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To: PUCO Docketing Fax # 614-466-0313

From: Connie Kline - 38531 Dodds Landing Dr., Willoughby Hills, OH 44094
Home Phone & Fax - 440-946-9012

Date: 12/28/10

Re: Amendment/Addendum to Case # 10-176-EL-ATA Testimony

Pages: 5 including this cover letter:

1. Original undeliverable email - 1 pg.
2. Cleveland Electric Illuminating Co. document "Criteria to Qualify for Residential Schedule Space Heating/Water Heating Discounts", No. 3723-A, Rev. 5-85 - 2 pgs.
3. Docketing Information System Electronic Filing Participation Agreement - 1 pg.

Earlier today, I attempted to send an email with a First Energy document attached to docketing@puc.state.oh.us which was returned as "undeliverable, mailbox unavailable."

I phoned the PUCO and spoke with Tanowa, a representative in the Docketing Department who explained that e-filing could not be done using the above captioned email address.

To expedite matter, she suggested that I fax the original email and the First Energy Document that was attached to it, so that it could be included in the record for the above captioned case.

She also directed me to the "Docketing Information System Electronic Filing Participation Agreement" on the PUCO website and suggested that I print and complete the form, and fax it back for possible future E-filing.

Thank you for your time and consideration.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of busines
Technician _____ Date Processed DEC 29 2010

Subj: **Amendment/Addendum to Case # 10-176-El-ATA Testimony**
Date: 12/28/2010 2:09:29 P.M. Eastern Standard Time
From: Klineisfine@aol.com
To: Docketing@puc.state.oh.us
CC: sue2811@roadrunner.com

When I submitted testimony at the November 23, 2010 PUCO hearing at Lakeland Community College in Kirtland, Ohio regarding **Case No. 10-176-El-ATA**, I referred to a **Cleveland Electric Illuminating Company's document entitled "Criteria to Qualify for Residential Schedule Space Heating/Water Heating Discounts", No. 3723-A, Rev. 5-85** that our builder used when our all electric home was built in 1986. This document outlined stringent construction conservation/efficiency mandates in order to qualify for the residential all-electric rate.

At the time of my testimony, I could not find this two page document but have since located it and am attaching it to this email.

Please include this "Criteria to Qualify for Residential Schedule Space Heating/Water Heating Discounts", No. 3723-A, Rev. 5-85 as part of First Energy's Case No.
10-176-El-ATA.

PLEASE NOTE - My testimony appears on pages 90-91 of "Exhibits for Kirtland hearing (Part 1 of 3)", filed on 12/13/10.

(**PLEASE ALSO NOTE** that the transcript for this hearing is incorrectly captioned on the PUCO website under Case Record/Case Documents filed 12/13/10 as "Transcript for local public hearing held November 23, 2010 at ***Sandusky*** **(which should be Kirtland) Ohio** commencing at 6:00 p.m. before attorney Henry Phillips Gary and Commissioner Paul Centolella"

Please confirm receipt of this attachment. Thank you so much for your time and consideration.

Connie Kline

CRITERIA TO QUALIFY FOR RESIDENTIAL SCHEDULE: SPACE HEATING/WATER HEATING DISCOUNTS

QUALIFICATION PROCEDURE

The builder of each individually-metered residential dwelling unit shall provide and certify to the Company information specifying the thermal insulation effectiveness (i.e. R/numbers) for insulation installed in each building section along with a description of installation and construction details. If each of the following insulation and other energy conservation standards in that dwelling is met, the Company shall approve the Consumer's application to be billed under the provisions of the "Residential Schedule: Space Heating/Water Heating discounts".

CRITERIA	Minimum Insulating Value of Insulation Installed
1. Building Sections (Except in Manufactured Housing units)	
A. Exterior Walls	
1. Masonry Walls **including basement walls above** frost line	R/5
2. Frame and other fabricated exterior walls above grade	
a. Where use of expanded polystyrene rigid board insulation (or equivalent material with comparable R/factor) is permitted.	R/16.5
b. In other locations	R/11
3. Common walls between separate dwelling unit	R/11
B. Ceilings	
1. Uppermost ceilings separating heated from unheated areas	R/30
C. Floors	
1. Frame floors over unheated areas	R/22
2. Slab on-grade floors shall have insulation at the perimeter edge:	
a. On the inside of the foundation wall from top of slab floor to below the frost line around the perimeter of the slab or	R/10
b. from the top of slab floor and extended down the thickness of the slab and then continued horizontally back under the slab to a width of at least two feet around the perimeter of the slab floor	Vertical Portion- R/10 Horizontal Portion- R/5
3. Heating/cooling ducts that are installed in slab floors shall be enclosed on the warm winter side of the perimeter insulation in the manner provided in 2-(b) above.	
D. Windows	
1. Maximum total window area as a percentage of the total floor area.	15%
2. Windows shall be either double-glazed or installed with storm windows.	
3. Metal windows shall provide a thermal break between the inside and outside surface areas of the frame.	
4. Basement windows shall be either double-glazed, with storm windows, or provided with plastic bubbles covering the entire window opening. No more than the minimum area of windows allowed by municipal code shall be installed.	
5. Air leakage shall not exceed 0.5 cfm per foot of operable sash crack.	

Minimum Insulating Value of Insulation Installed

E. Doors

1. Doors shall contain an insulation core, or
2. Uninsulated doors shall be installed with storm doors
3. Air leakage shall not exceed 0.5 cfm per square foot of door area for sliding glass doors and swinging doors, respectively.

2. Installation and Other Construction Techniques (Except in Manufactured Housing Units)

A. Insulation Installation Procedures

Insulation shall be installed in building sections in a workmanlike manner in order to receive the thermal insulation effectiveness of the manufacturers' designated R/numbers on their products.

1. Insulation on all side walls shall be firmly packed without exposures, at both top and bottom of wall cavities
2. Insulation shall be chinked into all rough windows and door frame openings and covered with a vapor barrier.
3. Batts shall be neatly stapled at least every 6 inches.

B. A maximum of one sliding glass door per floor of living area shall be installed.

C. All shower heads shall be equipped with flow control devices to limit the total flow to a maximum of 3 gpm per shower head.

D. All heating/cooling ducts running through unconditioned spaces shall be fully insulated both supply and return air ducts. R/7

E. Hot Water Installation Procedures

1. Water heaters providing the domestic hot water supply shall not be located in unheated areas unless additional insulation is installed surrounding the tank.
2. Water heaters shall be located as close possible to the points of greatest use of hot water. Where points of use are widely separated, more than one water heater shall be installed to eliminate excessive runs of hot water lines.
3. All hot water lines running through unconditioned areas shall be insulated (R/3.5 or better).
4. Water heaters shall have a minimum insulation of R/10, or a thermal insulation jacket that, in combination with the water heating insulation, meets or exceeds such minimum insulation of R/10.

F. Caulking and Sealants

1. Exterior joints around windows and door frames, between wall and foundation, between wall and roof, between wall panels, at penetrations of utility services through walls, roofs and through floors over unheated spaces, and all other openings in the exterior envelope of said dwelling structures shall be caulked, gasketed, weatherstripped, or otherwise sealed to prevent air leakage.

G. Vapor Barriers

1. All insulation shall be installed with vapor barriers, rated 1 perm or less, on the warm winter side of the insulation; provided, however, that vapor barriers shall not be required for top-ceiling areas that meet the attic ventilation provisions of Section 1529.11 of the Regional Dwelling House Code or applicable provisions of the Ohio Building Code.
2. Slab floors in living areas with slabs in crawl-space areas shall have vapor barriers rated 4 mil thickness with maximum 1 perm vapor penetration installed beneath the slab.
3. Vapor barriers, if damaged, shall be repaired before the final wall finish is installed.

3. Manufactured Housing Units Standards for Space Heating Discount

At mimimum, manufactured housing shall meet the requirements of the Ohio Basic Building Code for Energy Conservation in New Building Construction, Rule 4101:2-25-03.