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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

PUCO

In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Market Rate Offer	: : : : :	Case No. 12-426-EL-SSO
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs	: : : : :	Case No. 12-427-EL-ATA
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Authority	: : : : :	Case No. 12-428-EL-AAM
In the Matter of the Application of The Dayton Power and Light Company for the Waiver of Certain Commission Rules	: : : : :	Case No. 12-429-EL-WVR
In the Matter of the Application of The Dayton Power and Light Company to Establish Tariff Riders	: : : : :	Case No. 12-672-EL-RDR

**MOTION OF APPLICANT THE DAYTON POWER AND LIGHT COMPANY FOR
CONTINUANCE OF TESTIMONY AND HEARING DATES**

For the reasons stated in the memorandum in support of this motion, Applicant
The Dayton Power and Light Company ("DP&L") moves for an order continuing the June 25,
2012 hearing date, and establishing a date for a prehearing conference so that the parties can
discuss a new schedule.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT OF MOTION OF APPLICANT
THE DAYTON POWER AND LIGHT COMPANY FOR CONTINUANCE
OF TESTIMONY AND HEARING DATES**

For each of several reasons, a continuance of the June 13, 2012 deadline for intervenor testimony and of the June 25, 2012 hearing is necessary and appropriate. First, there is insufficient time to complete settlement discussions. A number of the parties have been in discussions with DP&L about settlement, and those discussions continue. This case has over two dozen parties, most with multiple counsel and client representatives, and the complexity of the case necessarily results in complicated settlement discussions. Intervenor testimony is due June 13, and DP&L does not want the settlement discussions to be overridden by the approach of the June 13 testimony due date and the June 25 hearing date.

In addition, a large number of parties in this case are also parties in other cases that have been and are presently tied up in hearings before this Commission, which further hampers settlement discussions. DP&L and the parties to this case should not be in the position of simply running out of time to reach settlement. DP&L is working on another settlement proposal that will balance the interests of settling parties.

Further, DP&L has been doing significant analysis and work to study the issues involved with separation of generation assets. The basis of the company's current capital structure is an enterprise which includes the generating assets and the transmission and distribution assets under one enterprise. Separation of generation would require addressing debt at DP&L, DP&L's parent, and the subsidiary which will ultimately hold the generating assets; the evaluation of the costs and feasibility of separation is inherently complex and will require more time to accomplish.

DP&L will waive the 90-day limit for Commission action on its first application for a market rate offer, under Ohio Revised Code § 4928.142(B)(3).

For the above reasons, DP&L asks for an order continuing the June 13 testimony due date and the June 25 hearing date, and setting a conference of the parties to select a new hearing date.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion of Applicant The Dayton Power and Light Company for Continuance of Testimony and Hearing Dates has been served via electronic mail upon the following counsel of record, this 4th day of June, 2012:

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