BEFORE THE

PUBLIC UTILITIES COMMISSION OF OHIO

THE DAYTON POWER AND LIGHT COMPANY

CASE NO. 15-1830-EL-AIR

CASE NO. 15-1831-EL-AAM

CASE NO. 15-1832-EL-ATA

2015 DISTRIBUTION BASE RATE CASE

BOOK I – APPLICATION AND SUPPLEMENTAL

VOLUME 2 OF 14

Dayton Power and Light Company

DP&L Case No. 15-1830-EL-AIR

Standard Filing Requirements for Rate Increases

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			OAC 4901-7	
			Appendix A, Chapter II, (B) Supplemental Filing Requirements	
1	1	Appendix A, Chapter II, (B)(1)(a)-(f)	S-1	Most recent 5 year capital expenditures budget.
1	1	Appendix A, Chapter II, (B)(2)(a)-(c) Appendix A, Chapter II, (B)(3)(a)-(d)	S-2	Most recent 5 year financial forecast and support for the underlying assumptions.
1	1	Appendix A ,Chapter II, (B)(7)	S-3	A proposed notice for newspaper publication.
1	1	Appendix A, Chapter II, (B)(8)	S-4.1	An executive summary of applicant utility's corporate process.
1	2-3	Appendix A, Chapter II, (B)(9)	S-4.2	An executive summary of applicant utility's management policies, practices, and organization.
			OAC 4901-7	
			Appendix A, Chapter II, (C) Supplemental Information Provided at Filing	
1	3	Appendix A, Chapter II, (C)(1)	Supplemental	The most recent Federal Energy Regulatory Commission's ("FERC") audit report.
1	3	Appendix A, Chapter II, (C)(2)	Supplemental	Prospectuses of current stock and/or bond offering of the applicant, and/or of parent company.
1	4-8	Appendix A, Chapter II, (C)(3)	Supplemental	Annual reports to shareholders of the applicant, and/or parent company for the most recent five years and the most recent statistical supplement.
1	9-12	Appendix A, Chapter II, (C)(4)	Supplemental	The most recent SEC Form 10-K, 10-Q, and 8-K of the applicant, and/or parent company.
1	13	Appendix A, Chapter II, (C)(5)	Supplemental	Working papers supporting the schedules.
1	14	Appendix A, Chapter II, (C)(6)	Supplemental	Worksheet showing monthly test year data by FERC account.
1	14	Appendix A, Chapter II, (C)(7)	Supplemental	CWIP included in the prior case.
1	14	Appendix A, Chapter II, (C)(8)	Supplemental	Copy of latest certificate of valuation from department of taxation.
1	14	Appendix A, Chapter II, (C)(9)	Supplemental	Monthly sales for the test year by rate schedule classification and/or customer classes.
1	14	Appendix A, Chapter II, (C)(10)	Supplemental	Written summary explaining the forecasting method used by the utility as related to test year data.
1	14	Appendix A, Chapter II, (C)(11)	Supplemental	Explanation of computation of materials and supplies.
1	14	Appendix A, Chapter II, (C)(12)	Supplemental	Depreciation expense related to specific plant accounts.
1	14	Appendix A, Chapter II, (C)(13)	Supplemental	Federal income tax information.
1	14	Appendix A, Chapter II, (C)(14)	Supplemental	Other rate base items and detailed information.
1	14	Appendix A, Chapter II, (C)(15)	Supplemental	Copy of all advertisements in the test year.
1	14	Appendix A, Chapter II, (C)(16)	Supplemental	Plant in service data from the last date certain to the date certain in the current case.
1	14	Appendix A, Chapter II, (C)(17)	Supplemental	Depreciation study showing depreciation reserves allocated to accounts.
1	14	Appendix A, Chapter II, (C)(18)	Supplemental	Depreciation study.
1	14	Appendix A, Chapter II, (C)(19)	Supplemental	Depreciation reserve data from the last date certain to the date certain in the current case.
1	14	Appendix A, Chapter II, (C)(20)	Supplemental	Construction project details for projects that are at least seventy-five percent complete.
1	14	Appendix A, Chapter II, (C)(21)	Supplemental	Surviving dollars by vintage year of placement (original cost data as of date certain for each individual plant account).
1	14	Appendix A, Chapter II, (C)(22)	Supplemental	Test year and two most recent calendar years' employee levels by month.

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			OAC 4901-7 Appendix A, Chapter II, Section E	
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2	3	Appendix A, Chapter II, Section E(B)(2)(a)	E-2	Current Tariff Schedules
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2	1	Appendix A, Chapter II, Section E(B)(5)	E-3.2	Cost of Service Study
2	1	Appendix A, Chapter II, Section E(C)(2)(a)	E-4	Class and Schedule Revenue Summary
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2	1	Appendix A, Chapter II, Section E(D)	E-5	Typical Bill Comparison

THE DAYTON POWER & LIGHT COMPANY

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Supplemental S-4.2 Information (B)(9)

Requirement:

Provide an executive summary of applicant utility's management policies, practices, and organization employed to meet the corporate goals determined by the board of directors and corporate officers.

Response:

Please see attached.

The Dayton Power and Light Company

Executive Summary of Management Policies Practices and Organization

Schedule S-4.2, Part 1

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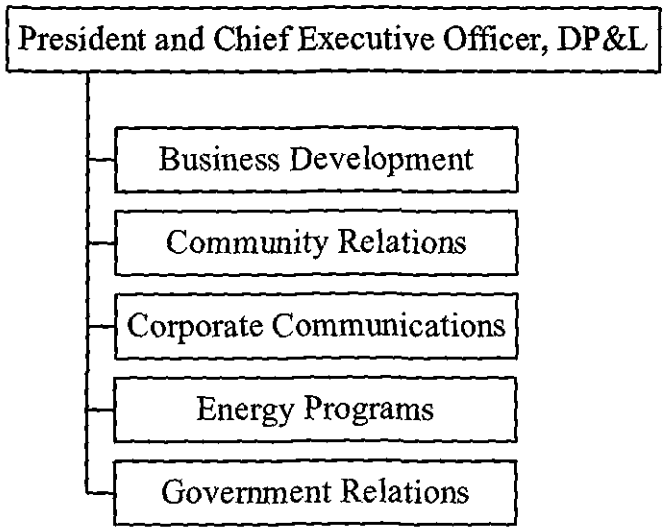
Office of DP&L's President and Chief Executive Officer

The President and Chief Executive Officer of The Dayton Power and Light Company ("DP&L") has overall responsibility for DP&L's relationships with customers, community and local governments. The included functional areas are described in detail in the following sections.



Functional Area:
Business Development

SFR Reference
(B)(9)(d)(v) External Relations

Policy and Goal Setting:

DP&L's Business Development Department encompasses the responsibilities of Strategic Account Management and Economic Development. Policy and goal setting follows the processes established by AES.

The policy and goal setting process begins at the AES corporate level and flows down through the United States Strategic Business Unit ("US SBU") to each operating department. Department goals are then set to support the US SBU goals, followed by individual goals to support the department goals.

Goals for Strategic Account Management focus on customer satisfaction and customer service. Goals for Economic Development focus on promoting growth within the region and the implementation of economic development programs. Final approval of goals rests with the Director of Strategic Accounts and DP&L's President and Chief Executive Officer.

Safety is an important driver in all we do at DP&L. Business Development holds monthly safety meetings and participates in the safety walk program to keep safety awareness high and create an injury-free workplace.

Strategic and Long-Range Planning:

Strategic and long-range planning is driven by the strategic and long-range plans developed at the AES corporate level and the US SBU level. The strategic plans are then communicated downward to the operating departments and are translated into near term tactical goals at the department level. For Strategic Accounts, the near-term tactical goals focus primarily on customer satisfaction and providing customer service to DP&L's largest accounts. Customer feedback is provided directly to strategic account managers as they interact with customers on an ongoing basis. Overall business customer satisfaction is measured by J.D. Power, providing DP&L with formalized customer feedback on a broad range of customer service issues.

For Economic Development, the near-term tactical goals focus on the implementation of economic development programs that promote economic growth in the region. The economic development programs will have a long-range positive impact on the region by identifying and preparing sites for future investment and supporting regional causes that strengthen the regional economy.

Organizational Structure and Responsibilities:

The Business Development Department consists of four employees and is led by the Director of Strategic Accounts. Two employees focus primarily on strategic account management and two employees focus on both strategic account management and economic development. This area maintains responsibility for the following utility activities:

1. Strategic Accounts is located primarily at DP&L's Dayton Service Building, although one employee is located at DP&L's Marysville office. Having an employee in Marysville allows DP&L to better serve the northern part of its service area. Strategic Account management activities include:
   a. Providing a single point of contact for DP&L's largest customers 24/7;
   b. Responding to customer requests for billing and service information;
   c. Communicating with customers, communities and emergency management organizations through outage restoration events;
   d. Managing and coordinating customer service work such as planned outages and service upgrades;
   e. Promoting economic development and energy efficiency programs with DP&L's largest customers;
   f. Providing customers with rate and tariff information;
   g. Coordinating service issues with community administrators related to projects such as road widening, infrastructure relocations and right-of-way ordinances;
   h. Coordinating the Community Ambassador Program, which provides communities with a DP&L point of contact;
   i. Providing operational support as needed during service restoration events.

2. Economic Development is performed by two employees. One is located at DP&L's Dayton Service Building and one is located at DP&L's Marysville office. Having an employee in Marysville allows DP&L to better serve the northern part of its service area. In addition, DP&L corporate areas support economic development activities as well, including Government Relations, Community Relations, Corporate Communications, Regulatory and executive management. For instance, the DP&L President and Chief Executive Officer is on the Board of Trustees' Executive Committee of the Dayton Development Coalition. Specific economic development activities include:
   a. Responding to prospect requests for information regarding electric facilities, capacity and rates within DP&L's service area;
   b. Representing DP&L on site visits by prospects considering locating new facilities in the region;
   c. Acting as a point of contact for JobsOhio and its regional partners, the Dayton Development Coalition and Columbus 2020;
   d. Serving as a point of contact to coordinate service installation for new major account customers;
   e. Providing community representatives with information regarding electric facilities serving community sites available for development;
   f. Participating in economic development organizations in the region;

g. Implementing DP&L's economic development programs, including site certification, regional economic development grants, and infrastructure grants.

The organizational chart for Business Development is included as Business Development - Exhibit 1.

Decision-Making and Control:

Business Development decision-making and control is achieved by the individuals in the organization making decisions within their given scope of authority in support of DP&L's overall mission and in accordance with DP&L policies and procedures. Decisions are raised to the proper level of authority as required by DP&L's policies. Input is taken into consideration from internal and external sources, depending on the situation. Internally, Business Development regularly works with operational areas such as Engineering, Planning, System Operating, Dispatch and the Call Center, and corporately with areas such as Government Relations, Regulatory, Community Relations and Corporate Communications. Externally, Business Development often works in partnership with JobsOhio, the Dayton Development Coalition, Columbus 2020 and a number of communities in the region.

The Director of Strategic Accounts monitors decision-making and control through day-to-day communication with account managers, regular staff meetings and financial reporting. Major decisions are elevated as needed to senior management, with final responsibility resting with the President and Chief Executive Officer of DP&L.

Specific controls include financial controls, with the Director of Strategic Accounts maintaining a financial authorization level consistent with AES policies. Controls also include operational and customer service controls, as the Business Development team interfaces with operational areas.

Internal and External Communications:

Internal communications are accomplished through a variety of communication channels including phone calls, conference calls and e-mail. These communications include interacting with areas such as Engineering, Dispatch Operations, Customer Service, Community Relations, and Regulatory. Internal communications also include formal communications initiated by AES, the US SBU and DP&L Corporate Communications.

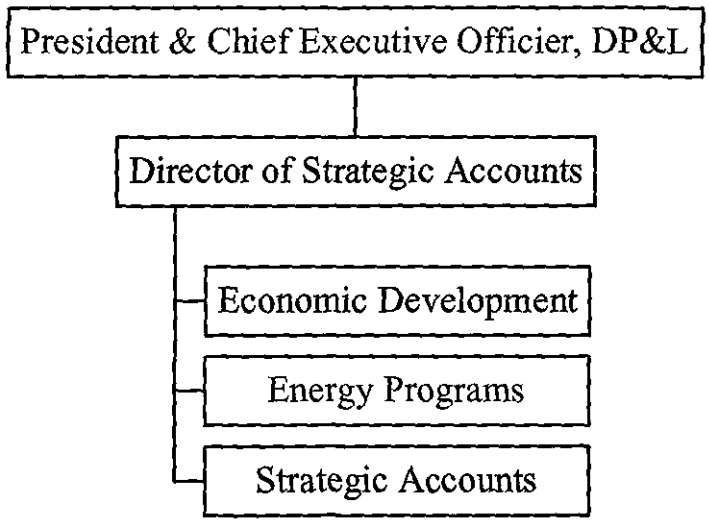
External communications with customers and communities are accomplished through a variety of communication channels including phone calls, in-person meetings, and e-mail. For Strategic Accounts, customers have the contact information, including mobile phone number, for their strategic account manager as well as an emergency outage telephone number answered 24/7 by DP&L. Further, Strategic Accounts provides its customers with "DP&L Weather Alerts" when threatening weather is approaching and a periodic newsletter, informing customers on a variety of DP&L and energy-related topics.

For Economic Development, communities and development organizations have the contact information for DP&L's economic development staff. To promote and provide information about DP&L's economic development services, DP&L has a dedicated section of its website, which customers can access at dpandl.com/development. Further, a dedicated economic development mailbox has been established for customer applications and inquiries regarding DP&L's economic development programs.

In addition to the above, DP&L's Community Ambassador Program provides a line of communication for a number of communities within the service area. Community Ambassadors are DP&L employees from throughout the Company that act as the point-of-contact for their respective community or communities. The Ambassador provides their community contacts with information about DP&L programs and coordinates responses for specific community requests.

Business Development – Exhibit 1

Business Development Organizational Chart



Functional Area:
Community Relations

SFR Reference
(B)(9)(d)(v) External Relations

Policy and Goal Setting:
DP&L's Community Relations Department is responsible for stakeholder relations and various issues pertaining to state and local regulations and policies as they apply to public relations inclusive of community giving and engagement, external communications, marketing and advertising. The overall objectives are to develop a sustainable corporate social responsibility program, awareness and understanding on the issues with external audiences, and promote positive support of the company's position. DP&L's policies are developed by DP&L's management under the guidance of AES's management and board of directors. All parties are equally responsible to ensure that DP&L policies meet or exceed the requirements set forth by all of DP&L's regulating entities.

The first priority of all DP&L areas is to ensure the safety of all DP&L employees, contractors and the public. Community Relations takes this priority very seriously, and incorporates safety into all aspects of day-to-day operations and when communicating externally. The safety program focuses on getting everyone involved in safety in order to increase safety awareness and create an injury-free workplace.

Community Relations goals are set annually in support of DP&L Company and AES corporate goals. Goals include targets for safety, compliance, budgets, community giving outreach and corporate, employee and community engagement.

Strategic and Long-Range Planning:

Community Relations implements plans and strategies that strengthen relationships and enhance DP&L's image with business and residential customers, local governmental agencies and community leaders and increase customer satisfaction. Community Relations and Corporate Communications directors and managers use a planning process to identify customer and stakeholder needs and coordinate with other departments to deliver cost-effective communications, service and solutions.
Strategic planning includes an ongoing effort to identify and incorporate diverse outreach and communication channels in order to reach all demographics of stakeholders throughout our 24-county service territory.
Community Relations annually completes a plan that projects the short and long-term needs encompassing up to a 3 year period. Community Relations plan supports DP&L priorities and aligns with the broad objectives established at the AES corporate level. Plans are periodically reviewed and adjusted to meet business needs and targets in concert with our customer's needs. Plans typically include a sustainable corporate social responsibility program, stakeholder management program, corporate sponsorships, corporate contributions and principle areas of

giving, employee/stakeholder engagement, and related Public Utilities Commission of Ohio ("PUCO") cases and filings. In addition to operational needs, planning considers budget allowances and staffing needs.

Organizational Structure and Responsibilities:

The Community Relations Department consists of two employees and is led by the Director of Community and Corporate Social Responsibility. Community Relations develops and administers a community relations program which promotes positive company relationships and provides support to the communities served by DP&L. This area maintains responsibility for the following utility activities:

1. Develop a sustainable corporate social responsibility program
2. Corporate contributions to educational, economic development, environmental, community, and other non-profit organizations throughout the 24-county region
3. Corporate sponsorships
4. Manage the stakeholder management program leading a cross functional stakeholder management team
5. Coordinate community events and projects with employees, community leaders and elected officials
6. Manage community board relationships
7. Maintain memberships and subscriptions in community, professional, economic development and business trade organizations
8. Coordinate employee charitable giving campaigns (such as United Way) and on-site donation programs
9. Support other employee community relationships and projects
10. Maintain corporate social responsibility webpages
11. Operations and budget management

The organizational chart for Community Relations is included as Community Relations - Exhibit 1.

Decision-Making and Control:

Community Relations decision-making and control is achieved by working with appropriate resources and subject matter experts both internally and externally. Decisions are raised to the proper level of authority as required by DP&L's policies. Input is taken into consideration from internal and external sources, depending on the situation.

Performance against the Community Relations goals is monitored and reported on a monthly basis. Monitoring allows management to uncover trends in a timely manner and proactively address issues.

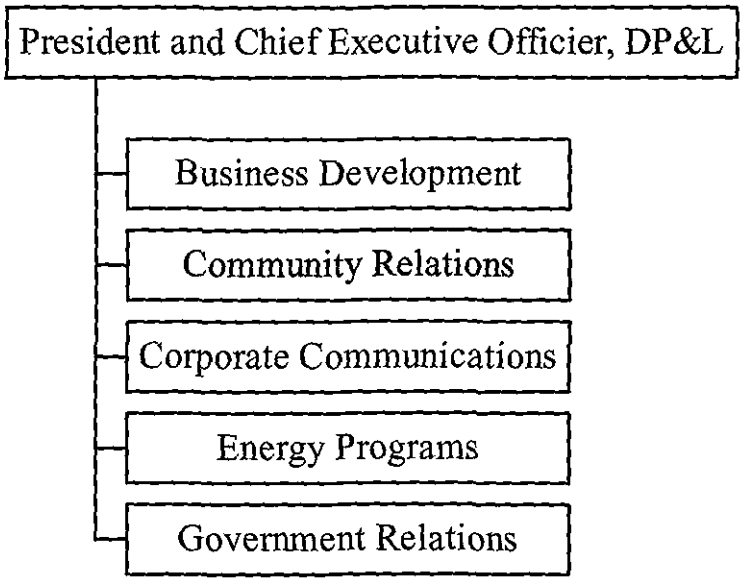
Internal and External Communications:

Internal communications are accomplished through a variety of communication channels including: phone calls, conference calls, e-mail, Intranet and in person meetings. Internal communications typically correspond to supporting community outreach efforts and employee giving campaigns.

External communications are accomplished in coordination with DP&L Corporate Communications through a variety of communication channels including: phone calls, conference calls, e-mail, in person meetings, and news releases/media advisories/media interviews, and social media. External communications typically correspond to community giving, community involvement and events, and stakeholder communications.

Community Relations – Exhibit 1

Organizational Chart for Community Relations



Functional Area:
Corporate Communications

SFR Reference
(B)(9)(d)(iv) Marketing

Policy and Goal Setting:

The Corporate Communications Department is responsible for various issues pertaining to federal, state and local regulations and policies as they apply to external public relations inclusive of marketing and advertising. The overall objectives are to develop awareness and education on these issues with its external audiences and promote positive support of the company's position. External marketing efforts are used to promote good will, educate and build trust with external customers. Examples of DP&L's marketing are included as Corporate Communications – Exhibit 2. Corporate Communications goals are set annually in support of DP&L and AES corporate goals. Goals include targets for safety, compliance, reliability, timely and accurate communications and budgets.

DP&L's external communication policies are developed by DP&L's executive management team in support of AES corporate policies. The policies support the company's business plan through effective and efficient communication procedures. All parties are equally responsible to ensure that policies meet or exceed the requirements set forth by DP&L's regulating entities.

The first priority of all DP&L areas is to ensure the safety of all DP&L employees, contractors and the public. Corporate Communications takes this priority very seriously, and incorporates safety into all aspects in day-to-day operations and when communicating externally. For example, there are many safety tips incorporated into our website to promote electric safety, www.dpandl.com/education/safety-tips/.

Strategic and Long-Range Planning:

Strategic and long-range planning is a collaborative effort utilizing Corporate Communications, DP&L's executive management, and US SBU executive management. Corporate Communications annually completes a plan that projects the short and long-term needs encompassing up to a 3 year period. Plans are periodically reviewed and adjusted to meet business needs in concert with our customer's needs. Corporate Communications and Community Relations use a planning process to identify customer and stakeholder needs and coordinate with other departments to deliver cost-effective communications, services and solutions.

Strategic planning includes an ongoing effort to identify and incorporate diverse (traditional and non-traditional) communication channels best suited to reaching all demographics within DP&L's 24-county service territory. This approach helps to ensure effective messaging for the

customer, general public and employee and creates flexibility for promoting a variety of customer programs.

Organizational Structure and Responsibilities:

The Corporate Communications Department consists of three full-time employees and is led by the Director of Corporate Communications. The department reports directly to DP&L's President and Chief Executive Officer.

Corporate Communications has responsibilities for all external communications inclusive of all DP&L digital assets including; Internet sites, social media, media relations, brand architecture, advertising and select internal communications and the Intranet. Additionally, Corporate Communications provides services to community relations, energy efficiency, regulatory, operations and human resources. The group works with all communications departments across the US SBU.

The organizational chart for Corporate Communications is included as Corporate Communications - Exhibit 1.

Decision-Making and Control:

Corporate Communications decision-making and control is achieved by working through the concerns involved in a particular issue with appropriate resources and subject matter experts. Reviews and approval for all decisions are vetted with DP&L's President and Chief Executive Officer and escalated within the company as appropriate for a given situation.

Performance against the Corporate Communications goals is monitored and reported on a monthly basis. Monitoring allows management to uncover trends and potential roadblocks in a timely manner and proactively address issues.

Internal and External Communications:

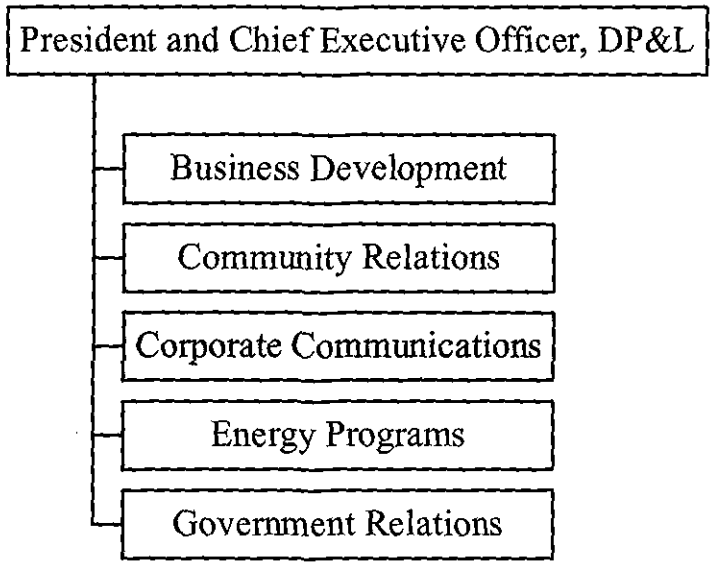
Corporate Communications internal communications promote an informed dialog about the industry, safety, energy efficiency, environment, community involvement and a wide range of other regulatory and legislative issues. Internal communications are primarily accomplished through electronic newsletters and Intranet. Both types of communications are updated and delivered regularly to help educate employees and enhance their work experience.

Corporate Communications external communications are accomplished through a variety of media. Communications are focused on meeting the company's objectives for awareness and education. The primary methods used to reach all our audiences include: news releases, media advisories, media interviews, bill inserts/messages, advertising, interviews, digital assets

(Internet and social media). Additionally Corporate Communications proactively provides communication service for event support across other departments.

Corporate Communications – Exhibit 1

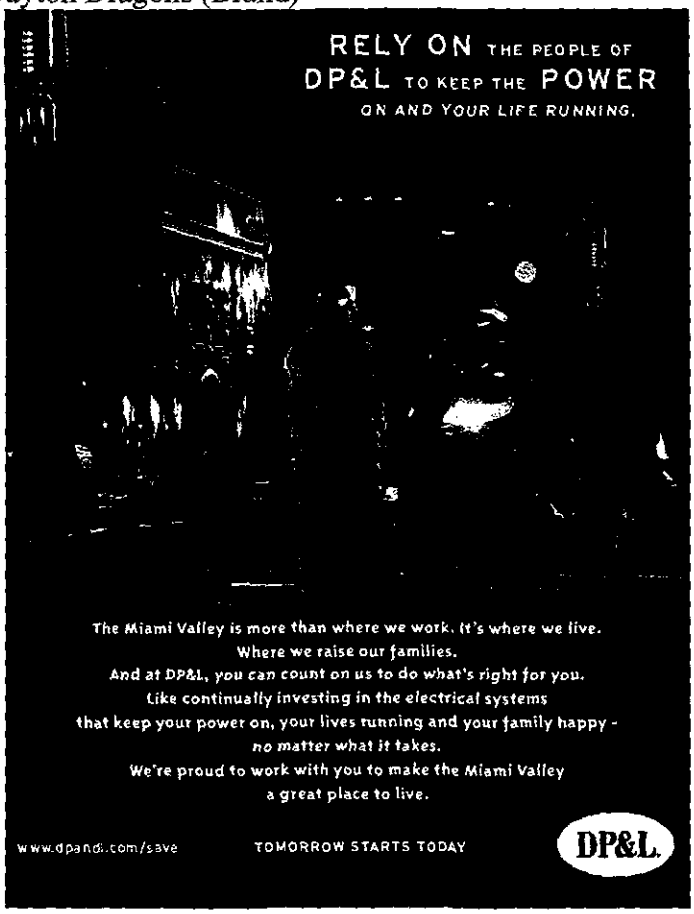
Organizational chart for Corporate Communications



Corporate Communications – Exhibit 2

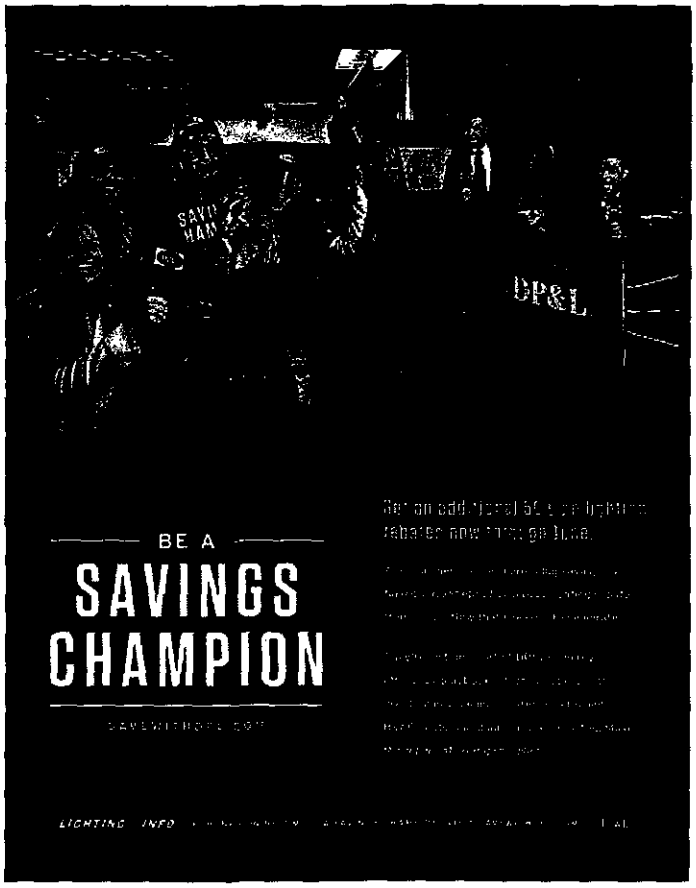
DP&L Marketing Examples

Program Ad for the Dayton Dragons (Brand)



Program Ad – Flyin' to the Hoop (Brand)

Ad – Dayton Daily News (Energy Efficiency)



Ad – FOCUS – Dayton Ohio Area Chamber of Commerce quarterly business magazine (Energy Efficiency)

Functional Area:
Energy Programs

SFR Reference
(B)(9)(d)(iii) Customer conservation programs
(B)(9)(i)(ii) Conservation program policies and procedures
(B)(9)(i)(iii) Demand-side management program policies and procedures
(B)(9)(i)(iv) Rate and bill impact evaluation process
(B)(9)(i)(v) Customer involvement
(B)(9)(i)(vi) Financing requirements generated by demand-side management and integrated resource planning

Policy and Goal Setting:

It is the responsibility of the Energy Programs Department to ensure DP&L's compliance with Ohio's energy and demand benchmark targets. To that end, DP&L filed its most recent energy efficiency portfolio plan as PUCO Case Nos. 13-833-EL-POR and 13-837-EL-WVR. The plan was approved by the Commission on December 4, 2013.

The portfolio filing includes information on the plan development process. The following are the goals as outlined on pages 18-34 of the Portfolio Plan filed April 15, 2013:

1. Comply with Ohio's energy efficiency benchmark targets as outlined in O.R.C. §4928.66(A)(1)(a) and O.R.C. §4928.66(A)(1)(b)
2. Develop cost-effective programs that provide value to customers
3. Leverage current program successes and lessons learned since 2009
4. Equitably provide savings opportunities for all customer classes
5. Provide a variety of programs in which customers can participate
6. Deliver quality customer programs that promote customer satisfaction with energy efficiency
7. Promote general market transformation and education to promote energy efficiency
8. Capture savings opportunities that have been identified in the market potential study
9. Implement best practices of other successful energy efficiency programs
10. Partner with collaborative members and other utilities when possible to capture program efficiencies and reach various customer groups

Overall policies are established at the US SBU level and flow downward to the operating department. In Energy Programs, it is the responsibility of each individual to follow all safety, financial control, and operational policies. Financial approval levels align with company policies and apply to all purchases and expenditures. Financial compliance is measured through cost and budget reports used for tracking purposes.

Safety is an important driver in all we do at DP&L. In Energy Programs, we hold monthly safety meetings and participate in the safety walk program to keep safety awareness high and create an injury-free workplace.

Strategic and Long-Range Planning:

DP&L's planning process for its energy efficiency programs is provided on Pages 18-34 of its Portfolio Plan filed on April 15, 2013. The following items are addressed in the plan section:

1. Portfolio Goals and Management
   a. Plan goals
   b. Management structure for energy efficiency
   c. Program implementation
   d. Quality assurance and control
   e. Tracking systems, savings documentation

2. Portfolio Plan Development
   a. Market potential study
   b. Potential and Ohio benchmarks
   c. Program design criteria
   d. Stakeholder participation
   e. Alignment of programs with other utilities

As a part of this filed portfolio plan, resources are defined with projected budgets, energy savings and demand savings. The plan and budgets were approved by the Commission on December 4, 2013.

Organizational Structure and Responsibilities:

The Energy Programs Department consists of six employees and is led by the Director of Strategic Accounts. Its overall responsibility is compliance with Ohio's energy and demand benchmark targets and the implementation of DP&L's approved energy efficiency portfolio plan. The daily activities of this area include:

1. Contracting with and managing implementation vendors for DP&L's residential programs
2. Managing the implementation of DP&L non-residential programs, including the processing of rebates
3. Developing and implementing marketing plans to promote customer participation
4. Answering customer inquiries and assisting customers
5. Communicating with energy efficiency stakeholder groups
6. Developing PUCO filings and reports as required
7. Coordinating with DP&L's independent evaluations provider as well as the State of Ohio's evaluations provider

8. Preparing PJM-required documentation and bidding energy efficiency into PJM capacity auctions

The organizational chart for Energy Programs is included as Energy Programs - Exhibit 1.

Decision-Making and Control:

Energy Programs decision-making and control is achieved by the individuals in the organization making decisions within their given scope of authority in support of departmental goals and in accordance with DP&L policies and procedures. Decisions are raised to the proper level of authority as required by DP&L's policies. Input is taken into consideration from internal and external sources, depending on the situation. Internally, Energy Programs regularly works with areas such as Strategic Accounts, Corporate Communications, Customer Service, Legal and Regulatory Operations. Externally, Energy Programs works with the energy efficiency collaborative, implementation providers, DP&L's evaluations consultant, and customers.

The Director of Strategic Accounts and the Manager of Energy Programs monitor decision-making and control through day-to-day communication with staff, regular staff meetings, program reporting and financial reporting. Major decisions are elevated as needed to senior management, with final responsibility resting with DP&L's President and Chief Executive Officer.

Specific controls include financial controls, with the Director of Strategic Accounts and the Manager of Energy Programs maintaining a financial authorization level consistent with AES policies.

Compliance and regulatory controls are achieved through DP&L's quarterly reporting to the energy efficiency stakeholders through collaborative meetings, filed Annual Status Reports with the PUCO and ongoing evaluations by DP&L's independent evaluation, measurement and verification ("EM&V") provider as well as the State of Ohio's EM&V provider. DP&L's EM&V plan and processes may be found in DP&L's Portfolio Plan. A description of cost effectiveness controls, through the Total Resource Cost test and other tests, is also found on pages 80-91 of DP&L's Portfolio Plan.

Internal and External Communications:

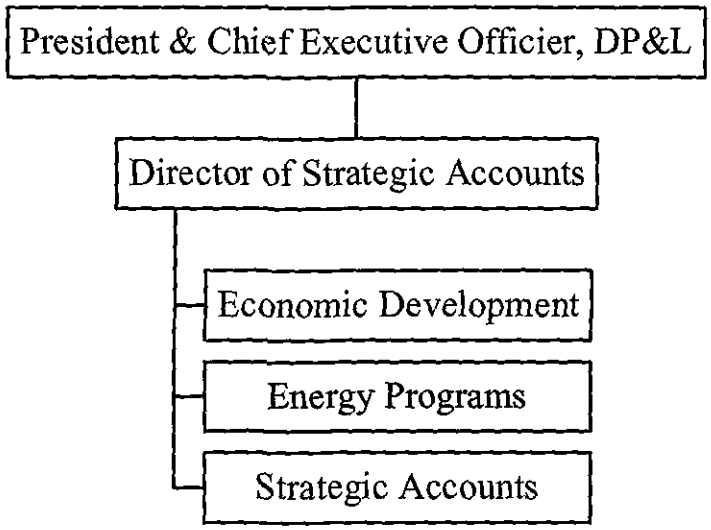
Internal communications are accomplished through a variety of communication channels including phone calls, conference calls and e-mail. These communications include interacting with areas such as Customer Service, Corporate Communications, Strategic Accounts, Legal and Regulatory Operations. Internal communications also include formal communications initiated by AES US SBU and DP&L Corporate Communications.

External communications consist of marketing DP&L's energy efficiency programs and providing energy efficiency education. The marketing and education efforts use a mix of mass communications including television, print, radio, Internet, sponsorships and social media.

DP&L's education plans are provided on pages 72-74 of the Portfolio Plan. A review of the previous year's marketing and education activities is provided on pages 99-106 of DP&L's Annual Status Report. Further, marketing activities for each program are included in the program-by-program section of the Annual Status Report on pages 14-98.

Energy Programs – Exhibit 1

Organizational Chart for Energy Programs



Energy Programs – Exhibit 2

Listing of Most Recent Energy Efficient Filings

Filing Name	Filing Date	Case Numbers
Portfolio Plan	April 15, 2013	13-833-EL-POR, 13-837-EL-WVR
PUCO Approval of Portfolio Plan	December 4, 2013	13-833-EL-POR, 13-837-EL-WVR
Annual Status Report	May 15, 2015	15-777-EL-POR

Functional Area:
Government Relations

SFR Reference
(B)(9)(d)(v) External Relations

Policy and Goal Setting:

The Government Relations Department has the general charge of state government relations and maintains liaisons with elected and appointed policy makers (with emphasis on State of Ohio) on activities related to the DP&L and its operations, informs DP&L of state regulatory and legislative issues and coordinates advocacy of DP&L policies and positions on these issues at the state level. Government Relations has a broad scope of goals based on the changing regulatory and competitive landscape in which DP&L operates and it is responsible for:

1. Identifying key state policy issues that affect DP&L
2. Advancing corporate positions at the state level through pro-active policy development and strategic communications
3. Ensuring Ohio policy makers are educated on corporate positions.

Annual goals and objectives are designed to support the achievement of the strategic and operational initiatives of the corporate business plan. These goals and objectives are developed with input from the Legal, Regulatory Operations, Tax Department and Human Resources personnel and are approved by DP&L's President and Chief Executive Officer.

Strategic and Long-Range Planning:

Strategic planning for the department is coordinated between DP&L's President and Chief Executive Officer and Director of Government Relations and involves structured input and feedback from all the department personnel. Regular staff meetings are held to discuss pending issues and decide what items require attention and the appropriate timeframe for issues to be addressed. In conjunction with the development of annual individual and department goals, resources are directed toward overall corporate goals as developed by executive management. A collaborative process is used to identify major internal and external issues and to develop appropriate response strategies. DP&L's President and Chief Executive Officer and Director of Government Relations are involved in all planning and review sessions. In addition, previous programs are reviewed and, if necessary, budget resources are reallocated to meet the needs for items that have been identified as having priority.

Organizational Structure and Responsibilities:

Government Relations primarily is responsible for state governmental relations, but has some federal responsibility as well. It maintains liaison with elected and appointed federal and state

policy makers on activities related to DP&L and its operations, informs DP&L of federal and state regulatory and legislative issues, and assists in the development of DP&L's policies and positions on these issues:

Government Relations responsibilities include:

1. Establishing, maintaining, and strengthening communications between the DP&L and its legislative, political, and regulatory constituents;
2. Providing timely and relevant information about DP&L to its legislative, political, and regulatory constituents;
3. Increasing legislative, political, and regulatory understanding and confidence regarding DP&L operations;
4. Drafting, reviewing, negotiating, and promoting legislative initiatives at the state level;
5. Drafting position statements and reviewing, analyzing and responding to legislative and regulatory initiatives at the state level;
6. Informing DP&L personnel of important legislative, political, and regulatory developments at the state level and aiding in the analysis of these developments as they relate to DP&L's business interests;
7. Administering DP&L's Political Action Committee ("PAC") "DP&L Responsible Citizenship Fund" and its' employee network of supporters.

The organizational chart for Government Relations is included as Government Relations - Exhibit 1.

Decision-Making and Control:

Decision-making is generally delegated to the Director of Government Relations, with major decisions rolling up to DP&L's President and Chief Executive Officer. Legal counsel is consulted on an as-needed basis. In addition, to staff meetings, informal discussions are held frequently with all department personnel. The level at which decisions are made and the amount of control exercised depends on the potential effect of the decision. All personnel are apprised of their responsibilities and authority and are expected to make decisions within the parameters of that authority and report their actions to the next level of supervision as appropriate.

Government Relations maintains a close working relationship with nearly all of the DP&L's various business units, and works with appropriate DP&L personnel to develop legislative and regulatory policy positions to be used at the state level. Prior to representing DP&L on any federal issue, Government Relations receives guidance and clearance from US SBU executive management and AES Corporate.

Decision-making and control is based on overall department goals and input from other departments. Government Relations is involved in both proactive and reactive issues and consults frequently with management and expert technical personnel from throughout DP&L to

determine appropriate responses. Major decisions are reviewed with senior management for input, advice and concurrence.

Internal and External Communications:

Government Relations facilitates internal communication and interpretation of Ohio legislative and regulatory developments, and externally communicates DP&L's position to appropriate Ohio policy makers. External communications focus on elected state officials, administration officials, their respective staffs, various trade associations of which DP&L is a member, and other stakeholder groups including, but not limited to, national environmental groups, labor unions, other utilities, political parties and organizations, etc.

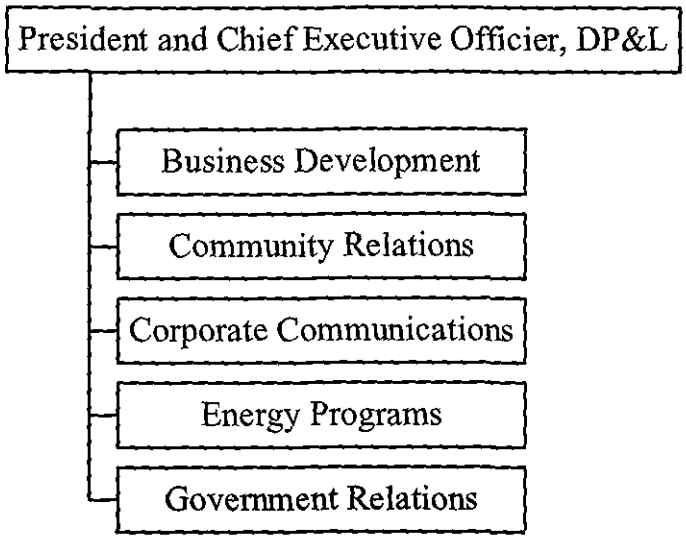
Timekeeping requirements and periodic education on restrictions, such as lobbying and ethics laws and reporting requirements, assure compliance with all applicable rules and regulations regarding external communications with lawmakers and regulatory bodies.

Daily interaction is maintained between the Director of Government Relations and DP&L's President and Chief Executive Officer and other department personnel. Frequent formal and informal lines of communication are also maintained with other personnel throughout DP&L. Meetings are held with all the department personnel to share ideas, disseminate information on DP&L activities, address various administrative needs, enhance creativity and productivity, and foster a positive and safe working environment.

Internal communication is encouraged with personnel throughout DP&L whose departments are affected by various federal and state legislative and regulatory policies and proposals that are being analyzed. Teams are utilized as needed to facilitate inter-departmental communication. Most activities will affect more than one segment of DP&L, so continual and timely communication with the appropriate personnel throughout DP&L is essential.

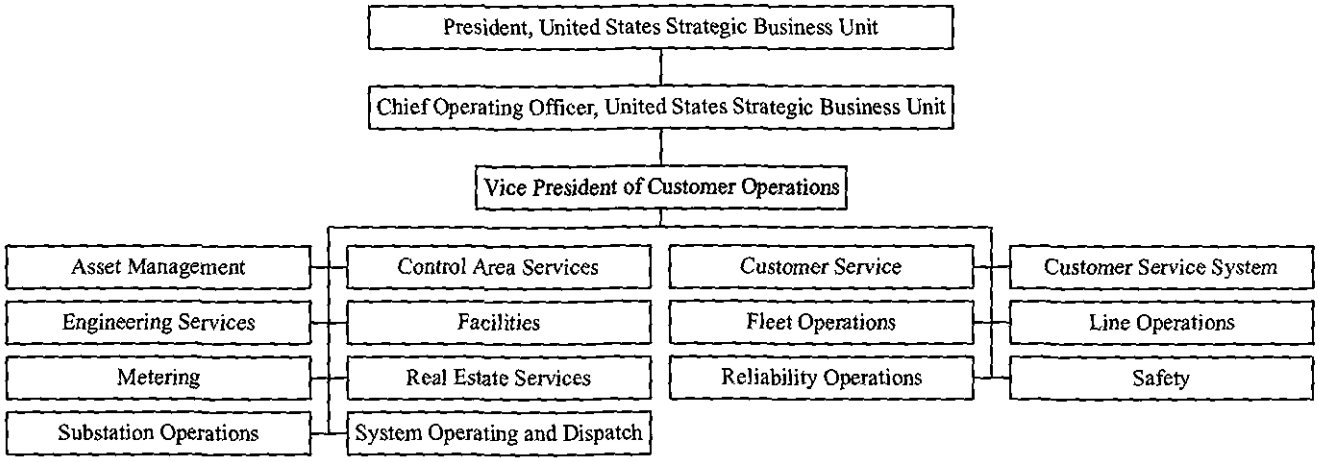
Government Relations – Exhibit 1

Organizational Chart for Government Relations



Customer Operations

Customer Operations has overall responsibility for all DP&L distribution operations. The included functional areas are described in detail in the following sections.



Functional Area:
Asset Management

SFR Reference
(B)(9)(a)(iii) Plant productivity and performance evaluation
(B)(9)(a)(vii) Research and development
(B)(9)(b)(v) Materials and inventory management and control

Policy and Goal Setting:

DP&L's Asset Management policies are developed by DP&L's management under the guidance of AES's management and AES's board of directors. All parties are equally responsible to ensure that DP&L policies meet or exceed the requirements set forth by all of DP&L's regulating entities.

The first priority of all DP&L areas is to ensure the safety of all DP&L employees, contractors and the public. Asset Management takes this priority very seriously, and incorporates safety into all aspects of engineering, maintenance and operations.

A corporate Asset Management policy is published and used as a guideline for setting overall policies in support of company and corporate goals. Goals include targets for safety, compliance, reliability, and budgets. The remaining part of this section summarizes this AES Asset Management policy.

In order to pursue operational excellence, sustainable development, and optimization of our resources, we have adopted a comprehensive Asset Management system that is defined by AES Global Asset Management standards. The Asset Management system supports our commitments regarding how we will manage our physical assets:

1. Make safety the top priority for our employees, contractors, customers, visitors, and stakeholders
2. Minimize and/or control our impact to the environment, complying with all legal and regulatory requirements
3. Maintain a systematic and sustainable process that considers the interrelated aspects of commercial, environmental, safety, legal, employee, information, financial, community, and any other stakeholder needs that influence or affect the management of our physical assets
4. Optimize the availability and performance of our physical assets during their lifecycle through the implementation of operation, maintenance, risk, and investment processes that are considered to be best practices prevailing in the industry
5. Strive for continuous improvement of our processes through innovation, application of new technologies, and best practices using the AES Performance Excellence ("APEX") methodology to establish the appropriate metrics to measure, evaluate, and compare our operating businesses

6. Provide a platform to maintain reliable asset identification and technical information as well as criticality criteria, to be used to mitigate risks and pursue market opportunities
7. Maximize our investments through better utilization of our physical assets and proactively manage their lifecycle costs
8. Ensure that our people are trained, motivated, responsible, and accountable for the results of our Asset Management system
9. Make asset management decisions at the local business level, supported by advice and processes provided centrally to allow optimization of a broader perspective

Strategic and Long-Range Planning:

Strategic long-range planning in Asset Management reflects DP&L's long-range strategy to achieve DP&L's goal of delivering safe, reliable service and meeting the compliance and reliability targets as well as our customer's needs.

The Asset Management strategy provides the link between the high-level strategies of the organization's Asset Management policies, and the detailed business objectives of the group. It is the connection between the quantitative and asset risk-based analysis of the group and the overall DP&L business objectives. Some of the key components of this strategy are described in the following sections.

Safety

Safety is everyone's responsibility and each area of Asset Management has an impact on safety across the organization. In Asset Management, safety is a consideration in all of our actions to manage the utility assets. This is most clearly demonstrated through our assessment of asset health, catalog of asset risks, maintenance plans, best practices, and as a criteria for our investment decision-making.

One of the key ways we encourage safety is through our understanding and cataloging of risk. Asset Management tracks asset health and asset based risk and reports this risk to senior level management so that they can make educated decisions about the risk in the organization and how it impacts the safety of our people, assets, and communities. The assessments of health and risk are tools both for senior management to make portfolio level decisions and for local management to track, mitigate, and address safety concerns.

By tracking risk and safety items over time we develop a quantified method to understand risk and develop best practices based on verifiable criteria. This knowledge will allow for targeted investments to be made in areas that have a measurable impact on safety. Investing in safety is important, but we want to make sure we are spending money on the mitigations that work.

Safety is an important consideration in how we analyze, review, and approve capital investments. Decisions to make investments are not just based on the financial costs and direct benefits; we also consider the impact on safety as one of the most important non-financial components of the

decision criteria. The inclusion of safety in how we evaluate all investments reinforces our commitment to safety as an organization.

Growth and Reliability

Through understanding our assets and the economics around those assets we can identify where and how to make the best investments possible to sustain overall reliability at the least cost. The goal is to make smart, targeted investments that minimize overall risk and enhance customer reliability.

Leveraging the Assets

Putting our existing assets to the best and highest use is critical to the success of our business. Leveraging and getting the most from our existing assets is important to ensure customer rates are competitive.

Asset Management measures, analyzes, and reports our asset performance. Measuring performance is the first step in maximizing performance. The ability to consolidate consistent performance gives DP&L the ability to identify the technologies and processes that are working. These insights are readily shared across AES to drive shared success for the group.

Another key step in leveraging the assets is through the rigorous evaluation of investments in both the planning and post investment closing process. We need to understand the expected benefits from our actions and the actual benefits achieved. Through this process we can ensure that we improve operations and our decision-making process over time.

Financial Excellence

Efficient use of our financial resources is critical to keep customer rates low. We compete based on our ability to efficiently deliver reliable power. To ensure this we critically analyze our asset performance and require investment decisions to undergo a competitive approval process.

To make the best investment decisions possible we must understand the long-term strategy for the assets. In assessing how to maintain our assets we must understand the attributes of those assets that sustain and improve customer satisfaction and reliability.

Innovation

Our business is not static and the pace of change in our industry is expected to continue to increase in the coming years. We must be vigilant in our efforts to understand the potential impact from changes in technology, customer needs, and new business models. We cannot rely on doing what has made us successful in the past. We must continue to look forward to ensure that we are successful in the future.

As experts in an asset class we need to know not only our existing assets but need to understand how new developments can impact the assets. These opportunities need to be carefully evaluated and incorporated into our long-range planning.

Innovation is a process that is incorporated into our daily thinking and process. To be successful over the long-term we must always look to improve.

Customer Satisfaction

One of the inputs to good asset management is to be continually mindful of how our actions across the portfolio can impact the full spectrum of our customers. This is an important factor in our life cycle plans, maintenance strategies, risk mitigations, and investment evaluations. By being mindful in our decision-making we ensure that we are responsive to the needs of our customers.

Our People

In addition to the external strategy, developing our people is a key goal internally to the Asset Management group. Given the need for this group to be knowledgeable and effective across the organization we must provide the professionals the opportunity to continually develop themselves and provide them with the tools to be successful.

Asset Management Strategy Review Policy

The Asset Management strategy will be reviewed at least annually in conjunction with the objective setting process for the year or after any significant change in the corporate strategy.

Organizational Structure and Responsibilities:

The Asset Management Department consists of 11 employees and is led by the Director of Asset Management. Asset Management is responsible to develop, document and maintain strategies that optimize the use of DP&L Transmission and Distribution assets. Utility activities include:

1. Establish criteria for preventive, predictive, and corrective maintenance
2. Develop the maintenance, repair, and replacement strategies for existing assets
3. Assure the strategies are system based to optimize asset performance recognizing the interaction between technical, financial, and regulatory requirements
4. Establish strategies on risk assessment with a greater focus on impact and criticality of assets
5. Develop capital and O&M budgets consistent with the asset management strategies
6. Document maintenance procedures and plans
7. Monitor asset performance and results from maintenance plans
8. Assure continuous improvement by regular review of the strategies considering asset performance, maintenance plan results, field input, corporate input, and use of APEX tools
9. Assure strategies are consistent with all regulatory requirements
10. Assure strategies are consistent with DP&L and AES goals and policies

The organizational chart for Asset Management is included as Asset Management - Exhibit 1.

Decision-Making and Control:

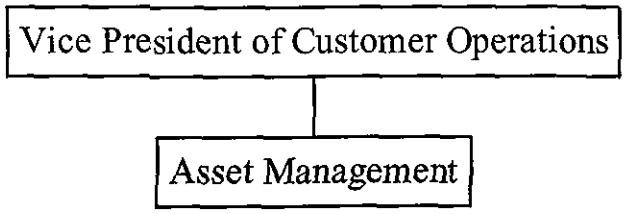
Asset Management decision-making and control is achieved by individuals throughout the organization making decisions within their given scope of authority in support of DP&L's overall mission. Asset Management works with local transmission and distribution operations to implement its policies under the guidance of AES Global Asset Management policy. Overall responsibility for all decisions is that of the Vice President of Customer Operations.

Internal and External Communications:

Internal communications are accomplished through a variety of means including e-mail, phone calls and meetings.
External communications involve direct communications to manufacturers, distributors, contractors and engineers in order to evaluate products and understand maintenance needs and to fully evaluate the life cycle cost of equipment. Additionally Asset Management maintains strong relationship with other utilities through formal and informal industry working groups and committees in order to learn from and share best practices with each other.

Asset Management - Exhibit 1

Asset Management Organizational Chart



Functional Area:
Control Area Services / Electric Choice Administration

Policy and Goal Setting:

DP&L's Control Area Services and Electric Choice Administration areas perform many critical and essential functions required for compliance with policies of the PUCO, Federal Energy Regulatory Commission ("FERC") and PJM Interconnection ("PJM").

DP&L's goals are to be the industry standard for safety and for all DP&L and AES people to take ownership of their own safety as well as the safety of their co-workers. While creating policies, employees are encouraged to consider how their goals impact safety performance first and foremost.

Personnel in the areas of Control Area Services and Electric Choice Administration are committed to being compliant with all relevant regulations, and operational plans will reflect the critical importance of compliance. Policies are set by leaders in each area in support of company and corporate goals, including safety, daily operations, financial performance, talent management, and personal development.

Strategic and Long-Range Planning:

Development of the strategic and long-range planning includes working closely with several groups including Financial Planning and Analysis, Regulatory Operations, Customer Service System, Residential and Business Customer Solutions Centers and Information Technology. In addition, long-range plans will be a result of leadership's familiarity with potential changes to regulatory policies, technological advancements in the industry or shifts in the competitive electricity marketplace.

Organizational Structure and Responsibilities:

Combined, Control Area Services and Electric Choice Administration currently consist of two full-time employees and two part-time employees and are led by the Supervisor of Control Area Services who reports to the Manager of Customer Service System. These areas maintain responsibility for the following utility activities:

1. Control Area Services is responsible for critical functions required for PJM, FERC and PUCO compliance including:
   a. Verification of real-time metered generation and interconnection data for submission to PJM for daily market settlements
   b. Schedule loads for DP&L's wholesale, retail and standard service offer auction suppliers
   c. Reconciliation of loads during the 60-day PJM settlement process

d. Report suppliers' capacity peak load contribution and Network transmission Service Peak Load obligations to PJM
e. Contribute data for monthly and annual reports filed with FERC and PUCO
f. Administer the settlements system software used for aggregate supplier load scheduling and for calculating the input to accounting's monthly unbilled revenue calculation

2. Electric Choice Administration is responsible for providing coordination services to retail suppliers active within the DP&L service area. This is an activity required by Ohio Administrative Code ("O.A.C."). Activities include:
   a. Provide initial and ongoing support to retail suppliers' operations
   b. Facilitate the supplier registration process including approval of forms and agreements, electronic data interchange certification and securing collateral to protect DP&L against supplier default
   c. Respond to supplier inquiries for customer data and historical usage
   d. Answer calls and emails regarding DP&L's business rules or issues concerning mutual customers
   e. Handle requests for interval metering required under DP&L's alternate generation supplier coordination tariff
   f. Communicate customer complaints to suppliers
   g. Administer DP&L's supplier support website
   h. Represent DP&L in PUCO working groups designed to set policy or standards related to electric choice

The organizational chart for Control Area Services and Electric Choice Administration is included as Control Area Services - Exhibit 1.

Decision-Making and Control:

While adhering to all pertinent regulations, laws, tariffs and policies, leaders within Control Area Services and Electric Choice Administration make decisions within their scope of authority to improve the organization and support DP&L's company and corporate goals. The departmental leadership has the authority to make decisions that affect daily operations, but decisions that have a significant financial impact on the company must be escalated to the proper levels as required by DP&L's policies. Overall responsibility for all decisions is that of the Vice President of Customer Operations.

Performance is measured annually against individual, department and company objectives. Some of those objectives include safety, customer/supplier satisfaction, budgets, compliance, and completion of any competitive enhancements ordered by the PUCO or other projects that improve operational efficiency. This allows management to uncover trends in a timely manner and proactively address issues.

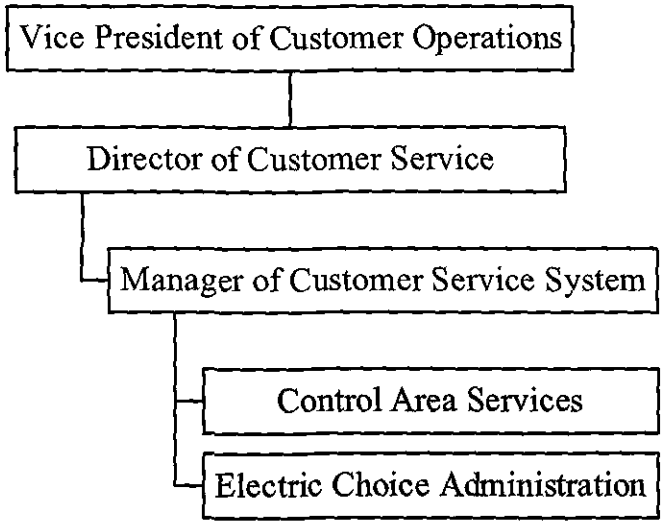
Internal and External Communications:

Internal communications are accomplished through a variety of communication channels including: phone calls, conference calls, in-person meetings and e-mail. Internal communications typically include seeking information to assist Electric Choice Administration operations or supporting the operations of other functional areas of DP&L. These communications involve areas such as Regulatory Operations, Customer Service System, Information Technology, Accounting, Legal, Meter Reading, and Residential and Business Customer Solution Centers.

External communications are accomplished through a variety of communication channels including: phone calls, e-mail, fax, social media, DP&L's supplier website and various working groups facilitated by PUCO Staff. External communications typically involve customers, suppliers, municipalities, aggregators, brokers, regulatory bodies and technology vendors.

Control Area Services – Exhibit 1

Organizational Chart for Control Area Services and Electric Choice Administration



Functional Area:
Customer Service

SFR Reference
(B)(9)(d)(i) Customer service and information

Policy and Goal Setting:

DP&L's Customer Service policies have evolved to be responsive to federal, state and local regulations and policies. DP&L's policies are developed by DP&L's management team under the guidance of AES's management and board of directors. All parties are equally responsible to ensure that DP&L policies meet or exceed the requirements set forth by all of DP&L's regulating entities.

The first priority of all DP&L areas is to ensure the safety of all DP&L employees, contractors and the public. Customer Service takes this priority very seriously, and incorporates safety into all aspects of operations. The safety program focuses on consistent communication surrounding safety and ensuring engagement by all employees.

Policies are prepared at various levels of the organization depending on the potential impact to the company. Most policies in Customer Service are made at the department level after gathering the necessary input from key internal stakeholders. Oftentimes, information is gathered from other like businesses to establish best practices before changes are considered.

Customer Service goals are set annually in support of company and corporate goals. Goals include targets for safety, compliance, customer satisfaction, and budgets.

Strategic and Long-Range Planning:

Planning in Customer Service reflects the long-range strategy to achieve DP&L's goal of delivering safe, reliable service and meeting the compliance and reliability targets as well as our customers' needs.

Customer Service completes a plan on an annual basis that projects the needs for the coming 2-3 year period. Plans typically include Customer Service projects that relate to known areas of customer satisfaction improvement opportunities, in addition to anything else in the potential future related to regulated requirements. In addition to operational needs, planning considers budget allowances and staffing needs.

Examples of strategic planning include the use of customer satisfaction data gathered by J.D. Power and Associates, Metrix Matrix, Inc., and DP&L's own internal customer satisfaction survey. DP&L analyzes all the data each year to determine what customers would like to see in the future, which is then utilized to create a plan of action and also for budget planning. A copy of our most recent internal customer satisfaction survey is included as Customer Service – Exhibit 2.

Organizational Structure and Responsibilities:

The Customer Service Department consists of approximately 120 employees and is led by the Director of Customer Service. This area maintains responsibility for the following utility activities:

1. Residential Customer Solution Center is responsible for handling all incoming customer service inquiries.
   a. Residential call center activities include:
      i. Answer incoming customer calls, often the first point of contact with the public for customer inquiries
      ii. Resolve routine and complex billing related questions
      iii. Respond to incoming customer calls regarding the Ohio Electric Choice program
      iv. Handle escalated customer inquiries
   b. Percentage of Income Payment Plan ("PIPP") activities include:
      i. Ensure DP&L is in compliance with all PIPP related requirements
      ii. Answer inbound calls and emails from state agencies
   c. PUCO activities include:
      i. Handle inquiries from the PUCO
      ii. Work with appropriate departments within DP&L to resolve complaints
      iii. Ensure DP&L is in compliance with PUCO requirements
   d. Cash Receipts activities include:
      i. Process customer payments
      ii. Resolve any technology problems that may arise with payment vendors
      iii. Ensure accuracy of balancing reports
   e. Back Office activities include:
      i. Complete bill audit related activities
      ii. Answer incoming customer emails, faxes or other correspondence
      iii. Research potential fraud and theft accounts
      iv. Process medical certification forms received from qualified practitioners
   f. Mail Room activities include:
      i. Travel to various DP&L locations to deliver internal mail
      ii. Distribute all mail within DP&L's service building

2. Business and Construction Solution Center is responsible for handling all incoming business customer service inquiries. Activities include:
   a. Answer inbound business and construction customer calls, often the first point of contact with the public for business and construction customer inquiries
   b. Resolve routine and complex billing related questions for area businesses
   c. Handle escalated business customer inquiries

d. Complete requests from builders and contractors regarding new meter installations
e. Produce net-metered bills for customers who generate a portion of their electricity via solar, wind, or other approved distributed energy resource
f. Dispatch service and collection orders to DP&L employees and contractors

The organizational chart for Customer Service is included as Customer Service - Exhibit 1.

Decision-Making and Control:

Customer Service decision-making and control is achieved by individuals throughout the organization making decisions within their given scope of authority in support of DP&L's overall mission and in accordance with the DP&L policies and procedures. Decisions are raised to proper level of authority as required by DP&L's policies. Overall responsibility for all decisions is that of the Vice President of Customer Operations.

Performance against the Customer Operations goals is monitored and reported on a continuous basis, which includes monitoring of safety, customer satisfaction, budgets, and compliance. This monitoring helps to ensure that early warnings are in place when problems arise. This allows management to uncover trends in a timely manner and proactively address issues.

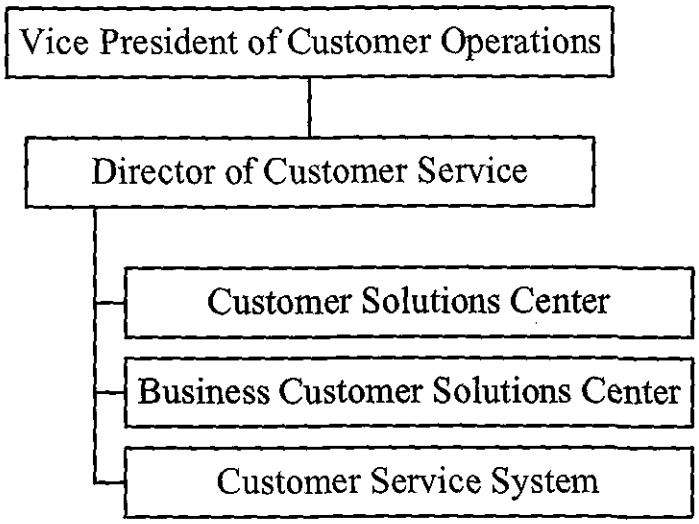
Internal and External Communications:

Internal communications are accomplished through a variety of communication channels including: phone calls, conference calls, in-person meetings and e-mail. Internal communications typically correspond to supporting the operations of other functional areas of DP&L. These communications include providing information to areas such as Community Relations, Security, Dispatch Operations, Regulatory Operations and Finance Planning and Analysis.

External communications are accomplished through a variety of communication channels including: phone calls, e-mail and most recently social media. Customer Service communications typically involve a variety of topics including: credit related inquiries, billing questions, outage restoration inquiries and complaint escalations.

Customer Service - Exhibit 1

Organizational chart for Customer Service



Customer Service - Exhibit 2

Outline of Internal Customer Survey

Customer Relationship Survey

(C1) Hello, this is [NAME] calling on behalf of [COMPANY NAME], your local electric utility. We are calling a few customers to get their thoughts and opinions regarding [COMPANY NAME]. Would you have time to participate in a brief survey?

(C2) First I would like to confirm, are you at least 18 years of age? [IF NOT, ASK FOR SOMEONE OF AGE OR TERMINATE]

(C3) This survey should take no more than 5 to 10 minutes. May I begin?

(C4) Before we begin, please be aware this conversation may be recorded for quality purposes.

(M1) [GENDER] [DO NOT READ]

1 - Male

2 - Female

(S1) On a scale of 1 to 10 where 1 is completely dissatisfied and 10 is completely satisfied, how would you rate your overall satisfaction with [COMPANY NAME]?

(Q1) What would you say is the primary reason for that particular score?

(C5) Using the same 1 to 10 scale, how satisfied are you with each of the following with regard to [COMPANY NAME]:

(S2) Receiving an uninterrupted supply of energy

(S3) Restoring service in a reasonable amount of time after an outage

(S4) Avoiding brief outages of 5 minutes or less

(S5) Avoiding lengthy outages of more than 5 minutes

(C6) The next set of questions have to do with the information and communications provided to you by [COMPANY NAME]. Using the same 1 to 10 scale how satisfied are you with:

(S6) The usefulness of suggestions on how you can reduce your energy usage and lower monthly bills

(S7) Communicating on how to be safe around electricity

(S8) Keeping you informed about changes that might affect your service

(C7) Now I would like to ask you a few questions regarding your billing and payment options. Using the same 1 to 10 scale, how satisfied are you with:

(S9) The variety of payment options available to pay your bill

(S10) The ease of understanding information on your bill

(S11) The accuracy of your bills

(S12) The ease of finding the due date and amount due

(C8) Moving on, I'd like to ask you a few questions regarding the price you pay for service from [COMPANY NAME]. On the same 1 to 10 scale how would you rate your satisfaction with:

(S13) The overall value of the service you receive from [COMPANY NAME] relative to the price you pay

(S14) Efforts taken by [COMPANY NAME] to help you manage your usage

(S15) Now, thinking about when you contact [COMPANY NAME] , how would you rate your satisfaction with the ease of getting in touch with them?

(M2) Have you visited [COMPANY NAME]'s website for any reason within the last 3 months?

1 - Yes
2 - No
3 - Don't Know [DO NOT READ]
4 - Refused [DO NOT READ]

(C9) Returning to the 1 to 10 satisfaction scale how would you rate:
(S16) The appearance of the website
(S17) The ease of navigating the website
(S18) The clarity of information provided
(S19) The ability to complete your desired task during visits to the website
(M3) Have you had any TELEPHONE contact with [COMPANY NAME] within the past 3 months?

1 - Yes
2 - No
3 - Don't Know [DO NOT READ]
4 - Refused [DO NOT READ]

(C10) Thinking about the most recent telephone call, and again returning to the 1 to 10 scale, please rate your satisfaction with the following attributes in regards to [COMPANY NAME]'s automated attendant:
(S20) The ease of navigating the menu prompts
(S21) The clarity of information provided
(S22) The ability to obtain the desired information or complete the desired task
(M4) Do you recall speaking with a Customer Service Representative during your phone call?

1 - Yes
2 - No
3 - Don't Know [DO NOT READ]
4 - Refused [DO NOT READ]

(C11) Using the 1 to 10 scale, please rate your satisfaction with the Customer Service Representative on the following attributes:
(S23) The courtesy shown by the representative
(S24) The knowledge of the representative
(S25) The ability of the representative to resolve your inquiry
(C12) I would like to ask you a few questions regarding your satisfaction with [COMPANY NAME]'s social responsibility. Again using the 1 to 10 scale how would you rate your satisfaction with:
(S26) [COMPANY NAME]'s involvement in local charities and civic organizations
(S27) [COMPANY NAME] being positively engaged in the community
(S28) [COMPANY NAME] being a good, fair, respectable, and trusted company
(S29) The actions taken by [COMPANY NAME] to protect the environment
(S30) The variety of energy efficiency programs offered
(S31) [COMPANY NAME]'s efforts to plan for future energy supply
(C13) Thinking specifically about advertising for [COMPANY NAME]:
(M5) Have you seen any [COMPANY NAME] advertising, such as ads on TV, radio or billboards, within the past 3 months?

1 - Yes
2 - No

3 - Don't Know [DO NOT READ]
4 - Refused [DO NOT READ]

(C14) Where did you see or hear the advertising? [DO NOT READ, RECORD Y FOR ALL MENTIONED]
(B1) TV
(B2) Radio
(B3) Online - conducted a search
(B4) Online - saw a banner ad
(B5) [COMPANY NAME]'s website
(B6) Printed advertisement
(B7) Billboard
(B8) Word of mouth
(B9) Don't know / Don't remember [DO NOT READ]

(M6) Which of the following best describes the ad's impact on your perception of [COMPANY NAME]? [READ LIST]
1 - Positive
2 - Neutral
3 - Negative
4 - Don't know [DO NOT READ]

(Q2) What do you remember about these advertisements in terms of the message or what was talked about? [RECORD VERBATIM] (Anything else?) [PROBE]

(C15) These final questions are for categorization purposes only.

(M7) Do you own or rent your home?
1 - Own
2 - Rent
3 - Don't Know [DO NOT READ]
4 - Refused [DO NOT READ]

(M8) Which of the following best describes your age? Please stop me when I reach the correct answer.
1 - Teens
2 - Twenties
3 - Thirties
4 - Forties
5 - Fifties
6 - Sixties
7 - Seventies
8 - Eighties
9 - Nineties
10 - Over 90
11 - Refused [DO NOT READ]

(M9) How would you categorize your total household income? Would you say it is:
1 - Under $20,000
2 - At least $20,000 but under $50,000
3 - At least $50,000 but under $100,000
4 - At least $100,000 but under $150,000
5 - Greater than $150,000

6 - Don't Know [DO NOT READ]
7 - Refused [DO NOT READ]

(C16) That is all the questions I have today. Thank you for your time. Your feedback is very valuable to [COMPANY NAME]

Functional Area:
Customer Service System

Policy and Goal Setting:

DP&L's Customer Service System area policies and goals are based on providing assurance that DP&L's billing system functionality enables DP&L to meet or exceed compliance requirements with all regulations, laws, tariffs, and DP&L policies in addition to meeting the needs of the business.

The first priority of all DP&L areas is to ensure the safety of all DP&L employees, contractors and the public. The Customer Service System area participates in monthly safety meetings to ensure safety awareness.

The Customer Service System area goals are set annually in support of company and corporate goals. Goals include objectives for safety, daily operations, financials, talent management and personal development.

Strategic and Long-Range Planning:

The Customer Service System area works with DP&L's Regulatory Operations, Information Technology, Residential and Business Customer Solutions Centers, Electric Choice Administration, and all operational groups (meter to cash) to define, evaluate, plan, test, and implement billing system and process changes that are being proposed by external or internal parties or required by regulation, law, or tariff.

Planning for these changes occurs annually with a two-year outlook to provide budgetary input for Information Technology and for the Customer Service System area.

Organizational Structure and Responsibilities:

The Customer Service System area consists of 4 employees and is led by the Manager of Customer Service System who reports to the Director of Customer Service. This area maintains responsibility for the following activities:

1. The Customer Service System area is responsible for the customer service system. The system functionality includes all functions from the meter to cash including; customer billing, rate configuration for DP&L and Competitive Retail Electric Service ("CRES") providers, order processing, financial transactions, collection processing, and meter inventory. Key activities for the Customer Service System area include:
    a. Development of system change and enhancement requirements, detailed specifications and testing

b. Implementation of changes and enhancements through development of process changes and training materials implemented utilizing a 'train the trainer' approach
c. Research of proposed regulatory, law, and tariff changes to determine viability, cost estimates and resource needs
d. Provide day-to-day support for system users related to functionality
e. Document and prioritize system problems, proposes fixes, and tests solutions
f. Develop system query and report requirements and verifies accuracy of data
g. Provide monthly reporting to the PUCO regarding disconnects, reconnects, deposits, payment plans, and the winter reconnect order
h. Provide monthly reporting to the PUCO and the Ohio Development Services Agency on the PIPP Plus
i. Setup and maintenance of summary billing and interval meter accounts
j. Provide daily support for Control Area Services and Electric Choice Administration
k. Review and approve high-level financial transactions performed in CSS
l. Engage in and support any project that could require data from and/or changes to the billing system

The organizational chart for Customer Service System area is included as Customer Service System - Exhibit 1.

Decision-Making and Control:

Customer Service System area personnel decision-making is based upon adherence to regulations, laws, tariffs, and policies. A listing including those key references is included as Customer Service System – Exhibit 2. Control is achieved by individuals making decisions within their given scope of authority in support of DP&L's overall mission and in accordance with DP&L policies and procedures. Decisions are raised to proper level of authority as required by DP&L's policies.

Performance against the goals is monitored on a continuous basis, which includes monitoring of safety, daily operations, budgets, compliance and status of Customer Service System enhancement project deliverables. This monitoring helps to ensure that early warnings are in place when problems arise. This allows management to uncover trends in a timely manner and proactively address issues.

Internal and External Communications:

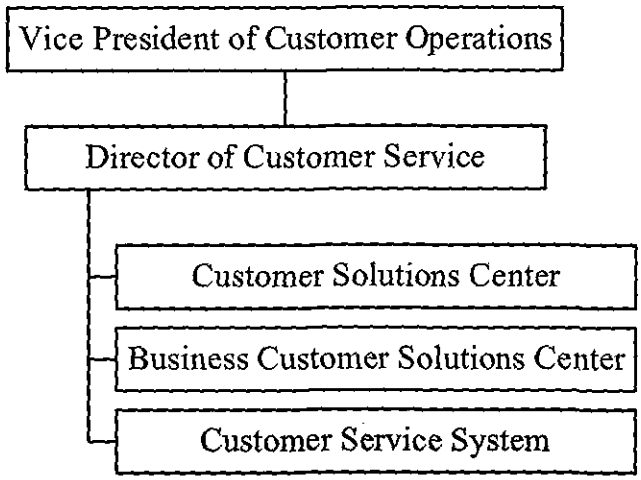
Internal communications are accomplished through a variety of communication channels including: phone calls, in-person meetings, conference calls and e-mail. Internal

communications typically correspond to support of Customer Service Operations and other areas of DP&L including Information Technology, Regulatory Operations, Accounting, Electric Choice Administration, Legal, and Meter Reading.

External communications are accomplished through a variety of communication channels including: phone calls, in-person meetings, conference calls and e-mail. External communications typically involve customers, regulatory bodies, and vendors.

Customer Service System – Exhibit 1

Organizational Chart for Customer Service System Area



Customer Service System – Exhibit 2

Key References Used for Compliance Adherence

- Electric Service and Safety Standards (O.A.C. 4901:1-10)
- Termination of Residential Service (O.A.C. 4901:1-18)
- PIPP Program (O.A.C. 122:5-3)
- DP&L Tariffs
- Billing Services Agreements with CRES Providers

Functional Area:
Engineering Services

SFR Reference
(B)(9)(a)(iv) Customer and usage growth forecasting
(B)(9)(a)(v) Demand and capacity load forecasting

Policy and Goal Setting:

Policies are developed by DP&L's management under the guidance of AES's management and board of directors. All parties are equally responsible to ensure that DP&L policies meet or exceed the requirements set forth by all of DP&L's regulating entities.

The first priority of all DP&L areas is to ensure the safety of all DP&L employees, contractors and the public. Engineering Services employees attend monthly safety meetings which cover topics relevant to work activity and allow employees to share concerns and experiences. Further, employees are properly outfitted with personal protective equipment for activities performed in the field.

Engineering Services goals are set annually in support of company and corporate goals. Goals include targets for safety, compliance, timeliness, and budgets.

Strategic and Long-Range Planning:

Planning in Engineering Services reflects DP&L's long-range strategy to achieve DP&L's goal of delivering safe, reliable service, meeting compliance and reliability targets, as well as our Customer's needs.

Several departments including Distribution Planning, Substations, Real Estate Services, Customer Service and Business Development work together to understand the Company's expected growth areas. Timing, budgets, and necessary resources are considered and a plan is developed to ensure Engineering Services is positioned to provide the services needed to accommodate the dynamic needs of DP&L's transmission and distribution system and that of its customers.

Customer growth projects are developed by first looking at current and proposed customer usage and then completing a demand and capacity load review. Customer growth and usage forecasting is achieved by collecting economic growth information throughout the year. Information is collected from various sources (government entities, developers, or internal resources) regarding proposed new or increasing load. Information collected includes:

a. Development location and layout
b. Estimated or proposed load
c. Voltage requirements

d. Specialized customer equipment (large motors, welders, furnaces) needs (auto-throwover switch).

Once customer growth and usage information is gathered, Engineering Services does a demand versus capacity review. This review involves assessing our electric substations and distribution circuits to validate the infrastructure necessary to reliably serve the forecasted load. Items reviewed include:

a. Existing circuit capacity versus demand
b. Existing substation capacity versus demand
c. Development of new substations and/or circuits
d. Review of circuit performance and reliability issues (ex. potential voltage issues due to large motors).

Organizational Structure and Responsibilities:

Engineering Services consists of 33 employees and is led by the Director of Transmission and Distribution Engineering. This area maintains responsibility for the following utility activities:

1. Design Engineering provides engineering design and technical support for all new customer construction as well as maintenance related projects designed to improve or upgrade the reliability of DP&L's electrical distribution system. Activities include:
   a. Provide design and technical support for all new customer construction
   b. Provide design and technical support for all maintenance related projects intended to improve or upgrade the reliability of DP&L's distribution system
   c. Provide design and technical support for all customer requested relocations or upgrades
   d. Management of the pole attachment process
   e. Engineering analysis of field hazards

2. Distribution Planning is responsible for planning and designing the electrical distribution system to ensure system reliability and acceptable service standards within our service territory. Activities include:
   a. Review of the capacity requirements of the distribution system annually
   b. Prepare distribution capacity expansion plans compatible with long-term expansion objectives and the associated capital budgets
   c. Manage project expenditure approvals for large capital projects
   d. Conduct electrical system studies as required to improve system efficiency, system reliability and quality of service to customers
   e. Specify reliability improvement plans where needed
   f. Develop and maintain computer programs that monitor substation and circuit loading
   g. Develop and issue capacity ratings for transmission and distribution circuits and transformers

h. Develop load blocks to assist operations with switching plans
i. Assist in the preparation of interconnection agreements with customers that have on-site generation
j. Develop capital budgets to include major projects
k. Analyze risk and value of projects to prioritize funding
l. Support power quality investigations
m. Act as subject matter experts and administrators for North American Electric Reliability Corporation ("NERC") compliance standards

3. Drafting is responsible for maintaining DP&L's mapping resources which are required for effective utility operations. Activities include:
   a. Update Geographic Information System ("GIS") electrical maps for any field corrections needed
   b. Create and edit DP&L's distribution circuit index prints
   c. Create and edit DP&L's AC Network, transmission, telecom and substation prints
   d. Perform quality control on GIS electrical maps
   e. Input new backgrounds for land base management

4. Transmission Engineering is responsible for transmission line projects and the development of technical resources with an in-depth understanding of transmission system design and operations. Activities include:
   a. Create construction drawings and associated bills of material for various projects
   b. Specify and obtain materials/equipment specific to a project
   c. Develop siting and permitting processes
   d. Support equipment specification and standards processes
   e. Develop project scopes and estimates
   f. Maintain and update engineering drawings associated with transmission lines and equipment
   g. Perform line encroachment investigations

The organizational chart for Engineering Services is included as Engineering Services – Exhibit 1.

Decision-Making and Control:

Engineering Services' decision-making and control is achieved by individuals throughout the organization making decisions within their given scope of authority in support of DP&L's overall mission and in accordance with the DP&L policies and procedures. Decisions are raised to the proper level of authority as required by DP&L's policies. Overall responsibility for all decisions is that of the Vice President of Customer Operations.

Performance against the Customer Operations goals are monitored and reported on a continuous basis, which includes monitoring of safety, reliability, budgets, and compliance. This monitoring

helps to ensure that early warnings are in place when problems arise. This allows management to uncover trends in a timely manner and proactively address issues.

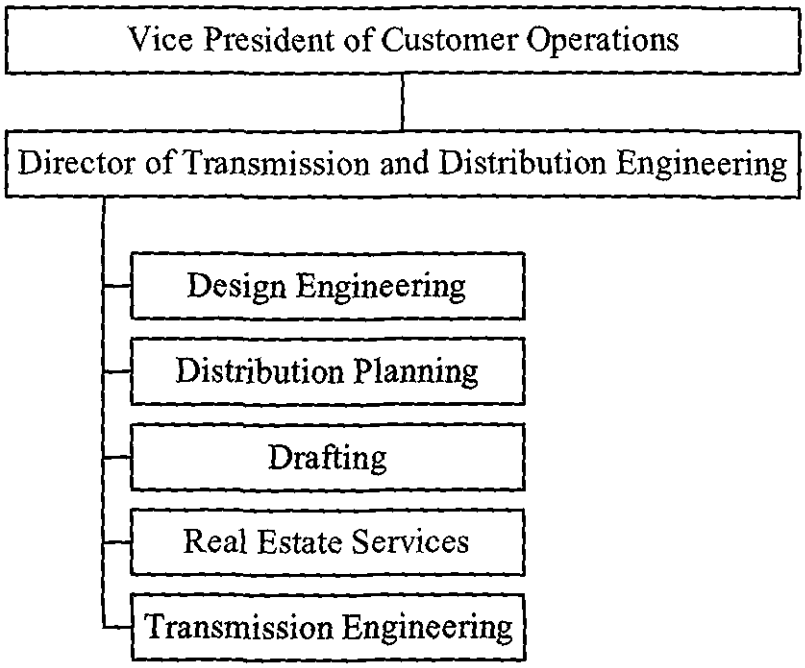
Internal and External Communications:

Internal communications are accomplished through a variety of communication channels including: phone calls, conference calls and e-mail. Internal communications typically include providing information and supporting field operations and typically involve areas such as Substations, Customer Service, Community Relations, Financial Planning and Analysis, Human Resources and Real Estate Services.

External communications are accomplished through a variety of communication channels including phone calls, meetings, and e-mail. Engineering Services employees will communicate directly with communities, customers, other utilities and vendors as needed. Communications typically involve a variety of topics including: engineering activities, material specification and procurement, technical issue resolution, construction projects, and maintenance activities. Employees also attend various meetings with other electric utilities, associations and organizations as delegates or committee members. They conduct joint studies, coordinate projects and discuss issues common to the electric utility industry. They also work with local, state and federal agencies to furnish information as requested.

Engineering Services – Exhibit 1

Organizational Chart for Engineering Services



Functional Area:
Facility Operations

SFR Reference
(B)(9)(a)(i) Plant/facilities planning process

Policy and Goal Setting:

DP&L's Facilities policies have evolved to be responsive to federal, state and local regulations and policies. DP&L's policies are developed by DP&L's management under the guidance of AES's management and board of directors. All parties are equally responsible to ensure that DP&L policies meet or exceed the requirements set forth by all of DP&L's regulating entities.

The first priority of all DP&L areas is to ensure the safety of all DP&L employees, contractors and the public. Facility Operations takes this priority very seriously, and incorporates safety into all aspects of operations. One example of safety activities in Facility Operations includes ensuring that housekeeping is maintained according to the safety standards, in an effort to make DP&L facilities injury-free workplaces.

Facility Operations goals are set annually in support of company and corporate goals. Goals include targets for safety, compliance, and budgets.

Strategic and Long-Range Planning:

Planning in Facility Operations reflects DP&L's long-range strategy to achieve DP&L's goal of delivering safe, reliable service and meeting the compliance targets as well as our Customer's needs.

Facility Operations annually completes a plan that projects the needs for the coming 10-year period. Plans typically include facility projects which relate to known areas of aging infrastructure and upgrades. In addition to operational needs, planning considers budget allowances and staffing needs.

Organizational Structure and Responsibilities:

The Facility Operations Department has one full-time employee. Facility Operations is responsible for the construction, maintenance, and emergency response related to the Dayton Service Building infrastructure and the outlying service centers. Activities include:

1. Provide maintenance and emergency response to 11 field service centers, the Dayton Service Building. The approximate location of each facility is included as Facility Operations - Exhibit 2.

2. Perform routine maintenance activities such as HVAC system inspections, housekeeping, lawn maintenance, and monthly service center inspections
3. Manage construction activities related to major or minor renovations at existing service centers
4. Maintain all preventative fire systems as directed by National Fire Protection Association

The organizational chart for Facility Operations is included as Facility Operations - Exhibit 1.

Decision-Making and Control:

Facility Operations decision-making and control is achieved by individuals throughout the organization making decisions within their given scope of authority in support of DP&L's overall mission and in accordance with the DP&L policies and procedures. Decisions are raised to proper level of authority as required by DP&L's policies. Overall responsibility for all decisions is that of the Vice President of Customer Operations.

Performance against the Customer Operations goals is monitored and reported on a continuous basis, which includes monitoring of safety, budgets, and compliance. This monitoring helps to ensure that early warnings are in place when problems arise. This allows management to uncover trends in a timely manner and proactively address issues.

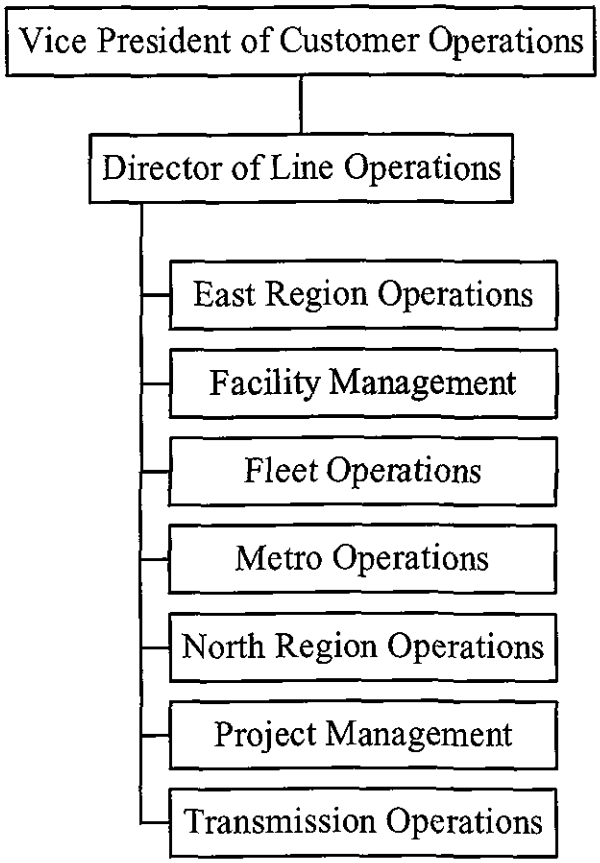
Internal and External Communications:

Internal communications are accomplished through a variety of communication channels including: phone calls, conference calls and e-mail. Internal communications typically correspond to supporting the operations of other functional areas of DP&L. These communications include providing information to areas such as Dispatch Operations, Customer Service, Community Relations, Environmental, Finance, and Regulatory Operations.

External communications are accomplished through a variety of communication channels including: phone calls, meetings, and e-mail. Communication typically involves cleaning, maintenance, and construction contractors who are performing work on DP&L facilities.

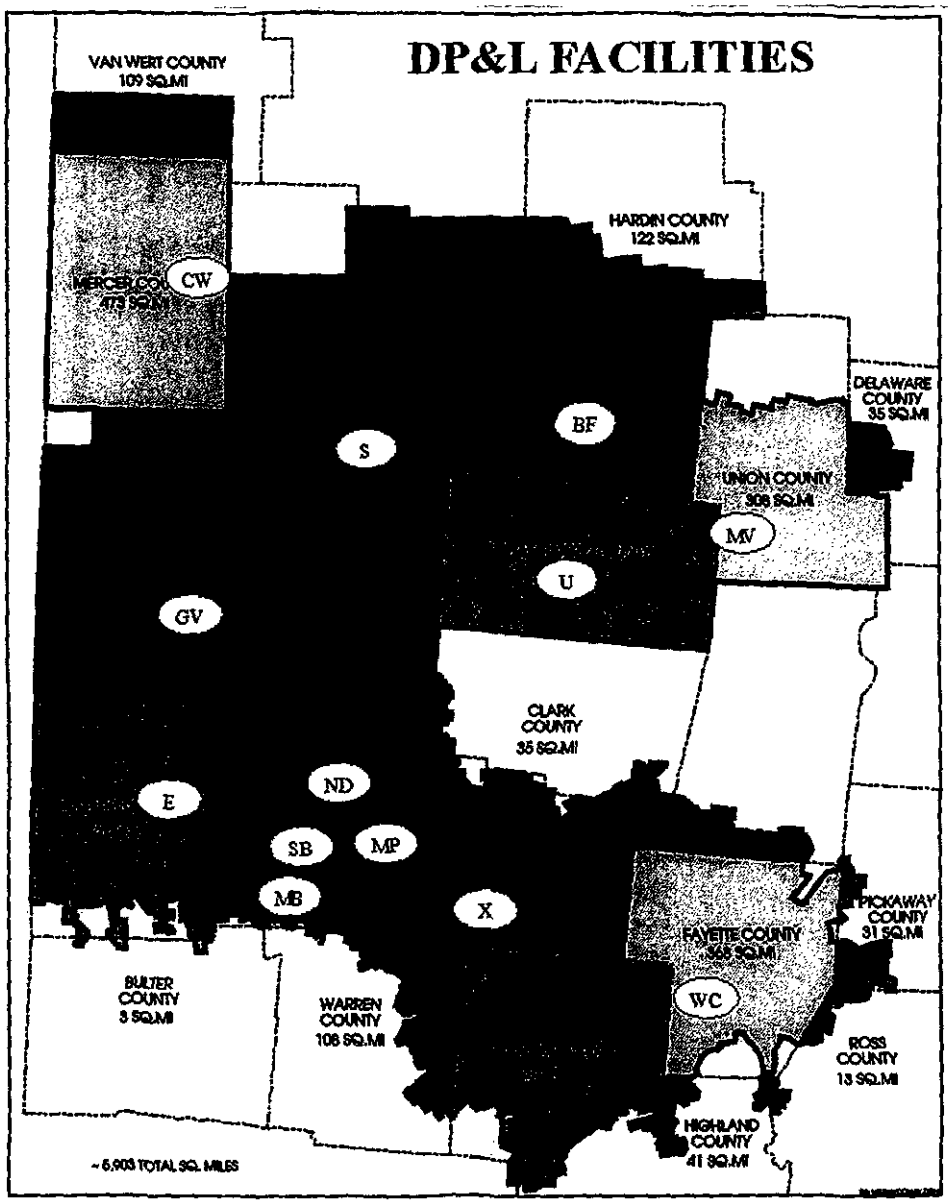
Facility Operations – Exhibit 1

Organizational Chart for Facility Operations



Facility Operations – Exhibit 2

Facility Locations in DP&L Service Territory



BF - Bellefountaine	ND - North Dayton
CW - Coldwater	SB - Dayton Service Building
E - Eaton	S - Sidney
GV - Greenville	U - Urbana
MB - Miamisburg	WC - Washington Courthouse
MP - MacGregor Park	X - Xenia
MV - Marysville	

Functional Area:
Fleet Operations

SFR Reference
(B)(9)(g)(i) Fleet management
(B)(9)(g)(ii) Garages/fleet maintenance

Policy and Goal Setting:

DP&L's Fleet Operations policies have evolved to be responsive to federal, state and local regulations and policies. DP&L's policies are developed by DP&L's management under the guidance of AES's management and board of directors. All parties are equally responsible to ensure that DP&L policies meet or exceed the requirements set forth by all of DP&L's regulating entities.

The first priority of all DP&L areas is to ensure the safety of all DP&L employees, contractors and the public. Fleet Operations takes this priority very seriously, and incorporates safety into all aspects of operations. The safety program focuses on getting everyone involved in safety through monthly safety meetings, pre-job briefings, and safety walks in order to increase safety awareness and create an injury-free workplace. Vehicle safety is a primary concern with rigorous planned maintenance and inspection schedules geared to accomplishing this goal. Any safety concern causes the vehicle or equipment to be immediately pulled from service for correction.
Fleet Operations goals are set annually in support of company and corporate goals. Goals include targets for safety, compliance, reliability, and budgets.

Fleet Operations provides reliable service equipment allowing the accomplishment of our restoration, construction and business missions. In addition, our goal is to preserve and optimize vehicle and equipment life at the lowest possible cost.

Strategic and Long-Range Planning:

Strategic planning in Fleet Operations reflects DP&L's long-range strategy to achieve DP&L's goal of delivering safe, reliable service and meeting the compliance and reliability targets as well as our customers' needs.

To achieve the highest reliability of the vehicles and equipment that service our customers, the performance of the fleet is constantly monitored. Performance metrics include overall fleet availability which translates to shorter restoration times for our customers. Also, a 10-year detailed unit replacement plan is updated annually.

Organizational Structure and Responsibilities:

Fleet Operations consists of approximately 30 employees and contractors and is led by a team leader. This area maintains responsibility for the following utility activities.

Fleet Operations is responsible for the acquisition, maintenance, repair and disposal of vehicles and equipment necessary to perform construction, maintenance, restoration activities and general transportation. A large repair facility is located at DP&L's service building along with 4 smaller regional facilities distributed strategically throughout the DP&L service territory. Activities include:

1. Write vehicle and equipment specifications in a customer inclusive process
2. Purchase, maintain and assign vehicles to each of the customer areas we serve
3. Provide around the clock road service throughout DP&L's service territory
4. Manage a full service repair facility at the Dayton Service Building including a body and paint shop
5. Perform major repairs such as engine or transmission replacements and fabricate custom items to meet specific vehicle needs of the organization
6. Maintain outlying repair facilities at North Dayton, Xenia, Greenville and Marysville service centers. Mechanics are available on two shifts at our Dayton, Xenia and Greenville locations which allows for overnight service and early morning availability for field personnel
7. Manage a small used parts inventory to improve cost efficiency and use parts from vehicles and equipment removed from service that have little residual value. Additionally, manage an inventory of new commonly used service parts
8. Manage a maintenance contract supplying a contractor workforce which also provides access to national buying power on parts
9. Purchase fuel (diesel and gasoline) in a cost effective manner and deliver daily to 7 storage tank locations. This allows for efficient on-site fueling of the fleet
10. Maintain a vehicle pool at the Dayton Service Building which is available to all employees who have an occasional need for transportation, optimizing the fleet for maximum use and efficiency. The pool contains a range of vehicles from passenger cars to bucket trucks and digger derricks which may be used when assigned vehicles are down for service
11. Manage vehicle assignments and obtain extra rental vehicles during service restoration emergencies

The organizational chart for Fleet Operations is included as Fleet Operations - Exhibit 1.

Decision-Making and Control:

Fleet Operations decision-making and control is achieved by individuals throughout the organization making decisions within their given scope of authority in support of DP&L's overall mission and in accordance with the DP&L policies and procedures. Decisions are raised

to the proper level of authority as required by DP&L's policies. Overall responsibility for all Fleet Operations decisions is that of the Vice President of Customer Operations.

Performance against the Fleet Operations goals is monitored and reported on a continuous basis, which includes monitoring of safety, reliability, budgets, and compliance. This monitoring helps to ensure that early warnings are in place when problems arise. This allows management to uncover trends in a timely manner and proactively address issues.

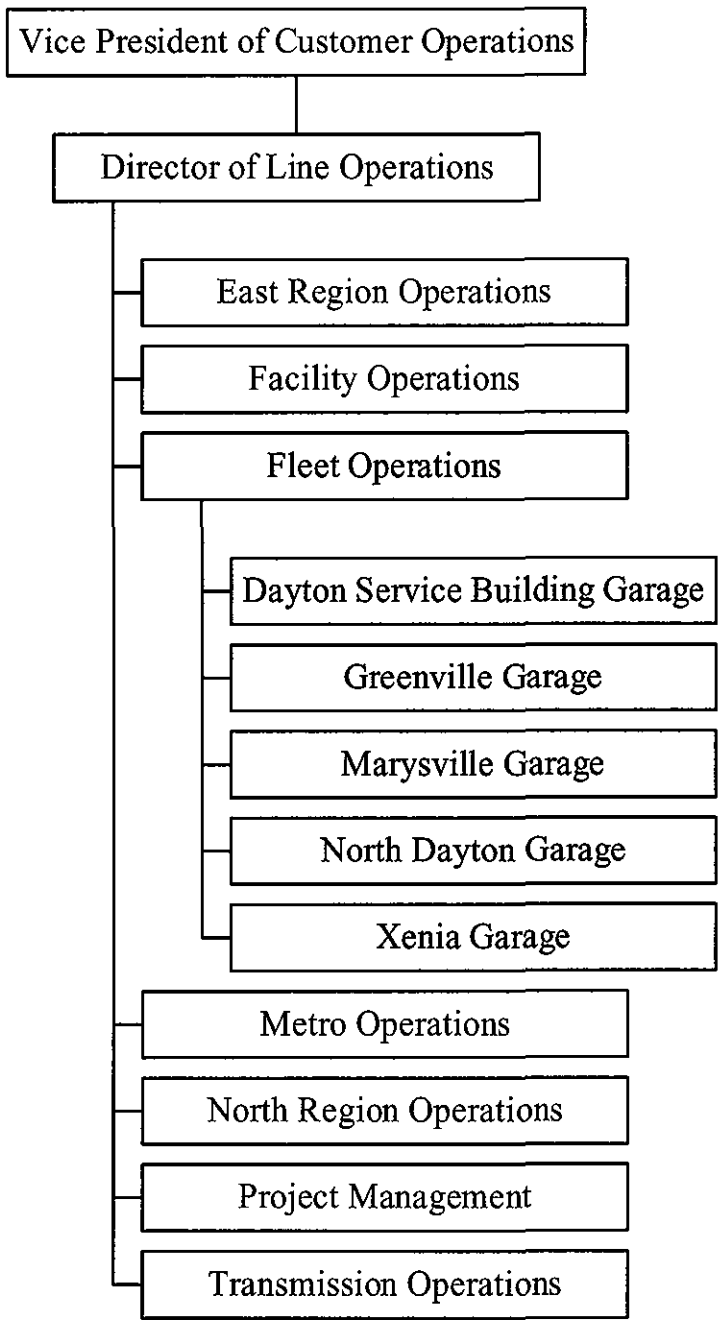
Internal and External Communications:

Internal communications are accomplished through a variety of communication channels including: phone calls, conference calls and e-mail. Internal communications typically correspond to supporting the operations of other functional areas of DP&L. These communications include providing information and responses to all transmission and distribution operating units.

External communications are accomplished through a variety of communication channels including: phone calls and e-mail. External communications typically relate to the acquisition of vehicles, parts and service.

Fleet Operations – Exhibit 1

Organizational Chart for Fleet Operations



Functional Area:
Line Operations

SFR Reference
(B)(9)(a)(ii) Operations and maintenance policies and procedures
(B)(9)(a)(vi) Construction project management and control

Policy and Goal Setting:

DP&L's Line Operations policies have evolved to be responsive to federal, state and local regulations and policies. DP&L's policies are developed by DP&L's management under the guidance of AES's management and board of directors. All parties are equally responsible to ensure that DP&L policies meet or exceed the requirements set forth by all of DP&L's regulating entities.

The first priority of all DP&L areas is to ensure the safety of all DP&L employees, contractors and the public. Line Operations takes this priority very seriously, and incorporates safety into all aspects of operations. The safety program focuses on getting everyone involved in safety in order to increase safety awareness and create an injury-free workplace.

Line Operations goals are set annually in support of company and corporate goals. DP&L manages its operations in an effort to achieve all of its goals including safety, compliance, reliability and budgets.

Strategic and Long-Range Planning:

Planning in Line Operations reflects DP&L's long-range strategy to achieve DP&L's goal of delivering safe, reliable service and meeting the compliance and reliability targets as well as our customers' needs.

Line Operations annually participates in completing a plan that projects the needs for the coming 10-year period. Plans typically include distribution projects which relate to known areas of customer growth, addressing the circuit reliability concerns experienced throughout the most recent year and other planned system expansions and upgrades. In addition to operational needs, planning considers budget allowances and staffing needs.

Organizational Structure and Responsibilities:

The Line Operations Department consists of approximately 141employees and is led by the Director of Line Operations. This area maintains responsibility for the following utility activities:

1. Project Management is operated out of three main hubs (Dayton, Sidney and Xenia) along with three operational offices (Eaton, Greenville, and Marysville) and is responsible for coordinating internal and external resources for all new construction projects, mandated road improvement projects, all customer driven project work, overhead reliability replacement or improvement programs and emergency restoration related to the electrical distribution system facilities. A listing of DP&L's project management policies is included as Line Operations - Exhibit 2. Activities include:
   a. Maintain regular customer contact related to system maintenance and construction activities
   b. Oversee all customer related projects as they relate to the distribution system which would include system relocations or replacements, new construction, mandated road work and customer driven projects
   c. Manage construction activities related to additional circuits and major renovation or replacements at existing distribution facilities which includes following bid processes for projects with labor greater than $25,000
   d. Manage construction activities in accordance with DP&L's construction standards. A listing of DP&L's construction standards is included as Line Operations – Exhibit 3
   e. Coordinate contractor resources for new construction, system upgrades or replacements, customer-related work and reliability programs
   f. Execute competitive bidding for contractor resources and manage contracts
   g. Organize the contractor safety program for overhead line maintenance and construction which includes quarterly meetings
   h. Support DP&L storm operations

2. 24x7 Operations is operated out of three main hubs (Dayton, Sidney and Xenia) along with five operational offices (Coldwater, Eaton, Greenville, Marysville, and Washington Court House) and is responsible for all aspects of the distribution system. Activities include:
   a. Provide operation and maintenance support to electric distribution system facilities twenty-four hours a day
   b. Interaction with customers related to system maintenance, construction and operational activities
   c. Manage emergency restoration operations to 578 circuits which includes day to day outages as well as storm operations
   d. Maintain DP&L's electric restoration standards in accordance with 4901:10-08 O.A.C.
   e. Perform routine maintenance activities such as replacing or repairing items identified through mandated inspection programs, assisting customers with planned outages, and transferring facilities after pole replacements
   f. Inspect overhead devices including airbreaks and reclosers annually and repair items identified through inspections

g. Coordinate construction activities related to replacing and upgrading existing distribution facilities due to forced replacements or auto accidents
h. Evaluate and remediate multiple incident outage report on a weekly basis to resolve areas with reliability concerns

3. Transmission Operations is operated centrally out of the Dayton Service Building and is responsible for construction, maintenance and emergency restoration related to the transmission system. Activities include:
   a. Provide maintenance and emergency restorations to 186 transmission circuits
   b. Regular customer contact related to system maintenance, construction and operational activities
   c. Perform routine maintenance activities such as repairing static wires, repairing or replacing guys wires, replacing crossarms and insulators
   d. Coordinate construction activities related to replacing and upgrading existing transmission facilities
   e. Implement and coordinate activities for new construction, system expansion and renewal and replacement projects

The organizational chart for Line Operations is included as Line Operations - Exhibit 1.

Decision-Making and Control:

Line Operations decision-making and control is achieved by individuals throughout the organization making decisions within their given scope of authority in support of DP&L's overall mission and in accordance with the DP&L policies and procedures. Decisions are raised to proper level of authority as required by DP&L's policies. Overall responsibility for all decisions is that of the Vice President of Customer Operations.

Performance against the Customer Operations goals is monitored and reported on a continuous basis, which includes monitoring of safety, reliability, budgets, and compliance. This monitoring helps to ensure that early warnings are in place when problems arise. This process allows management to uncover trends in a timely manner and proactively address issues.

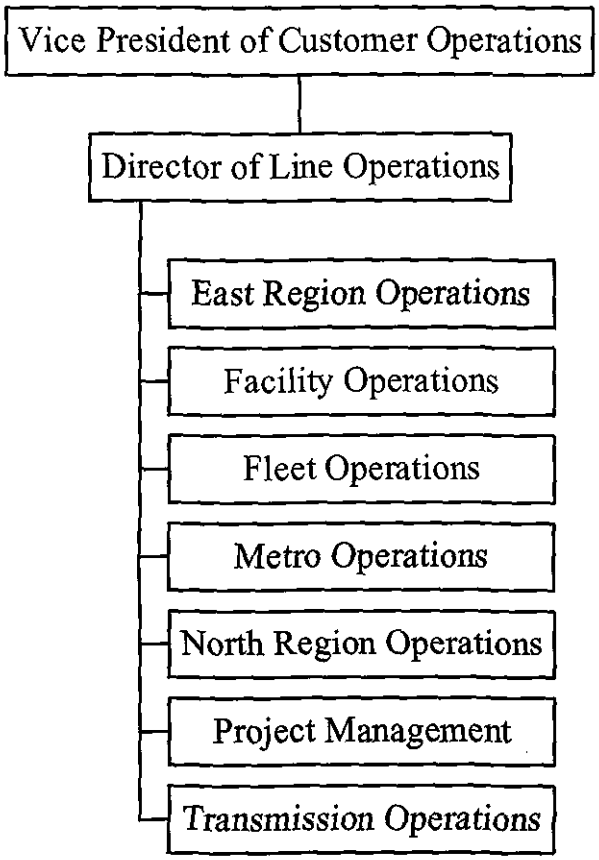
Internal and External Communications:

Internal communications are accomplished through a variety of communication channels including: phone calls, conference calls and e-mail. Internal communications typically correspond to supporting the operations of other functional areas of DP&L. These communications include providing information to areas such as Engineering, Dispatch Operations, Customer Service, Community Relations, Finance, and Regulatory.

External communications are accomplished through a variety of communication channels including: phone calls, meetings, and e-mail. Line Operations personnel will communicate directly with communities or larger customers when technical issues arise. Communications typically involve a variety of topics including: outage restoration, technical issue resolution, construction projects, and maintenance activities.

Line Operations – Exhibit 1

Organizational Chart for Line Operations



Line Operations – Exhibit 2

Listing of Project Management Policies and Procedures

- Service Operations Oracle Setup Policy
- Service Operations Work Order Close Review Policy
- Service Operations Capital Blankets
- Service Operations Overspend Authorization Form
- Plant In-Service Property Accounting Report
- Service Operations Oracle Initiated Projects Close-Out Sign-Off
- Service Operations Oracle Initiated Projects Blank Cost Estimating Worksheet
- Service Operations Oracle Initiated Projects Variance Form
- Service Operations StakeOut Projects Close-Out Sign-Off
- Service Operations StakeOut Variance Form

Line Operations – Exhibit 3

List of all Distribution and Transmission Construction Standards

DP&L

Electric Construction Standards
Section 00: Administration

Standard #: **EC-00-010**
Rev. Jan-13

Master Index of Construction Standards (Sections 00 to 40)

Standard # EC-	Title	Current Revision Date	# of Pages
SECTION 00 - Administration			
00-010	Master Index of Construction Standards (Sections 00 to 40)	Jan-13	28
00-020	Master Index of Engineering Standards (Sections 41 to 96)	Jan-13	6
00-025	Master Index of Retired Construction and Engineering Standards (Sections 00 to 96)	Dec-10	6
00-027	Purpose	Jan-12	1
00-030	Standards Department Procedures	Jan-09	3
00-040	Format of Published Standards	Jan-09	2
SECTION 01 - Pole Setting			
01-ALL	All Standards in Section 01 as a Single Document		
01-010	Recommended Bolt Length	Feb-09	2
01-020	Pole Grounding Practices and Butt Wrapping Specifications	Nov-08	3
01-030	Pole Grounding Practices for Primary and Secondary Riser Poles	Nov-08	3
01-040	Recommended Pole Setting Depth	Nov-08	1
01-050	Maintenance Replacement of an Existing Pole	Mar-09	5
01-060	Recommended Distribution Pole Sizing	Feb-09	2
01-070	Pole Physical Data	Feb-09	5
SECTION 02 - Guying and Anchoring			
02-ALL	All Standards in Section 02 as a Single Document		
02-010	Guy Marker Installation	Nov-08	1
02-020	Guy Wire	Nov-08	1

Standard # EC-	Title	Current Revision Date	# of Pages
02-030	Anchor Strengths	Nov-08	1
02-040	Soil Classification	Dec-08	1
02-050	Secondary or Neutral 5/16" Galvanized EHS Down Guy	Nov-08	2
02-060	Primary 5/16" Galvanized EHS Down Guy	Nov-08	2
02-070	Secondary or Neutral 3/8" Galvanized EHS Down Guy	Nov-08	2
02-080	Primary 3/8" Galvanized EHS Down Guy	Nov-08	2
02-082	Neutral 1/2" Galvanized EHS Down Guy	Nov-08	2
02-084	Primary 1/2" Galvanized EHS Down Guy	Nov-08	2
02-090	Head Guy Assembly	Nov-08	2
02-100	Arm Guy Assemblies	Nov-08	2
02-110	Grounded Looped Down Guy Assembly	Nov-08	2
02-120	Power Installed Screw Anchors	Dec-08	3
02-130	Rock Anchor	Nov-08	2

SECTION 03 - Primary Construction

03-ALL	All Standards in Section 03 as a Single Document		
03-020	Straight Line and Dead End Clamp for #4 Through 1/0	Jan-09	1
03-030	Extension Link	Jan-09	1
03-050	Loadbreak Tool Procedure – S&C Loadbuster	Jan-09	5
03-060	*Recommended Bolt Diameter and Washer Type*	Feb-09	1
03-080	Overhead Standard Phasing	Jan-09	2
03-090	Crossarm Installations	Jan-09	1
03-100	Distribution Neutral Requirements	Feb-09	2
03-110	Radio Interference (RIV) from Strain Insulators	Jan-09	1
03-120	Locations for Pole and Arrester Ground Wire	Jan-09	1
03-130	Location of Arrester Ground Wire	Feb-09	2
03-150	Single Phase Primary Pole Top Pin	Feb-09	2
03-160	Single Phase Primary Deadend Assembly	May-09	2
03-170	Single Phase Primary Deadend Corner	May-09	2
03-180	Single Phase Primary Vertical Swingout Construction for 1/0 and Smaller	May-09	2
03-200	Single Phase Primary Double Dead End	Mar-09	3
03-202	Single Phase Primary Double Dead End with Pole Top Pin	Mar-09	5
03-205	Single Phase Primary Double Dead End with Cutout	Apr-09	6
03-210	1Ø Reduced Tension Primary 1/0 AAAC with B/L Cutout	Dec-03	2
03-220	1Ø Primary 1Ø Buck Assembly and Provision for B/L Cutout	Dec-03	2
03-230	1Ø Primary with 1Ø Buck Assembly	Dec-03	2
03-240	Adding 1Ø Buck Assembly with Provision for a B/L Cutout	Dec-03	2
03-250	Cut Deadend into Existing Primary Lines for Fused Tie	Dec-03	2

Standard # EC-	Title	Current Revision Date	# of Pages
03-260	1Ø Primary on Crossarm	Dec-03	1
03-270	1Ø Primary Armless Construction	Dec-03	1
03-280	2Ø Primary on Crossarm	Dec-03	2
03-290	3Ø Fiberglass Post Assembly Tangent Pole	Dec-03	1
03-300	3Ø Fiberglass Post Assembly 4° to 15° corner	Dec-03	2
03-310	3Ø Fiberglass Post Assembly for 795 AAC Tangent Poles	Dec-03	2
03-320	3Ø Fiberglass Post Assembly for 795 AAC 4° to 15° corners	Dec-03	2
03-330	3Ø Fiberglass Post Assembly 1Ø B/L Middle or Opp. Ø	Dec-03	2
03-340	3Ø Fiberglass Post Assembly 1Ø B/L Adjacent Phase	Dec-03	2
03-350	3Ø Fiberglass Post Assembly 4/0 ACSR and Smaller	Dec-03	2
03-360	3Ø Fiberglass Post Assembly >/= 477 MCM Tension Lateral	Dec-03	2
03-370	3Ø Crossarm Deadend Assembly for </= 4/0 ACSR	Dec-03	2
03-380	3Ø Crossarm Deadend Assembly for >/= 477 ACSR	Dec-03	2
03-390	3Ø Crossarm 2-Way Deadend Assembly for </= 4/0	Dec-03	2
03-400	3Ø Crossarm 2-Way Primary Deadend Assembly >/= 477	Dec-03	2
03-410	3Ø Crossarm Deadend Assembly for 795 AAC	Dec-03	2
03-420	3Ø Angle Crossarm Assembly for 795 AAC	Dec-03	2
03-430	3Ø Corner Crossarm Deadend Assembly for 795 AAC	Dec-03	2
03-440	3Ø Single Arm Assembly	Dec-03	1
03-460	3Ø Double Crossarm Assembly with Angle Pins	Dec-03	1
03-470	3Ø Assembly - 9' Crossarm for Underbuilds	Dec-03	2
03-480	Long Span 3Ø - 12' Transmission Crossarm for Underbuilds	Dec-03	2
03-490	Pole Top Extension Using Crossarm	Dec-03	2
03-500	Offset 9' Crossarm	Dec-03	2
03-510	Full Sidearm 9' Crossarm	Dec-03	1
03-520	3Ø Crossarm Deadend Assembly for Medium Tension	Dec-03	1
03-530	3Ø Crossarm Deadend Assembly for Heavy Tension	Dec-03	2
03-540	3Ø Corner Deadend Assembly for Medium Tension	Dec-03	1
03-550	3Ø Vertical Deadend Assembly for 4/0 ACSR and Larger	Dec-03	1
03-560	3Ø Vertical Swingout Assembly for 4/0 ACSR & Larger	Dec-03	2
03-570	3Ø Vertical 2-Way Deadend Assembly for </= 1/0 ACSR AAAC	Dec-03	2
03-580	3Ø Vertical 2 Way Deadend Assembly for 4/0 ACSR and Larger	Dec-03	2
03-590	3Ø Vertical 3 Way Deadend Assembly for 4/0 ACSR & Larger	Dec-03	2
03-600	3Ø Vertical Deadend Assembly for 795 AAC	Dec-03	2
03-610	3Ø Angle Vertical Swingout Assembly for 795 AAC	Dec-03	2
03-620	3Ø Corner Vertical Deadend Assembly for 795 AAC	Dec-03	2
03-630	3Ø Reduced Tension Primary 4/0 and Smaller	Dec-03	2

Standard # EC-	Title	Current Revision Date	# of Pages
SECTION 04 - Secondary Construction			
04-ALL	All Standards in Section 04 as a Single Document		
04-010	Neutral Clevis Assembly	Jan-04	1
04-020	Secondary Straight Line Clevis Assembly	Jan-04	1
04-030	Secondary Clevis Assembly with Extension Brackets	Jan-04	2
04-040	Secondary Pole Top Extension	Jan-04	1
04-050	Secondary Clevis Deadend Assembly with Service Clevis	Jan-04	2
04-060	Secondary Buck Assembly with Service Clevis	Jan-04	2
04-070	Secondary Spacer for Mid-Span Service Tap	Jan-04	1
04-080	Triplex Secondary Spacer	Jan-04	1
04-090	Limitations of Mid-Span Taps	Jan-04	1
04-100	Tangent Secondary Triplex Cable Support	Jan-04	1
04-110	2° to 20° Swingout Corner Secondary Triplex Cable	Jan-04	1
04-120	20° to 60° Swingout Corner Secondary Triplex Cable	Jan-04	1
04-130	Dead Ending Secondary Triplex Cable	Jan-04	1
04-140	Secondary Triplex Cable Corners Above 60°	Jan-04	1
04-150	Installing Secondary Fuses in Triplex Cable	Jan-04	1
05-ALL	All Standards in Section 05 as a Single Document		
05-020	Distribution Transformer Taps	Jul-10	2
05-030	Standard Practice for Installing Parallel Transformer Banks	Jul-10	2
05-040	Phase Reversal on Open Wye – Open Delta Transformer Banks with Three Phase Motors	Jul-10	1
05-050	Distribution Transformers	Jul-10	6
05-054	Overhead Transformers With Four Secondary Bushings	Aug-10	2
05-060	Open Wye – Open Delta Transformer Bank Connected to Three Phase Motors	Jul-10	1
05-064	480 Volt, 2-Wire Single Phase from Single Phase Primary - Overhead Transformer Connections	Aug-10	3
05-066	120/240 Volt, 3-Wire Split Single Phase from Single Phase Primary - Overhead Transformer Connections	Aug-10	3
05-067	120/240 Volt, 3-Wire Split Single Phase from Two Primary Phases - Overhead Transformer Connections	Aug-10	3
05-068	240/480 Volt, 3-Wire Split Single Phase from Single Phase Primary - Overhead Transformer Connections	Aug-10	3
05-071	208Y/120 Volt, 4-Wire Wye Three Phase, Wye-Wye - Overhead Transformer Connections	Aug-10	3
05-072	208Y/120 Volt, 4-Wire Wye Three Phase from Only Two Primary Phases - Overhead Transformer Connections	Aug-10	5

Standard # EC-	Title	Current Revision Date	# of Pages
05-076	480Y/277 Volt, 4-Wire Wye Three Phase, Wye-Wye - Overhead Transformer Connections	Aug-10	3
05-077	480Y/277 Volt, 4-Wire Wye Three Phase, Delta-Wye - Overhead Transformer Connections	Aug-10	3
05-081	120/240 Volt , 4-Wire Grounded Delta Three Phase, Wye – Delta – Overhead Transformer Connections	Aug-10	5
05-082	120/240 Volt , 4-Wire Grounded Delta Three Phase, Delta – Delta – Overhead Transformer Connections	Aug-10	5
05-083	120/240 Volt , 4-Wire Grounded Delta Three Phase, Open Wye – Open Delta – Overhead Transformer Connections	Aug-10	5
05-084	240 Volt , 3-Wire Ungrounded Delta Three Phase, Wye – Delta – Overhead Transformer Connections	Aug-10	5
05-085	240 Volt , 3-Wire Ungrounded Delta Three Phase, Delta – Delta – Overhead Transformer Connections	Aug-10	5
05-086	480 Volt , 3-Wire Ungrounded Delta Three Phase, Wye – Delta – Overhead Transformer Connections	Aug-10	5
05-087	480 Volt , 3-Wire Ungrounded Delta Three Phase, Delta – Delta – Overhead Transformer Connections	Aug-10	5
05-090	Phase Connections	Mar-04	2
05-100	Copper Transformer Secondary Terminations	Mar-04	2
05-110	Sizing Overhead Transformer Secondary Leads	Nov-10	8
05-120	Parallel Secondary Connection Instructions for Overhead Transformers	Aug-10	1
05-130	*Rated Currents of Transformers*	*Dec-08*	*1*
05-140	Overhead and Pad Mounted Transformer Heights and Weights	Jul-10	1
05-160	Insulated Wire for High Voltage Bushings on Grounded Equipment	Jul-10	1
05-165	Guidelines for the Use of Hot Line Clamps	Jul-10	1
05-170	Overhead Transformer Grounding Practices	Aug-10	1
05-180	Standard Practice for Overhead Transformer Connections	Aug-10	2
05-190	Arrester Location for Transformer Installations	Mar-04	1
05-200	Triple Transformer Mount for Single Pole Installations	Mar-04	1
05-210	Three 333 KVA Transformer Mount	Mar-04	1
05-220	3Ø Wye/Delta Padmount Transformers	Mar-04	1
05-230	Elbow Arresters: Capacitance Charge on Underground Cables	Mar-04	1
05-240	Animal Guard	Mar-04	2
05-250	Transformer Mounting on 40' Tangent Pole	Mar-04	2
05-260	Transformer Mounting on 40' Deadend Pole	Mar-04	2
05-270	1Ø Transformer Mounting on Tangent Pole - Min. Clearance	Mar-04	2
05-280	Transformer Mounting - 3Ø Fiberglass Post Assembly	Mar-04	2

Standard # EC-	Title	Current Revision Date	# of Pages
05-290	Transformer Mounting - 3Ø Crossarm Assembly	Mar-04	2
05-300	Transf. Mntg. on 40' D.E. Pole - Open Wire Sec. Thru 50kVA	Mar-04	2
05-310	1Ø Transformer and Primary Riser Pole (same as 37-230)	Mar-04	2
05-320	Open Wye-Open Delta 3Ø Transf. Bank on Tangent or Deadend	Mar-04	2
05-330	3Ø Transf. Bank on Tangent or Deadend Crossarm Constr.	Mar-04	2
05-340	3Ø Transf. Bank on Tangent or D.E. Fiberglass Arm Constr.	Mar-04	2
05-350	Connector Strap for 167 to 500 kVA Transformers	Mar-04	1
05-360	Auto-Transformer Installation, 3-1Ø 5% Buck or Boost Units	Mar-04	4
05-370	Two Pole Regulator Assembly	Mar-04	3
05-380	Regulator or Transformer Platform	Mar-04	2
05-390	Basic Req. for Fenced Transf. Installation with Overhead Bus	Mar-04	4
05-400	1Ø Auto-Transformer Installation	Mar-04	2

SECTION 06 - Streetlights

06-ALL	All Standards in Section 06 as a Single Document		
06-010	Streetlight Luminaires	Nov-04	1
06-020	Streetlight Luminaires and Lamps, Mercury and Metal Halide	Nov-04	1
06-030	Streetlight Luminaires and Lamps, HPS	Nov-04	1
06-040	Streetlight Luminaires and Lamps, Incandescent Lamps Only	Nov-04	1
06-050	Pole Clearance from Curbs on Local Streets and Roads	Nov-04	1
06-060	Pole Locations on Streets and Roads	Nov-04	1
06-070	#8 Al 2/C Cable for Underground Secondary Fed Streetlights	Nov-04	1
06-080	Fusing of 480V Underground Fed Streetlights (Blvd, or Interstate)	Nov-04	1
06-090	#8 Duplex Insulated Cable over Trolley Crossing	Nov-04	1
06-100	Attachment of Signs to Street Light Poles	Nov-04	1
06-110	Banners on Street Light Poles	Nov-04	1
06-120	High Intensity Lamp Identification for M-Line Fixtures	Nov-04	2
06-130	Lateral Light Distribution Patterns	Nov-04	3
06-140	Lighting on Grades and Near Trees	Nov-04	2
06-150	Mounting Heights and Leveling	Nov-04	2
06-160	Electrical Data for Luminaires	Nov-04	1
06-170	Mast Arms and Min. Wood Pole Classes for Streetlight Fixtures	Nov-04	1
06-180	Wood Pole Required for a Streetlight Fixture and Mast Arm	Nov-04	1
06-190	Alum. Pole Required for a Streetlight Fixture and Mast Arm	Nov-04	1
06-200	Fusing Policy for Streetlight Circuits and Luminaires	Nov-04	1
06-210	Fusing for Streetlights	Nov-04	1
06-220	Fusing Schedule for Streetlights	Nov-04	1

Standard # EC-	Title	Current Revision Date	# of Pages
06-230	Streetlight Clearance	Nov-04	1
06-240	Wood Pole Mounting	Nov-04	4
06-250	Luminaires	Nov-04	6
06-290	Group Control for 120V Streetlight Circuit	Nov-04	1
06-300	Nightguard Light - Mercury Luminaire, 7000 Lumen	Nov-04	2
06-310	Nightguard Light - Mercury Luminaire, 21,000 Lumen	Nov-04	1
06-320	Night Guard Decorative Lighting	Nov-04	2
06-330	Steel Standard for 6 Foot Self-Supported Arm	Nov-04	2
06-340	Steel Standard for 7, 9, and 13 Foot Trussed Arm	Nov-04	2
06-350	Mast Arms for Steel Standard	Nov-04	1
06-360	Concrete Foundation for Metal Standard	Nov-04	1
06-370	Concrete Foundation - Pole Base	Nov-04	1
06-380	Streetlight Foundation Anchor	Nov-04	1
06-390	23' Aluminum Streetlight Standard	Nov-04	2
06-400	30'-6" Aluminum Streetlight Standard	Nov-04	2
06-410	10' Aluminum Standard Arm for Standards 06-390 and 06-400	Nov-04	1
06-420	6' Aluminum Standard Arm for Standards 06-390 and 06-400	Nov-04	1
06-430	Streetlight Pole Grounding Connection	Nov-04	1
06-435	Wood Pole Mounting 4' Tapered Arm	Nov-04	1
06-440	Grounding Requirements for Streetlight Mast Arms and Metal Poles	Nov-04	1
06-460	Sag Chart for #6 DX	Nov-04	1
06-470	Streetlight Dropout from #1/0 ACSR Neutral	Nov-04	1
06-480	Sag Chart for #8 DX Insulated Cable Over Trolley Crossing	Nov-04	1

SECTION 07 - Services

07-ALL	All Standards in Section 07 as a Single Document		
07-010	Emergency Service for Residential Underground Service	Nov-03	1
07-020	Tagging 480 Volt Meters	Nov-03	1
07-030	Metering Equipment Specifications	Nov-03	1
07-040	Definitions of Residential Masts	Nov-03	1
07-050	General information And Location	Nov-03	1
07-060	General Information	Nov-03	1
07-070	Overhead Three Phase Power Services	Nov-03	1
07-080	Overhead Triplex Residential Services	Nov-03	3
07-090	Service Mast Specifications	Nov-03	1
07-100	Aluminum Service Drop Deadends	Nov-03	1
07-110	Parallel Large Aluminum Drops	Nov-03	1
07-120	Trenching for Services	Nov-03	2

Standard # EC-	Title	Current Revision Date	# of Pages
07-130	Underground Services - General Information	Nov-03	1
07-140	Underground Service Cable Ampacity and Neutrals	Nov-03	1
07-150	Minimum Cable Length to Limit Fault Current	Nov-03	1
07-160	Paralleling Conductors	Nov-03	2
07-170	Multiconnectors	Nov-03	2
07-180	Overhead Temporary Service	Nov-03	3
07-190	Temporary Underground Service and Meter Post	Nov-03	1
07-200	Connection for Service or Secondary On Utility Pole	Nov-03	3
07-210	Temporary Service for Residential Underground in an Emergency	Nov-03	2
07-220	2-1/2" Residential Service Mast	Nov-03	4
07-230	Alternate Residential Service Mast	Nov-03	2
07-240	Service Drop Stringing Sags	Nov-03	2
07-250	Pole Mounted Traffic Control Device	Nov-03	1
07-260	Pedestal Type Traffic Control Overhead Service	Nov-03	2
07-270	Pedestal Type Traffic Control Underground Service (Dayton Only)	Nov-03	2
07-280	2 Wire, 480V, Pole Mounted, Metered Service - State of Ohio	Nov-03	1
07-290	Commercial Grouped Meter Centers	Nov-03	1
07-300	Attachment of Holiday Decorations to DP&L Co. Poles	Nov-03	1
07-310	Unmetered Temp. 120V Svc. for Attachments on DP&L Poles	Nov-03	1
07-320	3Ø Primary Metering on Crossarms	Nov-03	2
07-330	Preassembled Metering - Cluster Mount	Nov-03	1
07-340	Three Phase Primary Metering - Cluster Mount	Nov-03	2
07-350	Primary Metering Cable Protection	Nov-03	1
07-360	CATV Metering Installation	Nov-03	1
07-370	Meter Installation for Corrosion Control Rectifier	Nov-03	2

SECTION 08 - Switches

08-ALL	All Standards in Section 08 as a Single Document		
08-010	3Ø Fiberglass Post Assembly Fused Disconnect	Apr-04	2
08-020	Installation of 15 kV Air Break Switch	Apr-04	7
08-030	Maintenance of 15 kV Air Break Switch	Apr-04	2
08-050	Underground Phasing	Apr-04	1
08-060	PM-S Switch Symbols	Apr-04	2
08-070	Primary Padmounted Switchgear	Apr-04	3
08-090	PM-S 9-Mark III S&C	Apr-04	5
08-100	Fuseholders and Fuses for PM-S and MEU Gear	Apr-04	1
08-110	S&C - Company Type SM Cutouts	Apr-04	2

Standard # EC-	Title	Current Revision Date	# of Pages
08-120	Distribution Cutouts	Apr-04	1
08-130	138 kV Air break Switch Structure Detail Prior to 1980	Apr-04	4

SECTION 09 - Capacitors

09-ALL	All Standards in Section 09 as a Single Document		
09-015	Commissioning a Distribution VAR Control Capacitor Bank	Jun-10	3
09-017	Control Power Transformers for Unitized Switched Capacitor Banks Located in 95% Voltage (11.85Y/6.84 kV) Areas	Mar-12	1
09-020	Joslyn Vacuum Switches	Apr-10	3
09-030	Minimum Spacing of Switched Capacitor Banks	Nov-08	1
09-040	Capacitor Bank Information	Jun-09	3
09-041	Capacitor Combinations for a Given Size Capacitor Bank	Jul-09	1
09-043	Details of Three Phase Unitized Fixed Capacitor Banks	Jun-09	3
09-044	Details of Single Phase Unitized Switched Capacitor Banks	Jun-09	4
09-045	Details of Three Phase Unitized Switched Capacitor Banks	Jun-09	4
09-047	Details of Three Phase Unitized ZVC Switched Capacitor Banks	Apr-10	5
09-048	Long Length and Replacement Capacitor Control Cables for Unitized Switched Capacitor Banks	Mar-12	1
09-049	Material List for Unitized Capacitor Banks	Aug-09	2
09-052	Installation of Single Phase Fixed Capacitor Banks	Jul-09	4
09-053	Installation of Three Phase Unitized Fixed Capacitor Banks – Crossarm Construction	Jun-09	4
09-054	Installation of Single Phase Unitized Switched Capacitor Banks	Jul-09	6
09-055	Installation of Three Phase Unitized Switched Capacitor Banks – Crossarm Construction	Jun-09	6
09-057	Installation of Three Phase Unitized ZVC Switched Capacitor Banks – Crossarm Construction	Apr-10	6
09-060	Non-Unitized VAR Switched Capacitor Banks - Crossarm Construction (installed prior to 2006)	Jun-10	7
09-070	Control Wiring Diagram for Three Phase Non-Unitized Switched Capacitor Banks	Apr-10	5
09-074	Control Wiring Diagram for Single Phase Unitized Switched Capacitor Banks	Apr-10	6
09-075	Control Wiring Diagram for Three Phase Unitized Switched Capacitor Banks	Apr-10	6
09-077	Control Wiring Diagram for Three Phase Unitized ZVC Switched Capacitor Banks	Apr-10	9
09-080	Wiring Detail for Switched Capacitor Banks – Non-Unitized	Aug-09	1
09-085	Wiring Detail for Switched Capacitor Banks – Unitized	Aug-09	1

Standard # EC-	Title	Current Revision Date	# of Pages
09-090	120 Volt Power Connections for VAR Controlled Capacitor Banks	Aug-09	2
09-100	Miscellaneous Notes for Capacitor Installations	Apr-10	1
09-110	Miscellaneous Materials for Capacitor Installations	Jun-10	2
09-160	Installing a Capacitor Bank to the Top Circuit Where There is Underbuild	Aug-09	2
09-253	Installation of Three Phase Unitized Fixed Capacitor Banks – Aerial Spacer Cable Construction	Aug-09	5
09-255	Installation of Three Phase Unitized Switched Capacitor Banks – Aerial Spacer Cable Construction	Aug-09	7
09-257	Installation of Three Phase Unitized ZVC Switched Capacitor Banks – Aerial Spacer Cable Construction	Apr-10	7

SECTION 10 - Not Used

SECTION 11 - Fusing and Reclosers

11-ALL	All Standards in Section 11 as a Single Document		
11-010	Operating Single Phase Recloser Levers	May-04	2
11-020	Branchline Numbering & Sizing	May-04	1
11-025	Corrosion of Open Cutouts (prev. part of EC-11-030)	Jun-10	1
11-030	Installing and/or Removing Bayonet Fuses	Jun-10	3
11-040	Load Buster Tool Use	May-04	1
11-050	Fuse Conversion Table	May-04	1
11-060	Cutout Sizing for Distribution Feeders	May-04	1
11-070	Substation Listing	May-04	3
11-080	Transformer Cutout Fusing Schedule	Dec-08	2
11-090	Transformer Bayonet Fusing Schedule	Feb-09	1
11-105	Fusing Schedule for 4.16/2.4 kV Distribution Capacitor Banks	Jun-10	1
11-110	Fusing Schedule for 12.47/7.2 kV Distribution Capacitor Banks	Feb-09	1
11-120	Single Phase Recloser	May-04	3
11-130	3Ø Recloser, 400 Amp, 4/0 and Larger with Electronic Ctrls.	May-04	2
11-160	Three Single Phase Reclosers - 1/0 and Smaller	May-04	2
11-170	Arrester Rack Specification	May-04	1
11-180	3Ø Reclosers, 400 Amp, 4/0 or Larger	May-04	2
11-190	3Ø Reclosers, 600 Amp, 4/0 or Larger	May-04	2

SECTION 12 - Splices, Ties and Connections

12-ALL	All Standards in Section 12 as a Single File		

Standard # EC-	Title	Current Revision Date	# of Pages
12-010	845 Indenting Die	Jun-04	1
12-020	3/0 Aluminum Terminal Lug for Metering Purposes	Jun-04	1
12-030	Copper to Copper Connections	Jun-04	1
12-040	Installation of ACSR Full Tension Splices	Jun-04	3
12-050	Installation of ACSR, or Alum. Full tension or Loop Splices	Jun-04	1
12-060	Installation of T-Taps and Aluminum Pad Terminals	Jun-04	2
12-070	Installation of Copper or Copperweld Compression Splices	Jun-04	1
12-080	Installation Instr. for Preformed Armor Rod and Line Guards	Jun-04	1
12-090	Installation Instructions for Preformed Top Ties	Jun-04	1
12-100	Installation Instructions for Preformed Side Ties	Jun-04	1
12-110	Installation Instructions for Preformed Double Support Ties	Jun-04	1
12-120	Installation Instr. for the Automatic Full Tension Splice	Jun-04	1
12-130	AAAC, ACSR, AAC and Alumaweld Full Tension Splice Index	Jun-04	3
12-140	ACSR and All Aluminum Conductors Loop Splicing Index	Jun-04	1
12-150	ACSR Repair Sleeve Index	Jun-04	1
12-160	Copper, Copperweld, and Galvanized Steel Splicing Index	Jun-04	2
12-170	Aluminum Bolted T-Tap and Pad Teminals Index	Jun-04	1
12-180	URD Alum. Pad Terminal and Stainless Steel Bolt Table	Jun-04	1
12-190	Squeezon Selection Chart	Jun-04	2
12-200	Chart for Copper-to-Copper Connections Using Bolted Connectors	Jun-04	2
12-210	Ampact Connectors Chart	Jun-04	2
12-220	Ampact Tool and Lug Chart	Jun-04	2
12-230	Copperweld - Copper Tie Wire	Jun-04	1
12-240	Copper Tie Wire Specifications	Jun-04	1
12-250	Pin Type Insulator Ties for ACSR, AAAC or All Alum. Cond.	Jun-04	1
12-260	Index for Line Guards and Armor Rods	Jun-04	1
12-270	Preformed Ties	Jun-04	1

SECTION 13 - Not Used

SECTION 14 - Grounding

14-ALL	All Standards in Section 14 as a Single Document		
14-010	Specifications for Truck and Equipment Grounding	Jan-04	4
14-020	Fundamental Requirements When Installing Temporary Protective Grounds on the Overhead Distribution System	Jan-11	3
14-025	Overhead Temporary Protective Grounding Cables (Replaces 14-080 Rev. Jan-04)	Jan-11	1

Standard # EC-	Title	Current Revision Date	# of Pages
14-030	Single Phase Primary Temporary Protective Grounding	Jan-11	1
14-035	Single Phase Primary Double Deadend Temporary Protective Grounding (Replaces 14-070 Rev. Jan-04)	Jan-11	1
14-040	Three Phase Wye Primary, Crossarm and Pin Construction, Temporary Protective Grounding	Jan-11	2
14-045	Three Phase Wye Primary, Double Deadend With Crossarm Construction, Temporary Protective Grounding	Jan-11	2
14-050	Three Phase Wye Primary, Vertical Swingout Construction, Temporary Protective Grounding	Jan-11	2
14-060	Three Phase Wye Primary, Vertical Double Deadend Construction, Temporary Protective Grounding	Jan-11	2
14-062	Three Phase Wye Primary, All Wires Down, Temporary Protective Grounding	Jan-11	2
14-065	Three Phase Wye Primary, One or Two Phase Wires Down, Temporary Protective Grounding	Jan-11	2
14-090	Fundamental Requirements When Installing Temporary Protective Grounds on the Underground Distribution System	Jan-11	3
14-100	Temp. URD Grounding Equip. Feedthrough & Protective Cap	Jan-04	1
14-110	Temporary URD Grounding Equipment for 3Ø Equipment	Jan-04	1
14-130	Temporary Grounding of Cables for Safe Work Practices	Jan-04	1
14-140	Temporary Grounding of Cables for Safe Work Practices	Jan-04	1
14-150	Temporary Grounding of Cables for Safe Work Practices	Jan-04	1
14-160	Install. of URD Cables Spiking Jumpers Safe Work Practices	Jan-04	1
14-170	Install. of URD Cables Spiking Jumpers Safe Work Practices	Jan-04	1
14-180	Salisbury Voltage Tester Aud/Vis Signal for O/H or URD	Jan-04	1
14-190	URD Grounding	Jan-04	2

SECTION 15 - Not Used

SECTION 16 - Arresters, URD and Overhead

16-ALL	All Standards in Section 16 as a Single Document		
16-005	Lighting Arresters	Jun-04	1
16-010	Crossarm and Transformer Arrester Mounting Brackets	Jun-04	1
16-020	Satety Tips for Surge Arresters	Jun-04	1
16-030	Elbow and Parking Stand Surge Arresters	Jun-04	1
16-040	Lighting Arrester for Branchline Fuses	Jun-04	2
16-050	Application of Distribution Arresters	Jun-04	2
16-060	Riser Pole Arrester	Jun-04	1
16-065	3 kV Distribution Line Arrester	Jun-04	1
16-070	Elbow and Stand Parking Arrester Scheme for 3Ø PM Transf.	Jun-04	1
16-080	Elbow and Parking Arrester Scheme for 1Ø PM Transf.	Jun-04	1

Standard # EC-	Title	Current Revision Date	# of Pages
16-090	Placement of Overhead Arresters	Jun-04	1
16-100	Lighting Arrester Placement for Equipment Protection	Jun-04	1

SECTIONS 17 Thru 20 - Not Used

SECTION 21 - Engineering Symbols

21-ALL	All Standards in Section 21 as a Single Document		
21-010	Distribution Symbols	Sep-04	8
21-020	A.C. Network	Sep-04	4
21-030	LBC Numbering	Sep-04	2
21-040	Distribution Abbreviations	Sep-04	3

SECTION 22 - Code Clearances

22-ALL	All Standards in Section 22 as a Single Document		
22-010	Enforcement of Clearances about Pad-mounted Equipment	Apr-09	1
22-020	Streetlight Drip Loops and Cable Protection on Joint Use Poles	Apr-09	1
22-030	Pole Clearance from Curbs on Local Streets and Roads	Apr-09	3
22-040	Guidelines for Horizontal Clearances	Apr-09	2
22-050	Vertical Clearance Guidelines	Nov-09	3
22-060	Clearance from Buildings, Signs, Antennas, etc.	May-09	2
22-070	Clearance from Swimming Pools to Underground Cables and Overhead Open Wire Supply Conductors	May-09	2
22-071	Clearance from Swimming Pools to Overhead Triplex Cables	May-09	2
22-080	Clearance of Triplex and Quadraplex Service Attachments and Drops	May-09	2
22-090	Clearance of Conductors Above Ground	Apr-09	2
22-100	Clearance Between Conductors on Different Supports	May-09	1
22-110	Clearance of Conductor from Pole for Conductors Less Than 22 kV	Nov-09	3
22-120	Clearance of Drip Loops and Equipment from Communication	Apr-09	3
22-130	Clearance between Conductors at the Pole, 50kV or Less	Apr-09	2
22-140	Clearance Between Communication and Conductors	Nov-09	3
22-150	Maximum Span Length to Maintain Proper Vertical Clearance Between Primary and Neutral Conductors	Nov-09	4
22-160	Pole Clearance from Streets, Hydrants, and Rails	Apr-09	1
22-170	Clearances for Underground Supply Cables	Apr-09	2
22-180	Long Span Guidelines	Nov-09	5
22-190	Pad Mount Transformer Clearance	May-09	8

Standard # EC-	Title	Current Revision Date	# of Pages
22-200	Clearance from Grain Bins	May-09	2

SECTION 23 - Not Used

SECTION 24 - Conductors and Sags

24-ALL	All Standards in Section 24 as a Single Document		
24-005	Definition of "Guy for Tension" and "Ruling Span"	Aug-09	2
24-010	Conductor Sag by Return Wave Method (5th Return Wave)	Aug-09	1
24-020	Conductor Sag by Return Wave Method (2nd Return Wave)	Aug-09	1
24-025	Preferred Conductor Sizes – Overhead Construction	Aug-09	1
24-152	1/0 AAAC Sags and Tensions for 5/16" Short-Lead Guying, 100' Ruling Span – Reduced Tension	Mar-10	2
24-154	4/0 ACSR Sags and Tensions for 5/16" Short-Lead Guying, 100' Ruling Span – Reduced Tension	Mar-10	2
24-156	477 ACSR Sags and Tensions for 5/16" Short-Lead Guying, 100' Ruling Span – Reduced Tension	Mar-10	2
24-158	795 AAC Sags and Tensions for 5/16" Short-Lead Guying, 100' Ruling Span – Reduced Tension	Mar-10	2
24-252	1/0 AAAC Sags and Tensions for 3/8" Short-Lead Guying, 100' Ruling Span – Reduced Tension	Mar-10	2
24-254	4/0 ACSR Sags and Tensions for 3/8" Short-Lead Guying, 100' Ruling Span – Reduced Tension	Mar-10	2
24-256	477 ACSR Sags and Tensions for 3/8" Short-Lead Guying, 100' Ruling Span – Reduced Tension	Mar-10	2
24-258	795 AAC Sags and Tensions for 3/8" Short-Lead Guying, 100' Ruling Span – Reduced Tension	Mar-10	2
24-300	1/0 AAAC Conductor Information	Oct-09	1
24-301	1/0 AAAC Sags and Tensions, Slack Span - Unguyed	Nov-09	4
24-302	1/0 AAAC Sags and Tensions, 175' Ruling Span – Reduced Tension	Sep-09	2
24-303	1/0 AAAC Sags and Tensions, 200' Ruling Span	Sep-09	1
24-305	1/0 AAAC Sags and Tensions, 250' Ruling Span	Sep-09	1
24-307	1/0 AAAC Sags and Tensions, 300' Ruling Span	Sep-09	1
24-308	1/0 AAAC Sags and Tensions, 400' Ruling Span	Sep-09	1
24-309	1/0 AAAC Sags and Tensions, 500' Ruling Span	Sep-09	1
24-330	4/0 ACSR Conductor Information	Sep-09	1
24-331	4/0 ACSR Sags and Tensions, Slack Span - Unguyed	Nov-09	4
24-332	4/0 ACSR Sags and Tensions, 175' Ruling Span – Reduced Tension	Oct-09	2
24-333	4/0 ACSR Sags and Tensions, 200' Ruling Span	Sep-09	1
24-335	4/0 ACSR Sags and Tensions, 250' Ruling Span	Sep-09	1

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24-337	4/0 ACSR Sags and Tensions, 300' Ruling Span	Sep-09	1
24-360	477 ACSR Conductor Information	Sep-09	1
24-361	477 ACSR Sags and Tensions, Slack Span - Unguyed	Nov-09	4
24-362	477 ACSR Sags and Tensions, 175' Ruling Span – Reduced Tension	Oct-09	2
24-363	477 ACSR Sags and Tensions, 200' Ruling Span	Sep-09	1
24-365	477 ACSR Sags and Tensions, 250' Ruling Span	Sep-09	1
24-367	477 ACSR Sags and Tensions, 300' Ruling Span	Sep-09	1
24-390	795 AAC Conductor Information	Sep-09	1
24-391	795 AAC Sags and Tensions, Slack Span - Unguyed	Nov-09	3
24-393	795 AAC Sags and Tensions, 200' Ruling Span	Sep-09	1
24-395	795 AAC Sags and Tensions, 250' Ruling Span	Sep-09	1
24-397	795 AAC Sags and Tensions, 300' Ruling Span	Sep-09	1
24-420	#2 ACSR Conductor Information	Sep-09	1
24-422	#2 ACSR Sags and Tensions, 175' Ruling Span – Reduced Tension	Sep-09	2
24-423	#2 ACSR Sags and Tensions, 200' Ruling Span	Sep-09	1
24-425	#2 ACSR Sags and Tensions, 250' Ruling Span	Sep-09	1
24-427	#2 ACSR Sags and Tensions, 300' Ruling Span	Sep-09	1
24-428	#2 ACSR Sags and Tensions, 400' Ruling Span	Sep-09	1
24-429	#2 ACSR Sags and Tensions, 500' Ruling Span	Sep-09	1
24-430	1/0 ACSR Conductor Information	Sep-09	1
24-432	1/0 ACSR Sags and Tensions, 175' Ruling Span – Reduced Tension	Sep-09	2
24-433	1/0 ACSR Sags and Tensions, 200' Ruling Span	Sep-09	1
24-435	1/0 ACSR Sags and Tensions, 250' Ruling Span	Sep-09	1
24-437	1/0 ACSR Sags and Tensions, 300' Ruling Span	Sep-09	1
24-438	1/0 ACSR Sags and Tensions, 400' Ruling Span	Sep-09	1
24-439	1/0 ACSR Sags and Tensions, 500' Ruling Span	Sep-09	1
24-730	1/0 AAAC Covered Wire Conductor Information	Oct-09	2
24-732	1/0 AAAC Covered Wire Sags and Tensions, 175' Ruling Span – Reduced Tension	Oct-09	2
24-733	1/0 AAAC Covered Wire Sags and Tensions, 200' Ruling Span	Oct-09	1
24-735	1/0 AAAC Covered Wire Sags and Tensions, 250' Ruling Span	Oct-09	1
24-737	1/0 AAAC Covered Wire Sags and Tensions, 300' Ruling Span	Oct-09	1
24-900	#6 Duplex Conductor Information	Oct-09	1
24-901	#6 Duplex Sags and Tensions, 100' Ruling Span	Oct-09	1

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24-902	#6 Duplex Sags and Tensions, 150' Ruling Span	Oct-09	1
24-903	#6 Duplex Sags and Tensions, 200' Ruling Span	Oct-09	1
24-920	#4 Triplex Conductor Information	Oct-09	1
24-921	#4 Triplex Sags and Tensions, 100' Ruling Span	Oct-09	1
24-922	#4 Triplex Sags and Tensions, 150' Ruling Span	Oct-09	1
24-923	#4 Triplex Sags and Tensions, 200' Ruling Span	Oct-09	1
24-950	1/0 Triplex Conductor Information	Oct-09	1
24-951	1/0 Triplex Sags and Tensions, 100' Ruling Span	Oct-09	1
24-952	1/0 Triplex Sags and Tensions, 150' Ruling Span	Oct-09	1
24-953	1/0 Triplex Sags and Tensions, 200' Ruling Span	Oct-09	1
24-970	4/0 Triplex Conductor Information	Sep-09	1
24-971	4/0 Triplex Sags and Tensions, 100' Ruling Span	Nov-09	2
24-972	4/0 Triplex Sags and Tensions, 150' Ruling Span	Nov-09	2
24-973	4/0 Triplex Sags and Tensions, 200' Ruling Span	Sep-09	2

SECTION 25 - Superseded Conductors

25-ALL	All Standards in Section 25 as a Single Document		
25-410	#4 ACSR Conductor Information	Oct-09	1
25-413	#4 ACSR Sags and Tensions, 200' Ruling Span	Oct-09	1
25-415	#4 ACSR Sags and Tensions, 250' Ruling Span	Oct-09	1
25-417	#4 ACSR Sags and Tensions, 300' Ruling Span	Oct-09	1
25-418	#4 ACSR Sags and Tensions, 400' Ruling Span	Oct-09	1
25-419	#4 ACSR Sags and Tensions, 500' Ruling Span	Oct-09	1
25-450	336.4 ACSR Conductor Information	Oct-09	1
25-453	336.4 ACSR Sags and Tensions, 200' Ruling Span	Oct-09	1
25-455	336.4 ACSR Sags and Tensions, 250' Ruling Span	Oct-09	1
25-457	336.4 ACSR Sags and Tensions, 300' Ruling Span	Oct-09	1
25-458	336.4 ACSR Sags and Tensions, 400' Ruling Span	Oct-09	1
25-459	336.4 ACSR Sags and Tensions, 500' Ruling Span	Oct-09	1
25-500	3 #10 Copperweld Conductor Information	Oct-09	1
25-503	3 #10 Copperweld Sags and Tensions, 200' Ruling Span	Oct-09	1
25-505	3 #10 Copperweld Sags and Tensions, 250' Ruling Span	Oct-09	1
25-507	3 #10 Copperweld Sags and Tensions, 300' Ruling Span	Oct-09	1
25-508	3 #10 Copperweld Sags and Tensions, 400' Ruling Span	Oct-09	1
25-509	3 #10 Copperweld Sags and Tensions, 500' Ruling Span	Oct-09	1
25-510	#6A Copperweld Conductor Information	Oct-09	1
25-513	#6A Copperweld Sags and Tensions, 200' Ruling Span	Oct-09	1
25-515	#6A Copperweld Sags and Tensions, 250' Ruling Span	Oct-09	1
25-517	#6A Copperweld Sags and Tensions, 300' Ruling Span	Oct-09	1
25-518	#6A Copperweld Sags and Tensions, 400' Ruling Span	Oct-09	1

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25-519	#6A Copperweld Sags and Tensions, 500' Ruling Span	Oct-09	1
25-520	#4A Copperweld Conductor Information	Oct-09	1
25-523	#4A Copperweld Sags and Tensions, 200' Ruling Span	Oct-09	1
25-525	#4A Copperweld Sags and Tensions, 250' Ruling Span	Oct-09	1
25-527	#4A Copperweld Sags and Tensions, 300' Ruling Span	Oct-09	1
25-528	#4A Copperweld Sags and Tensions, 400' Ruling Span	Oct-09	1
25-529	#4A Copperweld Sags and Tensions, 500' Ruling Span	Oct-09	1
25-530	#2A Copperweld Conductor Information	Oct-09	1
25-533	#2A Copperweld Sags and Tensions, 200' Ruling Span	Oct-09	1
25-535	#2A Copperweld Sags and Tensions, 250' Ruling Span	Oct-09	1
25-537	#2A Copperweld Sags and Tensions, 300' Ruling Span	Oct-09	1
25-538	#2A Copperweld Sags and Tensions, 400' Ruling Span	Oct-09	1
25-539	#2A Copperweld Sags and Tensions, 500' Ruling Span	Oct-09	1
25-600	#6 Copper, Solid Hard Drawn Bare Conductor Information	Oct-09	1
25-602	#6 Copper, Solid Hard Drawn Bare Sags and Tensions, 175' Ruling Span – Reduced Tension	Oct-09	2
25-603	#6 Copper, Solid Hard Drawn Bare Sags and Tensions, 200' Ruling Span	Oct-09	1
25-605	#6 Copper, Solid Hard Drawn Bare Sags and Tensions, 250' Ruling Span	Oct-09	1
25-610	#4 Copper, Solid Hard Drawn Bare Conductor Information	Oct-09	1
25-612	#4 Copper, Solid Hard Drawn Bare Sags and Tensions, 175' Ruling Span – Reduced Tension	Oct-09	2
25-613	#4 Copper, Solid Hard Drawn Bare Sags and Tensions, 200' Ruling Span	Oct-09	1
25-615	#4 Copper, Solid Hard Drawn Bare Sags and Tensions, 250' Ruling Span	Oct-09	1
25-617	#4 Copper, Solid Hard Drawn Bare Sags and Tensions, 300' Ruling Span	Oct-09	1
25-620	#2 Copper, Stranded Hard Drawn Bare Conductor Information	Oct-09	1
25-622	#2 Copper, Stranded Hard Drawn Bare Sags and Tensions, 175' Ruling Span – Reduced Tension	Oct-09	2
25-623	#2 Copper, Stranded Hard Drawn Bare Sags and Tensions, 200' Ruling Span	Oct-09	1
25-625	#2 Copper, Stranded Hard Drawn Bare Sags and Tensions, 250' Ruling Span	Oct-09	1
25-627	#2 Copper, Stranded Hard Drawn Bare Sags and Tensions, 300' Ruling Span	Oct-09	1
25-630	2/0 Copper, Stranded Hard Drawn Bare Conductor Information	Oct-09	1

Standard # EC-	Title	Current Revision Date	# of Pages
25-632	2/0 Copper, Stranded Hard Drawn Bare Sags and Tensions, 175' Ruling Span – Reduced Tension	Oct-09	2
25-633	2/0 Copper, Stranded Hard Drawn Bare Sags and Tensions, 200' Ruling Span	Oct-09	1
25-635	2/0 Copper, Stranded Hard Drawn Bare Sags and Tensions, 250' Ruling Span	Oct-09	1
25-637	2/0 Copper, Stranded Hard Drawn Bare Sags and Tensions, 300' Ruling Span	Oct-09	1
25-640	4/0 Copper, Stranded Medium Hard Drawn Bare Conductor Information	Oct-09	1
25-642	4/0 Copper, Stranded Medium Hard Drawn Bare Sags and Tensions, 175' Ruling Span – Reduced Tension	Oct-09	2
25-643	4/0 Copper, Stranded Medium Hard Drawn Bare Sags and Tensions, 200' Ruling Span	Oct-09	1
25-645	4/0 Copper, Stranded Medium Hard Drawn Bare Sags and Tensions, 250' Ruling Span	Oct-09	1
25-647	4/0 Copper, Stranded Medium Hard Drawn Bare Sags and Tensions, 300' Ruling Span	Oct-09	1
25-710	1/0 ACSR Covered Wire Conductor Information	Oct-09	2
25-712	1/0 ACSR Covered Wire Sags and Tensions, 175' Ruling Span – Reduced Tension	Oct-09	2
25-713	1/0 ACSR Covered Wire Sags and Tensions, 200' Ruling Span	Oct-09	1
25-715	1/0 ACSR Covered Wire Sags and Tensions, 250' Ruling Span	Oct-09	1
25-717	1/0 ACSR Covered Wire Sags and Tensions, 300' Ruling Span	Oct-09	1
25-720	1/0 AAC Covered Wire Conductor Information	Oct-09	2
25-722	1/0 AAC Covered Wire Sags and Tensions, 175' Ruling Span – Reduced Tension	Oct-09	2
25-723	1/0 AAC Covered Wire Sags and Tensions, 200' Ruling Span	Oct-09	1
25-725	1/0 AAC Covered Wire Sags and Tensions, 250' Ruling Span	Oct-09	1
25-940	101.8 MCM ACSR Triplex Conductor Information	Nov-09	1
25-941	101.8 MCM ACSR Triplex Sags and Tensions, 100' Ruling Span	Nov-09	2
25-942	101.8 MCM ACSR Triplex Sags and Tensions, 150' Ruling Span	Nov-09	2
25-943	101.8 MCM ACSR Triplex Sags and Tensions, 200' Ruling Span	Nov-09	2

SECTION 26 - Transmission

Standard # EC-	Title	Current Revision Date	# of Pages
26-ALL1	Standards 26-020 through 26-330 as a Single Document		
26-ALL2	Standards 26-400 through 26-670 as a Single Document		
26-ALL3	Standards 26-790 through 26-940 as a Single Document		
26-020	Shield Wire and Insulator Base Bonding	Oct-04	2
26-040	Grading Ring Instructions	Oct-04	1
26-050	Type "A" Pole Top 69 kV Construction (Non-Preferred)	Oct-04	2
26-060	Type "A" Pole Top 69 kV Construction (Non-Preferred)	Oct-04	2
26-070	Type "B" Pole Top 69 kV Construction (Non-Preferred)	Oct-04	2
26-080	Type "D" Pole Top 69 and 138 kV Construction 10°-60° Line Angle	Oct-04	2
26-090	Type "E" 69 and 138 kV Construction	Oct-04	2
26-100	Modified Type "E" 69 and 138 kV Construction (Single Way D.E.)	Oct-04	2
26-110	Type "F" Pole Top Construction	Oct-04	2
26-140	Cattle Guard for Down Guys	Oct-04	1
26-170	Additional Grounding for Transmission Poles	Oct-04	1
26-173	Install. of 33-138 kV Transmn. Switch Grndg. Grid & Pole Grnds.	Oct-04	2
26-183	69 kV Deadends on Substation Structures	Oct-04	2
26-186	Transmission Guying with 5 Foot Guy Strain Insulator	Oct-04	2
26-190	Transmission Guying, Grounded	Oct-04	2
26-193	Looped Transmission Guying with 5 Foot Guy Strain Insulator	Oct-04	2
26-195	Numerals for CCD and DP&L Towers	Oct-04	1
26-196	Mounting Tower Numerals on CCD and DP&L Towers	Oct-04	1
26-197	Danger Signs for CCD and DP&L Towers	Oct-04	2
26-198	Warning Signs for DP&L Substations	Oct-04	1
26-200	Circuit Using "200-Series"	Oct-04	1
26-210	Type HA-1 Structure Assmbly Tangent Constr., 0° to 1-1/2°	Oct-04	1
26-220	Type HA-2 Structure Assmbly Tangent Crossing, 0° to 1-1/2°	Oct-04	1
26-230	Type HB Structure Assembly, Angles 1-1/2° to 8°	Oct-04	1
26-240	Type MC Structure Assembly, Angles 8° to 14°	Oct-04	1
26-250	Type MB Structure Assembly, Angles 14° to 50°	Oct-04	1
26-260	Type ME Structure Assembly, Angles 50° to 90°	Oct-04	1
26-270	Type HF Transposition Structure Assembly, Angels 0° to 1-1/2°	Oct-04	1
26-280	Ground Assembly Detail for Transmission Structures	Oct-04	1
26-290	Application of Type HF Transposition Structure	Oct-04	1

Standard #EC-	Title	Current Revision Date	# of Pages
26-310	Assembly Detail for Knee Braces and X-Braces	Oct-04	1
26-320	Insulator Assembly Detail for Transmission Structures	Oct-04	2
26-330	Material for "200-Series" Transmission Standards	Oct-04	2
26-400	Circuits using "400-Series"	Oct-04	1
26-410	Tangent Construction 0° to 1-1/2° (Historical)	Oct-04	1
26-420	Angle Construction 1-1/2° to 8° (Historical)	Oct-04	1
26-430	Angle Construction 8° to 14° (Historical)	Oct-04	1
26-440	Angle Construction 14° to 50° (Historical)	Oct-04	1
26-450	Angle Construction 50° to 90° (Historical)	Oct-04	1
26-460	Material for "400-Series" Transmission Standards	Oct-04	3
26-500	Circuits using "500-Series"	Oct-04	1
26-510	138kV Tangent Construction 0° to 1-1/2° (Historical)	Oct-04	1
26-520	138kV Angle Construction 1-1/2° to 8° (Historical)	Oct-04	1
26-530	138kV Angle Construction 8° to 14° (Historical)	Oct-04	1
26-540	138kV Angle Construction 14° to 50° (Historical)	Oct-04	1
26-550	138kV Angle Construction 50° to 90° (Historical)	Oct-04	1
26-560	Insulator Assembly Detail for Transmission Structures (Historical)	Oct-04	2
26-570	Material for "500-Series" Transmission Standards	Oct-04	3
26-600	Circuit using "600-Series"	Oct-04	1
26-610	138kV Single Circuit 0° to 1 1/2° - Tangent Structure (Limited)	Nov-04	2
26-620	138kV and 69kV Double Circuit 0° to 1° - Tangent Structure (Limited)	Nov-04	3
26-630	138kV Single Circuit 1-1/2° to 8° Angle Structure (Limited)	Nov-04	2
26-640	138kV and 69kV Double Circuit 1° to 14° Angle Structure (Limited)	Nov-04	3
26-650	138kV Single Circuit 8° to 14° Angle Structure (Limited)	Nov-04	2
26-660	138kV Single Circuit 14° to 50° Angle Structure (Limited)	Nov-04	2
26-670	138kV Single Circuit 50° to 90° Angle Structure (Limited)	Nov-04	2
26-790	Horizontal Post Insulator Tangent Pole	Nov-04	2
26-800	Horiz. Post Ins., 69kV Tangent Pole w/ Insulated Ground Base	Nov-04	2
26-820	Horizontal Post Insulator 69kV 2° to 10° Angle Pole	Nov-04	2
26-830	Dbl. Circuit Tangent 88kV Post Ins. on Horiz. Brackets	Nov-04	2
26-840	*138kV Tension Braced Two Arm Tangent 0° to 4° Angle*	*Nov-04*	2
26-850	138kV Tension Braced Three Arm Tangent, 0° to 4°	Nov-04	2
26-870	Horiz. Post Insulator 138kV Tangent Pole 2° to 10° Corner	Nov-04	2
26-880	Horizontal Post Insulator 138kV Tangent 2° to 10° Corner non-prfd	Nov-04	2

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26-890	138kV Horiz. Post Back-to-Back Tangent & 2° to 10° Corner Pole	Nov-04	3
26-900	Rebuild - Crossarm 69 to 138kV post	Nov-04	2
26-910	Davit Arm 138kV - Tangent Pole to 6° Corner	Nov-04	2
26-920	Davit Arm 138kV - 6° to 15° Corner	Nov-04	2
26-930	Double Circuit Davit Arm 138kV - Tangent	Nov-04	2
26-940	Double Circuit Tangent Construction Back-to-Back 138 kV Post Insulators	Nov-04	1

SECTIONS 27 and 28 - Not Used

SECTION 29 - Circuit Tagging

29-010	Hot Tag Guidelines	May-04	16

SECTIONS 30 and 31 - Not Used

SECTION 32 - Pads, Vaults, and Manholes

32-ALL	All Standards is Section 32 as a single document.		
32-010	Three Phase Transformer Pad Installations	Jul-04	1
32-040	Vault Scoop for Single Phase Padmounted Transformers	Jul-04	2
32-050	Transf. Pad O/H Transf. in Kearney 54-2 Powerglass Encl.	Jul-04	3
32-060	Transf. Pad 1Ø Pad Mount 25-167 kVA Dead Front Design	Jul-04	3
32-070	2-1Ø Padmounted Transf. Pad (Open Delta or Parallel)	Jul-04	3
32-090	2-1Ø Padmounted Transformers Paralleled Incl. Transclosure	Jul-04	3
32-110	Transformer Pad for 75-500 kVA 3Ø Transformers	Nov-04	3
32-120	Transformer Pad for 750-1500 kVA 3Ø Transformers	Jul-04	2
32-130	Transformer Pad for 2000-2500 kVA 3Ø Transformers	Jul-04	2
32-140	Transf. Pad for URD 3Ø with 20"X5"X5" Transition Cabinet	Jul-04	3
32-150	Transf. Pad URD 3Ø with Transition Cabinet (optional)	Jul-04	3
32-155	Transf. Pad for URD 3Ø with 30"X5"X5" Metering Enclosure	Jul-04	3
32-160	Precast Concrete Vault for Padmounted Switchgear (PM-S ...)	Jul-04	1
32-190	Concrete Cap for Precast Vault for PMU Switchgear	Jul-04	1
32-200	Poured Concrete Vault for EE PSI/II-3 Switchgear	Jul-04	2
32-210	18" x 18" Pullbox for Underground Boulevard Lighting	Jul-04	3
32-220	Typical 3'x 4' Svc. Box for Street Traveled Parking Area	Jul-04	2
32-230	5'-2" x 8'- 10" Removable Transformer Hatch Slab	Jul-04	2
32-240	Cable Supports	Jul-04	2
32-250	Foundation for Primary Metering Unit	Jul-04	2

Standard # EC-	Title	Current Revision Date	# of Pages
32-260	Pad for Customer Owned Automatic Throw-Over Switch, Primary	Jul-04	2
32-270	Pad for Primary Metering with Three Phase Switch	Jul-04	2

SECTION 33 - Primary Cable and Splices

33-ALL	All Standards in Section 33 as a Single Document		
33-010	Applications of Silicon Dielectric Lubricating Grease	Sep-04	1
33-020	Die Substitution for 1-5/16" Die in an Emergency	Sep-04	1
33-030	Grease on Elbow Threads	Sep-04	1
33-040	URD Cable Cleaner	Sep-04	1
33-050	General Information on Oxide Inhibitors	Sep-04	1
33-060	Fault Indicators	Sep-04	2
33-070	Coiling of URD Primary Cable in Vault or Pit	Sep-04	1
33-080	Installation of Load Break Elbows	Sep-04	1
33-090	Proper Cable Reel Handling	Sep-04	1
33-100	Primary 15kV Splice Installation Guidelines	Sep-04	1
33-120	Future Duct and Primary Cable Extensions	Sep-04	1
33-130	Fault Indicators	Sep-04	1
33-140	Sealing 500 MCM Through 1000 MCM Cable	Sep-04	2
33-150	Elbow Terminator	Sep-04	1
33-160	Procedure for Sealing Elbow Terminator on Jacketed Cable	Sep-04	3
33-180	Termination for 1/0 Through 1000 MCM Aluminum Cable	Sep-04	2
33-210	LBC Stand-Off Insulator	Sep-04	2
33-220	200A and 600A Straight Splices	Sep-04	1
33-230	Heat Shrink Jackets for Long Splices	Sep-04	2
33-240	200A & 600A Straight Spliced (old concentric to jacketed cable)	Sep-04	1
33-270	600A 15kV "T" Connector Splice	Sep-04	2
33-280	Single Phase Load Break Junction	Sep-04	2
33-290	Single Phase Installation for Transformer Deferral Unit	Sep-04	2
33-330	Installation of Three Phase Above Grade LBC	Sep-04	2
33-340	1/0 Insulation Stripping Tool	Sep-04	1
33-350	Cable End Cap Sealing	Sep-04	2

SECTION 34 - Secondary Cable and Splices

34-ALL	All Standards in Section 34 as a Single Document		
34-010	CATV Underground Power Supply Connection	Oct-04	1
34-020	Secondary Pedestal Grounding Lug	Oct-04	1
34-030	Index for Splices on Copper Secondary Cable	Oct-04	1
34-040	Aluminum Splicing Sleeves	Oct-04	1

Standard # EC-	Title	Current Revision Date	# of Pages
34-050	Hycrab URD Connector	Oct-04	1
34-060	Pedestal Connection	Oct-04	1
34-070	Aluminum Connector Installation	Oct-04	1
34-080	URD Secondary Pedestal	Oct-04	2
34-090	URD Secondary Polyethylene Pedestals	Oct-04	2
34-100	URD Aluminum Pad Terminals & Strainless Steel Bolt Table	Oct-04	1
34-110	Copper Pad Terminal for URD Applications	Oct-04	1
34-120	Bolted Aluminum Bus Connection	Oct-04	1
34-130	Heat Shrink Insulating Sleeves	Oct-04	1
34-140	Heat Shrink Jacket Repair Sleeve	Oct-04	1
34-150	Cable Tap Insulation Sleeve for Streetlight	Oct-04	2
34-160	Secondary Cable Ampacities	Oct-04	2
34-170	Sizing Secondary Conductors	Oct-04	2
34-180	Maximum Number of Conductors for Padmount Transformers	Oct-04	1
34-190	Secondary Enclosure for Multiple Connections	Oct-04	2

SECTION 35 - Pad Mounted Transformers

35-ALL	All Standards in Section 35 as a Single Document		
35-010	Locking of Padmount Transformers	Apr-04	1
35-020	Termination of Elbow Arresters	Apr-04	1
35-030	Pentahead Bolt for Pad-Mounted Electrical Equipment	Apr-04	1
35-040	Parallel Transformers for Single Phase Services	Apr-04	1
35-050	Grounding Scheme for 1Ø Padmounted Transformer	Apr-04	1
35-060	Grounding Scheme for 1Ø Submersible Transformer	Apr-04	1
35-070	Installation of 1Ø Low-Profile Padmounted Transformer	Apr-04	2
35-080	Installation of 1Ø 25 kVA Mini-Transformer ("Ranch Runner")	Apr-04	2
35-090	Installation Details for 3Ø Padmounted Transformer	Apr-04	2
35-100	Two Padmounted Transformers in Open Wye 240/120V 3Ø	Apr-04	2
35-110	Installation 1Ø Dead Front Pad Mounted Transformer 3Ø Bank	Apr-04	2

SECTION 36 - NOT USED

SECTION 37 - Risers, Ducts, and Trenches

37-ALL	All Standards in Section 37 as a single document.		
37-010	#2 Copper Pole Ground on Riser Poles	Jun-04	1
37-020	Insulating Primary Riser Streamer Wire and Terminals	Jun-04	1
37-050	Underground Phasing	Jun-04	1

Standard # EC-	Title	Current Revision Date	# of Pages
37-060	Marking and Locating URD Facilities	Jun-04	2
37-140	Pole Steps on Riser Poles	Jun-04	1
37-150	Requirements for Joint Trench with Gas & Electric Horizontal	Jun-04	1
37-160	Requirements for Joint Trench with Gas & Electric Vertical	Jun-04	2
37-170	DP&L Standard for Joint Use of Trenches	Jun-04	1
37-180	Separation from Water and Sewer Lines	Jun-04	2
37-190	Conduit Sizing	Jun-04	2
37-200	U-Guard Riser	Jun-04	2
37-210	U-Guard Riser Installed on Steel Poles	Jun-04	2
37-220	Single Phase Primary Risers	Jun-04	2
37-230	Single Phase Transformer and Primary Riser Pole	Jun-04	2
37-240	Three Phase Primary URD Riser, Overhead Construction	Jun-04	2
37-250	Three Phase Apitong Tangent URD Primary Riser	Jun-04	2
37-260	Three Phase Apitong Deadend Service Riser Pole	Jun-04	2
37-270	Three Phase Riser on Existing Armless Construction Pole	Jun-04	2
37-280	Station Riser with Apitong Arm, 600 Amp	Jun-04	3
37-290	Station Riser 600 Amp or 1200 Amp	Jun-04	3
37-300	Parallel Station Riser	Jun-04	1
37-310	Aluma - Form Three Phase Pothead Bracket	Jun-04	1
37-320	3Ø Air Break URD Primary Riser Switch for Spacer Cable	Jun-04	1
37-330	Substation Riser Terminator Installation	Jun-04	1
37-340	Connection Between Underground Duct and Riser Pole	Jun-04	1

SECTION 38 - Not Used

SECTION 39 - Underground Fusing and Switches

39-ALL	All Standards in Section 39 as a Single Document		
39-010	Switching Three Phase Padmounted Transformer Circuits	Jun-04	2
39-020	Maximum Cable Length to Avoid Ferroresonance	Jun-04	1
39-030	AC Network Copper Secondary Bus Fusing	Jun-04	1

SECTION 40 - Not Used

Functional Area:
Metering Services

SFR Reference
(B)(9)(d)(ii) Credit and collections

Policy and Goal Setting:

DP&L's Metering Services policies comply with federal, state and local regulations and policies. DP&L's policies are developed by DP&L's management under the guidance of AES's management and board of directors. All parties are responsible to ensure that DP&L's policies meet or exceed the requirements set forth by all of DP&L's regulating entities.

The first priority of all DP&L operating areas is to ensure the safety of all our employees, contractors and the public. Metering Services takes this priority very seriously and incorporates safety into all aspects of its operations. Monthly safety meetings, daily safety messages, jobsite safety inspections and stressing the importance of taking safety home ensures that all members are engaged and working to increase safety awareness and creating an injury-free workplace.

Metering Services goals are set annually in support of company and corporate goals. Goals include targets for safety, compliance and budgets.

Strategic and Long-Range Planning:

Planning in Metering Services reflects DP&L's long-range strategy to achieve DP&L's goal of delivering safe, reliable service and meeting the compliance and reliability targets as well as our Customer's needs.

Annually Metering Services plans its resources and prioritizes projects to meet regulatory requirements, meet customers' needs to establish new service, and to ensure accurate billing of our customers. Metering Services equipment and system upgrades are reviewed regularly to ensure that the necessary components and tools in place to meet the needs of our customers and all regulatory requirements. Long-range planning for this department includes initiatives to modernize metering and service infrastructure, refine business processes, and to utilize technologies to communicate and work safely and efficiently.

Organizational Structure and Responsibilities:

Metering Services includes areas involved with the service to and the metering of customers and is led by the Director of Metering Services and Safety.

1. Meter Reading consists of 1 full-time and 149 part-time employees. The department is managed out of DP&L's service building and operations are

conducted out of Greenville, Coldwater, Eaton, North Dayton, South Dayton, Sidney, Urbana, Bellefontaine, Marysville, Washington Courthouse and Xenia. Activities include:

a. Obtain accurate meter readings for all residential and commercial customers in accordance with the established meter reading cycle
b. Obtain meter readings off-cycle for electric service establishment, account discontinuation, service transfer and verification of read accuracy
c. Observation of meter equipment condition focusing on identification of potential unsafe conditions or potential meter tampering

2. Electric Meter consists of 16 full-time employees. This area maintains responsibility for the following utility activities:
   a. Electric Meter Technicians are responsible for all single phase transformer rated metering and all three phase metering installations including the following tasks:
      i. Inspect, test, check, adjust, and maintain all ratings and types of AC watt-hour meters, demand meters, and related auxiliary devices, used to indicate, integrate, or record electrical values associated with the measurement of power and energy
      ii. Inspect and maintain all metering instrument transformers and metering outfits, and associated equipment
      iii. Inspect, check, and verify primary, secondary, and auxiliary wiring and connections, on primary metered installations, and complex high capacity secondary metered installations
      iv. Install, change, and remove watt hour meters, demand meters, meter cabinets, meter panels, secondary wiring, and associated auxiliary devices, on primary metered installations, or where unusual hazards exist
      v. Verify suitability of watt hour meters and associated equipment assigned to installations
      vi. Conduct special tests, investigations, surveys and preparing reports and sketches

   b. Rubber Goods Testing is responsible for the testing of rubber goods used by DP&L throughout the organization. Rubber Goods Testing ensures the safety of DP&L employees by implementing rigorous testing procedures and frequent testing cycles of all rubber goods equipment. Activities include:
      i. Test and maintain rubber goods for Class 00 through Class 4 applications
      ii. Develop and maintain rubber goods testing schedule and cycle
      iii. Identification of inadequate rubber goods through testing and visual inspections of material
      iv. Regular maintenance and testing of rubber goods testing equipment

c. Interval Billing is responsible for the billing and meter reading of interval metered customers. Interval metering is used for customers in excess of 200kW and load research applications. The interval billing program MV90 is maintained by Information Technology but is utilized by technical clerks within Electric Meter Activities include:
   i. Verify maximum demands as reported, check calculations, inspect demand readings and charts for irregularities, and transcribe this data to permanent records and prepare necessary reports
   ii. Integrate demand readings and charts and verify results of such integrations with the meter registration
   iii. Totalize readings and compute simultaneous maximum demands as required
   iv. Study demands of installations to check for overload conditions on transformers and other equipment
   v. Prepare orders for installing, changing and removing meters, instrument transformers, shunts and other metering equipment, and for periodic testing of meters and equipment or periodic changing of demand measuring devices

3. Services consists of approximately 65 employees and contractors. This area maintains responsibility for the following utility activities:
   a. Services is responsible for the construction, maintenance and emergency restoration related to customers' service lines. Services is divided into two sub-groups: meter orders and construction
      i. Meter orders completes:
         (1) Meter reconnects and disconnects
         (2) High and low bill investigations
         (3) Single-phase meter installations and replacements
         (4) Other miscellaneous electrical orders
      ii. Construction completes:
         (1) New construction meter sets
         (2) Residential and commercial service upgrades
         (3) Single phase riser construction (excluding poles)
         (4) Night guard maintenance, installations and removals (excluding poles)
         (5) Transformer rated three phase reconnects and disconnects
         (6) A-base meter adapter installations
         (7) Other miscellaneous electrical orders

   b. Collections is responsible for overseeing all aspects of a customer's collection cycle while ensuring compliance with all rules and regulations set forth in the O.A.C. DP&L's credit and collections policies are included as Metering Services – Exhibit 2. Activities include:
      i. Payment agreement administration and audit
      ii. Notifications of disconnect
      iii. Service disconnect orders

iv. Final bill collection efforts

c. Revenue Protection promotes the safety of DP&L's customers and employees through identification and removal of unauthorized/unsafe field conditions that pose a physical threat to the public, customer property, DP&L employees or equipment. Additionally, minimizing and/or preventing theft of electric service reduces revenue loss which ultimately is in the best interests of all stakeholders. Activities include:
   i. Electrical power theft verification
   ii. Fraud investigation: ID theft, returned payments, false representation
   iii. Deceased customer account management
   iv. Bill itemizations for third party collections agencies

d. Locating is responsible for detecting and marking underground electrical cables in accordance with the Ohio Revised Code governing excavation and identification of utility owned underground facilities. Activities include:
   i. Review of electrical prints to declare an area is free of facilities
   ii. Physically marking the location of facilities with paint or flags
   iii. Coordinate with Engineering, Project Management and other areas for new construction, system expansion and renewal and replacement activities

The organizational chart for Metering Services is included as Metering Services – Exhibit 1.

Decision-Making and Control:

Decision-making and control within the Metering is achieved by individuals throughout the organization making decisions within their given scope of authority in support of DP&L's overall mission and in accordance with our policies and procedures. Decisions are raised to the proper level of authority as required by DP&L's policies. Overall responsibility for all decisions is that of the Vice President of Customer Operations.

Performance against the Customer Operations goals is monitored and reported on a continuous basis, which includes monitoring of safety, budgets, and compliance. This monitoring helps to ensure that early warnings are in place when problems arise allowing management to uncover trends in a timely manner and proactively address issues.

Internal and External Communications:

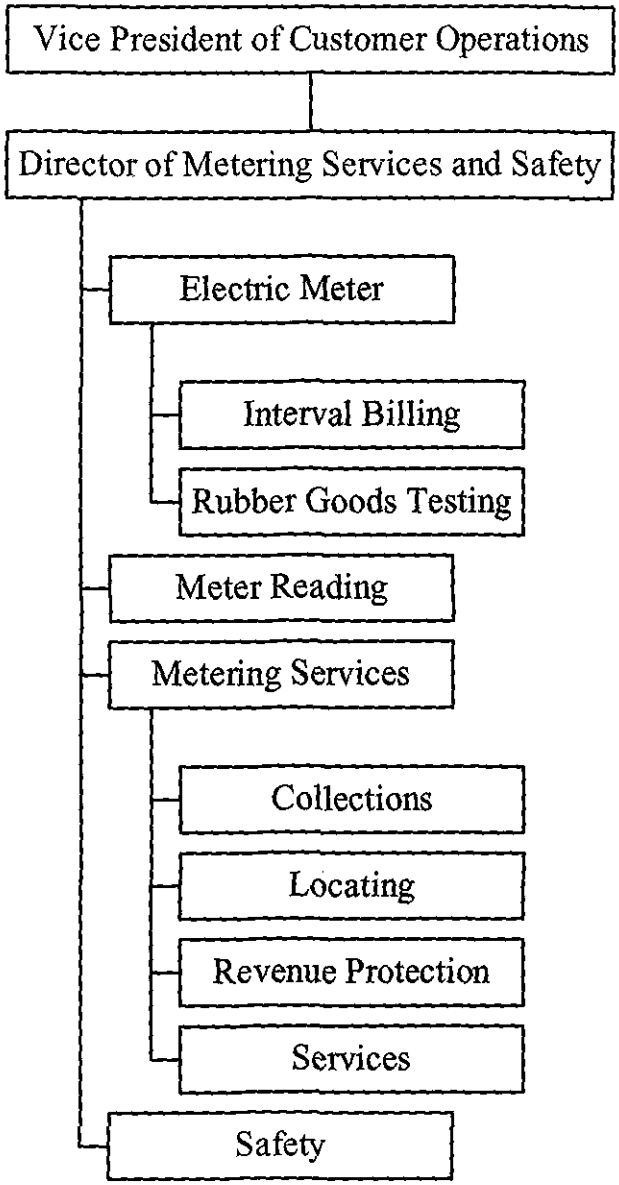
Internal communications are accomplished through a variety of communication channels including: department meetings, phone calls, conference calls and e-mail. Internal

communications typically correspond to supporting the operations of other functional areas of DP&L. These communications include providing information to areas such as Customer Service, Community Relations, Design Engineering and Regulatory Operations.

External communications are accomplished through a variety of communication channels including: phone calls, meetings, letters and e-mail. Communications typically include meter access coordination, technical issue resolution, construction projects, outage coordination, meter testing, meter facilities repair, and maintenance activities. Metering will often interface directly with the public to address complex meter concerns and customer high bill complaints or when technical issues arise regarding billing or metering.

Metering Services – Exhibit 1

Organizational Chart for Metering



Metering Services – Exhibit 2

DP&L Credit and Collections Policies

Credit and Collection Policies Table of Contents Last Updated 12/3/2014	
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Bankruptcies	CC-02
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Maintaining Customer Deposits—Residential/Non-Residential	CC-17
Returned Payment Processing	CC-18

Common terms and abbreviations used throughout the Credit and Collection policies:

ADMO – Adjustment Money Only
CMS – Cash Management System
CR – Cash Receipts
CSC – Customer Solutions Center
CSR – Customer Service Representative
CSS – Customer Service System
DAD – Dispatch Administrative Database
DCIS – Debit/Credit Issue
DP&L – Dayton Power & Light
HH – Handheld Unit
IVRU – Interactive Voice Response Unit
MOM – Mobile Order Management
PIPP – Percentage of Income Payment Plan
RMS – Report Management System
SONP – Shut Off for Non-Payment
SORM - Shut Off Remaining Services

Credit & Collection Policy
Application – Residential/Non-Residential Customers
Policy CC-01

Definitions: A residential/non-residential application is the on-line customer application required for all residential/non-residential customers.

Policy: A residential/non-residential application is required to be completed for all residential and non-residential customers.

Procedure:

New Residential Customer

- CSR takes customer application information over the phone. Spouses are allowed to provide application information on behalf of the other spouse.
- The CSR is required to obtain at least one name on the application. A second name on the application may be entered upon the customer's request.
- Only one application is completed for each customer. CSR is required to determine whether the customer has an existing application. A current application exists if the customer has an active, final, void or uncollectible account in CSS (see Existing Residential Customer requirement below).
- The CSR is required to determine whether the applicant is applying for service at a premise where the revenue protection checklist is required. (see Policy CC-05 –Revenue Protection Checklist).
- The customer's social security number should be requested from the applicant. We are allowed to ask for this information to determine a customer's credit worthiness.
- If the applicant refuses to provide a social security number, they must fax in a valid form of identification. The identification must be notarized and the notary signature and stamp must be visible. Security will be required (see Policy CC-11 Security/Deposits-Residential).
- One of the following pieces of identification must be obtained:
  - Driver's License number
  - State ID
  - Department of Human Services ID
  - Military ID
- If the applicant is not a U.S. citizen, a Passport or VISA must be provided in lieu of a social security number. The Passport or Visa must be notarized and the notary signature and stamp must be visible. The Passport or Visa must be faxed to the CSC. Security will be required (see Policy CC-11 Security/ Deposits – Residential).
- If a customer does not have a valid form of identification, the CSR

must place the order on hold pending the receipt of required information.

- The customer may fax, mail, or email the required information into the CSC.
- All new account opens are assigned a "C" credit rating with the exception of those customers who do not require a deposit as a result of passing a credit check. Customers not requiring a deposit as a result of passing a credit check are assigned an "A" credit rating.
- The CSR determines the amount of the security deposit (see Policy CC-11 - Security / Deposit Policy – Residential)
- All of the above mentioned steps must be completed prior to the CSR initiating a service request order.
- If the customer does not meet requirements at the time the application is placed, the application order must be created and put on hold.

Existing Residential Customer

- Only one application is completed for each customer.
- CSR is required to inquire of the customer to determine whether the customer has an existing application. A current application exists if the customer has an active, final, void, or uncollectible account in CSS
- All required customer identification information is required to be updated, (e.g., new driver's license number, social security number, etc.)
- The CSR is required to collect any past due amounts prior to initiating a service request order. A exception to this rule is during the winter season if the customer is eligible to use the Winter Reconnect Order (WRO).
- The customer may fax or mail the required information into the CSC.
- The CSR determines the amount of the security deposit (see Policy CC-11 - Security / Deposit Policy – Residential)
- All of the above mentioned steps must be completed prior to the CSR initiating a service request order.
- If the customer does not meet requirements at the time the application is placed, an application order must be created and put on hold.
- If a caller has an existing account but has been disconnected for nonpayment for ten or more business days the caller is treated as a new customer applying for service.

New Non-Residential Customer

- CSR is required to obtain the following required information based on the type of business:
  - Sole Proprietorship: Consists of an owner who can be liable for business debts.
    - Billing name (name of owner)
    - DBA, if applicable
    - Social Security Number (Owner)

- Contact name (example – name of manager, billing contact)
- Telephone number
- All new accounts are assigned a "C" credit rating
- Security is required as outlined in policy CC-10-Security / Deposit Policy – Non-residential.

  - Partnership: Consists of two or more parties, who can be liable, for business debts incurred by the partnership. A limited partnership has at least one general partner, who is responsible for all the business debts, and at least one limited partner, who has no liability for the partnership's debt.
- Billing name
- Business Type
- Limited or General—General Partner's name
- Federal Tax ID # (Can be requested but do not hold order)
- Contact name (example—name of manager, billing contact)
- Telephone number
- All new accounts are assigned a "C" credit rating.
- Security is required as outlined in policy CC-10 - Security/Deposit Policy-Non-Residential.

- Corporation: Consists of shareholders who own the business and elect a board of directors. The officers of a corporation are not personally liable for business's debts.
  - Billing name
  - Business Type
  - If incorporated (corporation or limited liability company)—Officer's name
  - Federal Tax ID # (can be requested but do not hold order)
  - Contact name (example—name of manager, billing contact)
  - Telephone number
  - All new accounts are assigned a "C" credit rating.
  - Security is required as outlined in policy CC-10 - Security / Deposit Policy – Non-Residential.
- Government: A municipal, state or federal entity.

Existing Non-Residential Customer

- When an existing non-residential customer requests new service or an additional account, an updated application is required.
  - There should be only one application for each legal entity. Example –Thomas Cloud (sole proprietor) would require a new application for Thomas Cloud and George Sky (partnership).
  - The CSR is required to collect all past due amounts and/or outstanding deposits from the customer before initiating a service request order.
  - All new account opens are assigned a "C" credit rating.
  - Security is required as outlined in policy CC-10 - Security /

Deposit Policy – Non-Residential.

Related Policies:

- CC-10 Security/ Deposit Policy – Non-Residential
- CC-11 Security/ Deposit Policy—Residential

Credit & Collection Policy
Bankruptcies
Policy CC-02

Definitions: Bankruptcy is the legal process for reorganizing or discharging debts. The most common types of bankruptcies that we deal with are:

- Chapter 7 (both residential & non-residential) is a liquidation of assets where the debtor is discharged from liability. These accounts are charged a security deposit.
- Chapter 11 (non-residential) is reorganization for corporate debtors who continue to operate.
- Chapter 13 (residential) is a debt adjustment where the debtor must repay all or a portion of unsecured debts over a three to five year period and is discharged from liability for the remainder of the debts.

Policy: The following security is required for customers involved in each of the various types of bankruptcies:

Chapter 7 Bankruptcy:

- A security deposit is usually, but not always required for all customers applying for service with a Chapter 7 Bankruptcy. If the customer has an "A" payment history rating, then a deposit is not required. If the customer has a "B or lower" payment history rating, then a deposit is required. Contact the bankruptcy department x7939 to determine if a deposit is required.

Chapter 11 Bankruptcy:

- If the customer has an "A" payment history rating, then a deposit is not required. If the customer has a "B or lower" payment history rating, then a deposit is required. In some cases, the Bankruptcy Court issues an Order prohibiting a deposit to be charged. In lieu of a deposit, the Court sets up an Adequate Assurance Account that is maintained by a trustee who reports to the Court. Contact the bankruptcy department x7939 to determine if a deposit is required.

Chapter 13 Bankruptcy:

- If the customer has an "A" payment history rating, then a deposit is not required. If the customer has a "B or lower" payment history rating, then a deposit is required. Accounts in the Dayton area are provided a deposit through the Chapter 13 Trustee, Jeff Kellner. If the account is in another district (ex: Marysville or Washington CH) a claim will be filed for the deposit. Contact the bankruptcy department x7939 to determine if a deposit is required.

Procedure:

- The CSR is required to forward all questions, issues, and correspondence regarding bankruptcy cases to the Bankruptcy Paralegal

x7939.

Related Policies

- CC-10 Security/ Deposits—Non-Residential
- CC-11 Security / Deposits – Residential

Credit & Collection Policy
Collection of Final Bills
Residential/Non-Residential
Policy CC-03

Definitions: The final bill is the last bill provided to a customer after service has been disconnected for non-payment.

Policy: The Company will follow a defined process when collecting amounts past due.

Procedure:

Process/timeline for collecting past due amounts up to the point the account is "final billed":

Winter Residential Collection Process (November 1 through April 15)

- Bill 1 is generated.
- Bill 1 is due in approximately 20 days from mailing date. If the due date falls on a Saturday, Sunday or Company holiday, the due date is adjusted to the next work day.
- Bill 2 is generated and shows Bill 1 past due if it has not been paid.
- Bill 2 is mailed.
- 14 day disconnect notice on past due charges from Bill 1 is mailed 2 days after Bill 2 is mailed.
- 14 day disconnect notice is due 14 days after it is mailed.
- 13 day disconnection notice is mailed the day after the 14 day disconnect notice is due. Service is eligible for disconnection the day following the 13 day disconnect notice due date.
- Attempt to call the customer via the IVR is made within 3 days after 13 day disconnect notice is mailed.
- Attempt to call the customer via the IVR is made within 3-4 days before the 13 day disconnect notice is due.
- Payments received by the Field Service Representative are handled in accordance with Policy CC-04 – Collections/Field Services-Field Service Pulls.
- If payment is not collected by the Field Service Representative the account is disconnected at the premise. The account is closed (final billed) not later than 10 days following the date of disconnection for non-payment.
- Shut off of remaining services is performed in accordance with Policy CC-12 – Shut Off Remaining Services.

Summer Residential Collection Process (April 15 through October 31)

- Bill 1 is generated.
- Bill 1 is due in approximately 20 days from mailing date. If due date

falls on a Saturday, Sunday or Company holiday, the due date is adjusted to the next work day.

- Bill 2 is generated and shows Bill 1 as past due if it has not been paid.
- Bill 2 is mailed.
- 14 day disconnect notice on past due charges from Bill 1 is mailed 8 days after Bill 2 is mailed. Service is eligible for disconnection the day following the 14 day disconnect notice due date.
- Attempt to call the customer via the IVR is made within 3-4 days before the 14 day disconnect notice is due.
- 14 day disconnect notice is due 14 days after it is mailed.
- Account is closed (final billed) not later than 10 days following the date of disconnection for non-payment.
- Shut off of remaining services is performed in accordance with Policy CC-12 – Shut Off Remaining Services.

Non-Residential Collection Processing

- Bill 1 is generated (Day 1).
- Bill 1 is mailed (Day 2).
- Bill 1 is due approximately 20 calendar days from mailing date. (It is never less than 20 calendar days but may be more. If the due date would fall on a Saturday, Sunday or holiday, the next scheduled work day becomes the due date).
- Disconnect notice is mailed 6 calendar days from the bill due date. Service is eligible for disconnection the day following the disconnect notice due date.
- Disconnect notice is due 5 calendar days from the disconnect notice mail date.
- Shut off of remaining services is performed in accordance with Policy CC-12 – Shut Off Remaining Services.

Process/Timeline of Final Bill to Account Charge Off:

- Final bill mailed (Day 0).
- Final bill due (Day 15).
- Final bill reminder generated and mailed the following day (Day 25).
- Final bill reminder due (Day 35).
- Bottom Line Impact program automatically transfers unpaid bills to active account for same customer (Day 35).
- CSRs review remaining unpaid final bills to determine whether they can be transferred to an active account for the same customer (Day 35).
- Bottom Line Impact program automatically transfers unpaid final bills to active account for the same customer (Day 60).
- CSRs review remaining unpaid final bills to determine whether they can be transferred to an active account for the same customer. If unpaid final bills cannot be transferred, the CSR charges the account off making their status uncollectible (Day 95). The earliest an account is

charged off in the above process is approximately 95 days from the mailing date of the final bill. Accounts associated with a bankruptcy are charged-off when known, which may be earlier than 95 days.

- The account is then sent to an outside collection agency via CSS in an FTP format.

Management of Relationship with Collection Agencies:

- The Report Management System (RMS) generates a monthly report (LCDCC12) that reviews all uncollectible accounts placed with a collection agency within the last 24 months. Data greater than 24 months from the placement date is excluded. Accounts having DP&L as the agency are excluded. The accounts are reported under the most recent agency to which it is assigned.

  Information Reported:

  - The month that the debt was placed with the agency.
  - The number of accounts placed with the agency in the month indicated.
  - The original amount placed with the agency in the month indicated.
  - Debit or credit amounts posted to the accounts via ADMO or DCIS since the account was placed with the agency. This field is cumulative.
  - Transfers to or from the account since the account was placed with the agency.
  - *Payments and payment corrections posted to the* accounts since the accounts have been placed with the agency.
  - Payment amount collected divided by the adjusted amount plus or minus adjustments and transfers.
  - Sum of the associated column. % collected is the same formula used for individual months.

Note: The report LCDCC12 is no longer displaying data when run in CSS as of the date of this revision. DP&L is currently exploring the ROI for using a third party to manage our collection agencies. If we decide to move in the direction of outsourcing this role we will not spend the money on CSS support to look into why this report quit running. If these activities are not outsourced, DP&L will need to have CSS support look into fixing the LCDCC12.

Related Policies

- CC-07 Medical Certification
- CC-08 Payment Agreements
- CC-10 Security/ Deposit Policy – Non-Residential
- CC-11 Security/ Deposit Policy—Residential

Credit & Collection Policy
Collections/Field Services-Field Service Pulls
Policy CC-04

Definitions: Process for CSC representatives to follow if an account has been dispatched for disconnect of service due to non-payment or change of status of a service order.

Policy: CSC representatives are required to follow the procedures defined in this policy when dispatched for disconnection of service due to non-payment or change of status of a service order.

Procedure:

- **Collections**
  - If the account is in the field for disconnection due to non-payment ($ on the customer's account):
    1. The CSR receives the customer's call:
       - CSR inputs the customer's information on the Remarks Screen in CSS.
       - CSR performs a search for the order in the Mobile Order Management (MOM) database.
       - The CSR should select to enter an alert type and enter in the necessary text.
    2. CSR sends an alert through the MOM desktop application to notify the field technician payment has been made and the order needs to be closed as "pulled".
  - The CSR is required to inform the customer that if a service has already been disconnected-they may be required to pay additional fees for reconnect and may have to call back for another appointment on the next available business day.
  - If the customer's account has collection activity pending but the account is not in the field for disconnection (no $ on the account):
    1. The CSR receives the customer's call with a future SONP pending:
       - CSR inputs the customer's information onto the Remarks screen in CSS.
- **Service**
  - Change of Service Order
    1. CSR receives the customer's call with a change on a service order:
       - CSR performs Transfer an Account Close; Cancel an Account Open/Close; Add remarks to an existing Account Open/Close in CSS.
       - CSR locates the order that is in the field and sends the

technician an alert informing the tech of the change being made to the order.
- CSR is required to inform the customer that if service has already been disconnected, the customer will have to call back for another appointment on the next available business day.
- Note: There are three scenarios that qualify for a "special" page. A "special" page is sent by a team lead and is sent from the CSC Interagent inbox to the appropriate contact based on what department has the order. The purpose of sending a "special" page is so that a confirmation is given to confirm if an order was successfully modified. The scenarios qualifying for a "special" page include: a customer who has met requirements for service at a premise that has an account close scheduled for the same day, a customer changing the date of an account close that has already been taken to the field, or a new customer has met requirements for service and there is a $ on the account. In each of these three scenarios the customer must be at the premise and verify that the service is on.

Related Policies:

- None.

Credit & Collection Policy
Revenue Protection Checklist
Policy CC-05

Definitions: An Affidavit is a sworn written statement by a customer attesting to certain facts or information. An Affidavit form is available on-line at http://www.dpandl.com/customer-service/account-center/start-or-stop-service/affidavit-to-start-service/

Policy: CSRs are required to follow the procedures defined in this policy to verify that a customer living at a premise is not responsible for an unpaid debt incurred through consumption of electric service at that premise.

Procedure:

- When an applicant applies for service at a premise that has been shut off for non-payment within the past 60 days or is in current collections the CSR is required to verify whether the previous tenant is still residing at the premise.
- If the applicant states the previous tenant no longer resides at the premise, the CSR requests the following information from the

applicant:

- Proof of ownership, if applicable. Example: Deed, Settlement Statement at closing, Property Tax information
- Lease agreement, if applicable. Must include address, date of lease, and signature page of lease.
- Notarized Landlord Statement. If lease is not available, the Landlord can provide a notarized statement for the property. Statement must include date of lease, address of property, names of all occupants, landlord name and contact number, and signature of landlord. Statement must also be notarized with a visible notary stamp/seal.
- Notarized Affidavit. The affidavit must include the name of person leasing the property, address of property, the statement "The previous tenant does not and will not reside at the address," and signature of person leasing the property. Statement must be notarized with a visible notary stamp/seal. The CSR is required to inform the applicant that falsifying affidavits is fraud and punishable in accordance with the Ohio Revised Code-ORC 2921.13.

- The customer is informed to fax (331-4880) or email the information to the CSC.
- The CSR is to notify the customer that once received the documentation will take approximately one hour to process. The CSR should obtain a phone number that the customer can be reached on after the documentation has been processed and inform the customer that a representative of the company will be contacting them back approximately 1-1 ½ hours after receiving the documentation. If the customer does not receive a call within 2 hours of faxing the documentation to DP&L the customer should contact the call center to ensure the documentation has been received.
- The CSR will place the order on hold for 14 days in CSS and the Fraud & Theft Checklist database pending the receipt of documentation.
- If the CSR determines that the previous tenant is still residing at the same premise, the CSR is required to inform the applicant that service will be denied until the previous tenant has vacated the premise or has paid the past due bill in full.
- Once all the requirements have been met and the customer calls with open information, the order is released for the next available business day.
- After completion of the order to establish service, the CSR forwards the original or a copy of the notarized affidavit and other supporting documentation to the Revenue Protection department.
- The Revenue Protection Checklist along with all supporting documents is filed by month and date in the Revenue Protection Department.
- Note: A customer can bypass going through the RP checklist when applying for service if he/she: is an A or B customer, has an A/T

agreement set up for the address service is being applied for, is applying at an address in which the previous customer has a past due balance owing of less than $100.

Related Policies:

- CC-01 Application – Residential/Non-residential Customers

Credit & Collection Policy
Guarantors
Policy CC-06

Definitions: A guarantor is a DP&L customer who agrees to "guarantee" payment of past due amounts for another DP&L customer so the guaranteed customer can obtain and/or keep service.

Policy: The CSR shall present the option of a guarantor as a means of obtaining new service or preventing disconnection of service to customers who are past due. Guarantor minimum qualifications include:

- A guarantor must be a DP&L customer who owns real estate and has an "A" credit rating.
- A guarantor must be willing to be responsible for up to 60 prorated days of a bill if the person being guaranteed fails to pay the bill at any time.
- If the person being guaranteed is a shopped customer the guarantor will be guaranteeing an amount equal to 60 prorated days of distribution charges.
- A residential account cannot guarantee a Commercial account.

Procedure:

- Guarantor information can be taken over the phone.
- The guarantor's responsibilities must be explained to the guarantor at the time of the request. Guarantor's responsibilities include:
  - If the amount is not paid, the guarantor may be responsible for a guarantor share.
  - When the 14-day notice comes due, the guarantor share may be transferred.
  - If the amount owed remains high enough after the transfer of the guarantor share, the account may be shut off for non-pay.
  - A deposit must be collected on all accounts shut off for non-pay prior to reconnecting the account.
- A guarantor of a residential account will receive a letter if the guaranteed customer does not pay his/her bill and receives a 14-day collection notice.

Release of Guarantor:

- The guarantor is released after the guarantor share is transferred.
- Guarantors will automatically be released when the guaranteed account has been paid promptly and in full for 12 consecutive months.
- A guarantor can also be manually released upon the request of the guarantor if the guaranteed account is not in the collection cycle. (In this instance, the previously guaranteed account will be billed a deposit if applicable.) If the guaranteed account is in collections, the guarantor cannot be released until this is resolved.

- If there is a guarantor on a residential account when the guaranteed account finals, the guarantor's share can be transferred to the guarantor's account if the final bill is unpaid.

Related Policies:

- CC-11 Security/Deposits—Residential

Note: Changes are being made to guarantor processing with the most recent changes to the ESS rules. Once all of the changes have been made this policy will be updated accordingly.

Credit & Collection Policy
Medical Certification
Policy CC-07

Definitions: Medical Certificates are forms completed by physicians that certify that termination of utility service for non-payment would be especially dangerous to a household member's health.

Policy: The Company will comply with the Medical Certificates rules as mandated by the Ohio Administrative Code. Medical Certificates are applicable on residential accounts only as a method to suspend collections for 30 days.

- At the request of a customer, a CSR is to send a medical certificate to a customer's certifying agent. If requested, a CSR is able to send the medical form directly to a customer who will then have the form completed by his/her certifying agent. At the time the medical is sent to a certifying agent the CSR is required to obtain a valid phone number to be called back at once the medical has been received and processed. This phone number should be recorded on MNRE.
- A customer may have no more than three Medical Certificates for each premise during a rolling 12-month period.
- A Medical Certificate is only available for a permanent resident of a household.
- A Medical Certificate cannot be used to obtain or transfer service.
- Reconnect fees are to be billed on medical reconnects if the service has been disconnected.
- The medical condition or the need for medical or life-supporting equipment shall be certified to the utility company by a licensed physician, physician assistance, clinical nurse specialist, certified nurse practitioner, certified nurse-midwife, or local board of health physician. If there is any question to the validity of a certifying agent listed on a medical certificate a search should be performed at the following website to confirm the certifying agent's credentials. https://license.ohio.gov/lookup/default.asp. If the CSR is unable to verify the certifying agent's credentials via the web address above a call should be made to the phone number provided on the medical certificate.
- As a general rule, if the certifying agent listed is licensed to prescribe medication a medical form will be accepted. The following are able to prescribe medication:
    - MD (Doctor of Medicine)
    - DO (Doctor of Osteopathic Medicine)
    - PA (Physician Assistant)
    - OD (Optometry)

- DPM (Podiatry)
- NMD or ND (Doctor of Naturopathic Medicine)
- DVM (Veterinary Physician)
- DDS (Doctor of Dental Surgery)
- DMD (Doctor of Dental Medicine)
- Clinical Pharmacists
- Nurse Practitioners
- APRN (Advanced Practice Registered Nurse)
- Clinical Nurse Specialist

- The following is a list of those not authorized to prescribe medication:
  - RN (Registered Nurse)
  - Medical Assistants
  - EMT (Emergency Medical Technicians)
  - Most Psychologists
  - Social Workers
- Because the above list is not all inclusive, if an agent not listed above attempts to complete a medical form the CSR processing medicals should attempt to determine if the certifying agent is licensed to prescribe medication. If the CSR is unable to make this determination a call to the certifying agent's office to verify is necessary
- If a certifying agent refuses to provide his/her Medical License Number, the Medical Certificate will be rejected (with an appropriate remark added to the MNRE screen as to cause).
- A designated CSR will contact the customer back at the provided phone number to confirm acceptance or rejection of the medical certificate. If rejected, the customer must be provided with the reason for the rejection.
- A Medical Certificate can be phoned in by a certifying agent, but paperwork must be submitted within seven days.
- The customer must also enter into a pay agreement (see Policy CC-08 Payment Agreements).
- A Medical Certificate cannot be used to re-establish service if service has been disconnected for more than 21 days.
- A Medical certificate cannot be used to re-establish service if service has been disconnected due to fraud, theft, or returned payment until the fraud, theft, or returned payment amount has been satisfied.
- CSS will track the Medical Certificate usage.

Related Policies:

- CC-03 Collection of Final Bills
- CC-04 Collections/Field Services-Field Service Pulls
- CC-08 Payment Agreements

Credit & Collection Policy
Payment Agreements—Residential/Non-Residential
Policy CC-08

Definitions: A payment agreement is an agreement between the company and the customer that allows the customer an agreed upon period of time to pay the outstanding balance on an account.

Percentage of Income Payment Plan (PIPP) allows a customer to make utility payments based upon their income instead of based upon their consumption. As part of this plan, the Ohio Department Services Agency reimburses the utility for the PIPP eligible utility charges. PIPP is only available for residential customers.

Residential Policy:

Payment agreements will be made available to customers upon request.

- Payment agreements will be granted only when requested by the customer.
- Payment agreements will not be offered on or after the scheduled day of disconnect.
- System-generated pay agreements will be offered to customers meeting certain criteria.
- Payment agreements will be written to include the corresponding cycle bill due date.
- All conditional payments must be made on or before the due date in order to activate the payment agreement.
- Itemized payment agreements will be avoided. The only exceptions to this rule are situations that require correction of a billing error. Example: itemized agreement for a dead or inaccurate meter.
- Itemized pay agreements will be reviewed monthly by the collections supervisor.

Standard Payment Agreements:

Winter Season (Nov 1-April 15)

- 1/3 payment agreements are authorized during the "Winter Rules" collection season only.
- 1/3 payment agreements will only be offered for as long as a customer continues to have consumption from the winter season.
- If a customer defaults on their payment plan the defaulted amount will be added to the initial payment of any other requested payment plan.
- If a customer has defaulted on a previous PIPP agreement, all defaulted PIPP payments from the time the customer was last on PIPP must be

paid before a new PIPP agreement will be granted.

All Seasons (April 16-Oct 31)

- During the "Summer Rules" period, the 1/6, 1/9 and PIPP plans are the only authorized pay agreements, unless there was a metering or billing problem that was not the fault of the customer.
- Customers who are PIPP-eligible can be enlisted on PIPP regardless of default on any previous pay agreement.
- If a customer has defaulted on a previous PIPP agreement, all defaulted PIPP payments from the time the customer was last on PIPP must be paid before a new PIPP agreement is be granted.
- Itemized pay agreements should only be written if there was a metering or billing problem that was not the fault of the customer. Any other itemized pay agreements for residential customers must be approved by a team lead or supervisor.

Non-Residential

Policy:

Payment agreements will be made available to customers upon request.

- Payment agreements will be granted only when requested by the customer.
- CSRs will not "volunteer" payment agreements.
- Payment agreements will not be offered on or after the scheduled day of disconnect.
- A 3 month itemized payment agreement is the only available payment agreement for non-residential accounts. A CSR is able to set up a pay agreement for fewer than 3 months at the customer's request using the same method for writing the agreement.
- A or B customers/business will be eligible for an agreement if they have a past due balance.
- C customers are eligible if they do not have a pending SONP ($)/not the day of disconnect.
- Will require a conditional payment to establish arrangement.
  Ex. Customer has past due balance of $300 and a current bill of $100. Required payment to establish payment agreement would be $200 ($100 past due + $100 current bill). There will then be 2 additional payments of $100 + current bill to complete the arrangement.
- If the customer fails to pay the conditional payment to establish an arrangement, they will not be eligible for another arrangement.
- If the customer has an expired not-kept arrangement within the last 12 months, they will not be eligible for another arrangement.
- Permanent remark must be placed on the account.
- Special Ledger accounts are to be referred to collection supervisor.

Related Policies

- CC-03 Collection of Final Bills

Credit & Collection Policy
Payments Taken in the Field
Policy CC-09

Definitions: None.

Policy: Field Collectors are required to follow the procedures defined in this policy when collecting on accounts that are scheduled for disconnect for non-pay.

Procedure:

- Field collectors are required to knock on the first collection attempt. Knocking on subsequent trips (in the event the meter is not accessible for house bracket or pole disconnection) is not required.
- Field collectors are required to collect past-due payment in full or disconnect the meter when a SONP order is issued by the billing system.
- Payments received by the Field Collector at the customer's premise must be in the form of cash, check, or money order unless the customer is identified as a "cash only" customer. The only authorized forms of payment for a "cash only" customer are cash or money order. Accounts are coded "cash only" by CSS after a customer has an "at-fault" returned payment with DP&L.. At no time is the collector to give change back to the customer in the field.
- The Field Collector enters the payment information into their handheld (HH) device and provides the customer with a receipt. After the order is completed the information entered by the field collector will load into the MOM database. A report file is created by the Mobile Order Management Database (MOM).
- The payments collected in the field are to be reconciled by the authorized Contractor and Collection representatives by 9 AM the following business day.
- By 9 AM the following business day, the DP&L Collection Dispatcher prints the report file from the MOM application (report is called "Cash Receipts by Tech").
- The field collector submits their daily receipts to their immediate supervisor.
- The collection dispatcher agrees the total cash receipts to the total per the report file.
- The dispatcher verifies that the total cash receipts agree to the MOM report.
- The dispatcher forwards the cash and MOM report to the CR (Cash Receipts) Specialty person.
- The CR Specialty person manually enters the payments into CSS. The Daily Cash Report is also prepared and updated.

- The CR Specialty person agrees the total cash receipts to the MOM report.
- The CR Specialty person prepares a deposit slip for the amount of the receipts. A copy of the deposit slip is maintained in the service center.
- The CR Specialty person puts the receipts and one copy of the deposit slip into a sealed bank deposit bag.
- The CR Specialty person delivers the bank deposit bag to the bank courier each day.
- The bank courier delivers the bank pouch to JPMorgan.
- JPMorgan verifies the contents and prepares a receipt. The receipt is provided to the bank courier.
- The bank courier returns the receipt to the CR Specialty person.
- CR Specialty person reconciles the total per the bank receipt to the total per the report file.
- The CR Specialty person forwards the bank receipt to Accounting.
- Accounting reconciles the total per the bank receipt to the total per the Daily Cash Report and bank statement.
- The actual payment should be posted to the system as quickly as possible (not later than 5 business days).

Related Policies:

- None.

Credit & Collection Policy
Security / Deposits – Non-Residential
Policy CC-10

Definitions: None.

Policy: Security, in the form of a deposit, guarantor or surety bond, may be required for non-residential customers, except for governmental accounts, including the following situations:

- Applicant has never used DP&L service.
- Applicant/Business has an Experian Intelliscore Plus score 65 or below and does not have any bankruptcies in the past 12 months, 1 judgment or lien in the last 12 months, 5 or less collection items in the last 12 months, and 61 days or less beyond term with any account in the last 6 months.
- Existing applicant has a current account with past due balance and/or outstanding deposit. All past due balances plus deposit must be secured before additional service is provided.
- Applicant is disconnected for non-payment and there is no security on file.
- Customer/applicant is involved in a confirmed Revenue Protection case (determined by Revenue Protection).
- Applicant is a former customer who has an account with a "U" status (paid or unpaid) on the system.
- Customer is a debtor in a bankruptcy action:
  - Chapter 7 or Chapter 11, bill deposit when opening bill account.
  - Chapter 13, bill deposit when opening bill account unless bankruptcy is filed in Montgomery County court.
  - If Chapter 13 is filed in Montgomery County court, waive deposit and use George Ledford as Trustee (MNSE).
- Customer has a "C" credit rating when applying to transfer or reconnect service.
- Applicant is currently using or previously used DP&L service where a credit status of "B" or "C" exists on any bill account.
- CSRs do have the ability to waive a deposit for a nonresidential customer applying for service if the customer agrees to go on bank plan to have their payment automatically withdrawn from their checking or savings account each month on the bills due date.
  - If waiving a deposit for bank plan, the bank plan form must be received prior to releasing service.
  - The following customers/applicants are not permitted to have a deposit waived for bank plan:
    - Customers applying for service at a premise where the suggested deposit amount is $25,000 or larger.

- Existing customers who have been billed a deposit as a result of recent payment behavior (requires supervisor approval). This includes customers that have been disconnected for nonpayment and do not have a deposit on file with the company.
- A Customer/applicant who have a prior uncollectible balance with the company.
- A customer/applicant who has previously filed bankruptcy.
- Customer/applicant is or has been involved in a confirmed Revenue Protection case (determined by Revenue Protection department).

Procedure:

Determination of Deposit Amount:

- The amount of the deposit shall not exceed one hundred thirty percent of the estimated average monthly bill for the customer's tariffed service for the ensuing 12 months. Reference ESSS 4901:1-10-14.
- If there is not a calculated deposit amount available, the CSR will calculate deposit based on $10 per 100 square foot of occupied space. Example 1300 square feet = Deposit of $130
- If the premise is new construction, the deposit is calculated based on kWh load (which is provided in the construction packet) using the deposit calculator.

Related Policies

- CC-01 – Application – Residential/Non-Residential Customers

Credit & Collection Policy
Security / Deposits – Residential
Policy CC-11

Definitions: None.

Policy: Security, in the form of a deposit, letter of credit, or guarantor (see policy CC-06 – Guarantors), will be determined for all customers applying for service.

- Security, if required, must be received before service will be established.
- A nationally recognized credit reporting agency will be used to perform credit screening for all first time applicants to determine security deposit requirements.
- The credit screening model will incorporate a modified version of a FICA score, called a TEC score, which was developed specifically for utility companies.
- The TEC score will be reviewed on a yearly basis to verify that DP&L is in-line with industry standards.
- The security requirement will be waived for customers with a DP&L TEC Score equal to or greater than 552.
- Customers with a TEC score less than 552 will require a security deposit, letter of credit, or guarantor.
- Security is specifically required in the following situations:
  - Applicant is not able to provide information for a credit screening.
  - Applicant is disconnected for non-payment and there is no security on file.
  - Customer/applicant is involved in a confirmed Revenue Protection case (determined by Revenue Protection department).
  - Applicant is a former customer who has an account with a "U" status on the system.
- If a deposit is waived with bank plan and a returned payment is received the returned payments will be handled as follows:
  - If the return reason is "unable to locate", a cash receipts representative will forward the account to a designated person in the BCSC to review that the bank plan information was input into CSS correctly.
  - If the return reason is at the fault of the customer, a cash receipts representative will forward the account to the collections department to pursue collection effort on.

Procedure:

Determination of Deposit Amount:

- The amount of the deposit shall not exceed one hundred thirty percent

of the estimated average monthly bill for the customer's tariff service for the ensuing 12 months. Referenced ESSS 4901:01-10-14.

- If there is no calculated deposit amount available, the CSR will bill a deposit of $100 for a non-heating electric account (billing rate of 111).
- If there is no calculated deposit amount available, the CSR will bill a deposit of $150 for an electric heating account (billing rate of 141).
- The percentage of the suggested deposit amount billed to a shopped customer is reviewed annually in connection with the budget bill review. For the 2014/2015 season these percentages are 40% for residential customers and 36% for non-residential customers.
- If the premise is a new construction, the deposit is calculated on a per square foot of occupied space basis per the schedule below:
  - Less than 1500 sq ft =$100
  - 1501-2500 =$200
  - 2501-3500=$300
  - 3501-4500=$400
  - 4501-5500=$500
  - 5501 and over=$1 per 10 square feet

Related Policies:

- CC-06 Guarantors
- CC-01 Application – Residential/Non-Residential Customers

Credit & Collection Policy
Shut Off Remaining Services
Policy CC-12

Definitions: None.

Policy: A customer's remaining service(s) will be disconnected after one service has been disconnected for non-payment, as long as the customer has not made arrangements to have the originally disconnected service restored. A customer will be eligible for a SORM order not later than five working days following a SONP of the first service.

Procedure:

- SORM orders will be automatically generated by CSS and printed through mass print.

Related Policies:

- *CC-03 Collection of Final Bills*

Credit & Collection Policy
Non-Residential Suspension/Extension of Collections
Policy CC-13

Definitions: None.

Policy: CSRs are required to follow the procedures defined in this policy when responding to requests by non-residential customers to suspend or extend the non-payment date of disconnection of services.

Procedure:

- CSR will inform customer of the minimum amount due to maintain service.
- CSR will inform customer of the due date for the minimum amount due.
- No extensions will be granted by the CSRs.
- Pay agreements may be offered in accordance to CC-08, Pay Agreements – Residential/Non-residential
- If customer requests to discuss account with the Collection Representative responsible for the account:
  - CSR will inform customer the Collection Representative will review the account and contact the customer within 24 business hours.
  - CSR will place remark on the CSS MNRE screen that customer was referred to the appropriate Collection Representative.

Related Policies:

- CC-03 Collection of Final Bill

Credit & Collection Policy
Third Party Notification
Policy CC-14

Definitions: A third party is a person that is to be notified if collection activity occurs on a pre-determined customer's account.

Policy: CSRs will initiate third party notifications when properly authorized by the customer of record. CSR will initiate a third party notification upon a verbal request from the customer of record.

Procedure:

- CSS will automatically generate a confirmation letter to both the customer of record and the third party. Both parties are also notified of collection activity.

Related Policies:

- CC-03 Collection of Final Bills

Credit & Collection Policy
Review of Deposits-Residential
Policy CC-15

Definitions: Review of accounts in CSS with deposits to determine if deposit should be returned because customer has established a payment history of 12 months of on time payments. CSS is the Customer Service System which stores customer account information. Example of the information stored is premise address, customer credit history, meter readings, etc.

Policy: On a monthly basis, CSS will identify customer accounts with deposits to determine whether deposits should be returned as a result of customers establishing a payment history of 12 months of on time payments. Deposits will be returned if the customer has established an "A" credit rating. An "A" credit rating has 4 or less points in the customer's credit history for the past 12 months.

Procedure:

- CSS begins an automated process of identifying accounts in their 13th month of billing.
- CSS automatically checks customer's accounts every month going forward until it is determined that the deposit can be applied to the customer's account.

Related Policies:

- CC-11 Security Deposits-Residential

Credit & Collection Policy
Review of Deposits-Non-Residential
Policy CC-16

Definitions: Review of accounts in CSS with deposits to determine if deposit should be returned because customer has established a payment history of 24 months of on time payments. CSS is the Customer Service System which stores customer account information. Example of the information stored is premise address, customer credit history, meter readings, etc.

Policy: On a monthly basis, CSS will review accounts with deposits to determine whether deposits should be returned as a result of customers establishing a payment history of 24 months of on time payments. The deposit will be returned if the customer has established an "A" credit rating. An "A" credit rating has 4 or less points in the customer's credit history for the past 24 months.

Procedure:

- CSS automatically reviews customer accounts on the 25th month of billing.
- CSS automatically checks the account every month going forward until the deposit can be applied to the customers' accounts.

Related Policies:

- CC-10 Security Deposits—Non-Residential

Credit & Collection Policy
Maintaining Customer Deposits-Residential
Policy CC-17

Definitions: Company will hold a customer's deposit payment until the customer has established 12 months of on-time payment history. For each billing, CSS enters a code to indicate the customer's promptness, delinquency, failure to make payment and other credit-related data. Each of these codes has an assigned point value.

Policy: Company will hold a residential customer's deposit payment until the customer has established 12 months of on-time payment history. For each billing, CSS enters a code to indicate the customer's promptness, failure to make payment, and other credit-related data. Each of these codes has an assigned point value. When a customer establishes an "A" credit rating (4 or less points in their credit history) the deposit will be refunded on their account.

Procedure:

- For each billing cycle, CSS enters a code to indicate the customer's promptness, delinquency, failure to make payment and other credit-related data. Each of these codes has an assigned point value.
- Each new account is established with a "C" credit rating unless a residential customer was not required to secure his/her account based on his/her TEC score.
- CSS will not upgrade the credit status to a "B" or an "A" within the 12 month period, even if the values in the field equate to a "B" or an "A".
- An "A" credit rating exists after 12 months, if the sum of the points in the credit history field is 4 or less.
- A "B" credit rating exists after 12 months, if the sum of the points in the credit history field is 5, but not greater than 8.
- A "C" credit rating exists if the customer is a new customer with less than 12 months credit history or the sum of the points in the credit history is 9 or greater.
- The credit history codes are assigned the following point values:
  - - =0 (not billed that month)
  - O=0 (Paid all arrears and previous bill amount by the due date)
  - 1=1 (Less than one month's bill past due)
  - 2=2 (One month previous bill past due)
  - 3=3 (More than one month previous bill past due)
  - I=9 (Returned check added that month—customer's fault)
  - S=9 (Shut Off Non-Pay generated that month)
  - D=9 (Service disconnected for non-pay that month)
  - L=3 (Collection letter sent that month)

  - N=0 (New customer –less than one year)
  - P=3 (Personal contact that month)
- *Credit history will not change between billing cycles if the code which* would be changed has a greater value than the new code. Example, if an account has a credit history code of "I" (insufficient check, value of 9) and a collection letter "L" (Letter, value of 3) is due to be issued, the "I" will not be replaced.
- Active PIPP customers will not be charged a deposit.
- If a customer with a deposit maintained on their account becomes PIPP eligible, the deposit will be applied to the customer's PIPP installment.
- Active PIPP accounts are reviewed weekly and monthly for deposits.

Related Policies:

- CC-10 Security/Deposits—Non-Residential
- CC-11 Security/Deposits—Residential
- CC-15 Review of Deposits—Residential
- CC-16 Review of Deposits—Non-Residential

Credit & Collection Policy
Returned Payment Processing
Policy CC-18

Definitions: None

Policy: When a customer has an at-fault returned payment of $175 or higher posted to their account the account will receive a notice posted at property and follow an accelerated collection timeline.

Procedure:

- A CSR in the cash receipts specialty group will handle the debiting back to CSS of returned payments.

Residential

- The cash receipts CSR will send any at-fault returned payment $175 or greater to the collections department. This threshold may change based on seasonal workloads.
- An AR Specialist will scan the accounts for payment prior to issuing an order to post a returned check notice. If there have been no payments a code 29 will be issued for the following business days.
- The customer will be eligible for disconnect three business days after the notice is posted.
- The collections department will use the following schedule for disconnecting service.
    - If the notice is posted on Monday, payment will be required by the following Tuesday, service will be disconnected on Wednesday of the following week.
    - If the notice is posted on Tuesday, payment will be required by the following Tuesday, service will be disconnected on Wednesday of the following week.
    - If the notice is posted on Wednesday, payment will be required by a week from the following Tuesday, service will be disconnected a week from the following Wednesday.
    - If the notice is posted on Thursday, payment will be required by a week from the following Tuesday, service will be disconnected a week from the following Wednesday.
    - If the notice is posted on Friday, payment will be required by a week from the following Tuesday, service will be disconnected a week from the following Wednesday.
- When a CSR speaks with a customer he/she should inform the customer that the payment check must be satisfied within the three day period as stated on the collection notice.
- If the customer is unable to pay within the three day period the CSR is to ask the customer when payment can be made.

- If the customer suggests a time that falls within the above timeframe based on the date the notice was posted the CSR is able to confirm with the customer it will be alright to make payment on the stated date.
- The CSR is to put a remark on MNRE stating who he/she spoke with and the date the returned payment will be satisfied.
- An AR Specialist will scan all accounts eligible for disconnect on Wednesday of each week and issue the NP order if the returned payment has not been satisfied.
- Returned payments over $1000 will be handled specially by the collection supervisor. For returned payments over $1000, the collection supervisor will have a 3-day notice posted and follow through will disconnect after the three days have passed. These accounts will not follow the timeline above. Additionally, the collection supervisor will send a letter to the customer regarding the returned payment.

Nonresidential

- Nonresidential returned payments are distributed to AR Specialists based on the assigned areas of responsibility.
- AR Specialists make contact with the customer to collect payment. If payment cannot be collected the customer is given a 3-day notice to satisfy the returned payment.
- If the payment is not satisfied in 3-business days the service is eligible for SONP.

Related Policies:

- CC-04 Collections/Field Services-Field Service Pulls

Functional Area:
Real Estate Services

SFR Reference
(B)(9)(e)(iii) Land management

Policy and Goal Setting:

Real Estate Services manages all rights-of-way, easements, property acquisitions and dispositions, surveying/staking, and abstracting for DP&L. Real Estate Services interacts with many areas within Customer Operations, but primarily supports the new business/construction workflow process. Policies are developed by DP&L's management under the guidance of AES's management and AES's board of directors. All parties are equally responsible to ensure that DP&L policies meet or exceed the requirements set forth by all of DP&L's regulating entities.

The first priority of all DP&L areas is to ensure the safety of all DP&L employees, contractors and the public. Members of Real Estate Services attend monthly safety meetings that cover topics relevant to work activity and which allow employees to share concerns and experiences and ensure employees are properly outfitted with personal protective equipment.

Real Estate Services goals are set annually in support of company and corporate goals. Goals include targets for safety, compliance, timeliness, reliability, and budgets.

Strategic and Long-Range Planning:

Planning in Real Estate Services reflects DP&L's long-range strategy to achieve DP&L's goal of delivering safe, reliable service and meeting compliance targets as well as our customers' needs.

The Real Estate Services department works with Customer Operations areas including Distribution Planning, Substation Operations and other operational areas to understand the Company's emerging easement and property needs. Timing, budgets, and necessary resources are considered and a plan is developed to accomplish the needed acquisition of property.

Organizational Structure and Responsibilities:

The Real Estate Services Department consists of 3 employees plus 1 contractor employee and is led by the Director of Transmission and Distribution Engineering. This area maintains responsibility for the following utility activities:

1. Provide technical support for field projects, staking available right-of-ways on request
2. Work with customers to gain easements and right-of-way
3. Purchase land for planned projects

4. Organize land and facility sales
5. Management of property leases

The organizational chart for Real Estate Services is included as Real Estate Services - Exhibit 1.

Decision-Making and Control:

Real Estate Services decision-making and control is achieved by individuals throughout the organization making decisions within their given scope of authority in support of DP&L's overall mission and in accordance with DP&L policies and procedures. Decisions are raised to the proper level of authority as required by DP&L's policies. Overall responsibility for all decisions is that of the Vice President of Customer Operations.

Performance against the Customer Operations goals is monitored and reported on a continuous basis, which includes monitoring of safety, reliability, budgets, and compliance. This monitoring helps to ensure that early warnings are in place when problems arise. This allows management to uncover trends in a timely manner and proactively address issues.

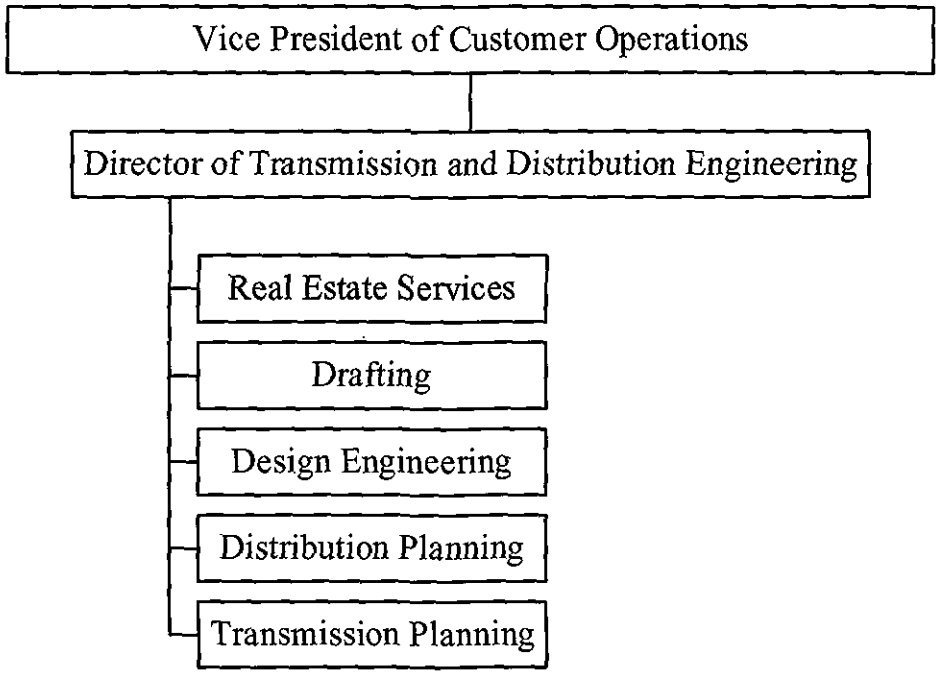
Internal and External Communications:

Internal communications are accomplished through a variety of communication channels including: phone calls, conference calls and e-mail. Internal communications typically correspond to supporting the operations of other functional areas of DP&L. These communications include providing information to areas such as Design Engineering, Substation Operations, Customer Service, Community Relations, and Regulatory Operations.

External communications are accomplished through a variety of communication channels including phone calls, meetings, and e-mail. Real Estate Services employees communicate directly with communities or customers when property issues arise.

Real Estate Services – Exhibit 1

Organizational Chart for Real Estate Services



Functional Area:
Reliability Operations

SFR Reference
(B)(9)(a)(ii) Operations and Maintenance

Policy and Goal Setting:

DP&L's Reliability Operations policies have evolved to be responsive to federal, state and local regulations and policies. DP&L's policies are developed by DP&L's management under the guidance of AES's management and board of directors. All parties are equally responsible to ensure that DP&L policies meet or exceed the requirements set forth by all of DP&L's regulating entities.

The first priority of all DP&L areas is to ensure the safety of all DP&L employees, contractors and the public. Reliability Operations takes this priority very seriously, and incorporates safety into all aspects of operations. The safety program focuses on getting everyone involved in safety, including all contractor employees in order to increase safety awareness and create an injury-free workplace.

Reliability Operations goals are set annually in support of company and corporate goals. Goals include targets for safety, compliance, reliability, and budgets.

Strategic and Long-Range Planning:

Planning in Reliability Operations reflects DP&L's long-range strategy to achieve DP&L's goal of delivering safe, reliable service and meeting the compliance and reliability targets as well as our customers' needs.

Reliability Operations annually completes a plan that projects the needs for the upcoming year given the cyclical nature of the maintenance and vegetation management program. Reliability Operations works with Asset Management to review DP&L's maintenance programs and determine the most effective maintenance programs to extend the life of DP&L's assets. A listing of the maintenance program practices is included as Reliability Operations – Exhibit 2.

Organizational Structure and Responsibilities:

The Reliability Operations Department consists of 6 employees and 3 contractor employees who are led by the Director of Reliability Operations. This area maintains responsibility for the following utility activities:

1. Reliability Operations is responsible for coordinating and managing a portion of DP&L's PUCO approved maintenance and inspection program in accordance with O.A.C. §4901:1-10-27. Activities include:
   a. Pole Inspection and Reinforcement Program – This program inspects DP&L's distribution poles for suitability, structural soundness and need for maintenance on a 10 year cycle
   b. Underground Inspection Program – This program inspects all underground devices and verifies the physical and visual condition of the equipment and corrects any safety issues on a 5 year cycle
   c. Underground Replacement Program – This program addresses 3,600 miles of underground cable through replacement and injection strategies
   d. Distribution Line Patrol – This program inspects the distribution system for hardware, vegetation, reliability and safety concerns on a 5 year cycle
   e. Distribution Overhead Devices – This program inspects capacitors and reclosers annually and voltage regulators biennially
   f. PUCO Reporting – Reliability Operations is responsible for timely and accurate completion of DP&L's Electric Service Safety Standards reports submitted or docketed with the PUCO

2. Vegetation Management is responsible for DP&L's distribution line clearance. Vegetation Management directs multiple contractors with a total contractor workforce of approximately 185 employees. Activities include:
   a. Vegetation Management Program – This program is responsible for completion of full circuit vegetation management on a 5 year cycle
   b. Performance of emergency trimming to address safety and/or reliability concerns
   c. Support vegetation management needs associated with capital projects
   d. Respond to customer driven requests for line clearance work
   e. Communicate with customers concerning DP&L's vegetation management
   f. Support emergency restoration efforts during storms

Vegetation Management is accomplished by following nationally accepted guidelines on tree pruning, tree removal and herbicide use. The pruning procedures enable DP&L to obtain acceptable clearances between the tree limbs and electrical conductors as required by the National Electric Service and Safety Code. Herbicides are used in targeted locations to provide the most cost-effective and environmentally friendly means to controlling undesirable vegetation.

The trimming procedures are general guidelines for establishing line clearance for the electrical system that will most improve reliability. Reasonable judgment is used to balance the needs of customers, resources, reliability and safety. Line clearances are established by trimming or removing vegetation to provide clearance of 10 – 14 feet away from the conductor.

DP&L uses natural pruning methods and base-cut limbs to a suitable lateral whenever possible to best preserve the health of the tree. DP&L will remove overhanging limbs from primary lines

and address other overhangs as necessary. If less clearance is to be obtained due to customer request, then appropriate documentation will be maintained regarding the concern and location.

The organizational chart for Reliability Operations is included as Reliability Operations - Exhibit 1.

Decision-Making and Control:

Reliability Operations decision-making and control is achieved by individuals throughout the organization making decisions within their given scope of authority in support of DP&L's overall mission and in accordance with the DP&L policies and procedures. Decisions are raised to proper level of authority as required by DP&L's policies. Overall responsibility for all decisions is that of the Vice President of Customer Operations.

Performance against the Customer Operations goals is monitored and reported on a continuous basis, which includes monitoring of safety, reliability, budgets, and compliance. This monitoring helps to ensure that early warnings are in place when problems arise. This allows management to uncover trends in a timely manner and proactively address issues.

Internal and External Communications:

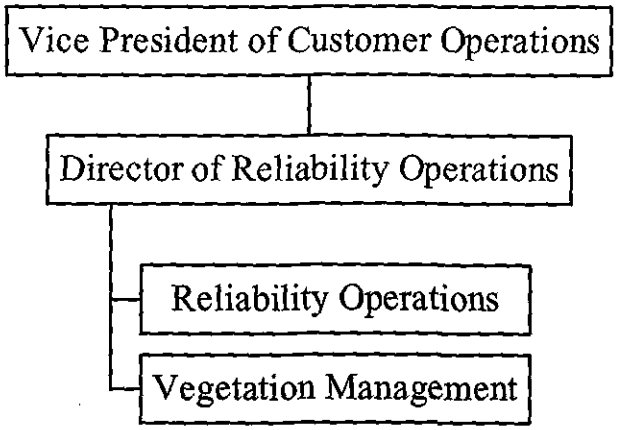
Internal communications are accomplished through a variety of communication channels including: meetings, phone calls, conference calls and e-mail. Communication with vendors and contractors is handled by field visits, telephone, e-mail and meetings. Internal communications typically correspond to supporting the operations of other functional areas of DP&L. These communications include providing information to areas such as Engineering, Dispatch Operations, Customer Service, Finance, and Regulatory Operations.

External communications are accomplished through a variety of communication channels including: phone calls, meetings, and e-mail. Reliability Operations will communicate directly with customers or communities regarding the timing of the pole inspections and line clearance activities. This communication is typically performed through an outbound call or a door hanger.

Reliability Operations employees also work with the PUCO to furnish information as requested and to coordinate inspections and audits of operations.

Reliability Operations – Exhibit 1

Organizational Chart for Reliability Operations



Reliability Operations - Exhibit 2

Listing of DP&L's Maintenance Practices

Inspection, Maintenance, Repair and Replacement of Transmission and Distribution Facilities (Circuits and Equipment) Program

- Poles and Towers
- Circuit and Line Inspections
- Primary Enclosures and Secondary Enclosures
- Line Reclosers
- Line Capacitors
- Distribution Right of Way
- Substations
- Air Break Switches
- Voltage Regulators
- Transmission

Functional Area:
Safety

Policy and Goal Setting:

DP&L's Safety policies comply with federal, state and local regulations and policies. DP&L's policies are developed by DP&L's management under the guidance of AES's management and AES's board of directors. All parties are responsible to ensure that DP&L's policies meet or exceed the requirements set forth by all of DP&L's regulating entities.

The first priority of all DP&L operating areas is to ensure the safety of all our employees, contractors and the public. DP&L takes this priority very seriously and incorporates safety into all aspects of operations. Safety takes precedence over all other utility operations and is listed first amongst the mission and values of the AES Corporation.

Safety goals are set annually in support of DP&L and AES Corporate goals. Goals are divided into both leading and lagging indicators which are established to report safety performance and to encourage behaviors which improve safety performance. Goals for lagging indicators include meeting injury and illness rates and preventable vehicle accident rates. Goals for leading indicators include safety meeting attendance, safety inspections, and safety walks. The Standards of Performance and the Safety and Health Policy are included as Safety – Exhibit 2 and Safety – Exhibit 3, respectively.

Strategic and Long-Range Planning:

DP&L believes that all incidents are preventable.

DP&L and AES maintain a thorough reporting system which requires that all incidents, near misses and the use of stop work authority is documented, reviewed and shared throughout DP&L and AES's operating companies. Through this sharing process AES helps all of its operating companies learn and grow from one another and DP&L benefits from safety lessons learned around the world. In addition, every DP&L employee is expected to attend a monthly safety meeting as well as DP&L's annual safety day. These events help to increase safety awareness both at work and at home. DP&L management employees perform safety walks and jobsite reviews which encourage safe practices in the field and engages field employees with positive safety dialog.

Through encouraging all employees and contractors to stay engaged in safety and being proactive on all safety topics, DP&L is aggressively pursuing an injury free workplace.

Organizational Structure and Responsibilities:

The Customer Operations Safety Department consists of 4 management and 2 elected union employees and is led by the Director of Metering Services and Safety. This organization is

supported by the AES Corporate Safety and Health Department. Safety provides program development and implementation support for all Customer Operation employees. Safety ensures compliance with the Company's safety policies, with the goal of eliminating occupational accidents and illnesses while ensuring compliance with federal, state and local laws. Utility activities include:

1. Work with AES Corporate to institute safety best practices. DP&L's safety policies are listed on Safety – Exhibit 4
2. Maintain cardinal safety rules. Cardinal safety rules are safety rules which are never to be broken. DP&L's cardinal safety rules are included as Safety – Exhibit 5
3. Report, analyze, and disseminate information on all DP&L and AES incidents
4. Encourage electrical safety programs in the general public with programs like "Think Hot, Stay Safe!" as well as information on DP&L's website
5. Coordinate intercompany audits, which involve safety experts from around the world evaluating the safety performance of local sites as well as sites abroad
6. Track safety statistics for both leading and lagging indicators of safety performance
7. Development and distribution of daily safety tips
8. Development of safety materials for monthly safety meetings attended by all DP&L employees and contractors
9. Organize DP&L's annual safety day event for all employees
10. Analyze conditions to proactively produce special safety alerts when warranted. For example alerts may be generated if road construction produces a hazardous area which is safer to avoid and/or if hazardous weather is forecasted and employees need to exercise caution due to the conditions
11. Conduct contractor meetings to encourage open dialogue about safety, share best practices and to ensure that DP&L safety policies are known and followed by all those performing work on DP&L's system
12. Monitor safety performance and trends in an effort to identify patterns which may justify a safety stand down

The organizational chart for Safety is included as Safety – Exhibit 1.

Decision-Making and Control:

At DP&L, safety, decision-making and control goes beyond the Safety area. Safety decisions are made at all levels of the organization. Any DP&L employee no matter what position or skill has the authority to stop any job at any time if they believe that the work being done isn't safe or if the job could be done in a safer manner. DP&L calls this our "Stop Work Authority." Using this authority is an obligation that every DP&L employee and contractor maintains if they see an unsafe situation.

Additionally the safety responsibility is also shared by designated Safety Champions. Safety Champion is a temporary role given to influential leaders throughout the business who share in

the safety leadership for a period of time. These leaders reinvigorate Safety with new perspectives and ideas.

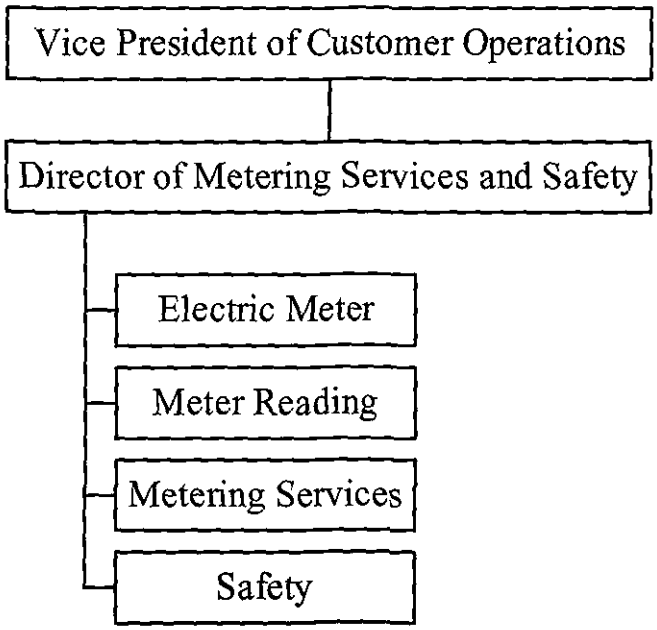
Performance against the Customer Operations goals is monitored and reported on a continuous basis, including monitoring of safety metrics, reliability targets, budgets and compliance. This monitoring helps to ensure that early warnings are in place when problems arise, allowing management to uncover trends in a timely manner to proactively address issues.

Internal and External Communications:

Internal and external communications are accomplished through a variety of channels including meetings, phone calls, conference calls, e-mails, public television, the "Think Hot! Stay Safe!" program, newspapers and the company website. Internal communications support the operations of all Customer Operations functional areas within DP&L. Safety works with Corporate Communications to develop messaging to communities and major accounts when inclement weather is forecasted, outages are planned and when any other safety concerns arise. Communications with communities typically involve a variety of topics including: electrical safety, generator safety during outages, pet safety, and holiday safety.

Safety – Exhibit 1

Organizational Chart for Safety



Safety – Exhibit 2

Standards of Performance

Safety is a core value for us at DP&L. We are united in purpose to safely serve our customers, communities and industry. Our goals include meeting, Lost Time Injury Rate ("LTIR") and Total Injury, Illness Rate ("TIIR") targets. Safety's goals are set annually in support of company and corporate goals.

Safety Metric	Customer Operations
LTIR	0.00
TIIR	1.20

The lagging indicators (injury and vehicle accident rates) are based on top quartile utility company performance of the members of the Edison Electrical Institute ("EEI") and the Southeast Electric Exchange ("SEE"). In addition to these lagging indicators, we will also have leading indicators in our goals. Leading indicators include:

- Inspections: Facility/site inspections, vast majority of areas completed within one year;
- Investigations: All recordable injuries are investigated;
- Safety Walks: All leaders within the organization are required to complete with DPL employees as well as contractor;
- Safety Meetings: achieve 95% attendance for Customer Operations.

Safety – Exhibit 3

Safety and Health Policy

Safety & Health Policy
Dayton Power and Light

Dayton Power and Light puts safety first for our people, the contractors that work on our behalf, our customers and the individuals in the community in which we operate. We strive to conduct all of our work activities in a manner that promotes personal safety, health and well being. To ensure that we adhere to these standards consistently across our business, we have established this Safety and Health Policy with the following principles:

- ***Dayton Power and Light leadership is ultimately responsible for safety performance.*** *While proper day-to-day safe work practices are everyone's responsibility, our leaders set occupational safety and health-related expectations, monitor safety performance against these measures, and hold themselves and our people accountable for meeting these targets.*
- ***Dayton Power and Light leadership will provide the appropriate resources, human and material, to ensure that all our people have the means to work safely.*** Our leaders will ensure that the necessary engineering controls, people training and mentoring, procedures and equipment are provided to mitigate occupational safety and health risk.
- ***Dayton Power and Light people will comply with all applicable occupational safety and health requirements.*** Our people will identify, understand and comply with all occupational safety and health-related governmental regulations, and other applicable safety and health requirements including those imposed by DP&L policies, procedures and standards.
- ***Dayton Power and Light contractors will to adhere to the same safety standards as our people.*** We will ensure that contractors working for our business meet our occupational health and safety-related performance expectations and requirements or take appropriate steps if those expectations and requirements are not met.
- ***Dayton Power and Light people will continuously strive to improve our Facilities occupational safety and health performance.*** We will put into place and implement a safety management system (SMS) to set occupational safety and health goals, objectives and targets; commit to preventing injuries; measure safety and health performance; conduct regular safety and health audits or assessments to review compliance with applicable safety and health legal and company requirements; and make necessary SMS adjustments to achieve continuous improvement.

This Safety & Health Policy is based on our fundamental beliefs that everyone has a right to a safe workplace, all accidents can be prevented and working safely is a condition of employment. Adherence to these principles is mandatory for all our people.

Barry J Bentley, Vice President Customer Operations

9/16/2014
Date

Safety – Exhibit 4

Listing of all DP&L Safety Policies

1. Bloodbourne Pathogens
2. Cell Phone and Two Way Radio Use While Driving
3. Confined Space
4. Contractor Safety Management
5. Defensive Driving
6. Electrical Safety Qualification
7. Emergency Action Plans
8. Enclosed Space Entry
9. Excavation of Underground Conductors
10. Facility Lockout Tagout
11. Fall Prevention
12. Flame Resistant Clothing
13. Grounding
14. Hazardous Communication
15. Hearing Protection and Noise Reduction
16. Heat and Cold Stress Prevention
17. Hoisting and Rigging
18. Housekeeping
19. Illumination
20. Incident Management
21. Lead Awareness and Protection
22. Live Line Work
23. Machine Guarding
24. Occupational Dog Bite Safety
25. Open Flame and Welding Permitting Requirements
26. Overhead Line Construction and Maintenance
27. Personal Protective Grounding
28. Pre-Job Briefing and Job Safety Analysis ("JSA")
29. Proactive Safety
30. Safety and Health Policy
31. Safety Facility Inspection and Hazard Identification Guidelines
32. Safety Management System
33. Safe Parking and Parking Lot Use
34. Substation Entry
35. Substation Personal Protective Grounding
36. Transmission and Distribution Lockout Tagout (Band and Tag)
37. Underground Line Construction and Maintenance
38. Vegetation Management
39. Work Zone Traffic Control

Safety – Exhibit 5

DP&L Cardinal Safety Rules

Dayton Power & Light Cardinal Safety Rules

Putting safety first is part of our company culture, and we all have a shared responsibility to be "Always On for Safety". To help us succeed in this endeavor, seven Cardinal Safety Rules have been put in place. Cardinal Safety Rules are rules that, if not completely understood and followed, represent significant risks to the individual violating the rule, co-workers, emergency responders, and the public. Without exception, all DPL people are expected to know and follow these rules at all times.

Cardinal Safety Rules:

1. Never operate an energy isolation device that is lock and/or tagged out.
2. Never remove a lock and/or tag from an energy isolation device without proper authorization.
3. Never work within minimum safe electrical clearances without following all energized work procedures.
4. Approved personal fall arrest systems must be used when exposed to fall hazards on unguarded working surfaces and when working in aerial equipment (such as bucket trucks and boom lifts).
5. Hoisting and rigging operations including those involving use of a crane shall be planned, supervised and performed by qualified personnel.
6. An atmospheric and physical hazard assessment shall be performed and necessary mitigation measures shall be implemented before entering a confined space.
7. Operators of motorized vehicles for company business on public roadways shall not be under the influence of alcohol or drugs and shall ensure that all people in the vehicle are wearing their seat belts while the vehicle is in motion.

Functional Area:
Substation Operations

SFR Reference
(B)(9)(a)(ii) Operations and Maintenance

Policy and Goal Setting:

DP&L's Substation Operations policies have evolved to be responsive to and meet federal, state and local regulations and policies. DP&L's policies are developed by DP&L's management team under the guidance of AES's management and board of directors. All parties are equally responsible to ensure that DP&L policies meet or exceed the requirements set forth by all of DP&L's regulating entities.

The first priority of Substation Operations is to ensure the safety of all DP&L employees, contractors and the public. Substation Operations takes this priority very seriously, and incorporates safety into all aspects of operations. The safety program focuses on getting everyone actively involved in safety in order to increase safety awareness and create an injury-free workplace.

Substation Operations goals are set annually in support of company and corporate goals. Goals include targets for safety, compliance, environmental, reliability, and cost management. Each of these goals comes with specific objectives and schedules to ensure completion. DP&L's Substation Operations is committed to meeting or exceeding applicable local, state and federal regulatory requirements.

Strategic and Long-Range Planning:

Planning in Substation Operations reflects DP&L's long-range strategy to achieve DP&L's goal of delivering safe, reliable service and meeting the compliance and reliability targets as well as our customers' energy needs.

Substation Operations annually completes a capital investment plan that projects the needs for the coming 10-year period. Plans typically include substation projects which relate to known areas of customer growth, addressing circuit reliability concerns experienced throughout the most recent year, substation modernization and other planned system expansions and upgrades. In addition to operational needs, planning considers budget allowances and staffing needs.

Organizational Structure and Responsibilities:

Substation Operations consist of 67 employees and is led by the Director of Substation Operations. This area maintains responsibility for the following utility activities:

1. Substation Maintenance and Construction is predominantly operated out of eight districts within DP&L's service area and is responsible for the construction, maintenance, and emergency restoration related to substations and other technical areas of the transmission and distribution system. Two substation technicians report to each of the eight districts to assure rapid response to equipment alarms, outages and system emergencies. Activities include:
   a. Provide maintenance and emergency restorations operations to 154 substations
   b. Perform routine maintenance activities such as breaker maintenance, bushing change outs, substation fence inspections, infrared inspections and monthly substation inspections. A listing of Substation Operations maintenance policies is included as Substation Operations – Exhibit 2
   c. Manage construction activities related to additional new substations and major renovation or replacements at existing substations
   d. Ensure construction projects are completed on time, on budget and in accordance with DP&L standards.
   e. Respond to substation equipment outages, alarms and complete switching within substations or on the line as directed by System Operating

2. Substation Engineering is responsible for engineering substation projects and the development of substation technical resources for system design and operations. Substation Engineering performs the following specific duties:
   a. Engineer substation projects in accordance with DP&L standards. A listing of Substation Operations engineering standards is included as Substation Operations – Exhibit 3
   b. Create construction drawings and associated bills of material for various projects
   c. Specify and obtain materials/equipment specific to a project
   d. Support siting and permitting processes
   e. Develop equipment specification and standards
   f. Develop project scopes and estimates
   g. Manage substation projects
   h. Provide construction support
   i. Setup and closeout projects in the financial system;
   j. Maintain engineering prints and schematics associated with substations and equipment
   k. Research and implement new technologies
   l. Support NERC compliance
   m. Provide technical support during emergency response situations

3. Relay Engineering is responsible for the design of the protective relaying systems, used on the electric system to protect employees, equipment and the public. Relay Engineering performs the following specific duties:
   a. Specify relays and associated communications systems

b. Design protective relay systems and work with Substation Engineering in the development of project drawings
c. Specify settings for protective relays
d. Maintain engineering records associated with relays and protective systems
e. Support field personnel in the installation and troubleshooting of relay systems
f. Manage relay projects
g. Support electrical event investigations
h. Coordinate protective systems between the grid and generators as well as with other interconnected electric utilities and large customers
i. Research and implement new technologies
j. Support NERC compliance
k. Provide technical support during emergency response situations

4. Test Department is operated centrally from the Dayton Service Building and is responsible for the analytical testing of substation class equipment and distribution line equipment as well as maintaining all protective relay schemes. Activities include:
   a. Test substation equipment, line capacitors, reclosers, line regulators and network protectors
   b. Conduct relay calibration, line carrier testing and breaker time travel testing
   c. Commission new substation equipment or relay systems to ensure proper operation and communications prior to the equipment being energized
   d. Investigate voltage and power quality concerns and work with the customers to address their concerns
   e. Locate underground cable faults

5. AC Network is operated centrally out of the Dayton Service Building and is responsible for the construction, maintenance, and emergency restoration related to the underground duct and manhole system and the downtown network. Activities include:
   a. Ensure the reliable operation and maintenance of the downtown Dayton and City of Troy network systems as well as the electrical infrastructure serving the Dayton International Airport
   b. Repair and maintain substation riser cables
   c. Provide all maintenance and emergency services when confined space entry is required. Confined space entry is primarily needed when working on the manhole systems located in downtown Dayton, downtown Troy, the Dayton International Airport and WPAFB
   d. Manage a portion of the underground inspection program which includes periodic inspections of the network and vaults
   e. Support restoration efforts in substations, switching and underground locating

6. WPAFB Operations is responsible for managing DP&L's compliance with the Wright Patterson Air Force Base ("WPAFB") privatization contract. The contract includes maintaining the transmission and distribution system which is located beyond WPAFB's utility meters. Activities include:
   a. Regular customer contact related to system maintenance, construction and operational activities
   b. Complete all contractually required reporting, pricing and billing
   c. Coordinate DP&L's activities with base personnel
   d. Communication and technical support during emergency response situations
   e. Project management for new construction, system expansion and renewal and replacement activities

The organizational chart for Substation Operations is included as Substation Operations – Exhibit 1.

Decision-Making and Control:

Substation Operations decision-making and control is achieved by individuals throughout the organization making decisions within their given scope of authority in support of DP&L's overall mission and in accordance with the DP&L policies and procedures. Decisions are raised to proper level of authority as required by DP&L's policies. Overall responsibility for all decisions is that of the Vice President of Customer Operations.

Performance against the Customer Operations goals is monitored and reported on a continuous basis, which includes monitoring of safety, reliability, budgets, and compliance. This monitoring helps to ensure that early warnings are in place when problems arise. This allows management to uncover trends in a timely manner and proactively address issues.

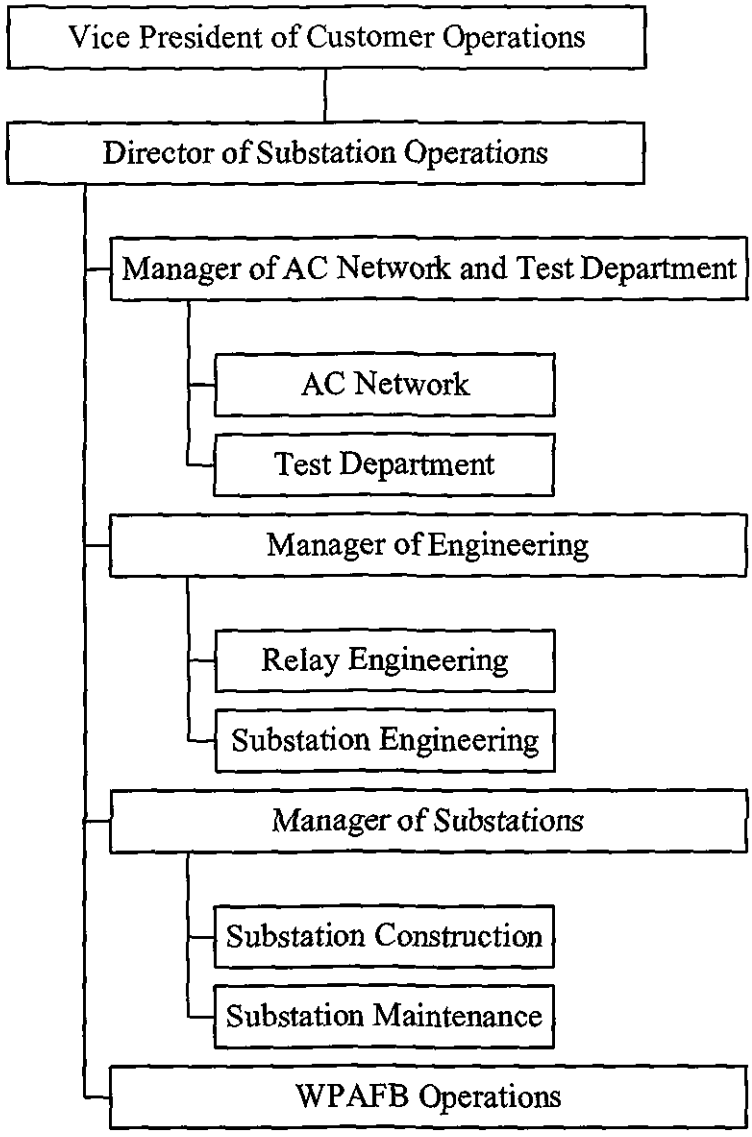
Internal and External Communications:

Internal communications are accomplished through a variety of communication channels including: phone calls, conference calls, scheduled meetings and e-mail. Internal communications typically correspond to scheduling projects, maintenance, trouble-shooting and in the support of other functional areas within DP&L. These communications include providing information to areas such as Engineering, Dispatch Operations, Customer Service, Community Relations, Finance, and Regulatory Operations.

External communications are accomplished through a variety of communication channels including: phone calls, meetings, and e-mail. Personnel within Substation Operations will communicate directly with communities or larger customers when technical issues arise. Communications typically involve a variety of topics including: outage restoration, technical issue resolution, construction projects, and maintenance activities.

Substation Operations – Exhibit 1

Organizational Chart for Substation Operations



Substation Operations – Exhibit 2

List of Service Operations Procedures Electric Operations – Substation Maintenance

- Purpose, Objective and Results
- Maintenance Responsibilities
- Important Contacts
- S/O Prints
- Master Capabilities Listing
- Switching Order Set-Ups
- Substation Inspections
- Thermographic Imaging
- Spill Prevention, Control and Counter Measures Plan
- Computerized Maintenance Management System
- RCM Strategy / Batteries
- RCM Strategy / Transformer
- RCM Strategy / Breaker
- RCM strategy / Voltage Regulators
- Relay Calibration Test and Maintenance Schedule
- PUCO Electric Service & Safety Standards
- Safety
- Transmission Protection System Maintenance and Testing

Substation Operations – Exhibit 3

List of Substation Operations Engineering Standards

- Power Plant, Substation and Telecommunication Batteries Procedures Manual
- Substation Standards
  - Alarms
  - Ampacities
  - Bus Design
  - Bushings
  - Cable
  - Capacitor Installations
  - Carrier
  - Circuits
  - Circuit Breakers
  - Electrical Clearances
  - Connectors and Dies
  - Customer Installations
  - Drawings
  - Filing Procedures
  - Fire Protection
  - Foundations
  - Function Numbers
  - Fusing
  - Grounding
  - Indicating Lights
  - Insulators
  - Interlocks
  - Lightning Protection and Coordination
  - Metering
  - Mobile Substation
  - Motor Operations
  - Phasing
  - Polarity
  - Potential Throwover
  - Relaying
  - Specifications
  - Station Power Auxiliaries
  - Switchboard
  - Switches
  - Transformers
  - Vendors Lists
  - Wire, Identification

Functional Area:
System Operating and Dispatch

SFR Reference
(B)(9)(a)(ii) Operations and Maintenance

Policy and Goal Setting:

DP&L's System Operating and Dispatch policies have evolved to be responsive to federal, state and local regulations and policies. DP&L's policies are developed by DP&L's management under the guidance of AES's management and board of directors. All parties are equally responsible to ensure that DP&L's policies meet or exceed the requirements set forth by all of DP&L's regulating entities.

The first priority of all DP&L areas is to ensure the safety of all DP&L employees, contractors and the public. System Operating and Dispatch takes this priority very seriously, and incorporates safety into all aspects of its operations. Interactions with field crews during high impact weather or system events are a prime example of the need to ensure field crew safety by following all safety protocols. The safety program focuses on getting everyone involved in safety in order to increase safety awareness and create an injury-free workplace.

System Operating and Dispatch goals are set annually in support of company and corporate goals. Goals include targets for safety, compliance, reliability, and budgets.

Strategic and Long-Range Planning:

Planning in System Operating and Dispatch reflects DP&L's long-range strategy to achieve DP&L's goal of delivering safe, reliable service and meeting the compliance and reliability targets as well as our customer's needs.

System Operating and Dispatch annually completes a work plan that details the requirements for updating the departmental Standard Operating Plans ("SOPs"). These are the basis for ensuring compliance to FERC, NERC, Reliability First, PJM and internal requirements. System Operating also performs seasonal system analysis and develops a list of contingency problem areas and develops remediation plans for each. In addition to operational needs, planning considers budget allowances and staffing needs to plan an orderly succession of team members. The Operational Technology group has a strategic road map which defines the technology needs for the support of the real time activities within the System Operating and Dispatch areas. The road map provides a basis for major capital projects and a timeline for when the projects need to be implemented which ties back to the budgeting process.

Organizational Structure and Responsibilities:

System Operating and Dispatch consists of approximately 36 employees and is led by the Director of System Operating and Dispatch. This area maintains responsibility for the following utility activities:

1. System Operating is responsible for the transmission and main line distribution system 24/7, including emergency restoration related to weather or manmade events. Utility activities include:
   a. Provide routine monitoring and emergency restoration for 1,800 miles of transmission lines
   b. Coordinate activities with interconnected utilities and PJM
   c. Operate the main line distribution system for approximately 450 distribution circuits
   d. Ensure compliance to all applicable NERC reliability standards including the assigned tasks from PJM
   e. Schedule outages with the applicable entities for all transmission maintenance needs, ensure system can withstand next contingency
   f. Communicate abnormal conditions to applicable internal and external stakeholders
   g. Maintain full Supervisory Control And Data Acquisition ("SCADA") functionality at primary and back up sites

2. Central Dispatch Operations ("CDO") is responsible for dispatching all trouble calls and emergency restoration related to storm activities. Utility activities include:
   a. Provide 24/7 dispatch of trouble calls for the entire DP&L footprint
   b. Monitor weather conditions and notify storm teams of impending events
   c. Coordinate storm team activities. Storm team typically consists of approximately 70 members of DP&L management that are utilized on an on call basis to provide 24/7 support of outage restoration during storm events
   d. Provide informational updates to various levels of management on the status of restoration events, safety notifications
   e. Central point of contact for local police and fire notifications
   f. Data control for outage reporting indices
   g. Maintain a redundant outage management system at the back up site

3. Operational Technology is responsible for maintaining the real time systems required for the System Operating and Dispatch functions to maintain their operational capability.
   a. Provide the systems required to run SCADA (internal computer network, communication equipment for remote terminal unit traffic, radio communication network)
   b. Maintain equipment to ensure required patches are applied consistent with the CIP requirements

c. Provide support to the operations team on troubleshooting system issues, coverage provided by on-call list for afterhours support
d. Maintain documentation required for NERC and PJM reliability standard requirements
e. Maintain capability for primary and back up sites
f. Participate in back up site functional testing

The organizational chart for System Operating and Dispatch is included as System Operating and Dispatch - Exhibit 1.

Decision-Making and Control:

System Operating and Dispatch decision-making and control is achieved by individuals throughout the organization making decisions within their given scope of authority in support of DP&L's overall mission and in accordance with the DP&L policies and procedures. System Operators have the authority and responsibility to take all necessary actions to ensure the reliability of the bulk electric system without seeking higher management approval. This explicit authority is provided to each system operator in an annual letter and is posted at both the main and back up control centers. Decisions are raised to proper level of authority as required by DP&L's policies. Overall responsibility for all decisions is that of the Vice President of Customer Operations.

Performance against the Customer Operations goals is monitored and reported on a continuous basis, which includes monitoring of safety, reliability, budgets, and compliance. A strong culture of compliance has been instilled throughout the group, which requires individuals to bring forward any concerns related to compliance either directly to supervision or through a hot line phone call. This monitoring helps to ensure that early warnings are in place when problems arise. This allows management to uncover trends in a timely manner and proactively address issues. Proactive 'Reliability Assurance' practices are being implemented to ensure the processes developed are monitored for compliance.

Internal and External Communications:

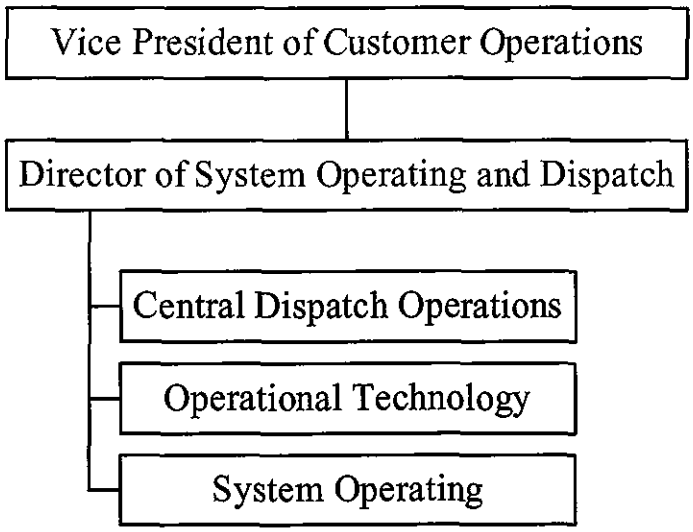
Internal communications are accomplished through a variety of communication channels including: phone calls, conference calls and e-mail. Internal communications typically correspond to requests of support from other functional areas of DP&L or to inform other areas of system events. These communications include requesting assistance and information from areas such as Substation Operations, Test Department, WPAFB Operations, Engineering Services, Dispatch Operations, Customer Service and Community Relations.

External communications are accomplished through a variety of communication channels including: phone calls, meetings, and e-mail. System Operating will communicate directly with other utilities or interconnected facility operators to determine system needs and appropriate response to any situations. PJM is consulted as the transmission operator for the DP&L

footprint. CDO communicates directly with local police and fire agencies for events affecting our facilities. CDO also answers the after-hours media communication line and provides the duty director with the requested information for outage cases. Communications to communities are coordinated with local community ambassadors or through our governmental liaison. Outbound 'proactive' outage information calls geared directly to the affected customers are completed by the CDO group for planned outages. Informational calls are completed after the restoration for un-planned events.

System Operating and Dispatch – Exhibit 1

Organizational Chart for System Operating and Dispatch



System Operating and Dispatch – Exhibit 2

Listing of Standard Operating Protocols for System Operating

SOP#	Topic
000	SOP Revision Process
001*	Evacuation of System Operating
003	UPS/Service Building Power
004*	Control Room Emergency Access
005	Personal Injury Report
008	EMS Restart of Tait, Sidney, and Monument Diesels
009*	Oil or Hazardous Spills
010*	Tagging Procedures
011*	Hot Tags
012	Notification of Honda
013	Major Account Customers
015*	Testing of Critical Communications
105*	Reclosing Philosophy
201*	Peak Load Conditions
202*	Voltage Control
203*	Master Set-Up Criteria
204*	Execution of Switch Orders
205*	Release to Work
206*	Release for Service/Other
208	Circuit Operation Report
401*	Planned Outage Scheduling
402*	Dispatch of Internal Units for System Imports
408*	Core Communications
501*	Capacity Shortages - Load Shed / Voltage Reduction
503	Disturbance and Event Reporting Plan--DOE/NERC/RFC/PJM
504	PUCO Notification
505*	Vandalism/Sabotage of Transmission or Substation Equipment and Facilities
506	Reporting Emergencies
507	Darby and Greenville Generator Control
601	System Restoration
602	Loss of Svc Bldg/Op w/o Siemens EMS-Backup Control Center Operations
603	Maintenance of DP&L and PJM Operations Models
604	Use of PTI for Switching Reliability
703*	Geo-Magnetic Disturbances
704	Reporting Problems
901	Reliability Coordinator

*** Documents are made available to the Public on DP&L**

System Operating and Dispatch – Exhibit 3

Listing of DP&L Standard Operating Procedures for Storm Operations

SOP #	Topic
000	SOP Revision Process
101	Predicting Storm Activity
102	Types of Storms
103	Storm Team Activation
104	Storm Team Functions
105	Field Storm Restoration Methodology/Circuit Manager
106	Storm Preparation
201	Contractor and Mutual Aid Storm Management
202	Management Staffing
203	Mutual Assistance
204	Field Crew Management Organization
205	Calling in DP&L Field Resources
206	Contracted Line Crews
207	Line Clearance
208	Specialized Resources
209	Other Resources
301	PUCO Rapid Response Process
302	Customer/Government Notification
303	Internal Update
401	Transmission
402	Network (Downtown Dayton)
403	Dayton International Airport (DAY)
501	Special Equipment
502	Generators
503	Helicopter

System Operating and Dispatch – Exhibit 4

Sample of Reliability KPIs distributed daily by e-mail

The following report is issued at 6 am, noon, 5 pm and 10 pm daily;
All Outs: 2 Outages affecting 45 customers
Circuit Lockouts: (none)
Total Orders: 8

	CAIDI		SAIFI		SAIDI	
	Actual	Target	Actual	Target	Actual	Target
MTD	150.60	108.71	0.005	0.013	0.81	1.40
YTD	125.98	128.09	0.671	0.708	84.55	90.66
2014 YTD	122.15	-	0.642	-	78.38	-

No Storm Days this Month
The following report is sent at 8 am daily:
As of 10/04/2015 8:01 AM

Ohio	MTD		YTD		Last YTD
	Actual	Target	Actual	Target	Actual
CAIDI	164.31	108.71	126.03	128.22	122.29
SAIDI	0.69	0.89	84.29	90.15	77.99
SAIFI	0.004	0.008	0.669	0.703	0.638

DPL SBU	MTD		YTD		Last YTD
	Actual	Target	Actual	Target	Actual
CAIDI	164.31	95.92	122.98	113.50	119.43
SAIDI	0.69	0.68	89.75	83.69	83.58
SAIFI	0.004	0.007	0.730	0.737	0.700

	Ohio			DPL SBU		
Projections	CAIDI	SAIFI	SAIDI	CAIDI	SAIFI	SAIDI
2015 EOY Goal	*125.00*	*0.880*	*110.05*	*110.00*	*0.896*	*98.54*
YTD 2015 + EOY 2014	124.90	0.848	105.96	120.78	0.953	115.07
YTD 2015 + EOY 2013	126.41	0.810	102.38	123.17	0.880	108.35
YTD 2015 + EOY 2012	123.00	0.817	100.41	119.97	0.890	106.69
YTD 2015 + EOY 2011	119.63	0.803	96.04	116.71	0.879	102.51
YTD 2015 + EOY 2010	116.36	0.868	100.86	114.59	0.930	106.45

Daily Customers Impacted	Ohio CI	Ohio CI Target	DPL SBU CI	DPL SBU CI Target
10/03/2015	615	1,418	615	1,235
10/02/2015	613	1,418	613	1,235
10/01/2015	1,054	1,418	1,054	1,235
09/30/2015	4,837	1,349	4,837	1,267
09/29/2015	1,818	1,349	1,818	1,267
09/28/2015	453	1,349	453	1,267
09/27/2015	359	1,349	359	1,267

The following report is sent at 9:30 am daily:

As of: 10/04/2015 09:30 AM
OHIO CAIDI COMPARISON:

Monthly Caidi: 166.660 Monthly Saifi: 0.004 (2,461)
YTD Caidi: 126.050 YTD Saifi: 0.669 (386,414)

*** Same Reporting Period Last Year ***
Monthly Caidi (2014): 80.880 Monthly Saifi (2014): 0.014 (8,231)
YTD Caidi (2014): 122.290 YTD Saifi (2014): 0.638 (366,704)

*** End of Year Projections ***
YTD 2015 + EOY 2014 CAIDI = 124.9 SAIFI = 0.848
YTD 2015 + EOY 2013 CAIDI = 126.4 SAIFI = 0.810
YTD 2015 + EOY 2012 CAIDI = 123.2 SAIFI = 0.815
YTD 2015 + EOY 2011 CAIDI = 119.6 SAIFI = 0.803
YTD 2015 + EOY 2010 CAIDI = 116.4 SAIFI = 0.868

SBU CAIDI COMPARISON:

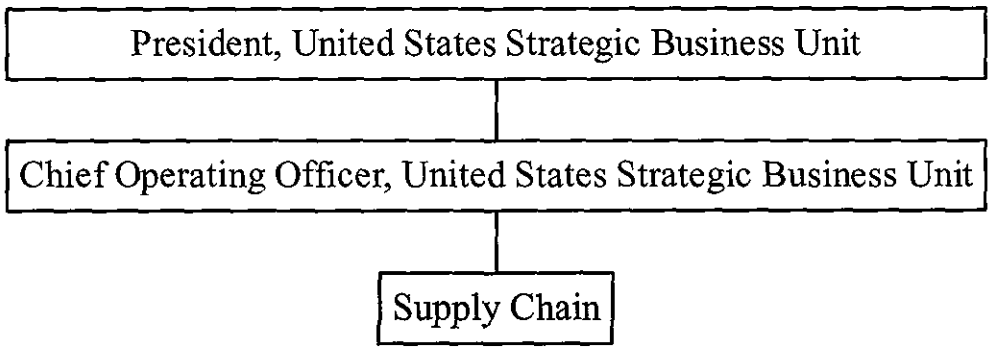
Monthly Caidi: 166.660 Monthly Saifi: 0.004 (2,461)
YTD Caidi: 123.000 YTD Saifi: 0.730 (421,671)

*** Same Reporting Period Last Year ***
Monthly Caidi (2014): 80.880 Monthly Saifi (2014): 0.014 (8,231)
YTD Caidi (2014): 119.430 YTD Saifi (2014): 0.700 (402,399)

*** End of Year Projections ***
YTD 2015 + EOY 2014 CAIDI = 120.8 SAIFI = 0.953
YTD 2015 + EOY 2013 CAIDI = 123.2 SAIFI = 0.880
YTD 2015 + EOY 2012 CAIDI = 120.1 SAIFI = 0.888
YTD 2015 + EOY 2011 CAIDI = 116.7 SAIFI = 0.879
YTD 2015 + EOY 2010 CAIDI = 114.6 SAIFI = 0.930

Supply Chain

Supply Chain has overall responsibility for all DP&L sourcing activities. The Supply Chain functions are described in detail in the following section.



Functional Area:
Supply Chain

Policy and Goal Setting:

Supply Chain policies are developed by US SBU Supply Chain management under the guidance of AES's management and AES's board of directors. All parties are equally responsible to ensure that the policies meet or exceed the requirements set forth by all of DP&L's regulating entities. Supply Chain personnel are also expected to conduct business in accordance with the AES code of conduct and AES values.

The first priority of all DP&L areas is to ensure the safety of all employees, contractors and the public. Supply Chain prioritizes safety and incorporates it into all aspects of operations. An example of incorporating Safety into all activities in Supply Chain includes implementing the PICS supplier program which prequalifies potential contractors on a variety of safety topics like acceptable safety policies and safety record. Additionally, all employees are required to attend monthly safety meetings.

Annual Supply Chain goals and objectives are set in support of company and corporate goals. Goals include targets for safety, savings, inventory and sourcing KPIs and training.

Strategic and Long-Range Planning:

Supply Chain updates its strategic plan annually for budgeting purposes and long-range planning with regard to inventory levels, personnel, equipment and service needs. Forecast and actual information is obtained from all business areas.

Supply Chain has the following short and long-term goals that support the AES Corporate business plan:

1. Meet monthly safety meeting attendance and safety walk requirements
2. Deliver savings through sourcing activities that directly contribute to the target financial goals
3. Leverage increased material/services needs from multiple organizations to obtain additional savings
4. Increase spend under management index by emphasizing customer service and awareness of business needs
5. Implement a supplier relationship management tool to regularly evaluate performance and promote development of critical suppliers in alignment with asset management strategy
6. Increase alignment with operations regarding upcoming project material flow through participation and feedback with operations planning teams

Organizational Structure and Responsibilities:

The Supply Chain Department consists of approximately 115 employees and is led by the Director of US SBU Supply Chain. There are three main divisions that are responsible for the following activities:

1. Strategic Sourcing is responsible for the sourcing, procurement and contracting of goods and services related to all areas of DP&L's business. Activities include:
   a. Develop and maintain relationships with internal customers and suppliers in order to procure the best quality and price of goods/services when they are needed
   b. Evaluate performance and promote development of critical suppliers
   c. Negotiate contracts, including terms and conditions
   d. Maintain pipeline of upcoming projects
   e. Continuously strive to include multiple and diverse suppliers in bid events

2. Materials Management is responsible for maintaining, distributing, replenishing and securing inventory. Activities include:
   a. Issue inventory according to requests made by internal customers
   b. Cycle counts to ensure the accuracy of physical inventory
   c. Replenish stock to maintain an optimum level of inventory for ongoing and emergency operations

3. Business Intelligence & Analytics is responsible for tracking, analyzing and reporting Supply Chain data. Activities include:
   a. Verification and reporting of savings recognized by Supply Chain
   b. Contract approval routing and maintaining contract database
   c. Analysis and reporting of all KPIs. A listing of all KPI's is included as Supply Chain – Exhibit 2
   d. Vendor setup and maintenance within all ERP/financial systems

The organizational chart for Supply Chain is included as Supply Chain - Exhibit 1.

Decision-Making and Control:

Supply Chain decision-making and control is achieved by individuals throughout the organization making decisions within their given scope of authority in support of DP&L's overall mission and in accordance with policies and procedures. Policies and procedures guide decisions made during the course of business and set up approval hierarchies with regards to purchase requisitions, purchase orders, contracts and inventory levels and adjustments. A listing of applicable supply chain policies are included as Supply Chain – Exhibit 3.

Performance against Supply Chain goals is monitored and reported on a continuous basis, which includes monitoring of safety, diversity and overall spend and inventory metrics. This

monitoring helps to ensure that early warnings are in place when problems arise. This process allows management to uncover trends in a timely manner and proactively address issues.

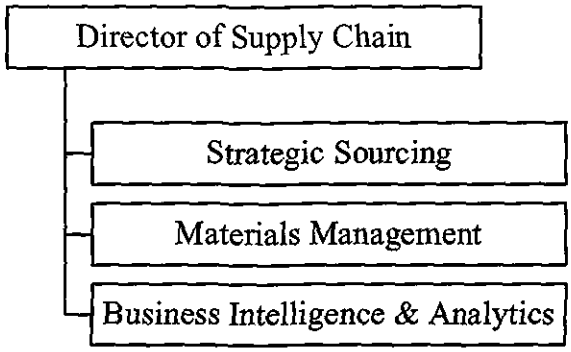
Internal and External Communications:

Supply Chain holds staff meetings between leadership and direct reports on a monthly, weekly and intermittent basis. Reporting on Supply Chain metrics is published in a central online location for all team members to access. Oftentimes, reports and other communications are circulated via email and conference calls as well. Internal communications also correspond to supporting the operations of other functional areas of DP&L. These communications frequently happen through Oracle or other applications and include purchase requisitions, inventory requisitions and contract compliance and approval.

External communications with DP&L's suppliers occurs as needed through a variety of means. Bids are obtained through written communications or by use of an e-sourcing tool. Other communication venues used with suppliers include emails, phone calls and face-to-face meetings.

Supply Chain – Exhibit 1

Organizational chart for Supply Chain



Supply Chain – Exhibit 2

Listing of Supply Chain Key Performance Indicators Spend Under Management Index

- Soft and Hard Savings
- Top 30 Suppliers by Spend
- Purchase Requisition to Purchase Order Turn Around
- Purchase Orders by Buyer by Month
- Inventory KPIs:
    - Inventory Levels
    - Fill Rate
    - New Stock
    - Issues
    - Returns
    - Receipts
    - Stockouts
    - Inventory Optimization
    - Turns
    - Write-Offs

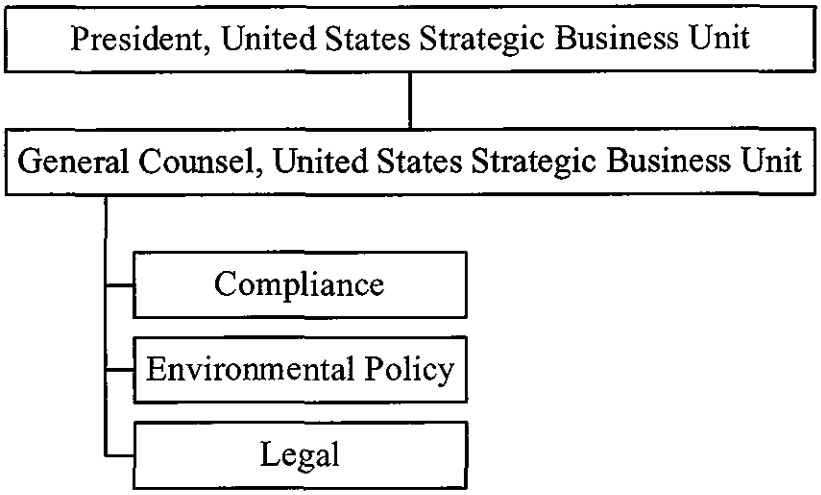
Supply Chain – Exhibit 3

Listing of Supply Chain Policies

- US SBU Supply Chain Purchasing Policy
- US SBU Supply Chain Inventory Policy
- AES Procure to Pay Policy
- US SBU Contract Execution Policy
- US SBU Expenditure Approval Policy
- DPL Authorization for Expenditures
- AES Code of Conduct

Legal

Legal has overall responsibility for all DP&L legal, environmental and compliance activities. The Legal functions are described in detail in the following sections.



Functional Area:
Claims Administration

SFR Reference
(B)(9)(e)(i) Legal

Policy and Goal Setting:

DP&L Claims Administration policy is to manage DP&L's payable claims, fleet claims, collectable claims and provide litigation support where needed. DP&L Claims performs these functions in accordance with the protocols developed and maintained in DP&L's tariff.

Strategic and Long-Range Planning:

Strategic planning in Claims Administration supports DP&L's goal of delivering safe reliable electric service, both now and in the future, by responding to and resolving claim issues in a professionally courteous and timely manner. Planning includes continued education for staff personnel to stay abreast of, and anticipate changes in the industry.

Organizational Structure and Responsibilities:

Claims Administration consists of 4 employees and is led by the Supervisor of Claims Administration. This area is responsible for managing the following utility activities:

1. Payable Claims resolves claims made against the Company for damages that result from the daily operation of an electrical utility
   a. Investigate claims submitted to the Company by obtaining information from the customer, making field inspections, and contacting responding crews for circumstances and necessary work
   b. Discuss claim with involved parties, including: customer, attorney, insurer, PUCO, Ohio Consumers' Counsel ("OCC") and other consumer agents
   c. Resolve the claim with the customer

2. Collectable Claims resolves claims made by the Company for third party damage to its facilities and equipment
   a. Investigate damages to Company facilities, obtain Company and civil records in support of billing, and prepare billing documents
   b. Defend, negotiate, and resolve claims with individuals, contractors, and insurance company representatives

3. Personal Injury Claims & Litigation Support investigates major accidents involving bodily injury and/or significant property damage

a. Investigate personal injury or significant property damage claims which may entail an immediate response. Work the accident scene, including taking photographs, gathering facts of the accident, gathering statements, preserving evidence, and working with field crews and civil authorities
b. Direct activities in support of litigation, gather pertinent records, respond to discovery requests in preparation for litigation, prepare witnesses for deposition and trial testimony, support Company and outside counsel, *testify and develop exhibits and expert witnesses as required*

4. Vehicle Fleet Claims coordinates and monitors vehicle fleet claims activity handled by a third-party administrator
   a. Gather information concerning vehicle fleet traffic accidents, ascertain liability and initiate a damage claim or submit the claim to external fleet adjusters
   b. Monitor and provide support of outside adjustment agency

The organizational chart for Claims Administration is included as Claims Administration - Exhibit 1.

Decision-Making and Control:

Claims Administration decision-making and control is achieved by individuals in the department making decisions within their given scope of authority in support of DP&L's overall mission and in accordance with the DP&L policies and procedures. Decisions are raised to proper level of authority as required by DP&L's policies. Overall responsibility for all decisions is that of the North American Compliance Officer. Control of monetary activities is overseen by the Accounting Operations Department while complying with the Sarbanes-Oxley Act.

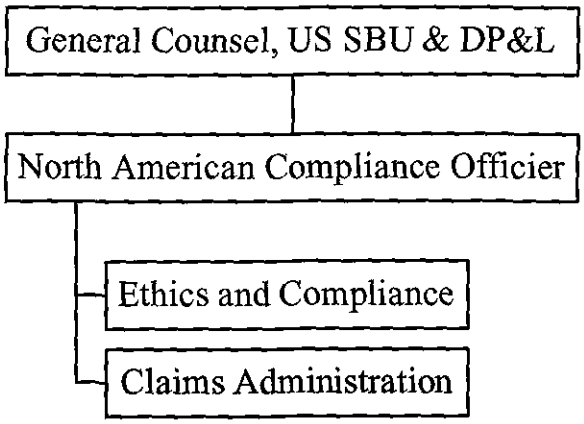
Internal and External Communications:

Internal communications are accomplished through a variety of communication channels including: telephone calls, conference calls, company mail, e-mails, and direct meetings. Internal communications typically correspond to supporting the operations of other functional areas of DP&L and typically include Legal, Security, Power Production, Real Estate Services, Line Clearance, Electrical Test, Electric Meter, Customer Service, Central Dispatch Operations, System Operating, Accounting, Services, Line Operations, Substation Services, and Engineering.

External communications are accomplished through a variety of communication channels including: telephone calls, U.S. postal mail, e-mails, and direct meetings with customers, attorneys, insurance agents, outside experts, company contractors, police and fire personnel, and government officials connected to various government agencies.

Claims Administration - Exhibit 1

Organizational chart for Claims Administration



Functional Area:
Environmental Policy

SFR Reference
(B)(9)(a)(viii) Environmental management
(B)(9)(e)(i) Legal

Policy and Goal Setting:

DP&L has adopted the Global AES environmental policy statement that is intended to be responsive to federal, state and local regulations and policies. These guidelines reflect DP&L's commitment to the environment and require DP&L leaders to develop a balanced approach to meeting these guidelines; one that considers all environmental standards and requirements, as well as the needs of all stakeholders (including social and other needs of the local community). All people within the organization are equally responsible to ensure that the Company's activities meet the requirements set forth by all of DP&L's regulating entities as well as the Global AES Environmental Policy.

A key part of Environmental Policy's responsibilities is creating policies and training that help to keep people safe. Environmental Policy takes safety into strong consideration in the development of policies and training to make employees aware of the hazards and personal protective equipment needed to ensure safety when dealing with different hazardous conditions.

Global AES establishes annual environmental goals and all AES businesses are expected to achieve these goals. The annual AES goals are designed to drive continued environmental performance improvement across the company and contribute to advancing broader company initiatives of sustainability and environmental stewardship. DP&L also establishes separate annual environmental goals as part of the continuous improvement process. Listings of DP&L's and AES's environmental policies are included as Environmental Policy – Exhibits 2 and 3, respectively.

Strategic and Long-Range Planning:

Strategic and long-range planning is focused on ensuring DP&L can continue to deliver safe, reliable service while maintaining compliance to the changing laws and regulations. Environmental Policy keeps abreast of the environmental, regulatory, and legislative climates and ensures that pending environmental issues and risks are incorporated into the business planning process.

Organizational Structure and Responsibilities:

Environmental Policy is structured under the US SBU Legal Services, and consists of 9 employees, including the Director of Environmental Policy. The Director reports to the US SBU

General Counsel. Additionally, at each DP&L business there is a local environmental professional who oversees environmental responsibilities, which includes ensuring the business meets the AES Global Environmental Policy goals and any separate DP&L goals.

Environmental Policy maintains responsibility for the following activities:

1. Identify and analyze key federal environmental issues that could impact DP&L operations
2. Advocate for positive environmental regulatory and legislative outcomes through stakeholder outreach
3. Promote environmental stewardship through policy development
4. Engage in the strategic planning process to support the business
5. Reduce cost and corporate risk related to environmental issues and identify preferred alternative approaches

Environmental Policy reviews and analyzes proposed and final regulations, communicates potential issues to the Company, and is responsible for coordinating the overall strategy of the Company to ensure that the impacts are quantified and possible future actions are integrated into the business plan. Current areas of focus include several proposed and final regulations that could impact AES's coal plants, including those owned or operated by DP&L. These regulations impact the disposal of coal ash, waste water and air emissions, including greenhouse gases. Environmental Policy also closely monitors regulations which could potentially impact transmission and distribution operations.

The organizational chart for Environmental Policy is included as Environmental Policy - Exhibit-1.

Decision-Making and Control:

The day-to-day operational decisions are achieved by individuals within their given scope of authority and in accordance with DP&L policies and procedures. Federal and state regulatory initiatives with potential consequences to DP&L businesses are managed through Environmental Policy, with overall responsibility being that of the US SBU General Counsel.

Internal and External Communications:

Promoting frequent, open communication on relevant environmental issues with our people, contractors and suppliers is an important responsibility within Customer Operations. Operating Managers are specifically accountable for clearly communicating environmental expectations for strong environmental performance to those people who report to them.

Environmental Policy supports the environmental communication efforts of Operating Managers by seeing to it that the business makes effective use of available communication means and

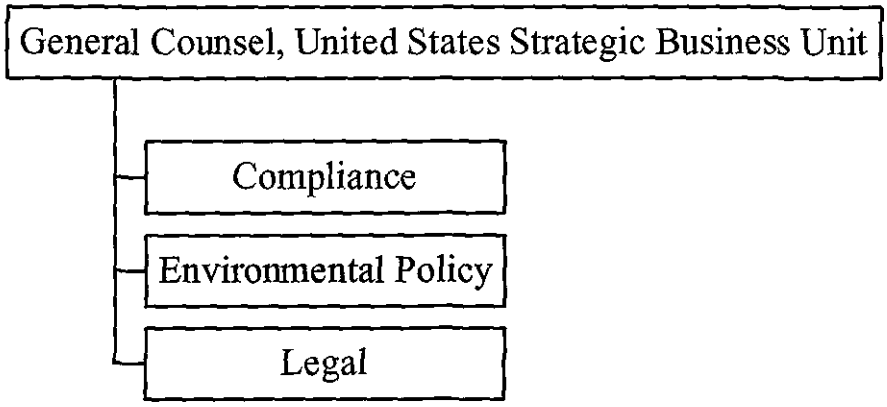
channels, such as annual environmental awareness training and DP&L's standard operating procedures.

It is the responsibility of Environmental Policy to manage the interface between Customer Operations and all relevant environmental regulatory agencies, including specific responsibilities for routine reporting, document submittals and correspondence as well as non-routine notifications and negotiations. Environmental Policy is accountable for assuring that all such communications with the environmental regulatory agencies are accurate and timely.

Responsibility for managing the process of environment-related communications with interested external stakeholders generally rests with Corporate Communications with input and guidance from Environmental Policy.

Environmental Policy – Exhibit 1

Organizational Chart for Environmental Policy



Environmental Policy – Exhibit 2

DP&L Environmental Policies, Procedures and Guidelines

Title	Description
DPL Environmental Policy	Establishes expectations for minimizing impacts to the environment.
ENV-01 PCB Disposal	Guide for cleaning up and disposing of PCB spills.
Env-02 PCB Inquiries	Answering customer questions about PCBs in transformers.
Env-04 SPCC Plans	Developing oil spill prevention and control plans.
Env-05 PCB Response Manual	How to respond to and clean up spills of transformer oil
Env-06 Underground Storage Tanks	Obligations associated with underground storage tanks
Env-07 Ozone Depleting Substances	Obligations associated with Freon and similar HVAC fluids
Env-08 EMF Measurements	Measuring electrical and electromagnetic fields
Env-09 Treated Wood	Guide for individuals receiving treated utility poles.
Env-09a Treated Wood Handling	Form to be signed by recipients of treated utility poles.
Env-10 Used Oil	How to handle, recycle, or dispose of used oil.
Env-11 Environmental Record Retention	Which environmental records to retain and for how long.
Env-12 Above Ground Storage Tanks	Obligations associated with above ground storage tanks.
Env-13 Construction Site Storm Water Permitting	Permits for storm water runoff from construction sites.
Env-14 Universal Waste	Obligations associated with used bulbs and batteries
Env-15 Mercury Spill Cleanup	Guide for cleaning up a spill of mercury
Env-16 Electrical Generators - Emergency	Obligations associated with portable emergency generators.
Env-17 Regulatory Agency Inspections	How to communicate the details of an EPA inspection
Env-18 Environmental Evaluation of Major Projects	How PEA's should be evaluated for permitting obligations
Env-19 External Vendor Environmental Audits	Reviewing vendor practices to reduce DPL environmental liabilities
Env-20 Permitting Renewable Energy Proj.	Environmental permitting issues - renewable projects
Env-21 Waste Management Manual	How to manage solid waste and hazardous waste
Env-22 Scrap Metal Reclamation - T&D	Policy for uniform handling and disposal of scrap metal
ENV-23 Battery Disposal Policy	General use battery disposal practices
Env-24 AES ENE and EOE Reporting	Reporting Environmental Non-Compliance and Other Events to AES
Generation Procedure: EPAP - 12	Quarterly EDR submittal review for Coal Units

Environmental Policy – Exhibit 3

AES Environmental Policies, Procedures and Guidelines

Title	Description
ENV 1	Interactive AES Environmental Compliance & Risk Protocol
ENV 1-1	General Site/Business Environmental Compliance Program
ENV 1-2	Hazardous Substance and Spill Control
ENV 1-3	Air Pollution Control
ENV 1-4	Water Pollution Control
ENV 1-5	Waste Management
ENV 1-6	Misc. Environmental Issues
ENV 2	Interactive AES Environmental Standards Protocol
ENV 2-1	General Environmental Requirements and Prohibitions
ENV 2-2	Spill Prevention and Containment
ENV 2-3	Hazardous and Special Waste Requirements
ENV 2-4	Chemical and Raw Material Management
ENV 2-5	PCB Management
ENV 2-6	AES Compliance Data Quality Assurance Reporting
ENV 2-7	AES Response to ENEs and EOEs
ENV 2-8	Environmental Emergency Response Planning
ENV 2-9	AES Hydroelectric Power Plant & Reservoir Requirements
ENV 2-10	Environmentally Related Financial Disclosure Obligations
ENV 2-11	Managing Potential Contractor Environmental Impacts
ENV 3	Interactive AES EMS Framework Protocol
ENV 3-1	Environmental Policy
ENV 3-2	Environmental Aspects
ENV 3-3	Legal and Other Requirements
ENV 3-4	Environmental Goals (Targets and Objectives) and Action Plans
ENV 3-5	Resources, Roles, Responsibility and Authority
ENV 3-6	Competence, Training and Awareness
ENV 3-7	Communication
ENV 3-8	Documentation
ENV 3-9	Control of Documents
ENV 3-10	Operational Control
ENV 3-11	Emergency Preparedness and Response
ENV 3-12	Monitoring and Measurement
ENV 3-13	Evaluation of Compliance
ENV 3-14	Nonconformity, Corrective Action and Preventive Action
ENV 3-15	Control of Records
ENV 3-16	Internal Audits
ENV 3-17	Management Review

Functional Area:
Ethics and Compliance

SFA Reference
B(9)(e)(i) Legal

Policy and Goal Setting:

The objectives of Ethics and Compliance are to provide services and expertise to support DP&L values and to enable its compliance mechanisms and governance processes to function properly. To accomplish this objective, the Ethics and Compliance Department:

1. Assist management in the assessment of ethics matters, compliance issues and related business risks and in the identification of cost beneficial actions to mitigate risks, including potential fraud, to acceptable levels
2. Assist management in evaluating whether DP&L's strategy, objectives and goals will be met ethically and effectively
3. Interact with various DP&L governance groups as required
4. Conduct selected special investigations, reviews, and consulting projects at the request of management, as appropriate
5. Follow-up on outstanding management actions and significant issues to validate that these matters are being resolved appropriately and timely

Work with management to take reasonable steps to respond to inappropriate conduct and to prevent further similar misconduct

Strategic and Long-Range Planning:

The strategic plan for Ethics and Compliance, which supports the overall strategic direction of DP&L, is created by the North American Ethics and Compliance Officer in conjunction with the AES Corporation's Ethics and Compliance Department.

Organizational Structure and Responsibilities:

Ethics and Compliance at DP&L is led by the North American Ethics and Compliance Officer for the US SBU, who reports to the General Counsel of the US SBU. This reporting relationship is designed to provide sufficient authority to promote independence and to ensure effective coverage and appropriate action and communication regarding ethics and compliance matters.

Ethics and Compliance is responsible for ensuring that the organization is in compliance with corporate policies as well as select regulations from federal and state regulatory agencies based on the framework provided by the U.S. Federal Sentencing Guidelines for Organizations. Activities include:

1. Assist in the investigation of suspected fraudulent activities within DP&L and report the results to management
2. Maintain and administer a rigorous follow-up process to ensure that committed management actions to address issues are properly and timely executed
3. Administer the anonymous helpline program in an efficient and effective fashion and in full compliance with applicable laws, requirements, and standards
4. Foster an appropriate level of ethics and compliance awareness throughout the organization and with vendors, customers and other key stakeholders as appropriate
5. Develop and administer effective training programs associated with ethics and compliance issues or matters
6. Help foster a culture of fraud awareness and assist in the development and implementation of anti-fraud programs as appropriate
7. Periodically evaluate the design, implementation and effectiveness of DP&L's ethics and compliance program
8. Discharge these responsibilities in a manner consistent with the purpose and objectives set forth in the DP&L/AES Code of Business Ethics and DP&L Vision and Mission.

An organizational chart for Ethics and Compliance is included as Ethics and Compliance – Exhibit 1.

Decision-Making and Control:

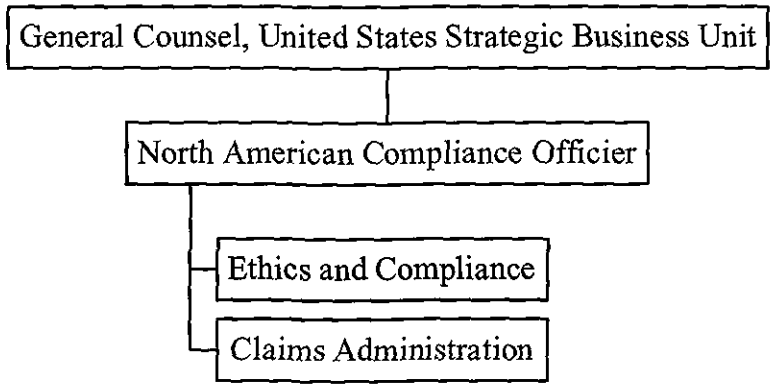
Decision-making authority flows up through the North American Compliance Officer to the Chief Legal Officer.

Internal and External Communications:

Ethics and Compliance personnel, in the performance of their duties and responsibilities, interface frequently with personnel within DP&L through a variety of communication methods; face-to-face, phone, and email correspondence.

Ethics and Compliance - Exhibit 1

Organizational Chart for Ethics and Compliance



Functional Area:
Legal

SFR Reference
(B)(9)(e)(i) Legal
(B)(9)(e)(iv) Record management

Policy and Goal Setting:

Legal does not establish policy for the US SBU. Corporate policies are developed by the management of the US SBU with support from Legal in an advisory capacity. Legal reviews proposed and existing policies for compliance with applicable state and federal law, regulations and the AES Code of Conduct.

Department level goals are driven by the goals of the various operating units within the US SBU. These team level goals form the foundation for individual goals for each attorney and staff members within Legal. Goals are established on an annual basis early in the calendar year and are monitored and reviewed periodically throughout the year and modified as necessary to align with evolving business objectives. Attorneys and staff members are evaluated at the end of each year based on the modified goals and objectives.

The primary goal of Legal is to serve the operating units comprising the US SBU in a safe, effective and efficient manner. Legal gets involved in DP&L's culture of safety, by attending safety meetings, safety day, and safety walks.

Strategic and Long-Range Planning:

Strategic plans for the US SBU are developed by the leadership team of the US SBU under the guidance of AES. Legal serves management in an advisory capacity throughout the planning process by reviewing plans for compliance with applicable state and federal laws and regulations and also provides any legal assistance necessary to implement plans.

Organizational Structure and Responsibilities:

Legal falls under the control of the President of the US SBU and is led by the General Counsel of the US SBU. While no direct reporting relationship exists, frequent consultation and coordination occurs with AES Corporate Legal, which is headquartered in Arlington, Virginia. In addition to the General Counsel, the Legal Department is comprised of 8 attorneys that serve the various entities within the US SBU, including DP&L. Additionally the attorneys are supported by paralegals and administrative staff.

1. Legal supports all of the operating units comprising the US SBU and is responsible for providing legal services across all of the functional areas of law that are applicable to the business operations of the US SBU. Each attorney within Legal focuses his or her practice in one or more of these functional areas:
   a. state regulatory compliance
   b. Federal regulatory compliance
   c. Environmental compliance
   d. *Litigation*
   e. Ethics and compliance
   f. Corporate governance
   g. Securities
   h. Finance and mergers
   i. Acquisitions
   j. Labor and employment
   k. Commercial contracts
   l. Retail

2. Attorneys have substantial experience in the area(s) in which they focus and are responsible, under the guidance of the General Counsel, for serving the needs of the business with regard to such area(s)
3. Determine when certain tasks or projects should be delegated to outside counsel
4. Manage outside counsel, the attorney responsible for the applicable functional area is responsible for managing outside counsel
5. Assist outside of their area(s) of emphasis as necessary to meet timelines and objectives
6. Keep current in attorney's area(s) of emphasis through self-study and continuing legal education. Each of the attorneys is required to satisfy the continuing legal education requirements of the state(s) in which he or she is admitted to practice and is responsible for keeping his or her license(s) current
7. Monitor attorney time closely to assure the appropriate allocation of costs across the various legal entities and operating units comprising the US SBU

The organizational chart for Legal is attached as Legal – Exhibit 1.

Decision-Making and Control:

Individuals within the US SBU make decisions within their scope of authority in support of the US SBU's mission and in accordance with US SBU policies and procedures. Decisions are raised to the proper level of authority as required by US SBU policies. Legal serves in an advisory capacity to the various operating units across the US SBU in support of business decision-making. Attorneys are responsible for decisions on legal issues relevant to the functional area(s) in which they focus and have the necessary information and experience to make decisions. The General Counsel has responsibility for decisions made by attorneys and staff within Legal. In the event that work is delegated to outside counsel, the assigning attorney closely monitors such work and maintains responsibility for any material legal decisions.

Outside counsel are selected based on their relevant expertise and cost and, like other suppliers of goods and services to the organization, are required to go through an onboarding process including a thorough due diligence investigation. Invoices submitted by outside counsel are closely reviewed by attorneys for the purpose of ensuring accuracy and monitoring the value of the services relative to the cost. Invoice approval limits are set for each attorney in Legal based upon experience level.

Internal and External Communications:

Legal practices an open door policy with regard to the exchange of communications among team members within the department. Attorneys and legal staff frequently communicate with clients and other individuals at all levels across the US SBU. These communications may be privileged or unprivileged and may consist of phone calls, in person meetings, conference calls, email and other written communications, and legal opinions, which may be formal or informal.

Attorneys frequently correspond with individuals outside of the organization as well, including regulators, financial institutions, customers, suppliers, outside counsel and others. The responsibility for external communications resides with the attorney having the appropriate level of information and experience to make such communications. Legal also coordinates with the communications group regarding external corporate level communications. US SBU policy requires that all press releases issued on behalf of the organization be reviewed and approved by Legal.

Legal – Exhibit 1

Organizational chart for Legal