

**BEFORE THE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

| | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|--------------------------------------------------|
| In the Matter of the Application of Ohio Power Company and Columbus Southern Power Company for Authority to Merge and Related Approvals |)))) | Case No. 10-2376-EL-UNC |
| In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan. |)))))) | Case No. 11-346-EL-SSO Case No. 11-348-EL-SSO |
| In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority |)))) | Case No. 11-349-EL-AAM Case No. 11-350-EL-AAM |
| In the Matter of the Application of Columbus Southern Power Company to Amend its Emergency Curtailment Service Riders |)))) | Case No. 10-343-EL-ATA |
| In the Matter of the Application of Ohio Power Company to Amend its Emergency Curtailment Service Riders |)))) | Case No. 10-344-EL-ATA |
| In the Matter of the Commission Review of the Capacity Charges of Ohio Power Company and Columbus Southern Power Company. |)))) | Case No. 10-2929-EL-UNC |
| In the Matter of the Application of Columbus Southern Power Company for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144 |))))) | Case No. 11-4920-EL-RDR |
| In the Matter of the Application of Ohio Power Company for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144 |))))) | Case No. 11-4921-EL-RDR |

**FIRSTENERGY SOLUTIONS CORP.'S
MOTION TO COMPEL COMPLIANCE WITH COMMISSION ORDER
& REQUEST FOR EXPEDITED RULING**

FirstEnergy Solutions Corp. (“FES”) hereby requests that the Commission take expedited action to order Ohio Power Company and Columbus Southern Power Company (collectively, “AEP Ohio”) to comply with the Commission’s December 14, 2011 Opinion and Order (the “Order”) approving with modifications AEP Ohio’s Joint Stipulation and Recommendations (the “Partial Stipulation”). AEP Ohio has failed to enroll customers with customers’ selected CRES provider on a timely basis and failed to provide necessary and timely information regarding the current status of the RPM allotments and GS-2 shopping credits, which harms the competitive market and causes confusion to both suppliers and customers. The Commission should direct AEP Ohio to: enroll customers with their selected CRES provider on a timely basis; provide the appropriate information; and, provide transparent updates to suppliers and customers as to their capacity prices and GS-2 credits – as called for by the Partial Stipulation itself, the Order, and state law and policy and as described in further detail in the attached Memorandum in Support, which is incorporated herein by reference. Irrespective of the outcome of pending applications for rehearing, the relief requested in this motion is necessary to address AEP Ohio’s failure to comply with provisions of the Partial Stipulation and Order because such a transparent, updated system is required as long as AEP Ohio maintains the RPM capacity pricing and GS-2 credits that are not available to all customers.

Respectfully submitted,

/s/ Laura C. McBride

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| In the Matter of the Application of Ohio Power Company for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144 |))))) | Case No. 11-4921-EL-RDR |

**MEMORANDUM IN SUPPORT OF FIRSTENERGY SOLUTIONS CORP.'S
MOTION TO COMPEL COMPLIANCE WITH COMMISSION ORDER
& REQUEST FOR EXPEDITED RULING**

I. The Commission Should Compel AEP Ohio to Comply With The Commission's December 14, 2011 Opinion and Order.

The Commission should take expedited action to order Ohio Power Company and Columbus Southern Power Company (collectively, "AEP Ohio") to comply with the Commission's December 14, 2011 Opinion and Order (the "Order") approving with modifications AEP Ohio's Joint Stipulation and Recommendations (the "Partial Stipulation") and AEP Ohio's own purported "Compliance Filing"¹ for the procedures set forth in Appendix C of the Partial Stipulation. AEP Ohio's Appendix C required that AEP Ohio's Cap Tracking System ("CTS") be operational on or before February 12, 2012, with specific requirements for disclosures. Appendix C, p. 5. Full disclosure and transparency in the pricing for retail electric service is required by Ohio law and policy.² State policy also seeks to "[e]nsure the availability of unbundled and comparable retail electric service that provides consumers with the supplier, price, terms, conditions, and quality options they elect to meet their respective needs," to "[e]nsure diversity of electricity supplies and suppliers, by giving consumers effective choices over the selection of those supplies and suppliers," and to "[e]ncourage cost-effective and efficient access to information regarding the operation of the transmission and distribution

¹ AEP Ohio filed its "Compliance Filing" setting forth a revised Detailed Implementation Plan on December 29, 2011. FES and other interested parties filed objections to the "Compliance Filing" and the Commission issued a subsequent Entry on January 23, 2012 confirming that the "Compliance Filing" is not in compliance with the Order. After AEP Ohio filed a Motion to avoid the obligation to make a filing that did comply with the Order and FES and others opposed AEP Ohio's Motion, the Attorney Examiners granted AEP Ohio's Motion, in part, in a February 3, 2012 Entry. In filing this Motion to Compel Performance with the Commission's Order and referencing the "Compliance Filing," FES does not waive and specifically reserves its objections to AEP Ohio's purported "Compliance Filing."

² See R.C. § 4928.10(A)(1) (Commission rules must require utilities to "[p]rovide consumers with adequate, accurate, and understandable pricing and terms and conditions of service"); O.A.C 4901:1-10-29 ("Each electric utility shall coordinate with CRES providers to promote nondiscriminatory access to electric services, to ensure timely enrollment with CRES providers to maintain a customer's electric service, and to timely and correctly switch the customer's electric service between CRES providers.").

systems of electric utilities in order to promote both effective customer choice of retail electric service.”³

However, AEP Ohio continues to provide insufficient and stale information regarding the current status of the RPM allotments despite the fact that AEP Ohio is well aware that real-time access to information regarding the availability and award of RPM-priced capacity is vital to the competitive market. First, despite the express requirement of Appendix C and AEP Ohio’s “Compliance Filing,” AEP Ohio’s CTS is not yet operational.⁴ Thus, CRES suppliers do not have ready access to the basic information regarding the status of the queue for RPM-priced capacity. Second, AEP Ohio continues to drag its feet in completing enrollments. As of February 13, 2012, FES had submitted over 400 enrollments that have been outstanding (and that AEP Ohio has failed to complete) for over 40 days.⁵ Five requested enrollments have been pending with AEP Ohio for over 4 months.⁶

AEP Ohio’s failure to provide sufficient information and transparency prejudices the competitive market and precludes customers from having an effective choice of retail electric service.⁷ In addition, it causes confusion and disruptions in the (already limited) competitive market in AEP Ohio’s service territory because neither suppliers nor customers are fully informed regarding the charges applicable to customers who are already shopping or interested in shopping. Without timely information and enrollments, FES’ ability to communicate with current and potential customers is severely prejudiced, as is its ability to tailor competitive offers to meet the needs of potential customers. This need for transparency also encompasses the need

³ R.C. § 4928.02 (B), (C) and (E).

⁴ Affidavit of Tony C. Banks on behalf of FirstEnergy Solutions Corp. (“Banks Aff.”), attached hereto as Exhibit A, at ¶ 5.

⁵ Banks Aff., ¶ 7.

⁶ Banks Aff., ¶ 7.

⁷ See Banks Aff., ¶ 8.

for AEP Ohio to clearly identify and confirm its application of the GS-2 credit to those customers to whom the credit has been awarded.

Accordingly, FES respectfully requests that the Commission issue an Order directing AEP Ohio to:

- Eliminate AEP Ohio-imposed enrollment limitations and increase administrative capacity to process and complete all requested enrollments within 2 days, including those for governmental aggregation, and to clear the current backlog of enrollments immediately;
- Provide CRES suppliers with immediate electronic access to a functioning queue that includes all customers eligible for RPM-priced capacity in all years of the ESP and that issues real-time notice of the customers entering or exiting the queue;
- Provide CRES suppliers with immediate electronic access to a list, which is updated daily, of the customers who have received an allotment of RPM-priced capacity;
- Provide CRES suppliers with confirmation within 2 days that a customer has been awarded an allotment of RPM-priced capacity;
- Provide CRES suppliers with electronic access to timely, transparent information regarding the status of the GS-2 credit, including real-time updates as to the remaining availability of the credit and formal notice to CRES suppliers and customers if the credit has been awarded;
- Provide timely, accurate and transparent billing for shopping customers, including a separate itemization reflecting the impact of the GS-2 credit; and,
- Award the GS-2 credit, effective cycle January 1, 2012 and provide confirmation of AEP Ohio's application of the credit.

II. Expedited Relief Is Required.

The damage to customers and competitive markets grows every day that AEP Ohio is allowed to violate the Commission's Order and to ignore its own commitments. Thus, FES respectfully requests that the Commission address this Motion on an expedited basis. To protect customers from immediate and substantial harm, the Commission should issue an order as set forth above by February 22, 2012, with any memorandum contra to be filed on or before February 21, 2012.

Respectfully submitted,

/s/ Laura C. McBride

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Exhibit A

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**AFFIDAVIT OF TONY C. BANKS
IN SUPPORT OF FIRSTENERGY SOLUTIONS CORP.'S
MOTION TO COMPEL COMPLIANCE WITH COMMISSION'S ORDER**

COUNTY OF SUMMIT)
)
STATE OF OHIO) SS:

TONY C. BANKS, being first duly sworn in accordance with the law, deposes and states:

1. I am over 18 years of age and have personal knowledge of the matters set forth herein.

2. I am employed by FirstEnergy Solutions Corp. ("FES") as Vice President of Competitive Market Policies.

3. FES is a competitive retail electric service ("CRES") provider, which has sought, and continues to seek, to provide retail electric generation service to customers in the distribution service territory of Columbus Southern Power Company and Ohio Power Company (collectively "AEP Ohio").

4. In my role as the Vice President of Competitive Market Policies, I have knowledge of FES' efforts to enroll customers in AEP Ohio's service territory.

5. FES has not been provided with any access to AEP Ohio's "Cap Tracking System," as of February 13, 2012.

6. As of February 13, 2012, AEP Ohio had failed to complete the enrollments requested by FES for a significant number of customers.

7. As of February 13, 2012, the number of outstanding enrollments requested by FES are as follows:

| Days Open | Total |
|-------------|-------|
| 152 | 1 |
| 145 | 1 |
| 142 | 1 |
| 129 | 1 |
| 122 | 1 |
| 69 | 1 |
| 61 | 330 |
| 60 | 1 |
| 56 | 57 |
| 54 | 1 |
| 53 | 7 |
| 46 | 1 |
| 41 | 2 |
| 13 | 1 |
| 5 | 7 |
| 4 | 33 |
| 3 | 32 |
| Grand Total | 478 |


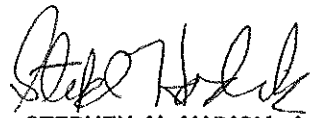
8. AEP Ohio's failure to complete these enrollments has prejudiced FES' ability to enroll customers and fully participate in the competitive market in AEP Ohio's service territory.

FURTHER AFFIANT SAYETH NAUGHT.



TONY C. BANKS

Sworn to before me and subscribed in my presence, this 14th day of February, 2012.



STEPHEN N. HADICK, Attorney at Law
Notary Public, State of Ohio
My Commission Has No Expiration Date Sec. 147.03 R.C.
My Commission Expires HAS NO EXPIRATION
DATE ✓

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *FirstEnergy Solutions Corp.'s Motion to Compel Compliance with Commission Order* and the *Memorandum in Support* thereof was served this 14th day of February, 2012, via e-mail upon the parties below.

/s/ Laura C. McBride

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Summary: Motion to Compel Compliance with the Commission's Order & Request for Expedited Ruling electronically filed by Ms. Laura C. McBride on behalf of FirstEnergy Solutions Corp.