

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the Application of The    )  
Dayton Power and Light Company for    ) Case No. 13-2420-EL-UNC  
Authority to Transfer or Sell its Generation    )  
Assets.    )

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**INITIAL COMMENTS OF THE OMA ENERGY GROUP**

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On September 4, 2013, the Public Utilities Commission of Ohio (Commission) issued an Opinion and Order in Case Number 12-0426-EL-SSO, which, in part, ordered the Dayton Power and Light Company (DP&L) to file an application by December 31, 2013 relating to its plan to divest its generation assets. On December 30, 2013, DP&L submitted an application for authority to transfer or sell its generation assets and to waive certain filing requirements (Application). The attorney examiner subsequently established a February 4, 2014 deadline for the filing of initial comments on the Application.

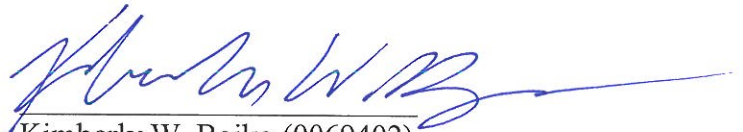
As set forth in its memorandum in support of its motion to intervene filed on January 30, 2014, the Ohio Manufacturers' Association Energy Group (OMAEG) has a substantial interest in this proceeding that will be affected by the Commission's determination in these matters. However, given DP&L's Application, as filed, it is difficult to make substantive comments at this time. DP&L filed its Application with the intent of supplementing the document at a later time, when additional information is known and when a more definitive plan is finalized. DP&L apparently filed this Applicant in an effort to comply with the Commission's

Opinion and Order in Case No. 12-0426-EL-SSO. The Application states DP&L is in the process of developing a plan for the transfer of the assets and that the plan may involve creating a new affiliate. The Application, however, provides no specifics related to the sale or transfer of assets and DP&L admits it does not have a final plan for the separation.

Given the lack of information, interested parties cannot effectively protect their interests by analyzing the effects of DP&L's plan to transfer its generation assets and by offering meaningful comments at this time. Accordingly, OMAEG requests the opportunity to file substantive comments subsequent to DP&L supplementing its Application and filing its detailed plan to sell or transfer its generation assets is known.

Additionally, without the complete Application and detailed plan, and without the appropriate analysis of such and its impact on customers, DP&L's requests for waivers of certain rules and a waiver of the hearing are premature and should not be granted at this time.

Respectfully Submitted,




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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Initial Comments Of The OMA Energy Group was served this 4th day of February, 2014, via e-mail upon the parties below.

  
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Summary: Comments Initial Comments Of The OMA Energy Group electronically filed by Mrs. Kimberly W. Bojko on behalf of OMA Energy Group