

**Eagle Energy, LLC**

**FIL** 4465 Bridgetown Road  
Cincinnati, OH 45211  
(513) 251- 7283

3  
08-917-EL-SSO  
WEB: www.EagleEnergyLLC.com  
EMAIL: EagleEnergy@fuse.net

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October 22, 2008

The Honorable Renee' J. Jenkins  
Secretary  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215

08-918 EL SSO  
08-920-EL-SSO  
08-921-EL-AAM  
08-922-EL-LNC  
08-923-EL-ATA  
08-935-EL-SSO  
08-936-EL-SSO

RE: Report entitled, "The Power of Efficiency"

Dear Secretary Jenkins:

Recently, the Environment Ohio Research & Policy Center filed a report<sup>1</sup> in several electric security plan cases pending before the Commission. The report argues that energy efficiency investments are extremely cost effective and encourages Ohio to look at states across the country that have adopted strategies to increase energy efficiencies. At the outset, I want to make clear that Eagle Energy supports energy efficiency programs where benefits can be realized. The purpose of this letter is to add an important piece of information that seems to be lacking from the report.

For years, the Commission has fairly and effectively regulated the utilities in the state. The benchmark I use to come to this conclusion, in addition to being involved in regulation for three decades, is the level of rates that Ohio enjoys relative to most other jurisdictions. The report recites several states and the efficiency programs some other jurisdictions have implemented. What is missing from the report is the price of electricity end-users pay and lead to the cost of justification for efficiency programs.

The following table summarizes average retail prices as of June 2008<sup>2</sup>:

	<u>RESIDENTIAL</u>	<u>COMMERCIAL</u>	<u>INDUSTRIAL</u>
Jurisdictions <sup>3</sup> Average	\$0.1562 per kWh	\$0.1428 per kWh	\$0.1100 per kWh
United States Average	\$0.1180 "	\$0.1088 "	\$0.0742 "
Ohio Average	\$0.1087 "	\$0.0933 "	\$0.0632 "

<sup>1</sup> See Opportunities to Expand the Economy, Save Money and Reduce Pollution in Ohio dated October 2008.

<sup>2</sup> See Report No. DOE/EIA-0226(2008/09).

<sup>3</sup> Includes the states of California, Connecticut, Massachusetts, Minnesota, New Jersey, New York, Vermont and Wisconsin.

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"Helping you get reliable energy at the most economical price"

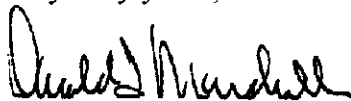
The report references several jurisdictions. In those jurisdictions, the average retail price in all sectors is roughly \$0.05 per kilowatt-hour higher than enjoyed by customers in the Buckeye state. Similarly, the Ohio retail price is about \$0.01 lower than the average price across the entire United States in all sectors. See the enclosed table for data for each state referenced in the report.

I have enclosed eight additional copies of this letter for filing in the following Case Nos.:

08-917-EL-SSO	08-918-EL-SSO	08-920-EL-SSO
08-921-EL-AAM	08-922-EL-UNC	08-923-EL-ATA
08-935-EL-SSO	08-936-EL-SSO	

While energy efficiency and independence are valued goals, I would suggest that all programs must be fairly evaluated that should include all variables. Obviously, the avoided price is an important variable. Thank you in advance for your consideration.

Very truly yours,



Donald I. Marshall  
President

cc: Ms. Amy Gomberg

**REPORT NO. : DOE/EIA-0226(2008/09)**  
**AVERAGE RETAIL PRICE OF ELECTRICITY**  
**DATA FOR JUNE 2008**

JURISDICTION		SECTOR		
		RESIDENTIAL	COMMERCIAL	INDUSTRIAL
California		\$ 0.1512	\$ 0.1505	\$ 0.1049
Connecticut		0.1923	0.1604	0.1372
Massachusetts		0.1742	0.1718	0.1525
Minnesota		0.1007	0.0857	0.0623
New Jersey		0.1713	0.1677	0.1591
New York		0.1940	0.1836	0.1064
Vermont		0.1479	0.1271	0.0911
Wisconsin		0.1182	0.0954	0.0668
<i>Average</i>		<del>\$ 0.1562</del>	<del>\$ 0.1428</del>	<del>\$ 0.1200</del>
Ohio		\$ 0.1087	\$ 0.0933	\$ 0.0632
<i>Difference:</i> Amount				
		\$ (0.0475)	\$ (0.0495)	\$ (0.0468)
Percent		30.4%	34.7%	42.6%
United States		\$ 0.1180	\$ 0.1088	\$ 0.0742
<i>Difference:</i> Amount				
		\$ (0.0093)	\$ (0.0155)	\$ (0.0110)
Percent		7.9%	14.2%	14.8%