip utility to open it. File layout will also be posted along with the Pre-Enrollment list.

Would DP&L provide a modified Pre-Enrollment Customer List which excluded customers with past due balances over 60 days old?

DP&L cannot provide CRES providers with this level of detail.

How do I get started EDI testing?

The test plans are on the DP&L supplier web site. You can review the plans and decide what is appropriate for the type of customers you will be soliciting. Then, contact DP&L Electric Choice through the supplier inbox or phone (937-331-4431) and you will put you in contact with the appropriate person to set up the testing. *Registration materials need to be submitted before testing begins.*

Questions regarding Transmission Service and Load Profiles:

How can I access the section of your web site that is called “AGS Load Info”?

Access to the AGS Load Info area of the Supplier web site is only granted *after an AGS has been fully registered* with DP&L in accordance with DP&L’s AGS Tariff.

Where can I find distribution loss factors for the various rate schedules found in your tariff?

Distribution losses can be found on our Supplier web site under AGS Load Info.

Do the “loss factors” under “secondary” service apply to residential as well as commercial customers?

Yes, the loss factors apply to all customers with secondary service.

Questions regarding consolidated billing:

Can the AGS have room on your bill to include messages to customers, and if so, how much room?

It is the Supplier's responsibility to inform DP&L of any changes that would necessitate a bill message pursuant to O.A.C. 4901:1-21-14. Bill messages and fees are subject to the terms of the Billing Services Agreement. Supplier must provide the exact language that is would like to be included in the required bill message to DP&L twenty (20) business days prior to the date the bill message is to be shown on the bill. Required bill messages are limited to seventy-six (76) characters per line, three lines for each bill message.

What is your policy regarding bill inserts?

This would be negotiated as part of the Billing Services Agreement.

Will we be allowed to have a flat monthly fee plus a variable rate pricing structure (i.e., \$5 per month, plus 5 cents/kWh)? Will we be allowed to have a flat monthly fee plus a tiered pricing structure? Will we be allowed to have a tiered pricing structure?

The supplier must maintain a pricing structure similar to DP&L's.

If a customer has a load meter, can we bill demand charges plus energy charges?

Yes, this is common industry standard.

What is a Billing Services Agreement and why is this needed?

A Billing Services Agreement is required when the AGS desires DP&L to provide for consolidated Rate Ready Billing. The purpose is to define specifics terms of billing and associated costs of providing the services. This would not be required until after Supplier Certification is complete. The AGS can contact DP&L though the Supplier Hotline or e-mail for details on who to contact for negotiation of this agreement.

How will technical assistance be billed to suppliers?

All technical assistance to a licensed supplier will be billed at a rate of \$41 an hour, as specified in the tariff. This excludes the testing effort required to get a supplier EDI certified.

The \$41 per hour charge includes, but is not limited to, the following:

- Manual Verification of Customer Data
- Explanation of DP&L Filings or Regulatory Orders
- Explanation of DP&L Internet Site/Network Communications
- Research in Connection with a Supplier Inquiry
- Requests or Inquiries on Dual Billing or Consolidated Rate Ready Billing

Additional fees may be assessed pursuant to the AGS Tariff Sheet (PUCO No. 17), G8, and Schedule of Fees and Charges.

Does DP&L have seasonal rates?

DP&L offers seasonal rates to residential (heating) customers.

If DP&L bill the Secondary Rate class with the first 5kw free, does a Supplier have to do the same?

A Supplier does not have to offer the first 5kw free to secondary customers.

Can a Supplier's rates include charges for demand-based billing determinants?

Supplier rates can have demand-based billing. These components will be charged if the customer's billing determinants include demands.

Can a Supplier have no demand charge on an EDU rate that does bill demand?

A Supplier does not have to have a demand charge in its rates.

Can a Supplier bill a demand other than the demand that is used for the EDU billing?

A Supplier must use the same demand that is used in the EDU billing.

APPENDIX

Glossary of Terms

Abandonment	Ceasing to provide competitive retail electric service(s) to one or more classes of customers in one or more electric distribution service territories prior to the expiration of those customers' contracts.
Adjustable Rate Tariff	A rate that reflects market price of power that may be higher than the Standard Offer rate, but allows the customer the flexibility to choose another supplier with minimal time requirements.
Aggregation	Combining the electric load of multiple retail customers via an agreement with the customers or formation of a governmental aggregation for the purpose of purchasing electric generation service on an aggregated basis.
Aggregator	An entity certified by the Commission who contracts with customers to combine the customers' electric load for the purposes of purchasing retail electric generation service on an aggregated basis.
AGS	Alternate Generation Supplier. A Supplier of electric generation that has been certified or licensed by the Public Utilities Commission of Ohio to sell electricity to retail customers within the State of Ohio in accordance with the Competition Act.
AGS Coordination Tariff	The Company's Alternate Generation Supplier Coordination Tariff, No. G8 of PUCO Vol. 17.
Ancillary Services	Those services that are necessary to support the Competitive Energy Supply from resources to loads while maintaining reliable operation of the transmission system as defined by the PJM.
Bad Credit	An AGS has bad credit if it has failed to make any payments or is insolvent (as evidenced by a credit report prepared by a reputable credit bureau or credit reporting agency or public financial data, liabilities exceeding assets or generally failing to pay debts as they become due). An AGS will also be deemed to have bad credit if it has failed to pay or is 5 days late in paying any Company invoice when they became due on any occasion within the most recent twelve billing cycles.
Billing Cycle	The time frame between two regularly scheduled meter readings. End-use customer meter readings are obtained on a regular schedule, which is managed by the Company.
Bundled Utility Services	The traditional set of services provided by a vertically integrated, regulated utility with a set or certified service territory.
Business Day	Any day on which the Company's corporate offices are open for business.
Certified Territory	The designated service territory of a distribution utility as determined by the PUCO.
Commission	The Public Utilities Commission of Ohio (P.U.C.O. or PUCO)

Company	The Dayton Power & Light Company or DP&L.
Competition Act	The Electricity Deregulation Act (Sub. S. B. No. 3, 123 rd General Assembly)
Competitive Energy Supply	Generation service provided by an AGS, and other products that may be provided by an AGS to fulfill its obligations to serve customer load.
Consolidated Billing	A billing service where the regulated utility charges as well as the Alternate Generation Supplier's charges are contained on a single customer bill.
Consolidated Billing (Bill Ready)	DP&L will calculate transmission and distribution charges and generate one bill for the customer or the Supplier can calculate its own generation charges and pass the generation billing detail to DP&L, which will produce one bill for the customer.
Consolidated Billing (Rate Ready)	DP&L will calculate bills for Suppliers with Supplier generation pricing. The customer can receive one bill from DP&L with transmission, distribution, other non-competitive charges and Supplier generation charges.
Consumer	Any person who uses a competitive retail electric service.
Contract	An agreement between a customer and an AGS that specifies the terms and conditions for provision of a competitive retail electric service or services.
Control Area	As defined by the North American Electric Reliability Council (NERC), an electrical system bounded by interconnection (tie-line) metering and telemetry.
Control Area Operator or CAO	The Dayton Power and Light Company, the Independent System Operator (ISO) or Regional Transmission Organization (RTO) that operates the Control Area to which The Dayton Power and Light Company belongs.
Coordination Activities	All activities related to the provision of Coordination Services.
Coordination Obligations	All obligations identified in this Tariff, relating to the provision of Coordination Services.
Coordination Services	Those services that permit the type of interface and coordination between the Alternate Generation Supplier and the Company in connection with the delivery of electricity to end-use customers located within the Company's certified territory, including load forecasting, certain scheduling-related functions, and Energy Imbalance.
Coordination Services Charges	All charges that are billed by the Company for Coordination Services performed.
CRES	Competitive Retail Electric Service. The services provided by an AGS.

CRES Provider	A person or entity, under certification by the Commission, who supplies or offers to supply a competitive retail electric service.
Customer	Any person who contracts with or is solicited by an AGS for the provision of a competitive retail electric service.
Customer premises	The residence(s), building(s), or office(s) of a customer.
DASR	Direct Access Service Request. An electronic form of communication that shall be exchanged between the Company and an Alternate Generation Supplier.
Direct Solicitation	Face-to-face solicitation of a customer initiated by an AGS at the home of a customer or at a place other than the normal place of business of the provider, and includes door-to-door solicitations.
Distribution Service	The state-regulated physical delivery of energy at non-transmission level voltages to homes and businesses in a distribution utility's service area.
DP&L Internet Site	A Company Internet site.
DP&L System Load Forecast	The next day forecast of DP&L's system load.
Dual Billing	A billing scenario where both the distribution Company and the AGS send separate bills to the customer to cover their respective charges.
ECAR	East Central Area Reliability Council, a regional reliability council of the North American Electric Reliability Council (NERC).
EDC Tariff	The Company's currently PUCO approved Distribution Schedule.
EDI	Electronic Data Interchange. An electronic data exchange protocol approved by the Commission.
EDU	Electric Distribution Utility. An electric utility that supplies retail electric distribution service.
Electric Choice	Program under which electric generation service in the state of Ohio was deregulated beginning January 1, 2001.
Electric Generation Service	Retail Electric Generation Service.

Electric Utility	A Company that is engaged on a for-profit basis in the business of supplying a non-competitive retail electric service in this state or in the businesses of supplying both a non-competitive and a competitive retail electric service in this state; This excludes a municipal electric utility or a billing and collection agent.
Electronic Exchange	Approved methods of data exchange by the PUCO.
End-Use Customer	The final user of generation and regulated delivery services.
Energy Imbalance	The difference between the final hourly AGS energy schedule and the actual hourly energy consumed by that AGS' customers utilizing hourly metering data and estimated hourly energy consumed by other customers using load profiles
Enrollment	An agreement between a customer and CRES provider that specifies the terms and conditions for provision of a competitive retail electric service by that provider for that customer.
FERC	The Federal Energy Regulatory Commission or its successor.
Generation Service	The provision of electric power and energy to a customer for ultimate consumption.
Governmental Aggregator	Legislative authority of a municipal corporation, a board of township trustees, or a board of county commissioners acting as an aggregator for the provision of a CRES under authority.
Individual Coordination Agreement	The Agreement entered into between the AGS and the Company.
Interval Meter	An electricity meter which records an end-use customer's electric usage for defined intervals.
Interval Metering Data	Data from electrical metering equipment that supplies hourly or sub-hourly readings of customer consumption.
Large Commercial Customer	A commercial customer with annual usage equal to or greater than 700,000 kWh.
Load Profiling	Process of estimating energy usage over a period of time for a customer class.
Load Serving Entity or "LSE"	An entity that has been granted the authority or has an obligation pursuant to State or local law, regulation or franchise to sell electric energy to end users located in the PJM Control Area.
Locational Marginal Price or "LMP"	The hourly integrated marginal price to serve load at individual locations throughout PJM, calculated by the PJM OI as specified in the PJM OATT.

Market Development Period	Period of time beginning on the starting date of competitive retail electric service and ending on the applicable date for that utility. For DP&L, the Market Development Period is January 1, 2000 to December 31, 2005.
Mercantile Commercial Customer	Commercial or industrial customer that consumes electricity for non-residential use and consumes more than 700,000 kWh per year or is part of a national account involving multiple facilities in one or more states.
Meter Read Date	The date on which the Company schedules a meter to be read for purposes of producing an end-use customer bill in accordance with the Company's regularly scheduled billing cycles.
NERC	North American Electric Reliability Council or its successor.
NERC Tagging System	Electronic Tagging (E-TAG) or NERC's current method of sending and receiving NERC interchange transaction tags, available at the Internet site, http://www.nerc.com .
Net Metering	Measuring the difference in an applicable billing period between the electricity supplied by an electric service provider and the electricity generated by a customer-generator, which is fed back to the electric service provider.
Non-Residential Customer	Any customer not defined as a residential customer, including any customer whose non-residential portion of the total service requirements, as measured through one meter, is greater than the residential portion.
OCC	Office of Ohio Consumer's Counsel.
PIPP	Percentage of Income Payment Plan currently existing at DP&L
PJM OI	The PJM Office of Interconnection, the system operator for the PJM Control Area.
PJM Control Area	The control area encompassing systems in Pennsylvania, New Jersey, Maryland, Delaware, District of Columbia, Ohio, Illinois, Virginia, Kentucky, Indiana and Michigan which is recognized by the North American Electric Reliability Council as the PJM Control Area.
PJM Tariff	The PJM Open Access Transmission Tariff ("OATT") on file with FERC and which sets forth the rates, terms and conditions of transmission service located in the PJM Control Area, including the DP&L zone.
Power Broker	A person, certified by the Commission who provides power brokerage service.
Power Brokerage	Assuming the contractual and legal responsibilities for the sale and/or arrangement for the supply of Retail Electric Generation Service to a retail customer in this state without taking title to the electric power supplied.
Power Marketer	A person, certified by the Commission, who provides power marketing services.

Power Marketing	Assuming the contractual and legal responsibilities for the sale and/or arrangement for the sale and provision of Retail Electric Generation Service to a retail customer in this state and having title to the electric power at some point during the transaction.
PUCO or Commission	The Public Utility Commission of Ohio or its successor.
Regulated Utility Charges	Utility charges for noncompetitive services including, but not limited to, tariffed transmission and distribution and generation services that are under the jurisdiction of the Commission.
Rescission Period	The amount of time that the customer has to void the enrollment request.
Residential Customer	A customer who contracts with a CRES for residential purposes.
Retail Electric Generation Service	The provision of electric power to a retail customer in this state through facilities provided by an electric distribution utility and/or a transmission entity in this state. The term encompasses the services performed by retail electric generation providers, power marketers, and power brokers, but does not encompass the service provided by an electric distribution utility.
Retail Electric Service	Any service involved in supplying or arranging for the supply of electricity to ultimate consumers in this state, from the point of generation to the point of consumption.
Retail Load Responsibility (“RLR”)	The AGS load obligation that the EDU submits to PJM that shows the aggregate electric power and energy (including losses on the transmission and distribution systems) that and AGS should have provided in DP&L’s certified territory for each hour of the calendar day to supply its customers.
Shopping Credit	A credit applied to a customer’s electric bill if they choose an AGS as their electric generation supplier.
Slamming	The transfer of, or requesting the transfer of, a customer’s competitive electric service to another provider without obtaining the customer’s consent.
Small Commercial Customer	A commercial customer that uses less than 700,000 kWh.
Solicitation	Any communication intended to elicit a customer’s agreement to purchase or contract for a competitive retail electric service.
Standard Offer	The tariff rate for generation service provided by the EDU for those customers who choose not to select an AGS.
Tariff	This Alternate Generation Supplier Coordination Tariff.
Transmission Customer	An entity that has satisfied all the requirements of DP&L’s OATT and is capable of scheduling interchange into the DP&L Control Area that acts on behalf of the retail end-use customer.

Transmission Scheduling Agent (TSA)	An entity that is an eligible Transmission Customer under the PJM OI, performing transmission scheduling and other bulk power services to deliver electrical energy into the Company's service territory for the Electric Choice program. An Alternate Generation Supplier may act as a TSA, if the AGS is an eligible Transmission Customer, or they may arrange for energy scheduling with another entity that is an eligible Transmission Customer.
Transmission Service	The delivery of energy through high-voltage lines that is regulated by FERC and provided by the Company's OATT.
Unaccounted for Energy (UFE)	The difference between the actual system load within the Company's control area and the sum of all customer load (AGS and Company).
Unbundling	The break-out of a customer's bill into separate rate components.
Unbundled Utility Services	A set of traditional utility services potentially provided by more than one service provider in a competitive market.

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