

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission’s Review)
of Chapter 4901:1-10 of the Ohio) Case No. 17-1842-EL-ORD
Administrative Code.)

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

The Dayton Power and Light Company (“DP&L” or the “Company”) hereby submits the following comments in response to the Public Utilities Commission of Ohio (the “Commission”) request for comments related to proposed changes to Chapter 4901:1-10.

O.A.C. 4901:1-10-01 – Definitions

The Commission should not adopt a revised definition of “major event” in 4901:1-10-01(T) that includes transmission outages because it lacks support for departing from prior precedent. In the November 5, 2008 Order in Case No 06-653-EL-ORD, the Commission “concurs with OCEA, AEP, FirstEnergy, and Staff that transmission outages and major events are reported separately and any inclusion of performance data during these events could unreasonably distort distribution performance. Therefore, performance data during transmission outages or major events should not be included in the calculation of the indices, standards, or revised performance requirements.” There is no support in this case to justify departure from this precedent to include transmission outages. Moreover, the recommended change would require that new performance standards be established. Therefore, DP&L recommends the PUCO continue with excluding transmission outages to determine a major event. Alternatively, if the Commission chooses to retain the Staff’s proposed change to the definition, the Commission should permit the utilities to file updated performance standards to reflect that change.

DP&L also recommends the addition of two definitions. First, “small commercial customer” is referenced several times in 4901:1-10-12(1) and 4901:1-10-29(F), but it is not defined in this chapter. DP&L recommends adopting the same definition that is used in 4901:1-13-01 and 4901:1-21-01 – “Small commercial customer” means a commercial customer which is not a mercantile commercial customer. Second, the Commission should adopt a definition of “seamless move” to accommodate the decision issued in Case No. 14-2074-EL-EDI, where the Commission found that a seamless move mechanism should be adopted. To implement a seamless move mechanism, DP&L is recommending changes to 4901:1-10-12(F)(1), 4901:1-10-24(E)(1) and 4901:1-10-29(F)(1) but requires a definition. DP&L recommends the following definition based on the Commission’s February 7, 2018 Finding and Order in Case No. 14-2074-EL-EDI.—“Seamless move” means the transfer of an already negotiated CRES contract to the customer’s new address. Seamless move requires that the customer affirmatively choose that opportunity when contacting the EDU to transfer service.”

O.A.C. 4901:1-10-05 – Metering

The Commission should not adopt the proposed edits to O.A.C. 4901:1-10-05 (J)(1), that effectively requires the utility to allow customers to retain their current traditional meter if they choose to opt out of advanced meter service. There are some circumstances, however, that it will still be necessary to exchange the customer’s existing meter to another traditional meter. For example, if an existing customer with a non-ERT meter chooses to opt-out of having an advanced meter installed it may still be necessary for the Company to exchange the existing non-ERT meter to an ERT meter. The proposed language may prohibit the Company from doing so if the existing non-ERT traditional meter meets industry standards for accuracy and safety. To accommodate this necessity, the Company proposes the following additional amendments to Staff’s proposed edits to 4901:1-10-05(J)(1):

- (1) An electric utility shall provide customers with the option to remove an installed advanced meter and replace it with a traditional meter, or in the event an advanced meter has not been installed, the option to decline installation of an advanced meter and retain the customer's current meter a traditional meter as long as it meets industry standards for accuracy and safety, including a cost-based, tariffed opt-out service.

O.A.C. 4901:1-10-07 – Outage Reports

The Commission should not adopt the proposed changes to O.A.C. 4901:1-10-07, which significantly reduces the threshold to trigger reporting to the Commission's outage coordinator. The decrease in the reporting threshold is onerous and is likely to produce little, if any, incremental benefit. This will pull employees away from restoration efforts potentially increasing restoration times. Moreover, to the extent this is to track problematic circuits, this is already being formed pursuant to O.A.C. 4901:1-10-11. Additional reporting is unlikely to provide additional benefits because EDUs currently post outage information and estimated restoration time on their websites and any interested party can view this information. Alternatively, if the Commission decides to move forward and reduce the threshold for reporting then O.A.C. 4901:1-10-07(A)(4) the outage threshold should be that of a sustained outage as defined in 4901:1-10-01(CC).

Irrespective of the recommendations above, O.A.C. 4901:1-10-07(C) should be clarified to establish that "accident" does not include vehicle accidents. While EDUs respond to vehicle accidents that involve electric utility facilities, it may not be known if the person involved in the accident requires hospitalization. Due to HIPAA laws, there will often be times that the EDU does not know if hospitalization is required regardless of the type of accident. Failure to report these types of "accidents" should not be considered a violation of the Rule.

O.A.C. 4901:1-10-09 – Minimum Customer Service Levels

The Commission should not adopt the addition of O.A.C. 4901:1-10-09(B)(5) as proposed, because it is ambiguous, which could burden the utilities and the Director of the Service Monitoring and Enforcement Department with reporting for minimal events that do not harm customers. First, the proposed rule does not define “outage messaging,” which requires clarification. Second, reporting of momentary glitches to the system that do not materially impact a customer’s ability to contact the utility would produce little, if any, incremental benefit. To address these concerns, DP&L proposes the following edits:

4901:1-10-01(JJ). “Outage messaging” means an automated message on the utility’s IVR system indicating that there has been a large outage to the distribution.

4901:1-10-09(B)(5). When an electric utility activates outage messaging on its system or its otherwise unable to accept inbound customer calls for a period of thirty minutes or longer, the electric utility shall notify the Director of the Service Monitoring and Enforcement Department, or its designee, of such messaging, and the anticipated timeframe for returning to normal business operations.

O.A.C. 4901:1-10-12 – Provision of Customer Rights and Obligations

As mentioned previously, the Commission found that a seamless move mechanism should be adopted in Case No. 14-2074-EL-EDI. Seamless move requires that the EDU transfer an already negotiated CRES contract to the customer’s new address if the customer affirmatively chooses that opportunity when calling the EDU to transfer service. To transfer the CRES contract, the EDU must disclose the customer’s new account number to the CRES provider. Because consent may be provided to the EDU via a telephone call, there needs to another exception added for disclosure of an account number without written consent, electronic authorization or a court or commission order. Thus, DP&L recommends the following addition to O.A.C. 4901:1-10-12(F):

(1) A statement that the electric utility is prohibited from disclosing a customer's account number without the customer's written consent or electronic authorization or without a court or commission order, except for the following purposes:

...

(d) Coordination with a CRES provider to effectuate a seamless move when a customer affirmatively chooses that opportunity when calling the electric utility to transfer service.

O.A.C. 4901:1-10-12 should be amended for consistency with O.A.C. 4901:1-10-24(E)(3).

Although substantially similar, O.A.C. 4901:1-10-24(E)(3) applies only to residential customers and does not limit customer consent to only that which is written. DP&L encourages the Commission to permit the availability of secure, user-friendly options for the customer to authorize the release of energy usage data. Allowing the customer to provide electronic consent for the release will become even more important as utilities move to a more digital interface through distribution modernization. To achieve consistency between the two sections, DP&L recommends the following change to OAC 4901:1-10-12(F)(3):

(3) A statement that the electric utility shall not disclose residential customer energy usage data that is more granular than the monthly historical consumption data, provided on the customer pre-enrollment list pursuant to paragraph (E) of rule 4901:1-10-29 of the Administrative Code, without the customer's written consent or electronic authorization or without a court or commission order.

Similarly, DP&L recommends that the rules are amended to reflect an additional option for cancelling a change to a customer's supplier of electric service. DP&L currently accepts requests to cancel any change in a residential or small commercial customer's supplier via the telephone number *or website* on the notice confirming the change. The availability of this customer-friendly web option should be reflected in the written summary of the customer's rights and obligations. To that end, DP&L recommends the following addition to OAC 4901:1-10-12(I):

(2) A statement that the customer has a right to cancel any change in its supplier of electric service within seven calendar days after the notice has been sent by

calling the electric utility at the telephone number on the notice or cancelling via a link to the electric utility's website on the notice.

While DP&L does not propose any further amendments to O.A.C. 4901:1-10-12 at this time, out of an abundance of caution, DP&L notes that additional changes to the rules may be necessary to accommodate DP&L Grid Modernization Plan as well as any recommendations that ultimately are agreed upon as a result of the Commission's Power Forward Data and Modern Grid Workshop.¹

O.A.C. 4901:1-10-14 – Establishment of Credit for Applicants and Customers

The proposed edits to O.A.C. 4901:1-10-14 appear to intend that the rule only apply to nonresidential customers. Presumably, this is because O.A.C. 4901:1-10-17 establishes the credit requirements for residential customers, but some sections of O.A.C. 4901:1-10-14 still contain references to residential customers; therefore, DP&L proposes the following deletions to O.A.C. 4901:1-10-14:

~~(C)(1) The electric utility verifies that the applicant is a creditworthy property owner or verifies the applicant's creditworthiness in accordance with legally accepted practices to verify credit. Verification methods for residential applicants shall include, but not be limited to, consideration of the applicant's employer and length of service, reference letters, and substantive credit cards;~~

~~(I)(3) Annually review each residential account, for which a deposit is being held, and shall promptly refund the deposit or credit the customer's account, plus interest accrued, if during the preceding twelve months:~~

- ~~—(a) The customer's service was not disconnected for nonpayment, a fraudulent proactive, tampering, or unauthorized reconnection; and~~
- ~~—(b) The customer had not more than two past due bills.~~
- ~~—(c) The customer is not delinquent at the time of review.~~

¹ Per the DWG's charter, one of its specific objectives is to "prescribe a methodology for competitive retail electric service (CRES) providers and other third parties to obtain customer energy usage data, including a method for CRES providers to obtain the total hourly energy obligation, peak load contribution, and network service peak load."

O.A.C. 4901:1-10-18 – Reconnection of Nonresidential Service

DP&L understands the intent of O.A.C. 4901:1-10-18(A) is to establish the utility must reconnect service no later than the close of the following business day unless the customer request the reconnect to occur at a later time. As written, however, the rule could be interpreted to mean that a nonresidential customer is able to request the reconnect to occur at a time prior to close of the following business day. DP&L proposes the following amendment to O.A.C. 4901:1-10-18(A):

- (A) Unless a nonresidential customer requests ~~otherwise the reconnection to occur at a later time in which the utility company regularly performs service reconnections~~, an electric utility shall reconnect service by the close of the following business day after either of the following:

O.A.C. 4901:1-10-19 – Delinquent Residential Bills

As proposed, O.A.C. 4901:1-10-19(D) requires the electric utility to “separate regulated from non-tariffed charges, *including* CRES charges” on the disconnection notice. The customer’s partial payment posting priorities are defined in O.A.C. 4901:1-10-33. The final priority in the order is “other past due and current non-regulated charges, *excluding* CRES charges.” Billed and past due CRES provider charges are required to be paid first in the order which means that any partial payments will always be posted against past due CRES charges before past due electric utility charges. Thus, by separating CRES charges from the total account balance on the notice, DP&L is concerned that customers may be more likely to withhold payment for the CRES balance. By doing so, those customers would be more at risk of disconnection because the partial payment would actually pay down the past due CRES charges before paying down the past due electric utility charges. The customer’s service could be disconnected if the customer inadvertently fails to pay for tariffed charges by making a partial payment intending to pay tariffed charges only but then the payment is posted to non-tariffed charges instead via regulated posting priorities. To

prevent increased disconnections, the Company proposes the following amendment to O.A.C. 4901:1-10-19:

In addition to the requirements of Chapter 4901:1-18 of the Administrative Code, no electric utility may disconnect service to a residential customer when:

...

(D) The electric utility issues a disconnection notice which fails to separate regulated from non-tariffed charges, ~~including~~ excluding CRES charges.

O.A.C. 4901:1-10-20 – Fraudulent Act, Tampering, and Theft of Service

As proposed, amended O.A.C. 4901:1-10-20 (C)(1) requires that a notice for disconnection due to fraudulent act, would have to be mailed to the service location even if an alternative address was provided for billing and correspondence. But EDUs should be able to mail the notice to an alternative mailing address, if provided by the customer. To accommodate this possibility, the Company proposes the following amendments to 4901:1-10-20 (C)(1):

(1) Before it may disconnect service for a fraudulent act, each electric utility shall deliver or send written notice to the customer or consumer ~~at the service location~~.

DP&L requests additional clarification on O.A.C. 4901:1-10-20(C)(3)(a). As it currently exists, O.A.C. 4901:1-10-20(C)(3)(a) requires utilities to determine the date a notice is delivered, which increases costs due to additional mailing and administrative procedures to ensure delivery. To reduce costs and maintain consistency with section O.A.C. 4901:1-18-05(B)(1), the PUCO should create a presumption that notifications sent by regular, U.S. mail are deemed delivered three business days later. To this end, the Company proposes the following amendments to O.A.C. 4901:1-10-20 (C)(3)(a) and O.A.C. 4901:1-10-20 (C)(3)(b):

(a) No sooner than three business days after deliver of the written notice required by this paragraph, if the customer does not contact the electric utility to dispute the Company's findings regarding the fraudulent act at the telephone number provided. Utility companies may send this notice by regular, U.S. mail; however, such notice must allow three calendar days for mailing.

- (b) No sooner than two business days after the customer received the electric utility's written adverse decision subsequent to the discussion between the company and the electric utility representative, in the event that the customer initiated the discussion to dispute the Company's findings regarding the fraudulent act. Utility companies may send this notice by regular, U.S. mail; however, such notice must allow three calendar days for mailing.

In addition to the above, the Company also notes that there appears to be a clerical error/typo in O.A.C. 4901:1-10-20(C). Specifically, the citation should be to "paragraph (R) of rule 4901:1-10-01 of the Administrative Code."

O.A.C. 4901:1-10-22 – Electric Utility Customer Billing and Payments

A. The Commission Should Refrain from Making Changes to Rules that Conflict with or Otherwise Usurp Active PUCO Proceedings.

DP&L objects to limiting bill format from including non-commodity goods or services through the addition of O.A.C. 4901:1-10-22(K).and removal of O.A.C. 4901:1-10-22(B)(16). As part of the Stipulation and Recommendation approved in DP&L's third Electric Security Plan, PUCO Case No. 16-395-EL-SSO, the Commission approved a provision whereby "DP&L shall submit an application to the Commission to establish non-commodity billing and parameters and to establish any terms for cost recovery by DP&L no later than eighteen (18) months after the date a Commission order issues approving this Stipulation with or without modification." (Amended Stipulation at p. 21). Consistent with that approved commitment, on April 19, 2019, DP&L filed an application to implement non-commodity billing. *See*, PUCO Case No. 19-860-EL-UNC. This suggested rule change will have the effect of undermining an active settlement agreement approved by an existing Commission Order and rendering DP&L's recent filing moot. DP&L encourages the Commission not to adopt this change to O.A.C. 4901:1-10-22.

DP&L also objects to the insertion of the "Prepaid service" provisions set forth in O.A.C. 4901:1-10-22(C). As part of its Distribution Modernization Plan, filed in Case No. 18-1875-EL-

GRD, DP&L has proposed a Prepay program that has been fully supported by testimony. *See, In Re The Application of The Dayton Power and Light Company for Approval of its Plan to Modernize its Distribution Grid*, Case No. 18-1875-EL-GRD, Direct Testimony of Thomas D. Tatham (Dec. 21, 2018). Implementing rules based upon assumptions about how prepay services will be structured is premature. These types of issues should be addressed in the individual cases in which they are proposed.

To the extent the Commission adopts some or all of the proposed edits to O.A.C. 4901:1-10-22, the use of “at any time” in O.A.C. 4901:1-10-22(C)(3) is overly broad making compliance unduly burdensome. Instead, the Company proposes an amendment which balances the needs of the Customer with the practical limitations of the utilities:

(3) The customer shall have the ability to request a current balance including usage and payments ~~at any time~~ on the utility’s website or during normal business hours.

B. The Commission Should Address Third-Party Attempts to Circumvent Rules.

It has recently been brought to DP&L’s attention that some customers are enrolling with a third party named Arcadia Power for a consolidated utility bill. The service that Arcadia provides to customers is outside of the utility’s coordination and consolidated billing services regulated by O.A.C. 4901:1-10-29 and O.A.C. 4901:1-10-33. The customer gives Arcadia permission to create an account on the utility’s website, and then Arcadia uses that access to retrieve the utility’s billing information. Arcadia then combines the utility’s charges with its own service charges into a single consolidated bill and pays the utility directly on behalf of the customer.

DP&L is not aware of customer complaints specific to Arcadia Power about its consolidated bill or for any other reason; however, DP&L does have a general concern that customers served by a third party, that is neither a party to a billing services agreement with the

utility nor subject to the consolidated billing requirements in O.A.C. 4901:1-10-33 or O.A.C. 4901:1-21-18, may not be afforded the same protections as other customers who receive a consolidated bill from their utility or CRES provider. For example, there are not any requirements for such a third party to communicate the same billing detail or bill messaging that the utility or CRES must display on the customer's bill.

To address this unique development, DP&L makes a few suggestions. First, to ensure that utilities are not held responsible for the actions of a third-party over which they have no control, DP&L proposes the following modification to O.A.C. 4901:1-10-22(I) (formerly OAC 4901:1-10-22(H)):

(I) Any electric utility wishing to issue billing statements online shall comply with the following requirements:

(4) The electric utility shall maintain a secure and encrypted site that is to be accessed only by the customer of record after completing a secure registration process. If the customer permits a third-party direct access to the site for additional billing and/or payment services, the electric utility shall not be responsible for restricting access to that third-party or for ensuring that the third-party accurately communicates any or all information required of the electric utility under this rule.

Second, DP&L recognizes customer protections are also necessary. Although not a part of these rules, DP&L recommends that such third parties must abide by the same customer protections for EDU and CRES billing services set forth in O.A.C. 4901:1-10-22, O.A.C. 4901:1-10-33, and O.A.C. 4901:1-21-18. Even if certified as a CRES to provide aggregation and/or power broker services in Ohio, it is not clear that a party providing billing services like Arcadia would be subject to the consolidated billing requirements of O.A.C. 4901:1-21-18 or if such a third party should even be required to seek certification as a CRES provider in order to provide such a service.

In addition to the above, the Company also notes that there appears to be a clerical error/typo in O.A.C. 4901:1-10-22(C)(4). Specifically, the citation should be to "4901:1-17-03 of the Administrative Code."

O.A.C. 4901:1-10-24 – Customer Safeguards and Information

To align with the changes proposed earlier to O.A.C. 4901:1-10-12(F) for seamless moves, DP&L also recommends the following similar change to OAC 4901:1-10-24(E):

(1) An electric utility shall not disclose a customer's account number without the customer's consent and proof of that consent as delineated in paragraph (E)(4) of this rule, or a court or commission directive ordering disclosure, except for the following purposes:

...

(d) Coordination with a CRES provider to effectuate a seamless move when a customer affirmatively chooses that opportunity when calling the electric utility to transfer service.

The disclosure of customer specific information is covered by O.A.C. 4901:1-10-24(E). That section lists three types of information (account number, social security number and residential customer energy usage data more granular than monthly) which require the customer's consent before utility disclosure. For account numbers and social security numbers, the rule clearly states that only consent "as delineated in paragraph (E)(4) of this rule" may be accepted. It can be assumed that the same requirements apply to residential customer energy usage data as well; however, that is not clear. For the sake of clarity, DP&L recommends the following addition to O.A.C. 4901:1-10-24(E)(3):

(3) An electric utility shall not disclose residential customer energy usage data that is more granular than the monthly historical consumption data, provided on the customer pre-enrollment list pursuant to paragraph (E) of rule 4901:1-10-29 of the Administrative Code, without the customer's consent as delineated in paragraph (E)(4) of this rule, or a court or commission directive ordering disclosure.

While DP&L does not propose any further amendments at this time, out of an abundance of caution, DP&L notes that additional changes to the rules may be necessary to accommodate DP&L Grid Modernization Plan as well as any recommendations that ultimately are agreed upon as a result of the Commission's Power Forward Data and Modern Grid Workshop.

O.A.C. 4901:1-10-27 – Inspection, Maintenance, Repair, and Replacement of Transmission and Distribution Facilities (Circuits and Equipment)

As proposed, amended O.A.C. 4901:1-10-27(D)(1) now requires that all distribution circuits and equipment, “including above-ground facilities associated with the operation of underground circuits,” shall be inspected at least once every five years. DP&L requests clarification that if the circuit is underground and the pad mount switchgear is inspected under O.A.C. 4901:1-10-27(E)(1)(c) at the same inspection interval but different inspection years, then the equipment does not need duplicate inspections. This will prevent the utilities from having to incur unnecessary inspection costs that do not materially add to reductions in outages or increases in safety.

In addition to the above concerning O.A.C. 4901:1-10-27, the Company also notes that there appears to be a clerical error in Section (D)(4)(c). Specifically, an additional word is needed to provide clarity. The Company proposes Section (D)(4)(c) read:

(c) ~~For each substation~~ A listing of all substations, and the date of each inspection during the year.

O.A.C. 4901:1-10-29 – Coordination with Competitive Retail Electric Service (CRES) Providers

In the Second Entry on Rehearing in Case No. 14-2074-EL-EDI, the Commission upheld its finding that seamless move should be adopted. It also required that each EDU’s operational plan must include a 7-day rescission period for customers when service is transferred to a new address. Currently, the 7-day rescission period is required to be included on a competitively neutral confirmation notice sent to the customer only after confirming a CRES provider’s customer enrollment request. Furthermore, DP&L currently accepts rescissions via its website as an alternative to calling the utility directly. This is a 24/7 customer-friendly option that is offered on

the confirmation letter to the customer along with the telephone number to call. To accommodate the seamless move Entry and to capture the benefits of modern communications with customers through the internet, DP&L recommends the following changes to O.A.C. 4901:1-10-29(F):

(1) Within two business days after confirming the validated electronic data file for a CRES provider's customer enrollment request or receiving affirmative consent from the customer to effectuate a seamless move, the electric utility shall mail or email with an electronic notification of receipt, the customer a competitively neutral confirmation notice stating:

(a) That the electric utility has received a request to enroll the customer for competitive electric service with the named CRES provider.

(b) The date such service is expected to begin.

(c) That residential and small commercial customers have seven days from the postmark date on the notice to contact the electric utility to rescind the enrollment request or notify the electric utility that the change of service provider was not requested by the customer.

(d) The electric utility's toll-free telephone number.

(e) The electric utility's website (if utility permits the customer to rescind via its website)

(2) Such notice shall not be used as an opportunity for the electric utility to convince customers to remain on or return to the electric utility's standard offer service.

(3) Each electric utility shall have a twenty-four hour per day capability for accepting CRES residential and small commercial customer enrollment rescission by telephone.

(4) When a residential or small commercial customer ~~calls~~ contacts the electric utility to rescind enrollment with a CRES provider, the electric utility shall provide the customer a unique cancellation number.

(5) Within two business days after receiving a customer's request to rescind enrollment with a CRES provider, the electric utility shall initiate such rescission and mail or email with an electronic notification of receipt, the customer confirmation that such action has been taken.

With respect to the proposed revision in O.A.C. 4901:1-10-29(I)(4), which replaces "department of development" with "development services agency", the Company notes that similar revisions were not made throughout the rest of the Section where "department of development" was used. For example, O.A.C. 4901:1-10-29(I), (I)(5), and (I)(6) were not modified to include "development services agency."

O.A.C. 4901:1-10-33 – Consolidated Billing Requirements

The recommended edits to O.A.C. 4901:1-10-33 track the same changes that were also proposed in O.A.C. 4901:1-10-22. For those reasons, DP&L adopts the same arguments by reference.

Additionally, the changes proposed to O.A.C. 4901:1-10-22 address the scenario in which customers receive a consolidated utility bill from a third party who has retrieved the billing information directly from DP&L's website using the customer's account. O.A.C. 4901:1-10-22 applies to standard service offer customers only, but similar language should be added to O.A.C. 4901:1-10-33 for consolidated billing customers. DP&L recommends the following changes to O.A.C. 4901:1-10-33(K) (formerly 4901:1-10-33(J)):

(K) Any electric utility wishing to issue consolidated billing statements online shall follow the listed guidelines:

(4) The electric utility shall maintain a secure and encrypted site that is to be accessed only by the customer of record after completing a secure registration process. If the customer permits a third party direct access to the site for additional billing and/or payment services, the electric utility shall not be responsible for restricting access to that third party or for ensuring that the third party accurately communicates any or all information required of the electric utility under this rule.

CONCLUSION:

DP&L appreciates the opportunity to provide comments and urges the Commission to adopt the recommendations set forth above.

Respectfully submitted,

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/16/2019 1:21:31 PM

in

Case No(s). 17-1842-EL-ORD

Summary: Comments electronically filed by Mr. Alan M. O'Meara on behalf of The Dayton Power and Light Company