BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Edison )

Company, The Cleveland Electric Illuminating )

Company and the Toledo Edison Company For ) Case No. 09-906-EL-SSO

Approval of a Market Rate Offer to Conduct A )

Competitive Bidding Process for Standard )

Service Offer Electric Generation Supply, )

Accounting Modifications Associated With )

Reconciliation Mechanism, and Tariffs for )

Generation Service )

MOTION OF CITIZEN POWER, INC. TO WITHDRAW AND NOTICE OF CHANGE OF ADDRESS

Citizen Power, Inc., (“Citizen Power”), respectfully moves the Public Utilities Commission of Ohio (the “Commission”) for leave to withdraw from the above captioned proceeding. Citizen Power is temporarily suspending legal advocacy operations effective October 31, 2016 due to funding shortages. Citizen Power further states that their withdrawal will not prejudice any other party and should be allowed by the Commission.

In addition, I also wish to advise the Commission of a change of contact information for Theodore Robinson. All correspondence for Citizen Power should be addressed to:

Theodore Robinson, Esq.

5274 Duncan St.

Pittsburgh, PA 15201

The email address will remain [robinson@citizenpower.com](mailto:robinson@citizenpower.com).

Citizen Power respectfully requests that the Commission grant this Motion to Withdraw and make such order as is just and appropriate. Should Citizen Power’s Motion be granted, please remove Citizen Power from the service list for this proceeding and also remove Theodore Robinson from the service list pursuant to Rule 4901-1-08(F).

Respectfully Submitted,

/s Theodore S. Robinson\_\_\_\_\_\_\_\_

Theodore S. Robinson

5274 Duncan St.

Pittsburgh, PA 15201

Telephone: (412) 421-7029

e-mail: [robinson@citizenpower.com](mailto:robinson@citizenpower.com)

October 18, 2016 Counsel for Citizen Power

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion of Citizen Power, Inc. to Withdraw and Notice of Change of Address was served electronically or by regular U.S. Mail upon the parties of record identified below in these cases on this 18th day of October, 2016.

/s Theodore S. Robinson\_\_\_\_\_\_\_\_

Theodore S. Robinson, Esq.

|  |  |
| --- | --- |
| Robert Fortney  Ray Strom  Tammy Turkenton  Public Utilities Commission of Ohio  180 E. Broad St., 3 Fl.  Columbus, OH 43215  [Robert.fortney@puc.state.oh.us](mailto:Robert.fortney@puc.state.oh.us)  [Ray.strom@puc.state.oh.us](mailto:Ray.strom@puc.state.oh.us)  [Tammy.turkenton@puc.state.oh.us](mailto:Tammy.turkenton@puc.state.oh.us)  Duane W. Luckey  Thomas McNamee  William L Wright  Asst. Attorneys General  Public Utilities Section  180 E. Broad St., 6th Fl.  Cohimbus, OH 43215  [Duane.luckey@ohioattorneygeneral.gov](mailto:Duane.luckey@ohioattorneygeneral.gov%20)  [Thomas.mcnamee@ohioattorneygeneral.gov](mailto:Thomas.mcnamee@ohioattorneygeneral.gov)  [William.wright@ohioattorneygeneral.gov](mailto:William.wright@ohioattorneygeneral.gov%20)  Ohio Energy Group (OEG)  Michael L. Kurtz  David F. Boehm  Boehm, Kurtz & Lowry  36 E. Seventh St., Suite 1510  Cincinnati, OH 45202  [mkurtz@bkllawfirm.com](mailto:mkurtz@bkllawfirm.com)  [dbochm@bklawfirm.com](mailto:dbochm@bklawfirm.com)  Ohio Consumers' Counsel  Maureen Grady  10 W. Broad St., 18th Fl.  Columbus, OH 43215-3485 [grady@occ.state.oh.us](mailto:grady@occ.state.oh.us)  The Kroger Company  John W. Bentine  Mark S Yurick  Chester Wilcox & Saxbe, LLP  65 E. State St., Suite 1000  Columbus, OH 43215 [jbentine@cwslaw.com](mailto:jbentine@cwslaw.com)  [myurick@cwslaw.com](mailto:myurick@cwslaw.com)  Ohio Environmental Council  Barth E. Royer  Trent A. Dougherty  Bell & Royer, LPA  33 S.Grant Ave.  Columbus, OH 43215  [barthroyer@aol.com](mailto:barthroyer@aol.com)  [trent@theoec.org](mailto:trent@theoec.org)  Industrial Energy Users (lEU)  Samuel C. Randazzo  McNees Wallace & Nurick LLC  21E. State St, 17 Fl.  Columbus, OH 43215  [sam@mwncmh.com](mailto:sam@mwncmh.com)  Ohio Partners for Affordable Energy David C. Rinebolt  Colleen L. Mooney  231 W.Lima St.  P.O.Box 1793  Columbus, OH 43215  [drinebolt@aol.com](mailto:drinebolt@aol.com)  [cmooney2@columbus.rr.com](mailto:cmooney2@columbus.rr.com)  Nucor Steel Marion, Inc.  Garrett A. Stone  Michael K. Lavanga  Brickfield, Burchette, Ritts & Stone  1025 Thomas Jefferson St., NW  8th Fl., West Tower  Washington, DC 20007-5201  [gas@smxblaw.com](mailto:gas@smxblaw.com)  [mkl@smxblaw.com](mailto:mkl@smxblaw.com)  Northwest Ohio Aggregation Coalition Lance M. Keiffer  711 Adams St., 2nd Fl.  Toledo, OH 43624-1680  [lkeiffer@co.lucas.oh.us](mailto:lkeiffer@co.lucas.oh.us)  Constellation Energy Commodities Group, Inc., and Constellation NewEnergy, Inc. M Howard Petricoff  Stephen M. Howard  Vorys, Sater, Seymore and Pease, LLP  52 East Gay St. PO Box 1008  Columbus, OH 43216-1008  [mhpetricoff@vorys.com](mailto:mhpetricoff@vorys.com)  [showard@vorys.com](mailto:showard@vorys.com)  Cynthia Brady  David I. Fein  Constellation Energy Resources, LLC  550 W. Washington Blvd., Suite 300 Chicago, IL 60661  [cynthia.brady@constellation.com](mailto:cynthia.brady@constellation.com)  [david.fein@constellation.com](mailto:david.fein@constellation.com)  Direct Energy Services, LLC  M. Howard Petricoff  Stephen M. Howard  Vorys, Sater, Seymore and Pease, LLP  52 East Gay St.  PO Box 1008  Columbus, OH 43216  [mhpetricoff@vorys.com](mailto:mhpetricoff@vorys.com)  [showard@vorys.com](mailto:showard@vorys.com)  Teresa Ringenbach  Direct Energy Services, LLC  5400 Frantz Rd., Suite 250  Dublin, OH 43016  [Teresa.ringenbach@directenergy.com](mailto:Teresa.ringenbach@directenergy.com)  FirstEnergy Solutions  Michael Belting  Morgan Parke  FirstEnergy Service Company  76 S. Main St.  Akron, OH 44308 [beitingm@firstenergycorp.com](mailto:beitingm@firstenergycorp.com)  [mparke@firstenergycorp.com](mailto:mparke@firstenergycorp.com)    Gregory J. Poulos  EnerNOC, Inc.  471 East Broad Street, Suite 1520  Columbus, Ohio 43215  [gpoulos@enernoc.com](mailto:gpoulos@enernoc.com)  Duke Energy Retail Sales, LLC  Michael D. Dortch  Kravitz, Brown & Dortch, LLC  63 E. State St., Suite 200  Columbus, OH 43215  [mdortch@kravitzllc.com](mailto:mdortch@kravitzllc.com)  PJM Power Providers Group  M Howard Petricoff  Stephen M. Howard  Vorys, Sater, Seymore and Pease, LLP  52 East Gay St.  PO Box 1008  Columbus, OH 43216-1008  [mhpetricoff@vorys.com](mailto:mhpetricoff@vorys.com)  [showard@vorys.com](mailto:showard@vorys.com) | James W. Burk  Arthur E. Korkosz  Mark A. Hayden  Ebony L. Miller  FirstEnergy Service Company  76 South Main Street  Akron, OH 44308  [burkj@firstenergycorp.com](mailto:burkj@firstenergycorp.com)  [korkosza@firstenergycorp.com](mailto:korkosza@firstenergycorp.com)  [haydenm@firstenergycorp.com](mailto:haydenm@firstenergycorp.com)  [elmiller@firstenergycorp.com](mailto:elmiller@firstenergycorp.com)  James F. Lang  Laura C. McBride  Calfee, Halter & Griswold LLP  1400 KeyBank Center  800 Superior Ave.  Cleveland, OH 44114  [jlang@calfee.com](mailto:jlang@calfee.com)  David A. Kutik  Jones Day  901 Lakeside Avenue  Cleveland, OH 44114  [dakutik@jonesday.com](mailto:dakutik@jonesday.com)  Ohio Hospital Association  Richard L. Sites  Ohio Hospital Association  155 E. Broad St., 15"'Fl.  Columbus, OH 43215-3620 [ricks@ohanet.org](mailto:ricks@ohanet.org)  Dylan F. Borchers  Bricker & Eckler LLP  100 E. Third St.  Columbus, OH 43215 [dborchers@bricker.com](mailto:dborchers@bricker.com)  Neighborhood Environmental Coalition, Consumers for Fair Utility Rates, United Clevelanders Against Poverty, Cleveland Housing Network, The Empowerment Center of Greater Cleveland (Citizens Coalition)  Joseph P. Meissner  Matthew Vincel  The Legal Aid Society of Cleveland  1223 West St.  Cleveland, OH 44113  [jpmeissn@lasclev.org](mailto:jpmeissn@lasclev.org)  [mvincel@lasclev.org](mailto:mvincel@lasclev.org)  The Ohio Manufacturers' Association  Mallory M. Mohler  Carpenter Lipps & Leland LLP  280 North High Street, Suite 1300  Columbus, Ohio 43215  [mohler@carpenterlipps.com](mailto:mohler@carpenterlipps.com)  Material Sciences Corporation  Craig L Smith  15700 Van Aken Blvd, Suite #26 Cleveland, Ohio 44120 [wis29@yahoo.com](mailto:wis29@yahoo.com)  GEXA Energy - Ohio, LLC  Dane Stinson  Bailey Cavalieri LLC  10 Broad St., Suite 2100  Columbus, OH 43215 [dane.stinson@baileycavalieri.com](mailto:dane.stinson@baileycavalieri.com)  Robert J. Triozzi  City of Cleveland  Dept. of Law  601 Lakeside Ave., Room 106  Cleveland, OH 44114  [rtriozzi@city.cleveland.oh.us](mailto:rtriozzi@city.cleveland.oh.us)  Association of Independent Colleges and Universities of Ohio  Gregory J. Dunn  Christopher Miller  Schottenstein Zox & Dunn Co., LPA  250 West St.  Columbus, OH 43215  [gdunn@szd.com](mailto:gdunn@szd.com)  [emiller@szd.com](mailto:emiller@szd.com)  Ohio Schools Council  Glenn S. Krassen  Matthew W. Warnock  Bricker & Eckler LLP  375 E. 9th St., Suite 1500  Cleveland, OH 44114  [gkrassen@bricker.com](mailto:gkrassen@bricker.com)  [mwarnock@bricker.com](mailto:mwarnock@bricker.com)  Morgan Stanley Capital Group Inc. Douglas M. Mancino  McDermott Will & Emory LLP  2049 Century Park East Suite 3800  Los Angeles, CA 90067-3218  [dmancino@mwe.com](mailto:dmancino@mwe.com)  Gregory K. Lawrence  McDermott Will & Emory LLP  28 State St.  Boston, MA 02109  [glawrence@mwe.com](mailto:glawrence@mwe.com)  Steven Huhman  Morgan Stanley  2000 Westchester Ave.  Purchase, NY 10577  [Steven.huhman@morganstanley.com](mailto:Steven.huhman@morganstanley.com)  Natural Resources Defense Council  Henry W. Eckhart  50 W. Broad St., #2117  Columbus, OH 43215  [henryeckhart@aol.com](mailto:henryeckhart@aol.com)  Duke Energy Ohio  Amy Spiller  Duke Energy Business Services, Inc.  221 E. Fourth St., 25 Fl.  Cincinnati, OH 45202  [amy.spiller@duke-energy.com](mailto:amy.spiller@duke-energy.com) |