BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the)	
PowerForward Collaborative)	Case No. 18-1595-EL-GRD
)	

COMMENTS OF THE DAYTON POWER AND LIGHT COMPANY

The Dayton Power and Light Company ("DP&L" or the "Company"), consistent with paragraph 8 of the Public Utilities Commission of Ohio's ("PUCO" or "Commission") Entry of November 14, 2018 ("Entry") hereby submits its Comments with respect to the Commission's proposed grid architecture status report.

As recapped in the Entry in this docket, the Commission's PowerForward Roadmap recommended that the regulated utilities file an "update of where the utility stands with their grid architecture in a grid architecture status report." Entry at ¶5. The robust discussions in the PowerForward process made clear that each of the Ohio utilities are employing different types of distribution grid infrastructure and differing levels of distribution technology. Given the varying degrees of grid modernization across the utilities in Ohio, DP&L is supportive of the grid architecture status report that proposes discussions of "field automation, substation automation, operational communications infrastructure, sensing and measurements, and operational analytics." Entry at ¶5. This will provide the necessary baseline in order to understand the unique requirements for each utility to provide innovation that enhances the customer electricity experience and to achieve a "uniform platform" across the state as noted by the Commission in its PowerForward Roadmap. While DP&L finds itself in the challenging position of having one of the least advanced distribution grids in the state, the Company is currently required to file a

comprehensive Distribution Modernization Plan by December 28, 2018. Therefore, DP&L believes the recommended proposed content and deadline of April 1, 2019 by which to file the grid architecture status report is timely and reasonable.

DP&L looks forward to sharing its grid architecture status report and participating in the PowerFoward Collaborative and related Workshops.

Respectfully submitted,

/s/ Michael J. Schuler Michael J. Schuler (0082390)

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(willing to accept electronic service)

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the interested parties on December 4, 2018.

/s/ Michael J. Schuler
Michael J. Schuler

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Summary: Comments of The Dayton Power and Light Company electronically filed by Mrs. Jessica E Kellie on behalf of The Dayton Power and Light Company