

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of : Case No. 16-0395-EL-SSO
The Dayton Power and Light Company for
Approval of Its Electric Security Plan :

In the Matter of the Application of : Case No. 16-0396-EL-ATA
The Dayton Power and Light Company for
Approval of Revised Tariffs :

In the Matter of the Application of : Case No. 16-0397-EL-AAM
The Dayton Power and Light Company for
Approval of Certain Accounting Authority :
Pursuant to Ohio Rev. Code § 4905.13

**THE DAYTON POWER AND LIGHT COMPANY'S NOTICE
OF WITHDRAWAL OF RELIABLE ELECTRICITY RIDER PROPOSAL**

The Dayton Power and Light Company ("DP&L") provides notice of the withdrawal of its request in this case for a Reliable Electricity Rider ("RER"). DP&L will continue to pursue an alternative to the RER, which has been named the Distribution Modernization Rider ("DMR").

Pursuant to DP&L's withdrawal of its request for an RER, DP&L withdraws its filed tariffs and provides notice of the following changes to its testimony:

<u>Witness</u>	<u>Pages/Lines/Exhibits</u>	<u>Status</u>
Robert Adams, Claire Hale, Nathan Parke, Tom Raga	Entire testimony	Change "Reliable Electricity Rider" to "Distribution Modernization Rider" each time that it occurs
	Entire testimony	Change "RER" to "DMR" each time it occurs

<u>Witness</u>	<u>Pages/Lines/Exhibits</u>	<u>Status</u>
Robert Adams	p. 6, ll. 11-14	Strike question and answer
	Ex. RJA-4	Entire Exhibit withdrawn
Eric Brown	p.9, l. 5-6	Strike "that are being provided and supported by Company Witness Meehan to project proxy auction clearing prices"
	Ex. ERB-1	Entire Exhibit withdrawn
	Ex. ERB-2	Entire Exhibit withdrawn
Angelique Collier	Entire Direct Testimony	Entire Direct Testimony withdrawn
Carlos Grande-Moran	Entire Direct Testimony	Entire Direct Testimony withdrawn
Claire Hale	p. 2, l. 6	Strike "Company obligations regarding the RER "
	p. 2, ll. 14-16	Delete "will be updated annually. DP&L will file an updated rate by November 1st of each year, which will become effective January 1st of the following year unless otherwise ordered by the Commission. This rider"
	p. 2, l. 18 through p. 3, l. 9	Strike question and answer
	p. 3, ll. 18-20	Strike "All rate design changes will be implemented in the first year of the RER and then held steady, with rates adjusted only to reflect the updated RER revenue requirement."
	p. 3, l. 23 through p. 4, l. 2	Strike "The remaining pages of the exhibit show the calculation of future years' rates simply by applying a scaling factor for the next

<u>Witness</u>	<u>Pages/Lines/Exhibits</u>	<u>Status</u>
		year's RER revenue requirement."
	p. 5, l. 11 - p. 7, l. 8	Strike questions and answers
	p. 8, l. 10	Strike "As discussed in Company Witness Collier's Testimony" and capitalize the "t" in "There"
	p. 8, ll. 11-12	Strike "As she explains more fully" and capitalize the "t" in "The"
	p. 9, ll. 7-8	Strike "RER true-up mechanism and"
	Exhibit CEH-1	Entire Exhibit withdrawn
Kevin Hall	No changes	
David Harrison	Entire Direct Testimony	Entire Direct Testimony withdrawn
Craig Jackson	Entire Direct and Supplemental Testimony	Entire Direct and Supplemental Testimony withdrawn
Robert Lee	No changes	
Jeff Malinak	Entire Direct and Supplemental Testimony	Entire Direct and Supplemental Testimony withdrawn
Eugene Meehan	Entire Direct Testimony	Entire Direct Testimony withdrawn
Mark Miller	Entire Direct Testimony	Entire Direct Testimony withdrawn
Roger Morin	Entire Direct Testimony	Entire Direct Testimony withdrawn
Nathan Parke	p. 2, ll. 14-15	Strike "Reliable Electricity Rider ("RER") and"

<u>Witness</u>	<u>Pages/Lines/Exhibits</u>	<u>Status</u>
	p. 3, ll. 4-5	Strike "Reliable Electricity Rider"
	Exhibit NCP-1	In Column 2, Strike "G11 Reliable Electricity Rider"
Thomas Raga	Table of Contents	Strike "III. Benefits and Allocation of Risks of the Reliable Electricity Rider . . 8"
	p. 2, l. 20 - p. 3, l. 4	Strike "(2) summarize the economic benefits that will accrue to DP&L customers and the Ohio economy as a whole from the Reliable Electricity Rider ("RER") proposal, including a description of future risks and how those risks are allocated between DP&L and its customers; (3) introduce the importance of the Ohio generation plants in maintaining fuel diversity, price stability, reliability and economic development;"
	p. 3, l. 3	Change "(4)" to "(2)"
	p. 3, ll. 8-13	Strike "This ESP is designed to promote economic growth and stability in Ohio by allowing at-risk generation plants to remain operational. If those plants were to close, then the adverse effects would include \$26.5 billion in economic losses in Ohio, the loss of almost 19,000 jobs, and an increase in reliability risks. This ESP is in the customers' best interest not only because it avoids those risks, but also because customers will receive \$454.8 million in credits under

<u>Witness</u>	<u>Pages/Lines/Exhibits</u>	<u>Status</u>
		the proposed RER."
	p. 4, l. 1 - p. 11, l. 11	Strike testimony
	p. 12	Strike the following witnesses and their associated topics: Angelique Collier; Carlos Grande-Moran (Siemens PTI); David Harrison (NERA); Eugene T. Meehan (NERA); Mark Miller. For topics under Claire Hale, strike "information sharing and Commission oversight." For topics under Craig L. Jackson, strike "severability clause;". For topics under R. Jeffrey Malinak, strike "the RER generation plants and"

In addition, to support and explain DP&L's DMR, DP&L will be filing replacement Direct Testimony. DP&L's proposed ESP still retains key components that benefit customers:

1. Retains customers' option to shop for a competitive electric supplier
2. Maintains the 100% competitive bidding structure for non-shopping customers
3. Introduces a Distribution Investment Rider to support continued investment in distribution system reliability
4. Introduces a Clean Energy Rider that will facilitate future investment in renewable and advanced technologies
5. Maintains DP&L's financial integrity and its ability to provide reliable, safe and stable customer service

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing The Dayton Power and Light Company's Notice of Withdrawal of Reliable Electricity Rider Proposal, has been served via electronic mail upon the following counsel of record, this 23rd day of September, 2016:

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Case No(s). 16-0395-EL-SSO, 16-0396-EL-ATA, 16-0397-EL-AAM

Summary: Notice of withdrawal The Dayton Power and Light Company's Notice of Withdrawal of Reliable Electricity Rider Proposal electronically filed by Mr. Charles J. Faruki on behalf of The Dayton Power and Light Company