BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of Protocols for the Measurement and Verification of Energy Efficiency and Peak Demand Reduction Measures.	**Case No. 09-512-GE-UNC**

JOINT COMMENTS REGARDING APPENDIX A OF THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO, COLUMBIA GAS OF OHIO, INC., VECTREN ENERGY DELIVERY OF OHIO, INC., AND DUKE ENERGY OHIO, INC.

I. INTRODUCTION

Pursuant to the Commission's June 24, 2009 Entry ("Entry"), The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO"), Columbia Gas of Ohio, Inc. ("Columbia"), Vectren Energy Delivery of Ohio, Inc. ("VEDO"), and Duke Energy Ohio, Inc. ("DE-Ohio") (together, the "Gas Utilities") jointly file these comments regarding Appendix A to that Entry. The Gas Utilities are filing these joint comments to construct a consensus regarding policy issues associated with the development of an energy efficiency Technical Reference Manual ("TRM") for Ohio. The Gas Utilities reserve the right to raise additional issues throughout this proceeding.

There are four things that the Commission should consider in determining whether to adopt a TRM for gas utilities and, if adopted, what such a TRM should contain. First, the Commission should consider whether it is necessary to have a TRM for gas utilities at all, especially in light of the programs that already exist in Ohio and the manner in which those programs have developed and similar future programs will develop in the absence of a TRM. The Commission has approved voluntary energy efficiency programs for all of the Gas Utilities. Entry at 2. It approved all of those programs without a TRM. Some of the energy efficiency programs approved by the Commission include many of the same features that the Commission

may prescribe through a TRM, including engineering data and measurement and verification. Imposing new requirements on Gas Utilities will only lead to higher rates for customers because customers will bear the costs of any additional administrative requirements associated with a TRM. Given the progress already achieved in reducing per customer consumption and increasing energy efficiency for gas customers, the Commission should consider whether new procedures imposed through a TRM will be worth the cost.

Second, if the Commission adopts a TRM, the TRM should not disturb existing programs, including the methodologies to determine whether those existing programs are cost effective.

Third, the parameters set forth in the TRM should be flexible enough to permit each sponsoring utility to present accurately the costs and benefits associated with its portfolio, program(s), project(s) or measure(s).

Fourth, the TRM should be simple and inexpensive to administer. There is a cost to gather all of the data so that sponsoring utilities can: (a) produce an application for program approval; (b) demonstrate that the program is cost-effective; (c) provide appropriate measurement and verification; (d) develop new programs; (e) annually amend existing programs to meet ongoing requirements; and (f) participate in continuous regulatory proceedings to amend the TRM. Many of these activities may be necessary, but they should be designed to minimize time and cost.

II. COMMENTS

A. The Commission Should Not Adopt a TRM for Gas Utilities.

The Commission's Entry requires interested parties to comment on policy issues set forth in Appendix A regarding the development of a TRM. Entry at 5. It also invites parties to

"suggest other policy considerations…." *Id*. A preliminary policy consideration is whether a TRM applicable to energy efficiency programs sponsored by the Gas Utilities is necessary at all.

Despite the lack of a TRM, customers already benefit from gas energy efficiency innovations developed and implemented by the manufacturers of gas appliances and other home equipment. Most gas appliances — including stoves, ovens, furnaces, and water heaters — have become more efficient over the years and efficiency continues to improve. These efficiencies have evolved from, among other factors, pilotless features and technologies that burn gas more completely. Other nongas-burning residential equipment have also contributed to reduce gas consumption. For example, low-flow showerheads reduce the need for hot water usage, thereby reducing the amount of gas used to heat water. Newer homes have also become more energy efficient because they are better insulated than ever before. And, despite the fact that there is no statutory requirement that the Gas Utilities invest in energy efficiency, all of the Gas Utilities have made Commission-approved energy efficiency investments, and customers have instituted their own energy efficiency investments, without a TRM. Entry at 2. Some of the Gas Utilities have developed cost effective energy efficiency programs with measurement and verification standards approved by the Commission. Additional approval and verification processes, along with the time and expense that would accompany such additional processes, are not necessary.

Indeed, the additional process, time and cost associated with a TRM may have the opposite effect intended by the Commission. A TRM could create a barrier to gas utility energy efficiency investment. Redundant market assessment, sampling, and engineering costs are just some of the increased costs that result from unnecessary regulatory requirements. These increased costs will ultimately be borne by customers. And the more it costs for an individual to participate in any energy efficiency measure, the less likely that person will participate in the

program. For energy efficiency programs sponsored by Gas Utilities, the Commission already has an application, approval and cost recovery process. No additional processes — and costs — are required.

If the Commission determines that a TRM should apply to gas energy efficiency programs, it should not retroactively apply the TRM. The Gas Utilities' existing energy efficiency programs were developed as part of a collaborative process and the Commission determined they were cost-effective when it approved them. The collaborative process provides the flexibility necessary to design and evaluate each Gas Utility's programs to account for the differences among the Gas Utilities' respective systems. The Commission has applied reporting requirements to some of the Gas Utilities. The Commission receives measurement and verification of program performance relative to program goals from some of the Gas Utilities. The different application and approval processes used by the Commission to implement diverse energy efficiency programs sponsored by the Gas Utilities demonstrates the value of a flexible process necessary to accommodate the unique circumstances of each Gas Utility. The "one size fits all" approach of a TRM may undo much of what has already been done. No additional process or expense is necessary relative to the gas energy efficiency programs already approved.

The Commission suggested that "the electric and gas utilities… review and consider the TRMs and protocols developed by other states and regional entities for energy efficiency programs, such as the Pennsylvania TRM…." The Gas Utilities are reviewing the protocols developed by other states beginning with the eleven states identified by the Commission at its technical conference and in its June 24, 2009 Entry. Three things have become clear:

- Of those eleven states, only Minnesota and Wisconsin require gas utilities to develop and implement energy efficiency programs (Minn. Stat. 216B.241(1c); Wis. Stat. 196.374(1)(e));
- Only Minnesota has adopted a mandatory TRM that is applicable to gas utilities (Minnesota Public Utilities Commission, Case No. 08-272); and
- Some states, including Pennsylvania, have adopted a TRM applicable only to energy efficiency programs sponsored by electric utilities (73 P.S. § 1648.3).[1]

Most states — including California, Connecticut, Massachusetts, Oregon, Vermont, and Washington — have adopted energy efficiency requirements for electric utilities only. Some of the states that mandate that electric utilities develop and implement energy efficiency programs, like Massachusetts and California, suggest that gas utilities voluntarily sponsor energy efficiency programs or adopt published measures. None of those states, statutorily or by TRM, mandate that gas utilities sponsor energy efficiency programs. The Commission should follow the policy decision adopted by most states and develop a TRM applicable only to electric utilities.

B. Should the Commission Evaluate Performance of Utility Programs on the Basis of Achieved Gross or Net Savings, or Both?

1. The Commission Should Determine Program-by-Program Whether to Evaluate Savings on a Gross or Net Basis.

The Commission should evaluate gas energy efficiency programs on the basis of either gross savings or net savings, depending upon the attributes of the particular program. In addition to the energy efficiency measure and the various ancillary circumstances that affect a measure (*e.g.*, the amount of insulation in a home affects the amount of gas that a new high efficiency furnace will consume), there are three factors that should be evaluated: free riders; take-back

[1] The Gas Utilities will not list the state statutes that do not apply to gas utilities. In Ohio, the statute corresponding to Pennsylvania's is R.C. 4928.66, which, like Pennsylvania's statute, applies only to electric utilities.

effect; and spillover effect. *See* Pennsylvania Public Utilities Commission, *Implementation of the Alternative Energy Portfolio Standards Act of 2004: Standards for the participation of Demand Side Management Resources – Technical Reference Manual Update* (Order at 16) (June 1, 2009).

Free riders are customers that take advantage of energy efficiency program incentives even though they would have installed the measure(s) anyway. *Id*. Take-back effect occurs when a customer implements an energy efficiency measure but increases energy use for comfort or convenience. *Id*. Spillover is when a customer invests in energy efficiency without taking advantage of program incentives. *Id*. The savings associated with gas energy efficiency programs with significant and measurable free riders, take-back effect, or spillover may be more accurately determined through a net savings calculation because such effects increase or decrease the savings associated with energy efficiency programs. For example, spillover causes customers to implement additional energy efficiency measures without using program resources.

The savings associated with other gas energy efficiency programs may be more accurately determined through a gross savings calculation because there is no ancillary influence on the savings calculation.

The Gas Utilities should be free to suggest either a net or gross savings calculation methodology as part of an application seeking approval of a gas energy efficiency program if such an application is required.

2. The Commission Should Consider Measures That Have a Payback Period of Less Than One-Year.

The Commission recommends that "utilities should not provide incentives for measures that have a payback period of one year or less to customers." Entry at Appendix A at 2. The Gas Utilities disagree with the Commission's recommendation.

Each gas energy efficiency portfolio — and ultimately each program within a portfolio — should be judged upon its cost-effectiveness and other benefits and detriments. The length of a payback period is irrelevant, especially when affordability is an issue. In difficult economic times, a customer may participate in energy efficiency programs with a shorter payback period because the customer cannot afford to invest more capital in energy efficiency. When economic conditions are better, customers may be willing to participate in energy efficiency programs with longer payback periods. To reject a gas energy efficiency program because its payback period is less than one year is an arbitrary standard that may prevent a beneficial program from being proposed and approved.

For example, there are few low-flow showerheads that are currently available at retail stores. The Commission has approved gas energy efficiency programs that offer incentives to residential customers to purchase low-flow showerheads. The payback period for such devices is less than a year. However, supporting programs that offer incentives to purchase such showerheads is a market transformation opportunity. Such programs should not be rejected simply because the customer saves more than the cost of the purchase in less than a year.

C. How Should Baseline Efficiency and Market Penetration be Defined for Determining Energy Savings and Demand Reductions?

The Commission recommends that the baseline efficiency "used to calculate savings should be set at the minimum efficiency requirements of federal standards and state codes or current market practice, whichever is higher." Entry at Appendix A at 4. During the July 8, 2009 technical conference on the Commission's energy efficiency policy, the Commission's consultant asked the question: how good is good enough? This is the right question to ask in relation to the determination of a baseline efficiency from which to measure savings.

The Commission's recommendation would require a market assessment as part of the process to determine an efficiency baseline for every gas energy efficiency measure. Market assessments are expensive. Where different social groups have different practices – for instance, where purchasing habits differ between socio-economic classes – there effectively could be multiple markets within a region, each requiring a market assessment. Because customers ultimately pay for those assessments, the Commission should consider whether market assessments add sufficient value before requiring them in all cases.

It is not necessary to perform a market assessment where the market practice is reasonably known or the energy-efficient technology is not significantly different than technology already available in the market. On the other hand, a market assessment should be performed where market participants have market options that may be significantly less energy efficient than the federal or state standards would otherwise require. That may occur, for example, when consumers purchase used, energy-inefficient gas stoves because they cannot afford the cost of new models that meet the federal or state standard.

Ultimately, the Commission should consider the appropriate baseline efficiency approach on a case- by-case basis. If government standards provide a reasonable result at a minimal cost, the Commission should approve those standards. If a market assessment is necessary to establish a reasonable baseline, the Commission should approve a market assessment process if such a process permits the gas energy efficiency program to remain cost-effective. The Commission should consider a flexible approach in reviewing any application that proposes a reasonable methodology to establish baseline efficiency.

The Gas Utilities agree with the Commission's recommendation that, for "early retirement" programs, the baseline should be the energy use of the existing appliance or

equipment until the remaining useful life of the existing equipment would have ended. After that point, the baseline should be the efficiency of new standard equipment, as defined by code, standard, or standard practice. Entry at Appendix A at 4. In determining remaining useful life for existing equipment, however, the Commission should keep in mind that remaining useful life actually goes up the older a piece of equipment is. The longer a piece of equipment has run without replacement, the greater the likelihood that the equipment is well-made and will continue operating longer than usual.

D. Should Reported Energy Savings and Demand Reduction Use Retroactive or Prospective TRM Values?

The Gas Utilities agree with the Commission's recommendation that energy savings and demand reduction estimates approved by the Commission as part of a gas energy efficiency program should not be adjusted retroactively. *Ex post* estimates should cause adjustments only on a going forward basis. The Commission should proceed with caution when making such adjustments.

Energy price forecasts are an important component of the estimated energy savings projected by the Gas Utilities in a gas energy efficiency program application. Energy prices, including gas prices, are volatile. Additionally, price forecasts are typically for a period of twenty-years or more. The basis for price forecasts may be a proprietary model for the early years and an index adjustment for inflation for the remaining years. Differences between early year price forecasts and actual prices should not require the Commission automatically to adjust energy savings on a going forward basis. Subsequent years' prices may move just as quickly in the opposite direction, better aligning forecasts with actual prices. Because prices may move quickly in the opposite direction (a not-unexpected phenomenon with energy commodity prices), changes to energy savings should be based upon established trends rather than upon a reaction to

short-term price volatility. Energy savings reporting requirements should permit the Gas Utilities to contrast estimated savings with current and reasonably forecasted conditions and make recommendations based upon historical facts and judgment. The TRM should permit the Commission the flexibility to amend estimated savings proactively in a reasonable manner rather than in a manner dictated by an inflexible rule.

E. Should the Cost-Effectiveness Test be Applied at the Measure, Project, Program or Portfolio Level?

The Gas Utilities generally agree with the Commission's recommendation to apply the cost-effectiveness test at the portfolio or program level. Such a standard allows the Commission, Gas Utilities and customers flexibility to design, test, and adjust energy efficiency measures, projects and programs to maximize benefits. Some measures, projects, and programs may require the application of a cost-effectiveness test, such as the TRC, before being submitted to the Commission for approval. The TRM should be flexible enough to accommodate application of the TRC, or other cost-effectiveness test, at any appropriate level. For example, if a measure requires the use of engineering standards to design, measure and verify the measure, it is likely that the engineering standards should also be used at the measure level to determine cost-effectiveness.

The Gas Utilities also generally agree with the factors that the Commission has listed for consideration in weighing whether a non-cost-effective measure should be included in an approved program. *See* Entry at Appendix A at 7. The Gas Utilities would recommend including "Building science/performance issues" as an additional potential factor. In some instances, an energy efficiency measure could be considered non-cost-effective due to extrinsic home improvement costs necessitated by the measure. For instance, installing a new, high-efficiency gas heating system at a residence that had both a gas furnace and a gas water heater

might require installing a separate venting system for the new, replacement furnace and re-lining the existing chimney venting for the water heater to insure that combustion products from the water heater draft properly. As another example, a homeowner may need to repair his or her roof before installing additional attic insulation. If the Commission rejects energy efficiency measures because of extrinsic costs due to building science or performance issues, the Commission could lose important opportunities for energy savings. The Gas Utilities encourage the Commission to consider that some costs are only indirectly related to an energy-efficiency measure, and more directly related to building science/performance issues, when weighing requests to include non-cost effective measures in a program.

F. What Expectations Should the Commission Establish for Energy Savings and Demand Reduction Determination Certainty?

The Commission recommends that "any evaluation sampling provide results at a 90 percent confidence level with 10 percent precision." Such a standard makes sense if there is a need for sampling. Many gas energy efficiency programs, however, do not require sampling. Sampling can be an expensive process that requires an evaluation of measure or project units. For most gas energy efficiency programs, a bill analysis may yield better results at a lower cost. Moreover, a 90 percent confidence level with 10 percent precision may not always be achievable, depending on the population size and the parameters of interest.

The Commission should consider the cost of precision before it applies a blanket prescription for sampling. The Gas Utilities recommend a flexible approach permitting an application to the Commission that suggests sampling or another reasonable approach to establish energy savings certainty.

III. CONCLUSION

The Gas Utilities appreciate the opportunity to present comments to the Commission's proposed Appendix A. The Gas Utilities are in the process of implementing energy efficiency programs. A process that encourages the development and implementation of cost-effective gas energy efficiency programs is prudent. A flexible approach to the development of gas energy efficiency portfolios is necessary to achieve accurate results and maximize benefits for customers. This is consistent with the process currently used by Gas Utilities, which does not include a TRM.

Respectfully submitted,

/s Paul A. Colbert
David A. Kutik (Counsel of Record)
JONES DAY
North Point, 901 Lakeside Avenue
Cleveland, Ohio 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212
dakutik@jonesday.com

Paul A. Colbert
Grant W. Garber
JONES DAY
325 John H. McConnell Blvd., Suite 600
P. O. Box 165017
Columbus, Ohio 43216-5017
Telephone: (614) 469-3939
Facsimile: (614) 461-4198
pacolbert@jonesday.com
gwgarber@jonesday.com

ATTORNEYS FOR THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO

/s Eric Gallon per email authority/PAC
Eric Gallon
Porter Wright Morris & Arthur LLP
Huntington Center
41 South High Street
Columbus, Ohio 43215
Telephone: (614) 227-2190
Facsimile: (614) 227-2100
egallon@porterwright.com

Stephen Seiple
Columbia Gas of Ohio, Inc.
200 Civic Center Drive, PO Box 117
Columbus, Ohio 43215
Telephone: (614) 460-4648
Facsimile: (614) 460-4944
sseiple@nisource.com

ATTORNEYS FOR COLUMBIA GAS OF OHIO, INC.

/s Mark A. Whitt per email authority/PAC
Mark A. Whitt
Carpenter Lipps & Leland LLP
280 Plaza, Suite 1300
280 North High Street
Columbus, Ohio 43215
Telephone: (614) 365-4100
Facsimile: (614) 365-9145
whitt@carpenterlipps.com

ATTORNEY FOR VECTREN ENERGY DELIVERY OF OHIO, INC.

/s Elizabeth H. Watts per phone authority/PAC
Elizabeth H. Watts
Duke Energy Ohio, Inc.
155 East Broad Street, 21st Floor
Columbus, Ohio 43215
Telephone: (614) 222-1331
Facsimile: (614) 222-1337
Elizabeth.watts@duke-energy.com

ATTORNEY FOR DUKE ENERGY OHIO, INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent by electronic mail* or regular U.S. mail, postage paid to the following parties on this 24th day of July, 2009.

_____

Paul A. Colbert

*Mark A. Whitt, Esq.
Carpenter, Lipps & Leland LLP
280 Plaza, Suite 1300
280 North High Street
Columbus, OH 43215

*Kathy J. Kolich, Esq.
FirstEnergy Corp
76 South Main Street
Akron, OH 44308
kjkolich@firstenergycorp.com

*Rodger A. Kershner, Esq.
450 West Fourth Street
Royal Oak, MI 48067-2557
rkershner@howardandhoward.com

*Mr. Kenneth D. Schisler
Enernoc, Inc.
75 Federal St., Suite 300
Boston, MA 02110
kschisler@enernoc.com

*Ms. Janet K. Stoneking
Ohio Department of Development
77 S. High Street
P.O. Box 1001
Columbus, OH 43216-1001

*Carolyn S. Flahive, Esq.
Thompson Hine LLP
41 South High Street Suite 1700
Columbus, OH 43215-6101
carolyn.flahive@thompsonhine.com

*Mary W. Christensen, Esq.
Christensen Christensen Donchatz
Kettlewell & Owens
100 East Campus View Blvd., Suite 360
Columbus, OH 43235
mchristensen@columbuslaw.org

*W. Jonathan Airey, Esq.
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street Po Box 1008
Columbus, OH 43216-1008
wjairey@vorys.com

*Mr. Nolan M. Moser
The Ohio Environmental Council
1207 Grandview Ave.
Columbus, OH 43212-3449
nolan@theoec.org

*Lisa G. McAlister, Esq.
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus, OH 43215
lmcalister@mwncmh.com

*Ms. Deb J. Bingham
The Office of the Ohio Consumers' Counsel
10 West Broad St., Suite 1800
Columbus, OH 43215-3485

*Ms. Christine M. Falco
PJM Interconnection LLC
965 Jefferson Avenue
Norristown, PA 19403
falcoc@pjm.com

*Matthew S. White, Esq.
Chester Willcox & Saxbe
65 E State Street
Columbus, OH 43228
mwhite@cwslaw.com

*Mr. Dwight N. Lockwood
Global Energy, Inc.
312 Walnut Street, Suite 2300
Cincinnati, OH 45202
dnlockwood@globalenergyinc.com

*Elizabeth H. Watts, Esq.
Assistant General Counsel
Duke Energy Ohio, Inc.
155 East Broad Street, Suite 2100
Columbus, OH 43215
elizabeth.watts@duke-energy.com

*Ms. Connie L. Lausten
V.P. Regulatory and Legislative Affairs
New Generation Biofuels
4308 Brandywine St. NW
Washington, DC 20016
cllausten@newgenerationbiofuels.com

*Mr. Steven T. Nourse
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
stnourse@aep.com

*Ms. Kari Decker
APX
2939 27th St
Sacramento, CA 95818
kdecker@apx.com

Duane Luckey, Section Chief
Office of the Ohio Attorney General
Public Utilities Section
180 East Broad Street, 9th Floor
Columbus, OH 43215
duane.luckey@puc.state.oh.us

Columbia Gas of Ohio Inc
Robert G. Kriner
200 Civic Center Drive
Columbus, OH 43215

Eric B Gallon, Esq.
Porter Wright Morris & Arthur LLP
41 South High Street Suite 3000
Columbus, OH 43215
egallon@porterwright.com

Vectren Energy Delivery of Ohio, Inc.
Ronald E. Christian
One Vectren Square
Evansville, IN 47708

Office of the Ohio Consumers' Counsel
Jeffery Small, Esq.
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485
small@occ.state.oh.us
serio@occ.state.oh.us

Michael R. Beiting, Esq.
FirstEnergy Corp
76 South Main Street
Akron, OH 44308
kjkolich@firstenergycorp.com

Sally Bloomfield, Esq.
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215-4291

Candace Jones, Esq.
Ohio Department of Development
77 S. High Street
P.O. Box 1001
Columbus, OH 43216-1001

Thomas E. Lodge, Esq.
Thompson Hine LLP
41 South High Street Suite 1700
Columbus, OH 43215-6101

Steven Millard
200 Tower City Center
50 Public Square
Cleveland, OH 44113

Garrett A. Stone, Attorney At Law
Brickfield, Burchette, Rim & Stone, P.C.
1025 Thomas Jefferson Street N.W.
8th Floor, West Tower
Washington, DC 20007

Randall V. Griffin, Chief Regulatory Counsel
Dayton Power and Light Company
1065 Woodman Drive
P O Box 8825
Dayton, OH 45401

Gregory J. Poulos, Attorney
The Office of the Ohio Consumers' Counsel
10 West Broad St., Suite 1800
Columbus, OH 43215-3485

Ms. Anita Schafer
Duke Energy Ohio
139 East Fourth Street
Cincinnati, OH 45202

Harvey Wagner
Cleveland Electric Illuminating Co.
Ohio Edison Company
Toledo Edison Company
76 S. Main Street
Akron, OH 44308

Selwyn J. Dias, Esq.
Columbus Southern Power
Ohio Power Company
88 East Broad Street, Suite 800
Columbus, OH 43215

Gary S. Guzy, Esq.
General Counsel
APX Inc
5201 Great America Parkway #522
Santa Clara, CA 95054

David C. Rinebolt
Ohio Partners For Affordable Energy
231 West Lima St
P O Box 1793
Findlay, OH 45839-1793

Robert J. Triozzi, Esq.
Director of Law
Cleveland City Hall
601-Lakeside Ave, Room 206
Cleveland, OH 44114-1077

David R. Marchese
Haddington Ventures, L.L.C.
2603 Augusta, Suite 900
Houston, TX 77057

Joseph V. Maskovyak
Ohio State Legal Services Association
555 Buttles Avenue
Columbus, OH 43215-1137

Dayton Power & Light Company
Dona Seger-Lawson
1065 Woodman Drive
Dayton, OH 45432

Judi L. Sobecki, Attorney at Law
1065 Woodman Drive
Dayton, OH 45432

Environment Ohio-Environmental Advocate
Amy Gomberg
203 East Broad Street, Ste 3
Columbus, OH 43215

Greenfield Steam & Electric
Neil Sater
6618 Morningside Drive
Brecksville, OH 44141

Industrial Energy Users of Ohio
Samuel C. Randazzo, Gener
21 E. State Street, 17th Floor
Columbus, OH 43215

Joseph M. Clark, Attorney at Law
McNees Wallace & Nurick LLC
21 East State Street, 17th Fl.
Columbus, OH 43215-4228

Mid Ohio Regional Planning Commission
Erin Miller
111 Library Street, Suite 100
Columbus, OH 43215

Ohio Energy Group, Inc.
David Boehm
36 E. Seventh Street, Suite 1510
Cincinnati, OH 45202

Michael Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202

Ohio Farm Bureau Federation, Inc.
Dale Arnold
Director Energy Services
P.O. Box 182383
Columbus, OH 43218

Ohio Fuel Cell Coalition
737 Bolivar Road
Cleveland, OH 44115

Rolls-Royce Fuel Cell Systems, Inc.
6065 Strip Avenue NW
North Canton, OH 44720

Sierra Club Ohio Chapter
Brandi Whetstone
131 N High St., Ste. 605
Columbus, OH 43215

The Climate Registry
Ann McCabe
1543 W. School St
Chicago, IL 60657

United Steel Workers District 1
Dave Caldwell
777 Dearborn Park Land, J
Columbus, OH 43085

Vertus Technologies Inc
Joseph Koncelik
2500 Key Center
127 Public Square
Cleveland, OH 44114-1230

FirstEnergy Solutions Corp.
Lou D'Alessandris, Market
341 White Pond Drive
Akron, OH 44320

Morgan Parke, Attorney at Law
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308

AARP
Ron Bridges
17 South High Street
Suite 800
Columbus, OH 43215

American Municipal Power-Ohio Inc
Marc Gerken, P.E., President
2600 Airport Drive
Columbus, OH 43219-2266

John Bentine, Esq.
Chester Wilcox & Saxbe, LLP
65 East State Street, Suite 1000
Columbus, OH 43215-4259

American Wind Energy Assoc.
1101 14th Street NW
12th Floor
Washington, DC 20005

Appalachian People's Action, Coalition
Michael R. Smalz
Ohio State Legal Service Assoc.
555 Buttles Avenue
Columbus, OH 43215

APX Inc
5201 Great America Parkway
#522
Santa Clara, CA 95054

BrightPath Energy LLC
33 West 19th Street
4th Floor
New York, NY 10011

Buckeye Power, Inc.
P.O. Box 26036
Columbus, OH 43226-0036

Citizen Power
David Hughes, Ex. Dir.
2121 Murray Avenue
Third Floor
Pittsburgh, PA 15217

Theodore Robinson
Citizen Power
2424 Dock Road
Madison, OH 44057

Citizens for Fair Utility Rates
Tim Walters
c/o The May Dugen Center
4115 Bridge Avenue
Cleveland, OH 44113

Joseph Meissner
Director of Urban Development
Attorney at Law
1223 West Sixth Street
Cleveland, OH 44113

City of Cleveland
601 Lakeside Avenue, Room 106
Cleveland, OH 44114-1044

Steven L Beeler Assistant Director of Law
City of Cleveland Department of Law
601 Lakeside Avenue
Room 106
Cleveland, OH 44114

City of Hamilton
Charles S. Young
345 High Street
Hamilton, OH 45011

City of Toledo
One Government Center
Suite 2250
Toledo, OH 43604

Leslie Kovacik
420 Madison Avenue, 4th Fl
Toledo, OH 43624

Cleveland Electric Illuminating Company
76 South Main Street
Akron, OH 44308

Cleveland Housing Network
2999 Payne Avenue
Cleveland, OH 44114

Columbus Southern Power Company
1 Riverside Plaza
Columbus, OH 43215

Communities United for Action
Noel M. Morgan, Attorney
Legal Aid Society of Southwest Ohio
215 E. Ninth Street Suite 200
Cincinnati, OH 45202

Constellation NewEnergy, Inc.
David I. Fein
550 W. Washington Blvd, Suite 300
Chicago, IL 60661

M. Howard Petricoff
Vorys, Sater, Seymour & Pease
52 East Gay Street
P.O. Box 1008
Columbus, OH 43216-1008

Council of Smaller Enterprises
Steve Millard
100 Public Square, Suite 201
Cleveland, OH 44113

Direct Energy Services LLC
Ron Cerniglia
40 Columbine Drive
Glenmont, NY 12077

Edgemont Neighborhood Coalition
Ellis Jacobs
333 West First Street, Suite 500B
Dayton, OH 45402

Empowerment Center of Greater Cleveland
3030 Euclid Avenue, Unit 100
Cleveland, OH 44115

Global Energy
Dwight N. Lockwood, Group Vice President
312 Walnut Street, Suite 2300
Cincinnati, OH 45202

Great Lakes Energy Development Task Force, Cuyahoga County, Ohio
100 East Campus View Blvd.
Suite 360
Columbus, OH 43235-4679

Integrys Energy Services, Inc
Teresa Ringenbach
300 West Wilson Bridge Road
Suite 350
Worthington, OH 43085

Interstate Gas Supply, Inc.
Vincent Parisi
5020 Bradenton Avenue
Dublin, OH 43017

The Kroger Company
Mr. Denis George
1014 Vine Street-G07
Cincinnati, OH 45202-1100

KW Solar Solutions LLC
Robert Wevodau
250 Corporate Blvd Suite D
Newark, DE 19702

Legal Aid Society of Cleveland
Joseph Meissner
Urban Develop Off
1223 W. Sixth St
Cleveland, OH 44113

Lucas County Commissioners
Lance Keiffer
711 Adams, 2nd Floor
Toledo, OH 43624

Midwest Energy Efficiency Alliance
645 N. Michigan Avenue
Suite 990
Chicago, IL 60611

Natural Resources Defense Council
2 N Riverside Plaza
#2250
Chicago, IL 60606-2600

Neighborhood Environmental Coalition
Rev. Mike Frank, Co-Chair
5920 Engle Ave.
Cleveland, OH 44127

NOPEC
31320 Solon Road, Ste 20
Solon, OH 44139

Norton Energy Storage, L.L.C.
c/o Langdon D. Bell, Esq.
Bell & Royer Co., LPA
33 South Grant Avenue
Columbus, OH 43215

Nucor Steel Marion, Inc
912 Cheney Avenue
Marion, OH 43302

Michael K. Lavanga, Esq.
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street N.W.
8th Floor West Tower
Washington, DC 20007

Barth E. Royer, Esq.
Bell & Royer Co LPA
33 South Grant Avenue
Columbus, OH 43215-3927

Ohio Farmers Union
20 S. Third Street
Columbus, OH 43215

Ohio Hospital Association
Richard L. Sites
155 E. Broad Street, 15th Floor
Columbus, OH 43215-3620

Thomas O'Brien Attorney at Law
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215

Ohio Interfaith Power and Light
Gregory E. Hitzhusen, MD
P.O. Box 26671
Columbus, OH 43226

Ohio Manufacturers Association
Eric L. Burkland, President
33 North High Street
Columbus, OH 43215-3005

Ohio Partners for Affordable Energy
Colleen L Mooney
1431 Mulford Rd
Columbus, OH 43212

Ohio Power Company
1 Riverside Plaza, 29th Floor
Columbus, OH 43215

Sierra Club Ohio Chapter
Jennifer Miller
131 N. High Street, Suite 605
Columbus, OH 43215

SunEdison
12500 Baltimore Avenue
Beltsville, MD 20705

The Solid Waste Authority of
Central Ohio
4239 London Groveport Road
Grove City, OH 43123

Dennis Hirsch
Porter Wright Morris & Arthur
41 S. High Street
Columbus, OH 43215

Toledo Edison Company
76 S Main Street
Akron, OH 44308

United Clevelanders Against Poverty
May Dugan Center
4115 Bridge Avenue
Cleveland, OH 44113

Wind on the Wires
1619 Dayton Avenue
Suite 203
Saint Paul, MN 55104

Summary: Comments Joint Comments regarding Appendix A to the Commision's June 24, 2009 Entry electronically filed by Paul A Colbert on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio and Columbia Gas of Ohio, Inc. and Vectren Energy Delivery of Ohio, Inc. and Duke Energy Ohio, Inc.