

FILE

PUCO EXHIBIT FILING

Date of Hearing: 4-1-2019

Case No. 16-395-EL-SSO, 16-396-ATA, 16-397-EL-AAM

PUCO Case Caption: In the Matter of the Application of The Dayton
Power and Light Company for Approval of its Electric
Security Plan

Volume VI

List of exhibits being filed:

IGS 1002

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Reporter's Signature: Karen Sue Gibson
Date Submitted: _____

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Technician MA Date processed April 22, 2019

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 OBJECTIONS AND
RESPONSES TO INTERSTATE GAS SUPPLY, INC.'S TENTH SET OF
INTERROGATORIES, REQUESTS FOR PRODUCTION OF
DOCUMENTS, AND REQUESTS FOR ADMISSION TO
THE DAYTON POWER AND LIGHT COMPANY**

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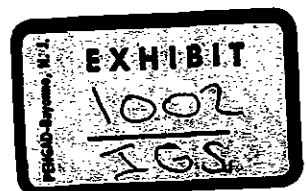
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The Dayton Power and Light Company ("DP&L") objects and responds to
Interstate Gas Supply, Inc.'s Tenth Set of Interrogatories, Requests for Production of Documents,
and Requests for Admission to The Dayton Power and Light Company, as follows.

GENERAL OBJECTIONS

1. DP&L objects to and declines to respond to each and every discovery request to
the extent that it seeks information that is irrelevant and is not reasonably calculated to lead to
the discovery of admissible evidence. Ohio Admin. Code § 4901-1-16(B).

2. DP&L objects to and declines to respond to each and every discovery request to
the extent that it is harassing, unduly burdensome, oppressive or overbroad. Ohio Admin. Code
§§ 4901-1-16(B) and 4901-1-24(A).



INT-10-12. Identify DP&L's current equity capitalization. Also identify DP&L's total long-term debt.

RESPONSE: General Objections Nos. 1 (relevance), 2 (unduly burdensome), 4 (proprietary), 5 (inspection of business records), 9 (vague or undefined). Subject to all general objections, DP&L states that as of 9/30/18 DP&L's equity capitalization was 42% and DP&L's long-term debt was \$593.77M as of 12/31/18.

| | |
|---|-----------------|
| 2020 Tax Exempt First Mortgage Bonds A Series | \$100.00M |
| 2020 Tax Exempt First Mortgage Bonds B Series | \$40.00M |
| 2022 Term Loan B First Mortgage Bonds | \$436.10M |
| <u>2061 Wright Patterson AFB Note</u> | <u>\$17.67M</u> |
| Total Long-Term Debt | \$593.77M |

Witness Responsible: Gustavo Garavaglia M.

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