

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The Dayton Power and Light Company for an Increase in Electric Distribution Rates	:	Case No. 15-1830-EL-AIR
In the Matter of the Application of The Dayton Power and Light Company for Approval to Change Accounting Methods	:	Case No. 15-1831-EL-AAM
In the Matter of the Application of The Dayton Power and Light Company for Tariff Approval	:	Case No. 15-1832-EL-ATA
In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Electric Security Plan	:	Case No. 16-0395-EL-SSO
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs	:	Case No. 16-0396-EL-ATA
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Authority Pursuant to Ohio Rev. Code § 4905.13	:	Case No. 16-0397-EL-AAM

**REPLY MEMORANDUM OF APPLICANT THE DAYTON POWER AND LIGHT
COMPANY ON ITS MOTION FOR CASE MANAGEMENT ORDER TO ESTABLISH
DEADLINES AND TO COORDINATE CASES**

Two of the three intervenor groups responding to DP&L's Motion for Case Management Order offered their own proposed schedule. Preparation of a schedule in these two concurrently pending cases is difficult, and DP&L appreciates their efforts to be constructive by doing so.

This memorandum embraces aspects of their proposals and suggests the following approach. DP&L will agree with the intervenors' proposal to try the rate case first. In order that

rates can be in effect for both cases in January 2017, the following schedule modifies the schedule that was attached to DP&L's Motion for Case Management Order. It is difficult to construct a schedule that will please all parties. Yet there are certain elements of the schedule that are relatively undisputed. DP&L has not sought distribution rate relief in nearly twenty years and its financial integrity is threatened; while the amounts can and will be debated, relief in both cases is necessary. This relief is in the best interests of DP&L's customers and the Company.

In the words of the Dayton/Honda of America proposal, describing its proposed schedule, which would have "both cases tried and debriefed by the end of 2016," Dayton/Honda of America memorandum, p. 4, DP&L asks that both cases be tried and be briefed, so as to be decision-ready, by the end of 2016. DP&L proposes this schedule:

<u>Dates</u>	<u>Event</u>
Friday, July 1	Estimated date of Staff Report (distribution rate case)
Friday, July 8	Written discovery cutoff (both cases)
Tuesday, August 2	Objections to Staff Report due Intervenor testimony due (both cases)
Monday, August 15	Hearing 1 begins (rate case)
Tuesday, September 6	Hearing 2 begins (ESP case)
Monday, October 17	Opening briefs (both cases)
Monday, October 31	Reply briefs (both cases)
Monday, January 2, 2017	Rates in effect (both cases)

Some parties have been conducting discovery already, so that there should be no prejudice from this schedule.

Respectfully submitted,

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Nos. 15-1830-EL-AIR, 15-1831-EL-AAM,
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Reply Memorandum of Applicant The Dayton Power and Light Company on Its Motion for Case Management Order to Establish Deadlines and to Coordinate Cases, has been served via electronic mail upon the following counsel of record, this 16th day of May, 2016:

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Summary: Reply Reply Memorandum of Applicant The Dayton Power and Light Company on Its Motion for Case Management Order to Establish Deadlines and to Coordinate Cases electronically filed by Mr. Charles J. Faruki on behalf of The Dayton Power and Light Company