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The City Of Toronto

State of Ohio
"The Gem City"



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October 7, 2011

Chairman Todd A. Snitchler
180 E. Broad Street
Columbus OH 43215

11-346-EL-SSO

PUCO

2011 OCT 13 AM 11:15

RECEIVED-DOCKETING DIV

Dear Chairman Snitchler:

The City of Toronto is in AEP Ohio's service area. As a community who has the opportunity to provide its residents and small businesses with discounted electricity through a governmental aggregation program, we are genuinely concerned that the proposed settlement on AEP's Electric Security Plan (ESP) will effectively bring this type of discount program to an end for the next few years.

The proposed settlement includes unreasonable provisions which serve as caps or limitations on shopping and will limit the number of residents allowed to switch electric suppliers each year. Once this cap is hit, our community - and others like ours - will be effectively shut out from enjoying any savings. Hundreds of other Ohio communities in neighboring utilities are receiving savings through their aggregation programs. Why are we being penalized for being AEP customers? And why should AEP be able to dictate which groups of residents and businesses are allowed to save money on their electric bills?

It is the policy of this state to ensure effective competition in the provision of electric service - 4928.02 of the Ohio Revised Code - and it is the PUCO's mission to facilitate an environment that provides competitive choices. We ask that you encourage large-scale governmental aggregation as required by Ohio law - 4928.20(K) - by rejecting or significantly altering this settlement agreement to remove the caps. However, if the shopping caps are going to be implemented, we propose that governmental aggregation communities be exempted from the caps.

The reason our community has the potential for saving money on our electric generation supply is because a competitive generation supplier is competing for our business. It's apparent that AEP is attempting to prevent competitive suppliers from serving the customers in their service area. And if they are successful, the people and businesses in communities like Toronto will miss out on these savings. Other communities in Ohio have this opportunity to save and so should we.

Respectfully,

John Geddis
Mayor

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