

POSTING REQUIREMENTS

- **§358.7(a) – Contemporaneous Disclosure**
- **§358.7(c) – Voluntary Consent by Non-Affiliated Transmission Customer**
- **§358.7(e)(1) – Affiliates with Marketing Function Employees**
- **§358.7(e)(2) – DP&L Shared Facilities**
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- **§358.7(f)(2) – Employee Transfers**
- **§358.7(d) – Procedures – Standards of Conduct**

For questions relating to the FERC Standards of Conduct please contact:

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§358.7(a) – Contemporaneous Disclosure

DP&L does not have any events to report at this time.

§358.7(c) – Voluntary Consent by Non-Affiliated Transmission Customer

DP&L is a member of PJM and all transmission service is provided through the PJM OATT which can be found on the PJM website. DP&L does not have any transmission customers. Therefore there are no voluntary consents to disclose.

§358.7(e)(1) – Affiliates with Marketing Function Employees

DP&L is affiliated with the following entities that generate or market power within the United States. Those identified with an asterisk have market based rate tariffs on file with the FERC.

AEE2, L.L.C.*	Barker, NY
AES Alamitos, LLC*	Long Beach, CA
AES Armenia Mountain Wind, LLC*	Armenia Township, PA
AES ES Tait, LLC*	Dayton, OH
AES ES Westover, LLC*	Johnson City, NY
AES Huntington Beach, L.L.C.*	Huntington Beach, CA
AES Ironwood, L.L.C.*	Lebanon, PA
AES Laurel Mountain, LLC*	WV
AES Red Oak, L.L.C.*	Sayreville, NJ
AES Redondo Beach, L.L.C.*	Redondo Beach, CA
Condon Wind Power, LLC*	Gillam County, OR
DPL Energy, LLC*	Dayton, OH
Indianapolis Power & Light Company*	Indianapolis, IN
Mountain View Power Partners, LLC*	Northern Palm Springs, CA
Mountain View Power Partners IV, LLC*	Northern Palm Springs, CA
AES Beaver Valley, LLC	Monaca, PA
AES Deepwater, Inc.	Pasadena, TX
AES Hawaii, Inc.	Kapolei, HI
AES Mid-West Holdings, LLC	MN
Lake Benton I Power Partners, LLC	
Storm Lake II Power Partners, LLC	
AES Shady Point, LLC	Poteau, OK
AES Warrior Run, LLC	Cumberland, MD
AES Western Wind, LLC	CA
AES Palm Springs	
AES Tehachapi, LLC	
Altech III	
San Jacinto Power Company	
VPI Enterprises, Inc.	
Buffalo Gap Wind Farm, LLC	Merkel, TX
Buffalo Gap Wind Farm 2, LLC	Merkel, TX
Buffalo Gap Wind Farm 3, LLC	Merkel, TX

Some or all of these entities may have marketing function employees or may use market function employees who are employed by their parent company, The AES Corporation, or an affiliated company.

Marketing functions for The Dayton Power and Light Company are performed by its Commercial Operations group located at 1065 Woodman Drive, Dayton, OH 45432.

No marketing function employee of The Dayton Power and Light Company or of any affiliated company, including those listed above, is provided access to non-public transmission related information of The Dayton Power and Light Company.

§358.7(e)(2) – DP&L Shared Facilities

DP&L Transmission Function Employees do not share facilities with Marketing Function Employees.

§358.7(e)(3) – Potential Merger Partners

At this time, DP&L does not have any potential merger partners that may employ or retain marketing function employees.

§358.7(f)(1) – Transmission Function Employee Information

Dayton Power and Light System Operating Transmission Function Job Descriptions

Manager

Responsible for planning and directing activities to ensure safe, reliable and economic operation of the Company's electric transmission and distribution system. Responsible for establishing and evaluating management teams for 24x7 operation. Manages 24x7 dispatch operations, which directs company and contractor technical personnel who maintain real-time power system reliability. Key member of service restoration teams from both planning and operations perspectives.

Assistant Manager

Responsible for the development and management of a comprehensive training program for System Operating that ensures DP&L's compliance with NERC Regulations. Responsible for Cyber Security implementation.

System Operating Supervisor

Supervises and coordinates transmission system dispatching activities, including pool interconnections and the granting of major circuit and generating capacity outages. May also be responsible for scheduling generation and interchange of power for maximum system reliability. Assures compliance with NERC operating policies and practices.

System Operator

Shift position which directs and takes appropriate real-time actions necessary to ensure stable and reliable operation of the bulk electric system under normal and emergency conditions up to, and including, shedding of firm load to prevent Operating Security limit violations. Responsible for complying with NERC operating policies and practices.

Control Area Services & Budgeting, Supervisor

Assesses the regulatory, business, operations and external environments as it relates to DP&L's tariffs, the RTO and Electric Choice activities and makes recommendations as to Company action. Responsible for the daily operation of DP&L's energy forecasting and settlements system, will perform daily, weekly and monthly load forecasts as required for the RTO, retail choice functions and any purchase power agreements. Responsible for coordinating of all processes and procedures related to retail choice, including both customer and supplier coordination and communication. Demonstrates in-depth understanding of the retail forecasting and settlements system and its design such that he/she can support data correction, operation and troubleshooting as well as future design changes.

Systems Analyst

Performs various PJM required functions as required on daily/monthly basis, scheduling, e-capacity requirements, and monthly settlements. Maintains settlement and profiling system for account changes, loss factors and other variables, which impact load aggregations and forecasts

Engineering Manager

Responsible for managing major projects and providing troubleshooting skills for system problems to ensure a safe and reliable transmission and distribution system.

Engineering Supervisor

Gives technical assistance on electric transmission and distribution system operations. Develops policies, plans, and procedures to ensure the reliability, integrity and operability of the transmission and distribution system.

Engineer I-IV

Provide services in the following areas: Transmission Design, Substation Design, Distribution Design, System Planning, System Protection, Technology Development, Project Management, or Telecommunications.

§358.7(f)(2) – Employee Transfers

Employee Transfers, if any, are posted separately on the www.dplinc.com web-site.

§358.7(d) – Procedures – Standards of Conduct

**STANDARDS OF CONDUCT FOR
THE DAYTON POWER AND LIGHT COMPANY
REGARDING NON-DISCRIMINATORY OPEN ACCESS
TRANSMISSION**

I. APPLICABILITY

These Standards of Conduct (“Standards”) apply to all employees of The Dayton Power and Light Company (“DP&L”) or its affiliates who engage in the planning, directing, organizing or carrying out of day-to-day transmission operations, including the granting and denying of service requests (“Transmission Function Employees”), and its Marketing Function Employees (“Marketing Function Employees”). These Standards also apply to all other DP&L or affiliate employees who possess Transmission Function Information and are in a position to share such information between Transmission Function Employees and Marketing Function Employees (collectively, “DP&L Employees”).

II. STATEMENT OF POLICY

Electric transmission service is provided by PJM to all parties (including DP&L) on a non-discriminatory basis consistent with the Federal Energy Regulatory Commission’s (“FERC”) Order Nos. 888 and 2004. DP&L and its affiliates will perform Marketing Functions using only that information which is posted on the OASIS, whether that information pertains to DP&L’s transmission system or market information learned by DP&L’s Transmission Function Employees from third parties.

Accordingly, DP&L Employees shall comply with the following procedures:

- A. Independent Functioning**
- B. Information Access/Disclosure**
- C. Emergency Operations**
- D. Employee Transfers**
- E. Tariff Implementation**
- F. Compliance Auditing**
- G. Training**
- H. Maintenance of These Standards**

A. Independent Functioning

- **Employee functions** - Transmission Function Employees must function independently from Marketing Function Employees (except as provided in Section C below), and Marketing Function Employees cannot conduct Transmission Functions.

Job titles and descriptions for Transmission Function Employees shall be posted on the DPL Inc. website and updated within seven days of any changes.

- **Control room access** - Marketing Function Employees cannot have access to the system control center or similar facilities used for Transmission Functions on a basis different from other transmission customers, unless emergency circumstances exist (see Section C below). The Control Room is a secure facility and employees must have card code access to enter. No Marketing Function Employees shall have card code access to these facilities.
- **Books and records** - DP&L will maintain its books of account and records for transmission service (as prescribed under 18 CFR §§ 101 and 125) separately from those of its power marketing affiliates, and will make them available for FERC inspection.
- **Merger** - DP&L will post information concerning potential merger partners as affiliates that may employ Marketing Function Employees within seven days after the potential merger is announced.

B. Information Access/Disclosure

Transmission information - Transmission Function Employees cannot provide and Marketing Function Employees cannot have access to any information regarding DP&L's transmission system or information gathered by Transmission Function Employees about another party's transmission system (including ATC, price, curtailments, ancillary services) prior to making such information publicly available on OASIS. DP&L's Transmission Function Employees may not communicate transmission-related information to Marketing Function Employees off the OASIS. DP&L has implemented security measures to prohibit information access. Physical separation of the control systems used by Transmission Function Employees and Marketing Function Employees prevents access to any Transmission Function Information by Marketing Function Employees. Transmission Function Employees and transmission systems are located in a facility separate from DP&L's Marketing Function Employees. DP&L is a member of PJM and all transmission service is provided through the PJM OATT

- **Posting of breach** - Any disclosure contrary to these requirements must be immediately posted on the DPL Inc. website in accordance with FERC rules.
- **Market information** - Transmission Function Employees cannot provide and Marketing Function Employees cannot have access to any market information obtained by Transmission Function Employees from PJM or any other party, unless posted on the DPL Inc website.

C. Emergency Operations

- In emergency circumstances affecting transmission system reliability, DP&L Employees may take whatever steps are necessary to maintain system reliability, as long as a record describing the deviation from these Standards is made and kept for a period of five years.

D. Employee Transfers

- Transmission Function Employees and Marketing Function Employees may only transfer between functions if such transfer is: (1) not used as means to circumvent these Standards, and (2) posted on the DPL Inc. website for 90 days (including the name of the employee, respective titles held in each function, and the effective date of the transfer).

E. Tariff Implementation

DP&L is a member of PJM and all transmission service is provided through the PJM OATT which can be found on the PJM website.

F. Compliance Auditing

- The Chief Compliance Officer will perform compliance auditing on a periodic basis to ensure that DP&L conforms to these Standards. DP&L's Chief Compliance Officer is

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G. Training

- The Chief Compliance Officer will require all Transmission Function Employees, Marketing Function Employees, Officers, Directors and other employees in a position to share Transmission Function Information to participate in training regarding these Standards of Conduct once a year and attest that they have read and understood the Standards of Conduct. The Compliance Officer will keep a list of employees and the dates they participated in training for a period of three years.

H. Maintenance of These Standards

- The Chief Compliance Officer is responsible for maintaining these standards and will retain all documentation regarding these standards for a period of three years. A copy of these standards will be posted on the DPL Inc. website.