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**Via E-FILE**

June 30, 2014

Public Utilities Commission of Ohio  
PUCO Docketing  
180 E. Broad Street, 10th Floor  
Columbus, Ohio 43215

**In re: Case No. 13-2420-EL-UNC**

Dear Sir/Madam:

Please find attached the INITIAL COMMENTS OF THE OHIO ENERGY GROUP TO DP&L'S AMENDED SUPPLEMENTAL APPLICATION TO TRANSFER ITS GENERATION ASSETS e-filed today in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



David F. Boehm, Esq.  
Michael L. Kurtz, Esq.  
Jody Kyler Cohn, Esq.  
**BOEHM, KURTZ & LOWRY**

Encl.

Cc: Certificate of Service

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter Of The Application Of Dayton Power And Light Company For Authority To Transfer Or Sell Its Generation Assets      Case No. 13-2420-EL-UNC  
: \_\_\_\_\_

**INITIAL COMMENTS OF THE OHIO ENERGY GROUP TO  
DP&L'S AMENDED SUPPLEMENTAL APPLICATION TO  
TRANSFER ITS GENERATION ASSETS**

On May 23, 2014 the Dayton Power and Light Company ("DP&L") filed an Amended Supplemental Application in this case, the third and latest blurry description of its vision of how and when and to whom it will transfer its generating assets as ordered by the Public Utilities Commission of Ohio ("Commission"). The Ohio Energy Group ("OEG") has filed Comments responding to the other filings and believes that these address not only those early filings, but this one as well. Accordingly herewith, it incorporates those comments by reference. DP&L still has not told this Commission to whom it will transfer the assets, how it will transfer them and when it will transfer them, nor most of the questions and concerns ancillary to those main issues. Meanwhile, it continues to assert that in any event its existing ratepayers should assume, indefinitely and without limitation, the costs of cleaning up those plants, when and if they are cleaned up, no matter who owns them when that occurs. All of this, it maintains, can be decided and should be decided without the inconvenience of a hearing. But nothing demonstrates the need for such a hearing better than the reluctant, begrudging and highly selective responses or non-responses of DP&L to data requests. DP&L's ratepayers deserve a full and complete investigation of DP&L's intentions with live witnesses and the opportunity to examine and cross-examine witnesses and to present rebuttal testimony.

Respectfully submitted,



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Jody Kyler Cohn, Esq.

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**COUNSEL FOR THE OHIO ENERGY GROUP**

June 30, 2014

## **CERTIFICATE OF SERVICE**

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 30<sup>th</sup> day of June, 2014 to the following:



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**Case No(s). 13-2420-EL-UNC**

Summary: Comments Initial Comments of the Ohio Energy Group (OEG) to DP&L's Amended Supplemental Application to Transfer its Generation Assets electronically filed by Mr. David F. Boehm on behalf of Ohio Energy Group