21

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Edison Companies, The Cleveland Electric Illuminating Companies and The Toledo Edison Companies for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan.	)	Case No. 08-935-EL-SSO

POST-HEARING BRIEF OF OHIO PARTNERS FOR AFFORDABLE ENERGY

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Introduction

On July 31, 2008, Governor Strickland signed Am. Sub. SB 221 ("SB 221"), which overhauled the legislative framework governing monopoly utilities in Ohio. The statute fundamentally changed the requirements placed on regulated monopoly distribution utilities to serve as the provider of last resort to customers for whom a competitive option does not exist. This default service, defined in the legislation as a standard service offer ("SSO"), can be provided through two mechanisms: 1) a market rate option ("MRO"); or, 2) an Electric Security Plan ("ESP"). Both options are clearly within the purview of the Public Utilities Commission of Ohio ("PUCO" or "Commission") to regulate, in a manner prescribed by SB 221.

Opinions clearly differ about how the new statute should be implemented. This is apparent from the wide-ranging comments to the three sets of proposed rules designed to implement the statute. Thus, this is a case of first impression as to what elements an ESP must include to comply with SB 221.

The Cleveland Electric Illuminating Company, Ohio Edison Company, and The Toledo Edison Company (collectively "the Companies" or "FirstEnergy") offer a narcissistic view of the law. FirstEnergy believes that the only requirement is that an ESP offered by the Companies be "more favorable in the aggregate" than its vision of a competitive market would provide. The Companies contends that this is not a cost-based standard, but that its proposal includes a host of advantages to consumers through the generation and distribution provisions. Since the power to serve the load will come primarily from plants owned by the Companies' affiliate FirstEnergy Solutions ("FES") regardless of which option is employed – ESP or MRO -- the Companies have a unique position with respect to its definition of the "market" option that it puts forth as the basis for its conclusion that the ESP proposal is favorable to customers. It is reasonable to view the Companies proposal and its comparative analysis with the proverbial "grain of salt" because the natural tendency would be to provide customers with a price offering under the ESP which maximizes the profits of the holding Company by defining the market price at a level which is most favorable to its shareholders and not its customers. Customer advocates constantly monitor prices in the Regional Transmission Organizations looking for any hint that a competitive market exists that would provide savings to the average customer. Alas, the rarely available competitive options have to date failed to demonstrate any price benefits to residential customers compared to "regulated" rates, though due to the economic downturn wholesale prices have declined. Nonetheless, FirstEnergy exercises enormous actual and potential market power and its proposals must be viewed through this lens.

SB 221 provides more succor to customers than FirstEnergy is willing to acknowledge. The law establishes state policies including requirements that rates be reasonable and that vulnerable customers be protected. The law requires utilities to meet requirements for energy efficiency, demand reduction, and renewable energy. As the Companies' Witness Blank notes in his initial testimony, "the ESP *promotes* the availability to consumers of adequate, reliable, safe, efficient, nondiscriminatory and reasonably priced retail electric service as *encouraged* by Section 4928.02(A).[1] [Emphasis added.] He acknowledges the Application fails to conform to all the enumerated state policies, but fails to identify the basis for the Companies' apparent disregard of some policies in favor of others. The Application as submitted fails to achieve even Mr. Blank's interpretation of the law as advisory. Because the Companies ignore policies established by the General Assembly, their ESP proposal should be significantly modified or rejected.

Argument

I. The Proposed FirstEnergy ESP Fails to Provide Reasonable Rates as Required by SB 221.

The General Assembly designed the ESP to provide reasonable rates. R.C. 4928.02(A). The failures of the competitive market are well documented.[2] Yet customers require reasonably priced electric service. Reasonable prices are

[1] Direct Testimony of David M. Blank at 4.
[2] See generally, *Staff Comments*, Case No. 07-796-EL-ATA.

particularly critical given the present economic situation. The ESP proposed by FirstEnergy fails to provide reasonable rates.

OCC Witness Yankel and OEG Witness Kolen provide clear evidence that the generation rates proposed by FirstEnergy exceed prices that even a defective wholesale market can provide. The forward generation prices documented by OEG Witness Kollen, using October 10, 2008 forward prices, are roughly 12 percent lower than those estimated by FirstEnergy Witness Jones.[3] OCC Witness Yankel projects prices that are more than 30 percent lower than those posited by FirstEnergy Witnesses Jones and Graves.[4] Current wholesale prices continue to trend downward.[5] It is clear the FirstEnergy proposal fails at the most basic level to provide reasonable rates or provide rates lower than those available through the wholesale market.

Additional Riders proposed by the Companies further exacerbate the situation. FirstEnergy requests: (1) fuel transportation surcharges; (2) surcharges for new taxes; and, (3) fuel cost increases in 2011. These charges are based on costs incurred by FirstEnergy Solutions, the affiliated generation provider. In addition, FirstEnergy requests: (1) a minimum default service charge; (2) a standby charge (which apparently duplicates the minimum default service charge); (3) a generation uncollectible charge; (4) a PIPP uncollectible charge; and, (5) capacity cost adjustment charges. All these charges serve to increase generation charges, widening the gap between FirstEnergy's proposed

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[3] OEG Ex. 2A and FirstEnergy Ex. 6, 8-10.
[4] OCC Ex. 3.
[5] OEG Ex. 2A at 11.

prices and those currently available through the Midwest Independent System Operator.

Adding insult to injury, FirstEnergy proposes to defer significant portions of the proposed generation price increases. This is the functional equivalent of having customers charge parts of their rates to a virtual credit card to be paid back after the expiration of the rate plan with interest. The deferrals serve an additional purpose for FirstEnergy – keeping customers captive. The collection mechanism for the deferrals is non-bypassable, virtually eliminating the possibility that competitive options, should the market ever evolve, could produce lower prices for customers. The deferrals also fail to send the appropriate price signal to customers that would encourage conservation and efficiency investments. The ESP as proposed simply traps customers in a perpetual cycle of debt to the distribution utilities.

OPAE Witness Alexander outlines an approach to achieve reasonable rates, both short- and long-term, and price stability. Alexander recommends the Companies develop an integrated resource plan that would drive power procurement strategies under the ESP to produce affordable rates. This method has been adopted in a number of states retreating from competition, and in particular in states that have used "slice of system" bidding options that FirstEnergy offers as the comparison to the ESP.

Integrated resource planning requires the development of a diversified portfolio of energy efficiency, demand response, and generation supply resources designed to provide the lowest and most stable price during the plan.

The process begins with an analysis of current and future loads and load shapes by customer class. The next step is to determine how the load can be managed using energy efficiency and demand response options that are lower in cost than purchasing generation. Then renewable resources should be added to the mix because of their low cost and ability to provide long-term price stability by insulating customers from volatile fossil fuel costs. Minimum levels of efficiency, demand response, and renewables are required by SB 221. These elements of the plan may well exceed statutory requirements if lower in cost than generation options. The final component of a properly constructed integrated resource plan is a mixture of short, medium, and long-term generation supply contracts with affiliates and other generation suppliers, along with day ahead and spot purchases.

Several important considerations must underlie the planning. While the term of the ESP may only be for three years, the responsibility to provide an SSO is ongoing. It is appropriate to ensure investments are made now in efficiency, demand response, and renewables both to meet legislative targets and provide long-term price stability whether the Companies continues to provide service under an ESP or convert to an MRO. The strategy must be a bottom up approach that identifies the unique characteristics of each customer class, and their efficiency and demand response potential. The plan should be driven by customer needs and the goal of reasonable rates. This may not result in the lowest rates in the short-term, but should focus on long-term price stability to ensure that cost-effective investments in future resources financed by ratepayers and third-parties are made to provide the SSO required of the Companies.

II. The Proposed FirstEnergy ESP Fails to Protect At-Risk Customers.

R.C. 4928.02(L) requires that an SSO "[p]rotect at-risk populations." The FirstEnergy ESP proposal fails to do so. On the rate side, there is no consideration given to the impact of rate increases on low-income households or those struggling to pay their bills. Given the large and increasing number of families in poverty in the FirstEnergy service territory and the massive foreclosure problem in the region, this is an incredible oversight. Several FirstEnergy operating companies have offered reduced rates to low-income customers in the past and should do so as a part of the rate structure adopted under the ESP. In addition to the previous FirstEnergy discount, recent natural gas cases have also provided for bill credits to low-income customers. There are also payment troubled customers that do not fit the traditional definition of low-income that are also in need of assistance. Nonetheless, FirstEnergy's failure to acknowledge and comply with the policy requires adjustment to the plan.

The plan also lacks any significant energy efficiency program targeted to at-risk populations. There are no defined efficiency programs in the application. FirstEnergy operating companies have funded low-income efficiency programs for many years, predating the formation of the holding Companies. The program design of the Community Connections Program is well tested and effective. The Companies' failure in this area should be rectified. The Commission should order the Companies to continue funding for existing low-income programs during these challenging economic times until a collaborative can develop a comprehensive portfolio of programs

Assessing compliance with the State policies established by SB 221, requires that utilities address those options and there is an evaluation of the methods by which they are addressed. The General Assembly specifically requires an SSO protect at-risk populations. The Commission should modify the ESP to include provisions to achieve this critical State policy.

III. The Proposed FirstEnergy ESP Fails to Include a Plan that is Adequate to Produce the Energy Efficiency, Demand Reduction, and Renewable Energy Required by SB 221.

FirstEnergy's Application fails to define any programs designed to achieve the energy efficiency and demand response goals, nor has it provided any justification for an appropriate funding level to maximize the capture of cost-effective demand side resources. The application also fails to specify how the programs will be managed and what role stakeholders will play in program design and deployment. FirstEnergy acknowledges these shortcomings.[6]

OPAE Witness Alexander and other consumer witnesses contend that the Companies should adopt a time-tested model to develop appropriate programs that is in used in Ohio and nationwide, establishment of a stakeholder collaborative. This collaborative should start with the integrated resource plan developed by FirstEnergy which defines its preferred cost-effective program options and spending levels, along with the justification that the spending level and programs would contribute to a long-term, least-cost SSO. This could

[6] *Direct Testimony of Barbara R. Alexander*, Exhibit BA-2, FirstEnergy Response to OCC Set 7 – INT-134 (Blank).

include targets that exceed the goals of SB 221 if the underlying integrated resource plan justifies additional investments that would be cost effective. The focus should be on meeting the benchmarks over the long-term rather than simply a three year plan.

The collaborative should review the proposed programs and management structure, and make a recommendation to the Commission regarding the plan submitted by the Companies. In order to conduct this review, the collaborative should have access to funding to engage independent analysts that can conduct a rigorous review of the proposal. The plan should then be reviewed in a public process before the Commission. The final set of programs should be managed by a third party administrator hired with the advice and consent of the collaborative to implement the programs. Because FirstEnergy proposes to purchase power from its affiliate, it is critical that the management of the DSM portfolio be independent; the FirstEnergy Corp., the holding company, has a significant interest in maximizing the sales of its own generation.

Energy efficiency and demand response programs are a major source of green jobs in a region where job creation is critical. Both are least-cost resources that will help provide customers with reasonable prices. In addition, an effective DSM program will ensure that FirstEnergy is not subject to penalties for failure to meet the benchmarks of SB 221. Fundamentally, Ohio law has defined the utility of the future. It is imperative that monopoly distribution utilities follow the path dictated by the General Assembly and remake themselves to ensure the viability of Ohio's economy, and through that the economic success of the utilities themselves.

IV. The Advanced Metering Infrastructure (AMI) Plan Proposed by FirstEnergy Should be Rejected.

FirstEnergy proposes an extremely expensive AMI pilot that, like much of the application, lacks justification for the cost to ratepayers. The pilot is too small to provide much information on the technology or its impact on customer behavior. There have been numerous pilots of smart meters across the country which provide data that FirstEnergy might be able to use instead of "reinventing the wheel." However, FE's filing fails to even discuss these other pilot programs or describe why they need to spend $1 million for an additional pilot program.

An AMI implementation should only occur in the context of an integrated resource plan that defines cost-effective options to meet demand response goals. Direct load control programs that focus on communicating directly with whole-house air conditioning or electric water heaters may well be the least-cost approach to achieving demand response goals. Time of Use rate designs can be implemented without smart meters; Ohio Edison already has a tariff that makes this option available to customers. The suggestion that Ohio should rely primarily on time-based pricing that passes through volatile wholesale market spot prices to achieve SB 221's demand response objectives is misplaced. A major justification for the passage of SB 221 is the immaturity of the wholesale market. As a result, it makes little sense to subject customers to the real-time prices in an underdeveloped market. At the very least, a fact based analysis of both the costs and benefits associated with expensive smart meter proposals should be undertaken prior to further investments in pilot programs or other expensive efforts designed to justify this approach.

V. Distribution Issues Should be Severed from the Application and Considered in a Separate Proceeding.

Virtually all customers question the justifications provided by FirstEnergy for the host of distribution initiatives included in the application. The recent distribution base rate case is fully litigated and briefed. These issues have no place in this Application.

The proposed distribution improvement rider, Rider DIS, offers no value to customers at a tremendous cost. The price tag itself is not justified by anything other than "management judgment". The Application provides no detail on how the rider will be spent. There is simply no plan.[7]

The Companies also propose an incentive program for achieving certain reliability goals. There are two problems with this proposal. First, it lowers the SAIDI performance standards below the current CEI targets and is no higher than the current levels in place for OE and TE. There would be no improvement benefitting customers. The targets are not enforceable, since FirstEnergy proposes a fairly wide performance band. Reliability would have to significantly deteriorate before the rider would be adjusted downward, while a minimal improvement (and in the case of CEI a deterioration) would produce additional incentive revenues to the Companies.

[7] Tr. Vol. III at 302 (October 20, 2008) (Schneider); *Direct Testimony of Barbara R. Alexander*, Exhibit BA-2, FirstEnergy Response to OCC Set 6 – INT- 129 (Blank).

Distribution issues should be severed from the case. Any distribution improvement rider must be developed in light of the revenue already available through distribution rates and designed to improve reliability, not keep it constant or permit a decline in service quality. The risk of not meeting reliability targets should be borne by the Companies and their shareholders, not their customers. Until FirstEnergy meets existing reliability standards, its ability to effectively implement a distribution system upgrade program is unproven. Scarce ratepayer funds should only be committed when there are defined goals that exceed minimum standards and when there is a detailed plan to achieve those goals. The record in this case fails to justify the proposed program.

Conclusion

The Commission faces a difficult choice given the many infirmities of the FirstEnergy Application. The evidence indicates that the ESP is not "more favorable in the aggregate" than an MRO. The proposed prices over the three years are too high. The alleged benefits to customers of the distribution charges and improvements are too ephemeral to provide any real value. The plan enslaves customers, not just for three years, but far into the future with riders and deferred charges that trap customers in a vortex of ever increasing electricity bills. The only provisions of the plan that could benefit customers – energy efficiency, demand response, and renewables – are empty shells. Even if they were meaningful proposals, the Companies fail to acknowledge the potential contribution of these statutory mandates to producing reasonable rates by reducing the need for expensive generation supply.

The Commission should order FirstEnergy to start over. It needs to require the Companies to develop integrated resource plans that define what needs to be procured to provide service at reasonable prices. The planning horizon should be long enough to produce the investments in new supply and demand side resources to ensure reasonable rates and price stability beyond the two to three year planning horizon proposed by the Companies. Efficiency and demand response programs need to be designed that shape load in a cost-effective manner to reduce the need for expensive generation resources. Renewable energy, a key to long-term price stability, should be a component of the plan. The generation procured to meet the balance of SSO requirements should be a mixed portfolio of short-, medium-, and long-term supply designed to produce reasonable rates and price stability.

Design of an SSO which benefits customers appears antithetical to the plan advanced by FirstEnergy. It is likely that adoption of a plan resembling that proposed by OPAE would result in a withdrawal of the Application by the Companies. This does not, however, create a Hobson's choice for the Commission. Current wholesale electricity and capacity prices, though produced in an imperfect market, have the potential to provide lower bills for customers than the ESP as proposed by FirstEnergy. The Commission can impose that option as a short-term plan and order the Companies to file either an MRO or an ESP based on an integrated resource plan designed to ensure the reasonable rates and price stability customers need. At-risk customers can be protected through appropriate rate designs and targeted energy efficiency programs.

Reasonable rates are critical to setting the stage for economic growth and protecting customers during this time of economic crisis. Subjecting customers to the tyranny of an unchecked monopoly will ensure the regional economy goes into a death spiral causing immeasurable harm to residential, commercial, and industrial customers. We need to call FirstEnergy's bluff and require a filing that complies with Ohio law. Public utilities have responsibilities beyond those owed to their shareholders. A long list of legal precedents establishes the public responsibilities of public utilities. That rich tradition provides the guidance the Commission must follow to protect customers.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion to Intervene, Memorandum in Support, and Motion to Practice *Pro Hac Vice* were served by regular U.S. Mail, postage prepaid, upon the parties of record identified below on this 12th day of August, 2008.

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