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companies, COSE has a long history of fighting for the rights of all small business owners, whether it's through group purchasing programs in healthcare, workers' compensation, payroll services, shipping, or advocating for specific changes in legislation or regulation.

COSE, a certified Competitive Retail Electric Service Provider, started a group electric aggregation program for our members in 1999. Since that time, we have enrolled more than 6,000 electric accounts and are saving our members more than \$1 million annually on their electricity costs. In addition, COSE provides a variety of informational and educational resources to help small businesses better understand today's energy market to all of our 15,000 members in Northeast Ohio. The COSE Electric Program serves members within the FirstEnergy service territory.

Since the enactment of Senate Bill 221, COSE recognized the need for small businesses to engage in energy efficiency and alternative energy technologies. COSE has been working to develop products and programs to educate small business owners on the use and advantages of energy efficiency and alternative energy technologies within their work places. Because of the endeavors that COSE has undertaken, COSE is uniquely positioned to provide the PUCO with insight regarding energy efficiency programs and products outlined within FirstEnergy's filing.

II. ARGUMENT

A. The Commission Should Require FirstEnergy to Include Certain Residential Programs as Small Enterprise Programs Within FirstEnergy's Energy Efficiency and Peak Demand Response Plans.

On July 31, 2008, Amended Substitute Senate Bill 221 ("SB 221") was enacted to revise Chapter 4928 of the Ohio Revised Code to establish statutory bench marks for energy efficiency and peak demand reductions. These bench marks are set forth in O.R.C. 4928.66(A)(1)(a) and (b) and require Ohio's utilities to reduce energy consumption and peak demands for 2009

through 2012. The PUCO adopted rules that address the measurement and reporting of utilities results.

FirstEnergy, in its current filing, has developed and designed a strategy to comply with these respective benchmarks. These plans are intended to provide a suite of EE & PDR Programs for all major customer segments. Included within the plans are programs for residential customers, small enterprise customers, large commercial and industrial programs, and government programs.

Section 2.0 which define the program summaries of the Energy Efficiency Portfolio for FirstEnergy's EE & PDR Programs, FirstEnergy states "since many small businesses are operated out of facilities that have energy consumption patterns and low profiles more similar to residential customers, several of the programs for residential buildings may also apply to small business customers." (*See EE & PDR Program plan, The Cleveland Electric Illuminating Company p. 17, Company's Exhibit 7.*) Clearly, FirstEnergy is contemplating the use of the residential programs by small enterprise customers.

The Commission should require FirstEnergy to, at a minimum, include the CFL Program, the Online Efficient Products Program, the Online Audit Program, Energy Efficient Products Program, to be included amongst the Small Enterprise Programs within FirstEnergy's plans.

By including small commercial customers in these programs, the company will expand its target market, increase the utilization of these programs and increase energy savings and peak demand reductions.

III. CONCLUSION

For the reasons stated above, COSE request that this Commission adopt the position of COSE on the issues set forth herein.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Initial Post Hearing Brief
Of the Council of Smaller Enterprises was served upon the parties of record listed below this
25th day of March, 2010 via first class mail.

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