



Public Utilities Commission

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December 17, 2013

Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus OH 43215

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RE: *The Dayton Power and Light Company, Case Nos. 12-426-EL-RDR, 12-427-EL-ATA, 12-428-EL-AAM, 12-429-EL-WVR, and 12-672-EL-RDR*

Dear Docketing Division:

Enclosed please find the Staff's Review and Recommendations in regard to The Dayton Power and Light Company's proposed tariffs filed on November 15, 2013.

Sincerely,

Tamara S. Turkenton
Chief, Accounting & Electricity Division
Public Utilities Commission of Ohio

Enclosure
Cc: Parties of Record

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
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The Dayton Power and Light Company
Case No. 12-426-EL-SSO, et al

On November 15, 2013, The Dayton Power and Light Company (DP&L) filed proposed tariffs pursuant to the Opinion and Order approved by this Commission in Case No. 12-426-EL-SSO, et al. If approved, the proposed tariffs will become effective January 1, 2014.

As of December 17, 2013, there have been no comments filed by any party in regard to the proposed tariffs. Staff has reviewed the proposed tariffs and finds that the proposed tariffs are in compliance with the Opinion and Order; however, the Commission's Opinion and Order directed DP&L to allocate the Service Stability Rider (SSR) revenue based on a 1CP demand allocation methodology without specifically indicating whether the entire annual \$110M SSR revenue or only the incremental revenue (The difference between the current annual revenue collected via the RSC charge and the approved \$110M annual revenue for the SSR) should be allocated based on the 1 CP demand allocation methodology. The Staff recommends that the Commission clarify its intention in regard to the allocation of the \$110M for the SSR charge.

If the Commission clarifies that only the incremental revenues should be allocated based on the 1CP demand allocation methodology, then with its final filed tariffs, DP&L should include modified tariff sheets to reflect the Commission's clarification. If the Commission clarifies that its intent was to allocate the entire \$110M based on the 1 CP demand allocation methodology, then the tariffs as filed appear to be in compliance with the Opinion and Order.