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Springfield, Ohio 45323
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PUCO

Public Utilities Commission of Ohio
Attn: Docketing Department
180 E. Broad Street
Columbus, OH 43215

Reference Case Number 10-388-EL-SSO

I remember well the energy crises of 1973 and 1979. I remember the gas lines, soaring energy prices (including electricity), and the national outrage at being held hostage by foreign sources of energy. As a nation, we promised ourselves, "Never again!" We determined to take measures to prevent energy crises from happening in the future.

The size and cost of the electric generating infrastructure is as much a function of the peak demand as the average demand. I am reminded of the tremendous cost of meeting peak demands every time I drive by the jet engine-powered electricity generators next to I-75 south of Dayton, and those behind the now closed Ohio Edison electric plant at the west end of Springfield. I'm pretty sure these generators are idle most of the time. I can only guess these two installations represent a total investment in the hundreds of millions of dollars. Much of this investment probably could have been avoided if peak demands were controlled better.

In response to the energy crises of the 1970s, Ohio Edison and other electric utilities instituted residential time of day rates, as part of a means to reduce peak demand for electricity. Technology had provided us "smart" electric load meters and peak demand controllers, which could allow us to monitor and control peak usage of electricity.

In 1982, my family installed a demand controller in our all-electric house as a means to reduce electricity usage during peak times, and lower the cost of our electric bill. Ohio Edison installed a "smart" electric meter and we went under the residential time of day rate. We built a new house in 1995, chose to go all-electric, and installed a demand controller in that house. Installation of the first demand controller cost us \$1000, and the second one cost us \$1700. We took advantage of the residential time of day rate for 27 years, from 1982 to 2009.

In exchange for the residential time of day rate and the savings it provided, we accepted significant restrictions on our lifestyle. We came home in the winter to a cold house. Our house was similarly warm in the summer in the afternoon. We could not use major appliances during the peak periods (8 a.m. to 9 p.m. on weekdays). We occasionally had to run around the house to cut off lights and other electricity-consuming devices.

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We were notified in mid-2006 the residential time of day rate was planned to be phased out. When I complained, I was notified by the PUCO in January 2007 that:

"Ohio Edison's planned elimination of Optional Time of Day Rate is not for current customers like you. As long as you continue to use qualifying equipment, this rate will be available.

According to Ohio Edison, as long as you live at your current residence and continue to use all electric, the rate will remain. However, if you move and the new owner takes over the account, the new customer will be charged a different rate."

That promise by the PUCO and Ohio Edison was broken in the summer of 2009 with elimination of the residential time of day rate

We still have a "smart" meter, but it serves no additional purpose beyond an ordinary "dumb" meter, with the elimination of the time of day rate. Our demand controller is still turned on, but we have raised the peak load setting to a level where the demand controller no longer regulates peak demands. There is no incentive on our part to control peak demands. All that is needed for us to resume energy conservation is restoration of the residential time of day rate.

I can understand FirstEnergy / Ohio Edison calling the residential time of day rate a discount rate. All they understand is maximizing the generation and sale of electricity, and maximizing revenue. Energy conservation is not in their business model. However, the residential time of day rate is NOT a discount rate. It is an energy conserving rate. The intent is to reduce electricity usage during periods of peak demand. Ohio Edison did have other rates in the past that offered actual discounts as an inducement to use MORE electricity.

In terms of energy conservation, we are back at early 1973. We have abandoned energy conservation measures and technologies that are mature and proven. We have gone from "smart" to "dumb." We appear to be incapable of learning from history. There will be energy crises in the future.

When President Obama entered office he spoke of "smart meters" and "smart electric grids." I was hopeful that finally we had a political leader who understood electricity issues, and practical ways to address them. Action by the PUCO soon afterwards to allow elimination of the time of day rate was 180 degrees out of alignment with where we need to be going.

I call on the PUCO to restore the residential time of day rate.

Sincerely,



Alfred B. Thomas