

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of The)	
Energy Shortage Emergency Rules in)	
Ohio Adm. Code Chapter 4901:5-17, 5-)	Case No. 16-567-AU-ORD
19, 5-21, 5-23, 5-25, 5-29, 5-33, 5-35,)	
and 5-37.)	

**INITIAL COMMENTS OF
THE DAYTON POWER AND LIGHT COMPANY**

DP&L supports the Commission's commitment and obligation to issue rules to address energy emergencies that may impact the State of Ohio. Since these rules were originally drafted, all Ohio electric utilities have been required to join a Regional Transmission Organization (RTO) and those organizations have been given the responsibility of acting as the reliability coordinators for the region. Therefore, PJM is responsible for balancing and coordinating all bulk power supplies in DP&L's service territory, throughout Ohio, and most of the eastern United States. PJM LLC has been performing this function for DP&L since 2004 and performs this function on a real-time basis.

DP&L is obligated to follow the RTO rules, regulations, and directives contained in the PJM Reliability Assurance Agreement (RAA) to ensure the reliability of the grid is maintained. Those directives guide all generators (regulated or unregulated) in the region. Those directives also guide any sort of curtailment requirements if there was overloading of the

electrical grid. If there was an emergency that impacted any part of Ohio, PJM would be responsible for making sure electric generators in the region have sufficient fuel supplies on hand and available, or that certain generating units were running or not running in order to balance the system and avoid outages.

If the Commission believes it would be helpful, DP&L is willing to work with the Commission staff to address the Emergency policies given the significant role that PJM now plays in system emergencies and coordination of market participants in Ohio.

Respectfully submitted,

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Summary: Comments DP&L initial comments on the proposed Energy Shortage Emergency Rules electronically filed by Mr. Jason M Willis on behalf of The Dayton Power and Light Company