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

Reference:

- a. Case Number 10-388-EL-SSO
- b. Office of the Ohio Consumers' Counsel (OCC) letter of April 14, 2010

I previously provided comments to you in response to the referenced OCC letter. My previous reply was somewhat off target regarding the specific issues addressed in the OCC letter. However, I believe the OCC is asking for comments from consumers or the general public on issues that probably are technically beyond the ability or desire of most of us to comprehend fully. But since the OCC asked for concerns from consumers, here are mine:

Delivery Capital Recovery Rider. I can understand the need to invest in the "electric delivery system." This would appear to be a typical expense of an electric company, and similar to capital investments made by most business enterprises. Such costs normally are paid through retained earnings, debt obligations, or stock issues; and are recouped by income revenue over time. Investments in new plant and equipment may result in lower operating costs, if it replaces obsolete plant—thus no apparent cost to the consumer. However, if FirstEnergy wants their customers to pay for a capital investment up-front, I consider that to be out of order in a business sense.

Payment for Transmission Expansion Costs. This sounds like an off-books accounting scheme; something Enron would have done. If it's legal (without consideration of ethics), this also sounds like an internal business decision, and cost of doing business. If it costs more, why are they doing it? If they are trying to get their customers to pay for a specific cost of doing business, I object. Every business has a multitude of costs of doing business, and customers should not be charged separately for them. Such costs should be reflected in the prices of the services or products provided.

Lost Revenues.

FirstEnergy wants to charge its customers for product not purchased? That's an interesting concept; I hope other companies don't try the same trick. Was the reduction in consumption really a result of energy efficiency programs for which FirstEnergy can honestly take credit; or,

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was it the result of the recent and on-going economic downturn? If there was a reduction in energy usage due to FirstEnergy efficiency programs, the savings should be shared by the consumers and the provider (a revenue offset to FirstEnergy). But, the benefits share to the provider and the consumers should have been determined and agreed-to up front.

Maybe FirstEnergy should re-think its business model and plans for the future. I realize it's capitalist religion that growth in markets will always continue (just like housing prices will always rise), but maybe the future of electricity generation and consumption in Ohio, and other First Energy markets, will not include growth. Maybe energy efficiency and conservation should be primary goals of FirstEnergy for the future

Economic Development. These sound like measures that should be submitted to the affected electorate for approval. Let the voters decide if they want to bear the cost of subsidizing certain economic interests that may benefit the common good.

Sincerely,

A handwritten signature in black ink, appearing to read "Alfred B. Thomas". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Alfred B. Thomas