

FILE

20



Working For You Today And Tomorrow

RECEIVED-DOCKETING DIV

2005 APR -1 AM 10:48

REGULATORY OPERATIONS

PUCO

March 31, 2005

Ms. Daisy Crockron
Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

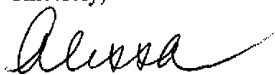
Docket No. 05-1000-EL-UNC


Dear Ms. Crockron:

Enclosed please find an original and 15 copies of the Annual Report of The Dayton Power and Light Company which was fax filed on March 31, 2005 in the above captioned docket. This report is being filed pursuant to 4901:1-10-26, Ohio Administrative Code.

Please call me if you have any questions at (937) 259-7236.

Sincerely,


Alissa Stephens
Regulatory Operations

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician  Date Processed 4-1-05

The Dayton Power and Light Company • P.O. Box 8825 • Dayton, Ohio 45401

**2004 Annual Report
The Dayton Power & Light Company**

Pursuant to Rule 26 of the Electric Service and Safety Standards, Ohio Administrative Code 4901:1-10-26, the Dayton Power & Light Company submits the following Annual Report for the reporting period ending December 31, 2004.

**Section I
(B1)**

(B)(1)(a) Description of Service Territory

The Dayton Power & Light Company serves over 505,000 residential, commercial, industrial and governmental customers in a 6,000 square-mile area of West Central Ohio. The service territory spans 24 counties including the Dayton metropolitan area and the surrounding outlying counties. In geographic terms, the majority of the service area is rural.

DP&L's transmission and distribution system includes 144 substations. The company operates over 470 distribution circuits including approximately 10,950 miles of overhead conductor and 3,250 miles of underground cable. DP&L's transmission system includes 106 circuits operated at 69 kV totaling 967 miles and 37 circuits operated at 138 kV totaling 377 miles. DP&L also operates 434 miles of wholly or jointly owned 345 kV transmission lines.

(B)(1)(b,c) Plan for Future Investment and Safety, Reliability and Service Quality Improvements

The Dayton Power & Light Company's primary planning objective is to provide safe and reliable service to its customers. This is accomplished through a planning process that includes an ongoing analysis of each component and its response to current and projected peak loads. Plans are developed and continually refined based on changing customer needs and the dynamic nature of the distribution system. In addition to capital investments, ongoing maintenance and inspection programs are in place to ensure safety and reliability. A detailed listing of these programs can be found in section (B)(3)(f).

The level of capital investment required may vary considerably from one year to the next depending on the number and scope of projects needed to ensure consistently good reliability at the system and circuit level. Due to the nature of the planning process, detailed project listings are generally most comprehensive for the near future. Differences in total expenditures between the current plan year and subsequent years reflect the decreasing level of detail as the planning horizon increases and are not meant to indicate a reduction in the actual level of investment. Upcoming major Transmission (T) and Distribution (D) investments include the following:

a.	b.	c.	d.	e.	f.	g.	h.	i.
Project/Program	T/D	Description and Goals	Portion of service territory affected	Characteristics of territory affected	Estimated cost	Date of initiation	Expected completion date	Changes to previous year's plan or project
Cable Replacement Program	D	Replace or inject old bare neutral primary cable	Various	Various	Approx. \$1.5 M/year	Ongoing	Ongoing	No change
Overhead Reliability Program	D	Complete pole replacements and other reliability improvements on least-reliable circuits	Various	Various	Approx. \$1.5 M/year	Ongoing	Ongoing	No change
Reliability Action Plan	D	Complete pole replacements and other reliability improvements on least-reliable branch lines	Various	Various	Approx. \$0.5 M/year	Ongoing	Ongoing	No change
Brookville Circuit ME 1203	D	Reconductor circuit for new school	Brookville	Urban	\$200,000	1/05	6/05	N/A
Clarksville - New Substation	D	Develop new substation in the Clarksville area	Clarksville	Rural	\$650,000	4/05	Completed 12/04	Installed Middleboro Sub using Mobile.
Dixie Circuit RL 1203	D	Reconductor backup feed to Kettering Hospital	Kettering	Urban	\$140,000	01/05	08/05	N/A
Fort Recovery Circuit KG 1201	D	Extend three phase - second feed into town	Fort Recovery	Urban/Rural	\$320,000	01/05	06/05	N/A
Hoover Sub	D	Replace 69/12kV transformer	West Dayton	Urban	\$700,000	06/04	03/05	N/A
Overlook Sub	D	Replace 69/12kV transformer	East Dayton	Urban	\$720,000	06/04	03/05	N/A
Loramie Sub	D	Add New 69/12kV transformer	Fort Loramie	Urban/Rural	\$610,000	06/04	06/05	N/A
Northridge Circuit RD 1211	D	Reconductor Section and transfer load	North Dayton	Urban	\$50,000	01/05	06/05	N/A
Normandy - Circuit RN 1204	D	Extend three phase	Kettering/Centerville	Urban	\$220,000	1/05	08/05	N/A
Manning Circuit AG 1204	D	Reconductor and extend three phase	Miamisburg/South Dayton	Urban	\$350,000	01/05	08/05	N/A
Tait AB 1233	D	Reconductor section feeding UD	Dayton	Urban	\$220,000	01/05	08/05	N/A
Phoneton Circuit RF 1209	D	Extend three phase to SR 201	Huber	Urban	\$100,000	01/05	08/05	N/A
Gratis Circuit MG1203	D	Reconductor section	Gratis	Urban/Rural	\$91,000	01/05	06/05	N/A
Jamestown Circuit GH 1201	D	Reconductor section	Jamestown	Urban/Rural	\$39,000	01/05	06/05	N/A
Garage Road Circuit MH 1208	D	Reconductor section	Eaton	Urban/Rural	\$130,000	01/05	09/05	N/A
New Hampshire	D	Build new 33/12kV substation	New Hampshire	Rural	\$250,000	01/05	06/05	N/A
Wilmington Sub	T	69kV Bus Reconfiguration	Wilmington	Urban	\$520,000	06/04	06/05	N/A
Jasper - Cedarville section of circuit 6636	T	Reconductor	Xenia	Urban/Rural	\$500,000	06/04	06/05	N/A
Circuit 6668 Hutchings - Yankee	T	Increase Clearances	South Dayton	Urban/Rural	\$60,000	01/05	06/05	N/A
New Substation	D	New Sub to support "The Greener" development	Beavercreek	Urban	\$2,500,000	01/05	06/06	N/A
Jackson Center	D	Add Second 30 MVA transformer to support major customer	Jackson Center	Rural	1,130,000	01/08	06/08	N/A
Huber Circuit AN 1204	D	Upgrade circuit AN 1204	Huber Heights	Urban	\$350,000	1/06	6/06	N/A
Marysville Sub	D	Extend CB 1204 into Mill Valley	Marysville	Urban	\$80,000	1/06	6/06	N/A
Vandalia Sub - Airport Expansion	D	Provide new feed into Dayton International Airport (Final scope with customer not yet determined) to support projected load growth	Vandalia/Airport	Urban	To be determined	11/04	Delayed by customer	Depends on timing of customer's expansion plans.

a.	b.	c.	d.	e.	f.	g.	h.	i.
Project/Program	T/D	Description and Goals	Portion of service territory affected	Characteristics of territory affected	Estimated cost	Date of initiation	Expected completion date	Changes to previous year's plan or project
Columbus St Substation Upgrade	D	Add second 30 MVA transformer	Wilmington	Urban	\$ 1,300,000	04/07	12/07	N/A
Various switch and breaker replacements	T	Circuit upgrades	Various	NA	Various	Ongoing	Ongoing	No change

(B)(1)(d,e) Quality, Safety and Reliability Complaints from Other Utilities

a.	b.	c.	d.	e.	f.	g.
Complaint(s) from other electric utility companies, regional transmission entity, or competitive retail electric supplier(s)	Date complaint received	Nature of complaint(s)	Action taken to address complaint	Complaint resolved (Yes or no)	Date Resolved	If unresolved, explanation why
None	N/A	N/A	N/A	N/A	N/A	N/A

Section II
B(2)

(B)(2) Results of Previous Annual Report

a.	b.	c.	d.	e.	f.
Identification of previously planned action	Transmission or Distribution ("T" or "D")	Planned completion date	Actual completion date of action	Identification of deviation(s) from goals of previous plan	Reason(s) for each identified deviation
Cable Replacement Program	D	2004 (ongoing program)	2004	None	N/A
Overhead Reliability Program	D	2004 (ongoing program)	2004	None	N/A
Reliability Action Plan	D	2004 (ongoing program)	2004	None	N/A
Benner Circuits Load Transfer	D	5/04	04/16/04	None	N/A
Webb Road - Extend three phase	D	11/04	10/20/04	None	N/A
Hoover Circuit AV 1230	D	6/04	06/04/04	None	N/A
Jackson Center Transformer	D	5/04	05/14/04	None	N/A
Jackson Center Capacitors	D	6/04	10/28/04	Delayed	Delayed in order to complete harmonics study requested by a major customer
Kettering Hospital	D	12/04	12/04	None	N/A
Kingscreek Circuit Extension	D	6/04	7/12/04	None	N/A
Needmore Circuit AW 1211	D	6/04	06/17/04	None	N/A
Normandy Circuit RN 1202	D	12/04	03/05	Delayed	Rescheduled to 2005
Phoneton Circuit RF 1209	D	12/04	12/04	None	N/A
Wilmington	D	12/04	---	Delayed	Major Customer Load Growth delayed.
Various switch and breaker replacements	T	2004 (Ongoing)	Various	None	N/A
Benner-Dayton Mall 69kV circuit	T	4/04	03/25/04	None	N/A
Tait - Overlook 69kV circuit	T	6/04	06/12/04	None	N/A
Crown Sub	T	06/04	06/04	None	N/A
Tait - Northlawn/Dixie 69kV circuit	T	6/04	05/27/04	None	N/A
Greenville - Treaty 69kV circuit	T	6/04	05/18/04	None	N/A
Greene - Trebein 138kV circuit	T	6/04	05/05	Delayed	Rescheduled to spring when loading is favorable for required equipment outages

Section III
B(3)

(B)(3) Condition of Transmission and Distribution Facilities

Transmission

(a,b) Qualitative Characterization of Condition of System & Explanation of Criteria Used in Making Assessment for Each Characterization

The System Operating and Transmission Planning functions work in concert to ensure that DP&L's transmission system is robust. While the transmission planning function initiates any needed upgrades to ensure that DP&L's transmission has the capacity to meet projected loading, System Operating monitors the condition of the transmission system on a daily basis. Any findings that may impact safety or reliability are immediately addressed.

System reliability performance is a good indicator of the physical condition of the system and industry standard measures show that system performance is consistently reliable.

Distribution

(a,b) Qualitative Characterization of Condition of System & Explanation of Criteria Used in Making Assessment for Each Characterization

The performance of the electric system over a period of several years is reflective of its physical condition. Consistently safe and reliable service can only be achieved through a well-maintained distribution system.

System level reliability performance is tracked on a monthly basis and reported annually as required by O.A.C. 4901:1-10-10. A review of Dayton Power & Light's historical reliability performance clearly shows the distribution system to be in excellent condition.

(B)(3)(b) Customer Safety and Reliability Complaints

DP&L received complaints in the following categories:

Out of Service	18
Damage	1
Quality of Utility Product	3

(B)(3)(c) Transmission Construction and Maintenance

Total Transmission Plant - \$366,307,628

Construction - \$2,902,565 Ratio .0792%

Maintenance - \$1,923,498 Ratio .0525%

(B)(3)(d) Distribution Construction and Maintenance

Total Distribution Plant - \$947,668,592

Construction \$41,412,608 Ratio 4.369%

Maintenance \$19,842,072 Ratio 2.093%

(B)(3)(e) Average Remaining Depreciation Life of Distribution and Transmission Facilities

The schedule provided in Attachment A shows the details of the calculation of the depreciation rates as filed in the company's electric rate case no. 91-914-EL-AIR. These depreciation rates, stipulated by that rate case, are still in use. The rates were calculated by means of a depreciation study performed by Management Resources International, Inc (MRI).

MRI's approach was consistent with generally accepted approaches employed to develop appropriate depreciation rates. In addition to reviewing and analyzing historical accounting records, MRI used engineering judgment in assessing the probability of historical experience being representative of expected future experience.

For transmission and distribution property, Dayton Power & Light and MRI have evaluated the impact over time of the likelihood of any significant change in the estimated remaining lives of this property. In summary, the expected life essentially remains the same since there are many additions and interim retirements which equalize the average life of the property.

(B)(3)(f)(i-ii) Inspection, Maintenance, Repair and Replacement of Distribution, Transmission and Substation Programs

Summary Report for Transmission (T), Distribution (D) and Distribution Substations (DS)

a.	b.	c.	d.	e.
T/D/DS	Program Name	Program Goals	Achieved (yes or no)	Summary of Findings
T	345 kV Aerial Patrol	Inspect transmission system for safety and reliability	yes	All inspections completed on schedule
T	138 kV Aerial Patrol	Inspect transmission system for safety and reliability	yes	All inspections completed on schedule
T	69 kV Aerial Patrol	Inspect transmission system for safety and reliability	yes	All inspections completed on schedule
T	Thermographic Inspection of Transmission Lines	Complete thermographic inspections where needed	N/A	No inspections scheduled for 2004
T	Transmission Line Clearance	Trim trees where needed	yes	All goals met
T	Herbicide Application	Spray to prevent growth & regrowth	yes	Spray program completed
T	Visual Inspection of Transmission Lines/Right-Of-Way	Inspect transmission system in metro area "No Fly Zone" for safety and reliability	yes	All inspections completed on schedule
T/DS	External Visual Inspection of Substation Transformers	Visually inspect all substation transformers each month	No	Completed 63% of scheduled inspections

a.	b.	c.	d.	e.
T/D/DS	Program Name	Program Goals	Achieved (yes or no)	Summary of Findings
T/DS	Thermographic Imaging of Substation Transformers	Complete infrared inspection of each substation transformer annually	yes	Inspections completed as scheduled
T/DS	Substation Transformers Dielectric Oil Breakdown Test	Test transformers on a 5-year cycle	yes	Program goals met
T/DS	Substation Transformer LTC Maintenance	Test transformers on a 4-year cycle	yes	Maintenance completed as scheduled
T/DS	Substation Transformer Doble Test	Test all transformers on a 5-year maintenance frequency	yes	Program goals met
T/DS	Operational Testing of Circuit Breakers	Conduct an operational test for breakers that are not otherwise operated during the calendar year	no	All testing was completed in early 2005
T/DS	Visual Inspection of Circuit Breakers	Visually inspect each breaker monthly	no	Completed 69% of scheduled inspections
T/DS	Circuit Breaker Preventive Maintenance	Scope and timing varies based on breaker type and vintage	yes	Maintenance completed as planned
T	345 kV Relay Calibration	Calibrate relays on a 6-year schedule	yes	Calibrations completed as planned
T	138 kV Relay Calibration	Calibrate relays on an 8-year schedule	no	All scheduled calibrations completed by February 2005
T/DS	<138kV Relay Calibration	Calibrate relays on a 10-year schedule	no	All scheduled calibrations completed by February 2005
T/DS	Thermographic Inspection of Substation Switches	Inspect all switches annually	yes	Inspections were completed as scheduled
D	Visual Inspection of Airbreak Switches	Maintain reliability by ensuring that all switches are in good working order when needed for planned or emergency switching	yes	All inspections completed as planned
D	Preventive Maintenance of Airbreak Switches	Maintain reliability by ensuring that all switches are in good working order when needed for planned or emergency switching	yes	Continued switch replacement program (replace older switches with new unitized switches)
D	Capacitor Inspections (Fixed Banks)	Ensure that capacitor banks are operational in order to provide voltage support when needed	no	99.5% of scheduled inspections were completed
D	Capacitor Inspections (Switched Banks)	Ensure that capacitor banks are operational in order to provide voltage support when needed	yes	Inspections completed as planned
D	Recloser Inspections	Inspect each device annually to ensure reliable operation	No	Some inspections delayed until January 2005 due to the December ice storm
D	Voltage Regulator Inspections	Inspect each device twice per year to ensure reliable operation	No	Some inspections delayed until January 2005 due to the December ice storm
D	Underground Device Inspections	Visually inspect devices on a 5-year cycle to ensure safety and reliability	yes	Inspections completed as planned
D	Monitor Circuit Reliability Performance	Per O.A.C. 4901:1-10-11, the least-reliable distribution circuits are reported. Circuits are evaluated and corrective action taken when appropriate.	yes	Circuits were reviewed and reported as required
D	Monitor Branch Line Reliability Performance	Least-reliable branch lines are evaluated monthly and corrective action completed if necessary	yes	All work completed as planned
D	Distribution Circuit Patrol	Visually inspect distribution circuits on a 5-year cycle to ensure safe and reliable operation	yes	Inspections completed as planned
D	Distribution Line Clearance Inspection	Evaluate circuit line clearance needs and schedule trimming where needed	yes	Program goals were met
D	Distribution Line Clearance	Complete trimming where needed	no	Priority circuits were completed

(B)(3)(f)(i) If response in column "d" of Report 9 is "yes", the following info needs to be provided:

1.	2.	3.	4.	5.
Program Name	Explanation of How Goals Were Achieved	Extent of Achievement	Quantitative Description of Goal	Quantitative Description of Actual Performance
345 kV Aerial Patrol	Inspect 14 circuits quarterly	All program goals were met	Inspect 14 circuits, 4 times per year	100% Complete
138 kV Aerial Patrol	Inspect 37 circuits quarterly	All program goals were met	Inspect 37 circuits, 4 times per year	100% Complete

1.	2.	3.	4.	5.
Program Name	Explanation of How Goals Were Achieved	Extent of Achievement	Quantitative Description of Goal	Quantitative Description of Actual Performance
69 kV Aerial Patrol	Inspect 82 circuits annually	All program goals were met	Inspect 82 circuits, annually	100% Complete
Thermographic Inspection of Transmission Lines	N/A	N/A	No inspections scheduled for 2004	N/A
Transmission Line Clearance	Spot trim were needed	All program goals were met	Spot trim in all needed areas	Spot trimming completed in 976 locations
Herbicide Application	Follow-up after circuit trim plus herbicide applications were made in applicable areas for safety and reliability	All program goals were met	Follow-up spray on 23 miles of 345kV system and 94 areas on balance of transmission system	165 Areas received herbicide application
Visual Inspection of Transmission Lines/Right-Of-Way	Inspect all circuits in Metro (No Fly) Zone, 24circuits	All program goals were met	3 times per year inspect 24 circuits	100% Complete
Thermographic Imaging of Substation Transformers	Infrared substation transforms as scheduled	All program goals were met	Infrared 304 transformers per year	100% Complete
Substation Transformers Dielectric Oil Breakdown Test	Perform oil tests during planned Doble tests	Program goals were met	Test oil on 65 transformers	Completed 86 oil breakdown tests (132% of goal)
Substation Transformer LTC Maintenance	Completed LTC maintenance for scheduled units	All program goals were met	Perform maintenance on 62 LTC's	100% Complete
Substation Transformer Doble Test	Perform power factor (Doble) tests on scheduled transformers	Program goals were met	Doble test 65 transformers	Completed 86 Doble tests (132% of goal)
Circuit Breaker Preventive Maintenance	Completed maintenance on scheduled units	Program goals were met	Perform maintenance on 223 breakers	Performed maintenance on 240 breakers (108% of target)
345 kV Relay Calibration	Test calibration for scheduled relays	All program goals were met	182 relays scheduled	100% Complete
Thermographic Inspection of Substation Switches	Completed thermographic inspections for switches as scheduled	All program goals were met	Infrared 2,244 switches per year	100% Complete
Visual Inspection of Airbreak Switches	Visual inspections completed as planned.	All program goals were met	Inspect approximately 1,316 switches	100% Complete
Preventive Maintenance of Airbreak Switches	Replaced old switched with new, unitized switches	Continued focus on new switch installations	Replace 74 switches	100% Complete
Capacitor Inspections (Switched Banks)	Perform visual and operational testing twice per year	All program goals were met	Inspect 604 capacitors twice per year	100% Complete
Underground Device Inspections	All inspections completed as planned	All program goals were met	Inspect all underground devices on each of 317 map grids	100% Complete
Monitor Circuit Reliability Performance	The least-reliable circuits were evaluated and action plans developed as appropriate	All program goals were met	N/A	36 circuits analyzed and reported
Monitor Branch Line Reliability Performance	The least-reliable branch lines were evaluated and action plans developed as appropriate	All program goals were met	N/A	Action plans were developed for 12 branch lines
Distribution Circuit Patrol	Visual inspections completed as planned	All program goals were met	Inspect 85 circuit mainlines	100% Complete
Distribution Line Clearance Inspection	Visual inspection results, circuit outage history and other data sources are evaluated to determine line clearance requirements	All program goals were met	Evaluate 85 circuits	100% Complete

(B)(3)(f)(i) If response in column "d" of Report 9 is "no", the following info needs to be provided:

1.	2.	3.	4.	5.
Program Name	Cause(s) for Not Achieving Goal(s)	Description of Level of Completion of Goal	Quantitative Description of Goal	Quantitative Description of Level of Completion
Operational Testing of Circuit Breakers	Testing was delayed until early 2005	All required testing was completed by February 2005	The number of breakers subject to verification in the annual operational breaker test is 662. 109 breakers required testing	No breakers were tested in 2004. 109 breakers (100%) were tested in early 2005
External Visual Inspection of	Part of monthly substation	Completed 63% of	Inspect 304 transformers per	Completed 2,360 of

Substation Transformers	inspections and not all monthly inspections were completed	scheduled inspections	month	3,648 scheduled inspections
Visual Inspection of Circuit Breakers	Part of monthly substation inspections and not all monthly inspections were completed	Completed 69% of scheduled inspections	Inspect 1,271 breakers each month	Completed 10,565 out of 15,252 scheduled inspections
138 kV Relay Calibration	Backlog was being tracked separately by previous Relay Engineer who retired during 2004. New Relay Engineer found this backlog towards the end of the year and all calibrations were completed by February 2005.	All inspections complete by February 2005	1,664 relays scheduled	Calibrated 263 relays (16%) in 2004 and the balance were completed by February 2005
<138kV Relay Calibration	Backlog was being tracked separately by previous Relay Engineer who retired during 2004. New Relay Engineer found this backlog towards the end of the year and all calibrations were completed by February 2005.	All inspections complete by February 2005	161 relays scheduled	Calibrated 85 relays (55%) in 2004 and the balance were completed by February 2005
Capacitor Inspections (Fixed Banks)	A small number of cap banks were overlooked during the spring inspection	99.5% of inspections completed on schedule	Inspect approximately 539 capacitor banks twice per year	Completed 1,073 out of 1,078 required inspections (99.5%)
Recloser Inspections	Some inspections were delayed until January 2005 due to the December ice storm	Most inspections were completed in 2004 and the balance were completed in January 2005	Inspect approximately 573 reclosers annually	80.5 % completed in 2004 and the remaining 19.5% were completed in January 2005
Voltage Regulator Inspections	Some inspections were delayed until January 2005 due to the December ice storm	Most inspections were completed in 2004 and the balance were completed in January 2005	Inspect approximately 466 regulators twice per year	90.4 % completed in 2004 and the remaining 9.6% were completed in January 2005
Distribution Line Clearance	Line clearance crews sent to Florida for hurricane mutual aid. Re-prioritized schedule to address poor performing circuits.	62% of scheduled circuits were completed and additional unscheduled circuits were trimmed in 2004	37 circuits scheduled in 2004	23 scheduled circuits and 6 unplanned circuits were completed in 2004. 10 circuits were rescheduled to 2005 and 4 circuits are being re-evaluated.

(B)(3)(f)(iii) - Remedial Activity

1. Program Name	2. T/D	3. Program Finding(s) Causing Remedial Activity	4. Remedial Activity Performed	5. Actual Completion Date	6. Remedial Activity Yet to be Performed	7. Estimated Completion Date
Transmission Line Inspections (aerial and foot patrols)	T	The following maintenance items were identified during inspections: Critical: 16 items (completed immediately) Medium priority: 95 items Minor : 286 items	Completed 16 critical repairs, 60 medium priority repairs and 59 minor repairs	Jan-Dec 2004	Pending work includes 35 medium priority items and 227 minor items (i.e. loose ground, chipped insulator, etc.)	Sept 2005 (medium priority items). Minor items to be completed as schedules permit.
External Visual Inspection of Substation Transformers	T/DS	Examples of significant findings requiring remedial activity include major oil leak, bushing problems, high or low oil level in main tank or LTC, high winding temperature and sudden pressure relay.	Repairs such as those described in item 3 are prioritized and scheduled based on loading. 20 problems were identified and 17 were scheduled and fixed.	Jan-Dec 2004	3 problems will be scheduled and fixed.	6/30/2005

1. Program Name	2. T/D	3. Program Finding(s) Causing Remedial Activity	4. Remedial Activity Performed	5. Actual Completion Date	6. Remedial Activity Yet to be Performed	7. Estimated Completion Date
Thermo graphic Imaging of Substation Transformers	T/DS	3 problems were identified	Did a second thermo graphic picture of problems identified. 2 of the transformers required additional work. These transformers were taken out of service and connectors were cleaned and returned to service.	Jan-Dec 2004	N/A	N/A
Substation Transformers Dielectric Oil Breakdown Test	T/DS	Significant finding requiring remedial activity is a failed oil test. No problems found.	Transformer remains out of service, until the oil is processed or replaced and the follow-up oil test is good.	N/A	N/A	N/A
Substation Transformer LTC Maintenance	T/DS	Examples of significant findings requiring remedial activity include bad or worn contacts.	Contacts are cleaned or replaced before the transformer is returned to service.	Jan -Dec 2004	None	N/A
Substation Transformer Doble Test	T/DS	Examples of significant findings requiring remedial activity include deteriorated bushings, bad lightning arrestors, or deteriorated winding insulation. Found elevated bushing power factor readings on three transformers	Items like bushings and lightning arrestors are replaced before returning to service. If there is problem with winding, transformer remains out of service until repaired or replaced. Replaced bushings on three transformers before returning to service.	Jan -Dec 2004	None	N/A
Operational Testing of Circuit Breakers	T/DS	5 problems were found during breaker testing	4 of the identified problems were repaired.	Feb-March 2005	One repair is scheduled for late March (per customer request)	March 2005
Visual Inspection of Circuit Breakers	T/DS	Examples of significant findings requiring remedial activity include low gas, low oil and compressor motor problems.	Repairs such as those described in item 3 are prioritized and scheduled based on loading. 10 problems were identified and 9 were scheduled and fixed.	Jan-Dec 2004	1 problem will be scheduled and fixed.	6/30/2005
Circuit Breaker Preventive Maintenance	T/DS	Findings requiring remedial action include items such as dirty contacts and lubrication of operating mechanism.	Any needed repairs were completed at the time of scheduled maintenance, before returning the device to service	Jan-Dec 2004	None	N/A
345 kV Relay Calibration	T	Found one relays requiring repair or replacement	Repaired one relay	N/A	N/A	N/A
138 kV and 69 kV Relay Calibration	T	Found 67 relays requiring repair or replacement	Replaced or repaired 53 relays	Jan 04-Mar 05	14 relays will be repaired / replaced.	12/31/2005
<12kV and 4kV Relay Calibration	T/DS	Found 3 relays requiring repair or replacement	None	None	3 relays will be repaired / replaced.	8/31/2005
Thermo graphic Inspection of Substation Switches	T/DS	13 problems were identified.	Performed a second thermo graphic picture of problems identified. 4 of the switches required additional work. One switch was taken out of service and connectors were cleaned and returned to service.	Jan-Dec 2004	3 switches will be taken out of service to clean the connectors.	06/30/2005
Visual Inspection of Airbreak Switches	D	None	N/A	N/A	N/A	N/A
Preventive Maintenance of Airbreak Switches	D	None	N/A	N/A	N/A	N/A
Capacitor Inspections (Fixed and Switched Banks)	D	Repairs required on 240 units	Completed required repairs on 119 units	Jan-Dec 2004	Repairs pending on 121 units	July 2005

1.	2.	3.	4.	5.	6.	7.
Program Name	T/D	Program Finding(s) Causing Remedial Activity	Remedial Activity Performed	Actual Completion Date	Remedial Activity Yet to be Performed	Estimated Completion Date
Recloser Inspections	D	Repairs required on 2 units	Repairs were completed at the time of the inspection	Completed during inspection	None	N/A
Voltage Regulator Inspections	D	Repairs required on 5 units	Completed required repairs on 1 unit	12/23/04	Repairs pending on 4 units	July 2005
Underground Device Inspections	D	284 repair items identified	Completed 262 repair items	Jan-Dec 2004	22 repair items pending	July 2005
Monitor Circuit Reliability Performance	D	Examples of remedial action items include pole replacements, replacement or repair of damaged equipment and lightning protection upgrades.	Work completed includes 631 pole replacements and the completion of 107 repair items (i.e. replace or add arrester, etc.).	Jan-Dec 2004	None	N/A
Monitor Branch Line Reliability Performance	D	Examples of remedial action items include pole replacements, replacement or repair of damaged equipment.	Work completed includes 107 pole replacements and the completion of 111 repair items (i.e. replace or add arrester, etc.).	Jan-Dec 2004	None	N/A
Distribution Circuit Patrol	D	25 repair items identified	11 repair items completed	Various	14 repair items pending	July 2005

2005 Goals

a.	b.	c.
T/D/DS	Program Name	2005 Goal
T	345 kV Aerial Patrol	Inspect 14 circuits, 4 times per year
T	138 kV Aerial Patrol	Inspect 37 circuits, 4 times per year
T	69 kV Aerial Patrol	Inspect 82 circuits, annually
T	Thermographic Inspection of Transmission Lines	Perform thermographic inspections where needed
T	Transmission Line Clearance	Trim trees where needed
T	Herbicide Application	Apply herbicide as needed
T	Visual Inspection of Transmission Lines/Right-Of-Way	Inspect 24 circuits
T/DS	External Visual Inspection of Substation Transformers	Inspect 3,612 Substation Transformers
T/DS	Thermographic Imaging of Substation Transformers	301 Substation Transformers
T/DS	Substation Transformers Dielectric Oil Breakdown Test	Perform 49 transformer oil dielectric breakdown tests.
T/DS	Substation Transformer LTC Maintenance	Complete maintenance on 57 LTC's
T/DS	Substation Transformer Doble Test	Perform Doble power factor tests on 49 substation transformers.
T/DS	Operational Testing of Circuit Breakers	Conduct an operational test for breakers that are not otherwise operated during the calendar year
T/DS	Visual Inspection of Circuit Breakers	Inspect 15,492 Circuit Breakers
T/DS	Circuit Breaker Preventive Maintenance	Complete maintenance on 258 circuit breakers
T	345 kV Relay Calibration	182 relays scheduled
T	138kV, 69 kV, 33 kV Relay Calibration	275 relays scheduled
T/DS	12kV, 4 kV Relay Calibration	292 relays scheduled
T/DS	Thermographic Inspection of Substation Switches	2,244 Substation Switches
D	Visual Inspection of Airbreak Switches	Inspect 1,316 switches
D	Preventive Maintenance of Airbreak Switches	Continue planned replacement of non-unitized switches

a.	b.	c.
T/D/DS	Program Name	2005 Goal
D	Capacitor Inspections (Fixed Banks)	Complete 1,080 inspections (540 twice per year)
D	Capacitor Inspections (Switched Banks)	Complete 1,208 inspections (604 twice per year)
D	Recloser Inspections	Inspect 46 three phase line reclosers and 527 single phase line reclosers.
D	Voltage Regulator Inspections	468 regulators will be inspected
D	Underground Device Inspections	Inspect URD devices on 316 map grids
D	Monitor Circuit Reliability Performance	Evaluate least-reliable circuits and initiate remedial action where needed
D	Monitor Branch Line Reliability Performance	Evaluate least-reliable branch lines and initiate remedial action where needed
D	Distribution Circuit Patrol	Inspect 91 circuits
D	Distribution Line Clearance Inspection	Evaluate 91 circuits
D	Distribution Line Clearance	Complete trimming where needed

(B)(3)(f)(iv) Plans and Programs to Prevent Overloading or Excessive Loading of Equipment and Facilities

Load forecasting and planning are critical to the successful operation of any electric utility. Transmission and distribution planners work year-round to ensure that facilities are adequate to meet actual and projected demand. A brief description of each function is included below.

a.	b.	c.
T/D	Program or plan name	Program Description
T	Transmission Planning	<p>DP&L performs an evaluation of its transmission system on an annual basis and in response to significant proposed changes to the system, such as the installation of a generating plant or a large change in customer load at a given location.</p> <p>DP&L bases its transmission system evaluations on a recent power flow model developed by ECAR on behalf of its members. A detailed model of the DP&L transmission system is then inserted in order to include all 69 kV and 138 kV facilities. Changes may be made to the generation dispatch in order to evaluate the most stressful conditions on the system.</p> <p>The evaluations typically consist of comprehensive contingency analyses including outages of single segment transmission lines, multiple-terminal transmission lines, transformers, generating units, and double circuits. The results of these studies are checked for thermal overloading and excessive voltage drop according to NERC/ECAR guidelines.</p>
D	Distribution Planning	The distribution planning process includes an ongoing analysis of each component and its response to current and projected peak loads. Short and long-range plans are developed and continually refined based on changing customer needs and the dynamic nature of the distribution system.

(B)(3)(f)(v) Actions to Remedy Overloading or Excessive Loading of Equipment and Facilities

a.	b.	c.	d.	e.	f.	g.
Transmission or Distribution ("T" or "D")	Circuit ID #	Date Overloading Identified	Plan(s) to Remedy Overloading	Estimated Completion Date	Action(s) Already Taken to Remedy Overloading	Actual Completion Date
T	None	N/A	N/A	N/A	N/A	N/A
D	BA1203	August 2004	Additional load may be transferred to BA1202 if needed	N/A	Transferred load to circuit BA1202	August 2004

(B)(3)(g)(i) Programs Deleted

a.	b.	c.
Transmission "T", Distribution "D", Transmission Substation "TS", or Distribution Substation "DS"	Deleted Program Name	Explanation for Elimination of Program
N/A	None	N/A

(B)(3)(g)(ii) Programs Modified

a.	b.	c.	d.
Transmission "T", Distribution "D", Transmission Substation "TS", or Distribution Substation "DS"	Modified Program Name	Explanation of Modification(s) to Program	Anticipated Effects on Program as Result of Modification(s)
D	Voltage Regulator Inspections	Two separate inspections will be combined into a comprehensive annual inspection that includes a control check, a visual check of the physical condition and indicator readings. This program modification will be implemented in 2005.	This change will improve the efficiency of the program.

(B)(3)(g)(iii) Programs Added

a.	b.	c.	d.
Transmission "T", Distribution "D", Transmission Substation "TS", or Distribution Substation "DS"	Added Program Name	Explanation of Additional Program's Purpose	Expected Goals for Additional Program
None	N/A	N/A	N/A

(B)(4) Planned and Unplanned Interruptions of Service

	a.	b.	c.	d.
Type of System	# of Planned Interruptions (Sustained)	Duration of Planned Interruptions (in minutes)	# of Unplanned Interruptions (Sustained)	Duration of Unplanned Interruptions (in minutes)
Transmission	3	13,192 (CMI)	14	1,880,692 (CMI)
Distribution	207	318,525 (CMI)	12,645	83,109,855 (CMI)

Voltage Measurements

Transmission and distribution bus voltages are monitored and recorded hourly. A sample voltage log is provided in Attachment B.

(B)(5) Customer Service Interruptions due to Outside Parties

a.	b.	c.	d.	e.	f.	g.
Date of Interruption	Time of Interruption	Type of Entity Causing Interruption (another electric utility, regional transmission entity, and/or a competitive retail electric supplier)	Name of Entity Causing Interruption	Identify Whether Impact was on Transmission or Distribution System ("T" or "D")	Reference ID of Circuit(s) Interrupted	Cause(s) of Interruption of Service
None	N/A	N/A	N/A	N/A	N/A	N/A

10-26 (B) Name and position of either the chief executive officer or other senior officer responsible for the service quality, safety, and reliability of the electric utility's transmission and/or distribution service

Patricia K. Swanke
Vice President of Service Operations

DAYTON POWER & LIGHT COMPANY

SCHEDULE OF DEPRECIATION ACCRUAL RATES AT DECEMBER 31, 1989

PLANT ACCOUNT	PLANT BALANCE 312/31/89	DISPERSTION TYPE	AVERAGE DOLLARS SERVICE LIFE	ANNUAL ACCRUAL RATE WITHOUT NET SALVAGE	ANNUAL ACCRUAL RATE WITH NET SALVAGE	ANNUAL ACCRUAL RATE WITH NET SALVAGE
NUMBER	(1)	(2)	(3)	(4)	(5)	(6)
DESCRIPTION						
TRANSMISSION PLANT						
352.10 STRUCTURES AND IMPROVEMENTS	4,238,034	R 3.0	56.0	2.00	84,761	1.10
352.90 STRUCTURES AND IMPROVEMENTS	30,834	R 3.0	56.0	2.00	1,219	1.10
353.10 STATION EQUIPMENT-NORMAL	66,575,308	R 2.0	50.0	2.00	1,331,506	1.05
353.90 STATION EQUIPMENT-NORMAL	7,840,437	R 2.0	11.0	9.09	694,518	1.00
354.10 STATION EQUIPMENT-AISAFDC	358,388	R 4.0	50.0	2.00	11,167	1.05
354.90 TOWERS AND FIXTURES	10,582,781	R 4.0	49.6	2.02	213,771	1.15
354.90 TOWERS AND FIXTURES-AISAFDC	22,272,153	R 4.0	49.6	2.02	449,003	1.15
354.90 POLES & FIXTURES	22,850,601	R 2.5	46.7	2.14	489,003	1.20
354.90 POLES & FIXTURES-AISAFDC	90,298	R 2.5	46.7	2.14	1,932	1.20
356.10 OH CONDUCTORS AND DEVS	27,981,636	R 2.5	48.2	2.07	579,220	1.03
356.90 OH CONDUCTORS AND DEVS-AISAF	123,943	R 2.5	48.2	2.07	2,566	1.03
357.00 UG CONDUIT	434,290	R 4.0	60.0	1.67	7,353	1.00
358.00 UG CONDUCTORS & DEVS	801,170	R 4.0	45.0	2.22	17,786	0.90
359.00 ROADS AND TRAILS	9,439	SQ	80.0	1.25	118	1.00
TOTAL DEPREC TRANS PLANT	142,229,264		41.3	2.42	3,460,317	1.06
						2.58

Attachment A
Depreciation Study

ANNUAL ACCUMULATED WITH NET SALVAGE	THEORETICAL RESERVE WITHOUT NET SALVAGE	THEORETICAL RESERVE WITH NET SALVAGE	ALLOCATED BOOK RESERVE a 12/31/89	INDICATED RESERVE VARIANCE	AVERAGE DOLLAR REMAINING LIFE	AMORT. OF INDICATED RESERVE VARIANCE	ANNUAL ACCUMULATED WITH AMORTIZATION	ANNUAL ACCUMULATED WITH AMORTIZATION
(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
117,550	2,138,080	2,362,888	2,184,307	178,581	24.9	7,172	124,722	2.59
1,259,236	15,713,181	20,780,940	19,136,418	1,564,522	33.6	46,563	1,305,799	2.18
2,053,536	17,087,104	23,879,946	22,075,163	1,804,783	31.1	67,849	1,033,506	9.88
1,226,536	15,086,924	17,257,983	15,953,652	1,304,331	25.9	50,359	2,163,905	3.80
1,812,746	1,786,607	1,846,437	1,743,865	142,572	31.8	4,483	1,777,215	3.00
1,434,019	11,439,503	13,178,428	12,182,438	995,990	28.8	34,583	85,779	2.02
2,433,988	31,839,877	31,838,877	29,433,584	2,406,293	30.9	77,876	1,468,602	3.09
763,337	8,410,773	12,614,163	11,662,666	951,497	16.5	57,788	2,513,664	2.34
937,331	5,739,656	7,162,070	6,620,780	541,290	27.3	19,827	821,245	4.89
831,643	9,751,683	9,751,683	9,014,679	737,006	20.3	36,363	957,158	3.66
452,489	2,634,069	3,160,872	2,921,982	238,890	13.0	18,376	470,785	6.24
7,905	151,730	151,730	140,263	11,467	30.8	372	8,277	2.09
1,422	20,208	20,208	18,681	1,527	25.8	59	1,481	2.60
11,739,867	126,282,109	144,529,926	133,606,739	10,923,187	27.0	429,922	12,169,789	3.03

DAYTON POWER & LIGHT COMPANY

SCHEDULE OF DEPRECIATION ACCRUAL RATES AT DECEMBER 31, 1989

PLANT ACCOUNT	PLANT	DISPERSTION	AVERAGE	ANNUAL RATE	ANNUAL	NET	SALVAGE	ANNUAL
NUMBER	DESCRIPTION	BALANCE	DOLLAR	ACCURUAL	ACCURUAL	SALVAGE	FACTOR	ACCURUAL RATE
		212/31/89	SERVICE	WITHOUT	WITHOUT	X		WITH
		(1)	LIFE	NET SALVAGE	NET SALVAGE	(6)	(7)	NET SALVAGE
			(3)	(4)	(5)	(6)	(7)	(8)
DISTRIBUTION PLANT								
361.00	STRUCTURES AND IMPROVEMENTS	4,817,639	45.0	2.22	106,951	-10	1.10	2.44
362.00	STATION EQUIPMENT-NORMAL	59,863,633	50.0	2.00	1,199,273	-5	1.05	2.10
362.60	STATION EQUIPMENT-EDS	1,041,274	11.0	9.09	95,197	0	1.00	9.09
364.00	POLES, TOWERS, FIXTURES	50,944,444	38.0	2.53	1,497,639	-10	1.40	3.68
365.00	OH CONDUCTORS AND DEVICES	42,599,182	40.0	2.50	1,069,979	-15	1.15	2.88
366.00	UG CONDUIT	9,256,346	55.0	1.82	77,465	-5	1.05	1.91
367.00	UG CONDUCTORS AND DEVICES	47,484,071	38.0	2.63	1,248,831	-15	1.15	3.02
368.00	LINE TRANSFORMERS	107,312,239	44.0	2.27	2,435,988	0	1.00	2.27
369.10	OH SERVICES	16,779,264	33.0	3.03	508,412	-25	1.50	4.55
369.20	OH SERVICES	26,182,421	33.0	2.86	748,417	-25	1.25	3.58
370.00	METERS	26,570,116	32.0	3.13	831,445	0	1.00	3.13
371.00	INST ON CUST PREM-POL	7,540,147	20.0	5.00	377,607	-20	1.20	6.00
371.20	INST ON CUST PREM-OTHER	395,272	50.0	2.00	7,905	0	1.00	2.00
372.00	LEASED PROP ON CUST PREM	56,865	40.0	2.50	1,422	0	1.00	2.50
	TOTAL DEPREC DISTR PLANT	401,948,883	39.4	2.54	10,201,531	-15	1.15	2.92

ANNUAL ACCURL WITH NET SALVAGE	THEORETICAL RESERVE WITHOUT NET SALVAGE	THEORETICAL RESERVE WITH NET SALVAGE	ALLOCATED BOOK RESERVE 2 12/31/89	INDICATED RESERVE VARIANCE	AVERAGE DOLLAR REMAINING LIFE	AMORT. OF INDICATED RESERVE VARIANCE	ANNUAL ACCURL WITH AMORTIZATION	ANNUAL ACCURL RATE WITH AMORTIZATION
(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
93,237	1,304,224	1,436,666	1,261,900	172,766	34.6	4,993	98,230	2.32
1,560	16,588,728	17,416,184	15,320,832	2,097,352	42.7	2-	1,338	2.20
1,398,081	4,058,218	4,056,215	3,550,214	486,004	37.5	55,929	1,454,810	2.18
584,513	11,725	18,017	4,785,789	600,752	5.2	91,402	787,980	10.31
245,519	4,335,302	4,986,198	4,385,783	600,385	43.3	37-	11,708	2.10
382,214	41,036	47,214	47,670	975,456	29.3	20,481	266,010	2.51
596,009	6,739,782	8,100,914	7,125,478	975,436	42.1	11-	6,503	2.32
2,640	13,482	16,178	18,334	1,173,156	32.9	29,649	616,909	2.70
7,833	9,409,887	9,744,508	8,571,163	1,173,343	39.7	36,782	632,791	2.57
16,923	17,948	18,428	18,656	178-	31.9	4-	2,636	2.25
118	154,239	154,299	135,720	18,579	91.2	480	7,733	2.13
	403,437	363,073	319,357	43,716	38.7	1,960	17,983	1.78
	3,085	3,085	2,714	371	22.3	7	125	2.34
					53.9			1.32
3,462,358	43,192,878	46,420,731	40,844,453	5,566,278	28.8	243,715	3,906,073	2.75

Attachment B
Sample Voltage Log

HKV11 MONDAY 03/15/04 1: 3:07 EDT 4/ 5/04 2: 3:07 PAGE 1 OF 8

LOG DIRECTORY

- - - - - 12 KV VOLTAGE LOG - - - - -

HOUR	AIRWAY	CARROLLTON		DARBY	-- EAKER --		- FAIRBORN -	
		EAST	WEST		S W	M E	NORTH	SOUTH
0100	13.0	12.8	12.8	12.9	12.2	12.2	12.9	12.9
0200	13.0	12.8	12.8	12.9	12.2	12.2	12.9	12.9
0300	13.0	12.8	12.8	12.8	12.1	12.2	12.9	12.9
0400	13.0	12.8	12.8	12.8	12.1	12.2	12.8	12.8
0500	12.9	12.6	12.7	12.8	12.0	12.1	12.8	12.8
0600	12.9	12.6	12.8	12.9	12.1	12.2	12.8	12.8
0700	13.1	12.6	12.7	12.9	12.0	12.1	12.9	12.9
0800	13.1	12.6	12.7	13.0	12.0	12.2	12.9	12.9
0900	13.0	12.7	12.8	13.0	12.0	12.2	12.9	12.9
1000	13.0	12.8	12.8	13.0	12.2	12.2	12.9	12.9
1100	13.0	12.8	12.9	13.0	12.2	12.3	12.9	12.9
1200	13.0	12.8	12.8	13.0	12.2	12.3	12.9	12.9
1300	13.0	12.8	12.8	12.9	12.2	12.3	12.9	12.9
1400	13.0	12.8	12.8	13.0	12.2	12.3	13.0	13.0
1500	13.0	12.7	12.7	13.0	12.2	12.3	12.9	12.9
1600	13.0	12.8	12.7	13.0	12.2	12.3	12.9	12.9
1700	13.0	12.8	12.7	13.0	12.2	12.3	12.9	12.9
1800	12.9	12.7	12.7	12.9	12.2	12.2	12.8	12.8
1900	12.9	12.6	12.9	13.0	12.1	12.2	12.9	12.9
2000	13.0	12.6	12.7	13.0	12.1	12.2	12.9	12.9
2100	13.0	12.7	12.7	12.9	12.2	12.2	13.0	13.0
2200	13.1	12.7	12.8	12.9	12.2	12.3	13.0	13.0
2300	13.1	12.8	12.8	12.9	12.2	12.3	12.9	12.9
2400	13.0	12.8	12.7	12.9	12.2	12.1	12.9	12.9
2500								

* RHGEMXT LOW LIM RETURN
* RHGEMWT LOW LIM RETURN