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OCT 15 2008

October 8, 2008

Dr. Alan R. Schriber, Chairman
Public Utilities Commission of Ohio
180 E. Broad St.
Columbus, OH 43215

Office of Chairman
P.U.C.O.

Dear Chairman Schriber:

As Director of the Cuyahoga County Department of Senior and Adult Services (DSAS), I wish to express my concern over FirstEnergy's proposed Electric Security Plan (ESP), which if approved will raise consumer bills an estimated 11% and includes long range costs for the next 25 years. Our agency is charged with serving some of the most vulnerable seniors and at-risk adults, helping them to remain independent. This past year, DSAS expensed \$150,000.00 in emergency utility funds to our clients, 38% or \$57,000.00 was used for assistance with electric bills. These funds are expensed after all other assistance options including Home Energy Assistance have been exhausted. The reality of the situation, our clients cannot afford a rate increase.

The proposal made by FirstEnergy includes an increase in generation-related and transmission costs which pay for high voltage lines that move electricity from power plants to neighborhoods. The proposal also includes distribution charges that cover local power lines and transformers. According to the Ohio Consumers Counsel, FirstEnergy requested that the Public Utilities Commission of Ohio (PUCO) allow them to defer distribution rates which will cost an estimated \$2 billion over the next 25 years. Many believe that FirstEnergy requested to defer these charges to avoid public scrutiny for their costly proposal.

While these charges will be passed on to all customers of FirstEnergy, it is important to note that many financially vulnerable people will be significantly impacted if this proposal is approved. According to the most recently available data from the United States Census Bureau's 2006 American Community Survey, Cuyahoga County had a senior population (65 years and older) of 189,806. Within that population, 18,675 seniors were living at or below the Federal Poverty Level (FPL) another 48,313 were living between 100% and 200% of poverty. In present-day numbers, the FPL for a senior living at 100% of poverty is \$10,400, for a couple that figure is \$14,000. Limited incomes such as these can hardly stand the impact of a rate increase.

When the General Assembly and the Governor adopted their energy policy, they moved towards a new system that included safeguards to prevent soaring costs. FirstEnergy's proposal will cost consumer's millions and is not in line with the states new system. The proposed increase coupled with the rising cost of natural gas and other essentials weakens the ability of our senior citizens to remain independent members of the community. I therefore ask that you reject FirstEnergy's proposal.

Sincerely,


Susan E. Axelrod, Director
Cuyahoga County Department of
Senior & Adult Services

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