

**BEFORE THE
OHIO POWER SITING BOARD**

In the Matter of the Letter of Notification of)	
The Dayton Power and Light Company)	
For a Certificate of Environmental Compatibility)	Case No. 21-972-EL-BLN
and Public Need for the West Milton to Airport)	
138 kV Expansion)	

In the Matter of the Letter of Notification of)	
The Dayton Power and Light Company)	
For a Certificate of Environmental Compatibility)	Case No. 21-973-EL-BLN
and Public Need for the Miami to Airport)	
138 kV Expansion)	

**The Dayton Power and Light Company dba AES Ohio
Motion for Leave to File Comments and Comments in Response to Public Comments and
Comments of Board of Monroe Township Trustee, Miami County**

Since November 7, 2021, a large number of public comments have been filed in one or both of these proceedings. Additionally, on December 10, and again on December 17, 2021, the Board of Trustees for Monroe Township (“Monroe Township”) filed a petition/notice of participation (“Petition”) to intervene in these two proceedings.

AES Ohio does not oppose the intervention of Monroe Township in these proceedings. AES Ohio, however, does take issue with several of the statements made in the documents accompanying Monroe Township’s Petition. AES Ohio has actively been communicating with the Monroe Township trustees: meeting in person, communicating via email, and phone discussions. The inaccuracies included in their filing are troubling and not indicative of the positive discussions and interactions up to the point of intervention.

There is also a substantial overlap between these statements of Monroe Township and comments submitted by members of the public.

To clarify the record, AES Ohio hereby submits before the Ohio Power Siting Board (“OPSB” or the “Board”) these Comments in Response to some of the statements made within the Monroe Township’s Petition and in certain Public Comments.

Because these Comments in Response are themselves non-standard in Board proceedings, AES Ohio moves for leave to file. Good cause exists to allow such Comments in Response to clarify the record and correct inaccuracies that have been presented to the Board, thereby facilitating a just and timely decision of the Board.

I. Background and Procedural History.

Load growth in the region around the Dayton Airport, particularly to the north and west of the Airport has been strong for several years as industrial and commercial enterprises recognize the value of a location near the intersection of two interstate highways and the Airport. A load growth projection made by Pioneer Electric Cooperative (“Pioneer”) in and around the Town of Union expects 6 MW of load growth by the end of 2022 from a single new customer moving to the region – Amazon is building a massive 3.1 million square foot fulfillment center on Union Airpark Road. That same load growth projection indicates 22 MW of growth by the end of 2024 compared to current levels from the combination of Amazon and six other developers known to Pioneer.¹ Pioneer obtains power for its customers in the region through AES Ohio lines. It is, in that regard, a “transmission dependent utility” or “TDU.”

For over two years, The Dayton Power and Light Company dba AES Ohio (“AES Ohio”) has been searching for a site north and west of the Airport that could be reached by new transmission lines that would interconnect on one end to the existing West Milton-Miami 138 kV

¹ The load growth projections were submitted as Attachment 2 to a memorandum contra filed on Dec. 20, 2021, in these proceeding by AES Ohio in opposition to motions made by Mr. and Mrs. Ray and Angela Davis.

transmission line and terminate at a distribution voltage substation, internally designated as the “Airport substation.” The Airport substation would step down the voltage from 138 kV to 12 kV and distribute it to areas north and west of the Dayton Airport to meet the growing demands of AES Ohio’s residential, commercial and industrial customers, and to distribute energy to Pioneer, who is similarly experiencing significant load growth in the area.

After two years of discussions with several landowners, a willing seller was finally identified who owned an 82 acre tract on Ginghamburg-Frederick Road. The owner insisted that the entire tract had to be purchased. The price was also the result of hard negotiations. But, there were no other viable options in the area and the site met key requirements. In particular, it was north and west of the Dayton Airport so it was close to where the load growth was occurring and, at the same time, because it was not immediately north of a Dayton Airport runway, it alleviated Federal Aviation Authority concerns about the height of the substation and connecting transmission lines. Additionally, the site was only approximately one mile from the existing transmission line and could be reached via either public road right of way or private easements down Bard Road and Peters Road. The site was purchased on June 17, 2021.

While the growing needs of the area have been recognized by AES Ohio for some time, the specific need to bring new power sources into the area before the end of 2022 was highlighted by Amazon’s announcement in May 2021, of the construction of a fulfillment center in the area to be operational by the end of 2022 and to bring 1500 jobs to the area. One indicator of the scale of this project is that it, by itself, will add 6 MW of load, which would be enough to overload the existing facilities in the area beyond their rated capacity. Overloads mean equipment failure and outages, which would affect not just Amazon but existing customers in the area.

After acquiring the Airport site, AES Ohio began reaching out and communicating with owners of property on or near the route of the planned transmission lines and with government officials of the community. These communications were to discuss the planned construction, the need for the new transmission lines and substation, and, to the extent thought necessary or useful, to negotiate private easements to allow the transmission lines to cross their properties. Out of the 26 parcels of land on which easements were initially sought, AES Ohio has gotten easements, voluntarily executed, from 19. Two geographically separate transmission lines are needed to bring reliable power to the substation and to avoid the inevitable outages that would occur if only one line were built and it was out of service for reasons that could include routine maintenance, or storm damage or other events that can result in a line being down.

On October 28, 2021, in Case No. 21-972-EL-BLN, AES Ohio filed before the Ohio Power Siting Board (“OPSB” or “Board”) a Pre-Application Notification Letter for a 1.0 mile “West Milton – Airport” 138kV transmission line extending from the existing West Milton-Miami 138 kV transmission line south down Bard Road and then east to the Airport substation that is being constructed on Ginghamburg-Frederick Road. On the same day, in Case No. 21-973-EL-BLN, AES Ohio filed a Pre-Application Notification Letter for a 1.2 “Miami – Airport” 138 kV transmission line starting from a different interconnection point on the existing 138 kV transmission line and extending south down Peters Road and then west on Ginghamburg-Frederick Road to the Airport substation. On December 6, 2021, AES Ohio filed Letters of Notification in each of Case Nos. 21-972-EL-BLN and 21-973-EL-BLN before the Board seeking approval and the finding of need and environmental compliance for the two transmission lines.

At some point during this process, the owners of one parcel of land near the planned construction began circulating a form letter opposing the projects and obtaining signatures on

that form letter. The first of these form letters, all dated November 6, 2021, and identical right down to the same typographical error (“statically” when “statistically” was meant), was submitted on December 7, 2021. Since then, approximately 90 of these form letters have been signed and submitted. These constitute almost all of the public comments that have been filed. AES Ohio is working diligently to respond to the public comments and meet individually or discuss with each property owner that has filed a public comment and still has a question about the project.

On December 6, 2021, at a meeting of the Board of Trustees for Monroe Township (“Monroe Township”), a resolution was passed authorizing intervention in the two cases. On December 10, 2021, Monroe Township filed a Petition/Notice of Intervention (“Petition”) in the two LON proceedings, accompanied by a number of attachments relating to the bases and reasons for its Intervention. On December 17, 2021, largely identical documents were filed for the same purpose.² These filings were made without any outreach to AES Ohio despite a collaborative working arrangement up to this point and a standing offer by AES Ohio to the Monroe Township trustees to answer any questions or address any concerns they may have.

On information and belief, the organizational force behind the form letter signature drive is Mr. Ray Davis and his wife, Dr. Angela Davis (Optometrist). They have also submitted two sets of non-form letter public comments.³ They filed through an attorney a petition to intervene and motions to consolidate the two LON proceedings and to remove the cases from the

² It appears that in the process of filing this before the Board through the DIS process, the December 10, 2021, was inadvertently labeled as if it were being filed on behalf of AES Ohio. The December 17, 2021, filing corrects this labeling. References herein these Comments in Response to Monroe Township’s filing will be to December 17, 2021, filing but would apply equally to the December 10, 2021, filing.

³ Comments of Dr. Angela Davis filed August 19, 2021 (dated Aug. 17, 2021); Comments of Mr. Raymond Davis and Dr. Angela Davis filed on Dec. 13, 2021 (dated Dec. 11, 2021);

accelerated review process reserved for short transmission line projects such as these.⁴

According to the attachments to the filing made by Monroe Township and past minutes, Mr.

Davis also appears to have been actively participating in the public session part of Monroe

Township Board meetings to urge Monroe Township to oppose the projects.⁵

II. Comments in Response.

A. AES Ohio Is Making Every Effort to Minimize Disruption to the Public.

AES Ohio recognizes that there have been many more Public Comments filed in these two cases than is typical in LON proceedings that involve, as these do, relatively short transmission lines. AES Ohio further recognizes that a form letter Public Comment is not invalid or dismissible merely because it is a form letter. At the same time, AES Ohio urges the Board to realize that an adroitly organized campaign spurred by one very unhappy landowner can create the appearance of opposition that is wider and deeper than it really is.⁶

Even before the campaign started, AES Ohio had been reaching out to affected landowners. It is continuing those efforts, including with those who have signed the form letter. Those efforts appear to be bearing fruit: AES Ohio has already obtained 19 of the 26 voluntary private easements that it has sought for Peters and Ginghamburg-Frederick roads to support the Miami-Airport line. The number of voluntary grants of easements is an indicator that there is a

⁴ On December 20, 2021, AES Ohio submitted an answer and memorandum contra to this filing of the Davises.

⁵ See, e.g., Case No. 21-972-EL-BLN, Monroe Township Petition, Appendix B and C.

⁶ In this regard, it is also worth noting that the campaign to obtain signatures extended to the point of finding landowners willing to sign the letter who are geographically remote from the proposed lines. There are, for example, at least seven form letters submitted from landowners on who are north of the existing 138 kV transmission line. All construction is from that line heading south. There are also 16 or so signatories from Ginghamburg-Frederick Road to the west of the intersection of that road and Bard Road. The West Milton-Airport line runs south on Bard Road to that intersection and then turns east. There are signatories from Peters Road that are south of any planned constructions and other signatories living on roads that are in the general area but are entirely unrelated to the projects.

significant group of directly-affected members of the community who are willing to allow these projects to move forward to meet the growing and pressing need for additional electric power to the area. It is noteworthy that at least three of these easements, voluntarily granted, are from landowners who also signed the form letter. The concerns expressed in the form letter appear to have been eased at least to some degree for these landowners.

The projects themselves have been designed to minimize disruption in the community. The transmission structures are single poles, not large towers. The conductors that actually carry the electric power are constructed on the street-side of the pole, not towards homes. As per AES Ohio standard practices, any damage done to driveways or other parts of the property will be promptly repaired. While the substation and its design is not before the Board, AES Ohio notes for informational purposes that it is maintaining the tree line on the western side of the property that separates the AES Ohio property from property owned by Mr. and Mrs. Davis. Berms on Ginghamburg-Frederick Road will be built to reduce the visual impact of the substation from that road.

Concerns were voiced in the form letter, other Public Comments, and in the Monroe Township about the potential adverse health effects of electromagnetic fields (“EMF”). EMF has been studied extensively for decades and standards have been developed to determine safe levels. In compliance with the Board’s requirements, AES Ohio provided a detailed EMF study and it showed that:

All calculated electric field values for all cross sections are well below maximum permissible exposure limits of 5kV/m for general public exposure as per Table 4 in IEEE Standard C95.6-2002 for 60Hz AC. Similarly, all calculated magnetic field values for all cross sections across the area of study are well below maximum permissible exposure

limits of 0.904mT (9,040mG) for general public exposure as per Table 2 in IEEE Standard C95.6-2002 for 60Hz AC.⁷

Monroe Township also voiced concerns about impacts of the substation on floodplains and noted the existence of a live stream.⁸ From a purely legal perspective, the siting of the substation is not before the Board and such concerns could not legitimately be part of these cases. More substantively, it is not alleged, nor could it be, that either of the transmission lines that are before the Board is on a flood plain or cross a stream. For informational purposes only, AES Ohio states that the construction of the substation is on a different portion of the site and will not affect a designated floodplain or stream. As Monroe Township is well aware from meetings AES Ohio has had with the Trustees, AES Ohio has completed all environmental studies and obtained all permits required for the work being done on the substation site.

With a substation located at Ginghamburg-Frederick Road east of Bard Road and west of Peters Road, the most economic, shortest routes to the substation with the least environmental impact are down Bard and Peters Roads as identified and discussed in the LONs. The routes are either within the public road right-of-way or along it on private land for which easements are being obtained. No streams, or wetlands are crossed; there are no sites of archeological or historical significance that will be disturbed. Each of the LONs provides several pages of information in full compliance with the requirements of ORC 4906(A)(10).⁹

B. No Viable Alternatives Exist.

The form letter, other public comments, and the Monroe Township Petition all suggest that there are other viable alternatives sites and routes for the planned projects. In this regard,

⁷ Case No. 21-972, LON at 5-7; and EMF Study at LON, Attachment B. Case No. 21-973, LON at 5-7; and EMF Study at LON, Attachment B.

⁸ Monroe Township Petition at 1.

⁹ See LONs at Section “4906-6-05(B)(10) Social and Ecological Impacts”, subparts (a) through (g).

Monroe Township makes the unsupported assertion that AES Ohio failed to exercise due diligence as required in Ohio Revised Code (“ORC”) 4906(A)(4) in “the selection of the proposed locations” and failed to adequately justify under ORC 4906(A)(10) that the proposed facility represents the minimum adverse environmental effects”¹⁰ These assertions are intertwined with the subsequent argument on page 2 of Appendix B that there is a City of Dayton alternative site available for the substation and that the transmission lines should have connected to a substation on that site.

Monroe Township’s focus on the siting of the substation is perplexing because the Trustees have been informed that the substation is not jurisdictional to the OPSB and, therefore, is not part of either of these cases. Because the substation is non-jurisdictional, AES Ohio’s LONs did not address the two-year struggle it had to find any useable site for the substation. For informational purposes only, AES Ohio states that the City of Dayton site was, indeed looked at, but it ultimately was not feasible. In order to get to the site, private easements would have been required and one landowner was a hard “no,” indicating that he was not going to execute an easement across his land. The site is also directly north across Lightner Road from the Dayton Airport and its main north-south runway. An FAA consultant identified several height-related problems for electric facilities placed along the approaches to the runway. Additionally, AES Ohio learned that there was a possibility that the Dayton Airport might execute on long-existing plans to extend that runway to the north, which would have required AES Ohio to move its facilities. The City of Dayton site was, and remains, infeasible. It was not a failure of due diligence to locate the substation on Ginghamburg-Frederick Road as AES Ohio plans.¹¹ AES

¹⁰ Monroe Township Petition, Appendix B, p. 1.

¹¹ The infeasibility of the City of Dayton site was addressed in more detail, along with supporting attachments, in a filing made in these proceedings by AES Ohio on December 20,

Ohio discussed City of Dayton site with the Monroe Township Trustees during an October 18, 2021 meeting and had Monroe Township expressed continuing concerns or required more information, AES would have gladly provided that directly to the township.

Assertions made in Appendix B of the Monroe Township Petition or other Public Comments¹² that the proposed transmission lines should be undergrounded are also flawed. To the extent these assertions were made in connection with the City of Dayton site, they fail because that site is not viable as discussed above. If made in connection with the transmission lines before the Board in these two proceedings, they are made with an inadequate understanding of the level of disruption created by underground transmission lines along a road with existing driveways and mature trees. Undergrounding lower voltage distribution lines in an as-yet undeveloped newly created subdivision is often a terrific idea; but the same cannot be said for undergrounding higher voltage transmission lines in an already developed area with already installed driveways and mature trees whose root systems would be damaged. In that circumstance, the amount of disruption from undergrounding far exceeds what occurs with an overhead pole line.

C. Alarmist Statements in the Form Letter Are Unsubstantiated.

As noted above, the detailed EMF study submitted with the LONs show EMF levels well below the exposure level standards established by IEEE. Allegations are made in the form letter and in other public comments about higher incidences of cancer near transmission lines or higher suicide rates for people living near transmission lines.¹³ These allegations have been circulating

2021, in a memorandum contra filed in opposition to motions made by Mr. and Mrs. Davis. AES Ohio Memorandum Contra at 17-20 (Dec. 20, 2021).

¹² E.g., Public Comments of Dr. Angela Davis, filed August 19, 2021.

¹³ E.g., Comments of Dr. Angela Davis dated Aug. 17, 2021 and filed Aug. 19, 2021.

for decades; have been consistently disproven by statistically valid studies;¹⁴ and the handful of studies that occasionally appear that might show a possible relationship to some health concern have never proven to be replicable. The claims made in the form letters appear to have been derived from similar claims made in an earlier Public Comment filed by Dr. Angela Davis (Optometry). But the source cited by Dr. Davis as support for these concerns is not itself a study. It is instead an article written in 2002 that reviews certain data and concludes that the author hypothesizes a relationship between theoretical concerns and actual results that warrant further study.

If as is hypothesized here several thousand excess cases of ill health occur each year near high-voltage powerlines in the UK, then clearly this would be of serious public health concern.¹⁵

The currently understood science, summarized on the National Institute of Environmental Health Sciences web-site places “power lines” in the category of non-ionizing EMF sources that is “Low to mid-frequency radiation which is generally perceived as harmless due to its lack of potency.”¹⁶ For power lines, EMF standards are in place in U.S. under the IEEE standards. As noted above and in more detail within the LONs, the EMF studies presented by AES Ohio demonstrate EMF levels well below the thresholds established by the IEEE standards.¹⁷

¹⁴ See e.g., <https://www.independent.co.uk/news/study-shows-no-cancer-risk-from-power-lines-a4422931.html> (World’s largest study of childhood cancers (1999) finds no relationship to magnetic fields.)

¹⁵ “Does our electricity distribution system pose a serious risk to public health?,” D. L. Henshaw, Published: Medical Hypotheses (2002), p.48.
https://www.buengerwelle.de/assets/files/henshaw_medical_hypotheses_59_39-51_2002.pdf?cultureKey=

¹⁶ See <https://www.niehs.nih.gov/health/topics/agents/emf/index.cfm>

¹⁷ See LONs at 5-7; and EMF Study within each LON, Attachment B.

Similarly, the claim in the form letter that property values can drop by as much as 75% nearby transmission lines also appears to have as its source the same Public Comments of Dr. Angela Davis, which cite a document that does not really support that claim. The 75% loss was not based on anything that had actually happened, but on the estimate of a real estate appraiser hired by the opponents of a 500 kV transmission line project supported on massive steel towers that was going to pass through undeveloped land in rural Virginia in 2006.¹⁸ Moreover, it was a true outlier. The same article identified studies that showed “the results are mixed, some cases showing a loss in value ranging from 7-15% with appraisers who had experience with valuing such properties, to having no effect” and “researchers James A Chalmers and Frank A Voorvaart published a large study spanning nearly 10 years and over 1,200 properties in which they found that an encumbering HVTL [High Voltage Transmission Line] had only a small negative effect on the sale price of a residential home. In half of their samples they found consistent negative property values mostly limited to less than 10%, with most between 3%-6%.”¹⁹

The projects before the Board represent the lower end of the spectrum of transmission lines, 138 kV lines (not 345 kV or 500 kV) that are sited on single poles (not towers). Any effect on property values is hypothetical, but certainly is far below the cited level in the form letters.

D. AES Ohio Properly Filed Two LONs and the Board Properly Docketed Two Cases.

The Monroe Township Petition, Appendix B labels the filing of two cases as an “improper” splitting of “this one large project”. There was no “splitting” of projects here.

¹⁸ Valuation Guidelines for Properties with Electric Transmission Lines, Kurt C. Kielisch, p. 19. Date of publication unknown.

<http://www.fieldpost.org/StarkEnergy/Studies/Valuation%20Guidelines%20for%20Properties%20with%20Electric%20Transmission%20Lines%201.pdf>

¹⁹ *Id.* at pp. 3 and 13.

Each of the proposed facilities will be interconnected at a different location on an existing 138 kV transmission system and will travel down different streets affecting different landowners. The only point, physically, that they have in common are interconnections with the non-jurisdictional 138kV-12kV Airport substation. Electrically, there is one additional point in common – each and both are absolutely essential to meet the electric power needs of this growing area. Because each is essential to bring additional sources of power to this fast-growing area, AES Ohio has coordinated its filings and its construction schedules are coordinated for the same reasons.

Coordination, however, does not mean, and it has never meant, that there is only one project. Whether due to informal guidance provided by OPSB staff or just consistency by most applicants with past practices, AES Ohio submits that it is common for applicants to file separately and for the Board to docket separately two or more cases even when the projects have some common elements such as the factors supporting need or the necessary coordination of construction schedules.²⁰

Moreover, if this were truly one project, the most efficient way to construct it would have been to design and build a larger single pole line down only one street affecting only one set of landowners and put double-circuit 138 kV conductors on those poles. But that construction

²⁰ See e.g., *In the Matter of the Construction Notice Application of The Dayton Power and Light Company for the West Milton Substation Expansion Project*, Case No. 19-1346-EL-BNR, Staff Report at 1-2 and Conclusion (Dec. 3, 2019), providing accelerated review and recommending automatic approvals of a project filed as a Construction Notice to add transformers at a substation and noting that the purpose and need for the project was “to help facilitate the West Milton-Eldean 138kV transmission line, that is the subject of a current proceeding before the Ohio Power Siting Board, in Case No.18-1259-EL-BTX.” In other words, in a separate docket and via the accelerated processes established in OAC Chapter 4906-6, the Staff recommended, and the Board allowed to make final, an approval of this project even while the need was tied to the closely related transmission line project, which was in the midst of a standard application process that was not final until an order was issued January 2021.

would also mean that the end-users served by the substation that will be distributing power throughout the area would be subject to interruption any time work were to be done on that single pole/double circuit line for maintenance, or to repair a line or pole down from storms, car accidents, or for other work requiring outages on that line. Significantly such a pole line would be approximately 1 mile in length and would still fall below the 2-mile threshold used as the break-point below which accelerated proceedings under a LON are eligible.

The better and more reliable design was followed by AES Ohio, which was to have two separate projects that were geographically separated and thus less susceptible to a single contingency outage event. This will result in better reliability to all customers served through this new distribution substation and improved safety for AES Ohio workers during maintenance and storm restoration work on AES Ohio facilities.

E. AES Ohio Has Acted in the Best Interests of Customers.

As part of its mistaken belief that the City of Dayton site was a viable alternative for the substation and transmission lines and that AES Ohio instead chose to pay more per acre to acquire a site that affects more residents, Monroe Township makes the truly offensive accusation that “It is possible that AES Ohio made a business decision that would put more value on financial gain over the welfare of the community it is being entrusted to serve.” This is untrue with respect to any and all actions taken by AES Ohio with respect to these projects.

AES Ohio has the lowest transmission rates among any of the investor-owned utilities in Ohio and its employees take pride in working for a utility that provides reliable service in a cost-effective way. The forward projections of growth in power demands in the area north and west of the Dayton Airport launched a two-year effort to find a suitable site at a reasonable price. The

site acquired after that arduous search was the result of negotiations with a landowner who knew the value of this site in an area with growing light industrial and warehousing development.

There is no cheaper, available, alternative site for the substation in this area north and west of the Airport and there are no alternative routes to that site for the transmission lines that are cheaper, shorter, or have fewer environmental effects. Further, AES Ohio has made several outreach attempts and has been a good-faith partner with Monroe Township up to this point. AES Ohio has provided information in advance of their meetings and has offered to meet individually with any property owners impacted.

III. Conclusion.

AES Ohio respectfully moves that these Comments in Response be accepted by the Board to assist it in its decision-making process. For the reasons set forth above and in its LONs, AES Ohio also respectfully urges the Board to review these short transmission lines projects and approved them expeditiously so as to allow construction to begin when needed to meet the pressing electric needs of a strongly growing area.

Respectfully submitted,
The Dayton Power and Light Company
dba AES Ohio

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CERTIFICATE OF SERVICE

I hereby certify that I have this day, December 27, 2020, served via e-mail or by first-class mail, a copy of the foregoing on each attorney representing an entity that has filed requesting party status in each or both of these proceedings.

On behalf of

The Dayton Power and Light Company
dba AES Ohio

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Case No(s). 21-0972-EL-BLN, 21-0973-EL-BLN

Summary: Comments The Dayton Power and Light Company dba AES Ohio
Comments in Response to Public Comments and to Petition of the Trustees of
Monroe Township electronically filed by Mr. Randall V. Griffin on behalf of The
Dayton Power and Light Company