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BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO

2376-ELUNC  
PUCO

Case No. 11-346-EL-SSO  
Case No. 11-348-EL-SSO

Case No. 11-349-EL-AAM  
Case No. 11-350-EL-AAM

Case No. 10-343-EL-ATA

Case No. 10-344-EL-ATA

Case No. 10-2929-EL-UNC

Case No. 11-4920-EL-RDR

Case No. 11-4921-EL-RDR

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## OHIO POWER COMPANY'S MEMORANDUM IN OPPOSITION

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On December 14, 2011, the Commission issued an Opinion and Order in the above-captioned cases (Opinion and Order), modifying and adopting the September 7, 2011 Stipulation and Recommendation (Stipulation). The Opinion and Order, among other things, adopted a modified Electric Security Plan (ESP) for Ohio Power Company (OPCo) and Columbus Southern Power Company (CSP) and approved the proposed merger of CSP and OPCo. In conformance with the modified Stipulation adopted by the Commission, CSP merged into OPCo effective at the end of 2011. Accordingly, OPCo (also referred to as "AEP Ohio") also represents, and is the successor in interest to, the interests of CSP.

On December 29, 2011, AEP Ohio filed a Revised Detailed Implementation Plan (Revised DIP) to ensure in a transparent and open fashion that all interested stakeholders understood the details associated with implementing the Opinion and Order. On January 13, 2012, AEP Ohio and other parties filed applications for rehearing related to the Opinion and Order. The Commission issued an Entry on January 23, 2012 indicating that it was interpreting and enforcing the Opinion and Order (Compliance Entry). Applications for rehearing are pending both with respect to the Opinion and Order and the Compliance Entry.

On January 25, 2012, AEP Ohio filed a motion and request for expedited ruling, asking the Commission to clarify that the Compliance Entry's directive for AEP Ohio to file another Revised DIP need not be completed until after the rehearing decision is issued. Through an Entry issued on February 3, 2012, the Attorney Examiner granted

AEP Ohio's procedural motion and directed AEP Ohio to file the new Revised DIP within seven days of the Commission's rehearing decision or March 14, 2012, whichever is first.

On February 14, 2012, FirstEnergy Solutions Corporation (FES) filed a Motion to Compel Compliance With Commission Order & Request for Expedited Ruling. The FES Motion to Compel alleges (at 2) that 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 allotment and GS-2 shopping credits, which harms the competitive market and causes confusion to both suppliers and customers." As demonstrated below, FES is once again "crying wolf" without justification.

On February 17, FES filed an amended motion saying simply that the enrollment issues have been resolved since the original motion was filed. This is a misleading statement by FES; saying the enrollment issues were resolved after the filing presupposes that problems existed on AEP Ohio's end of the process and saying the issues were resolved after the filing also falsely implies that issues were worked out or resolved after the filing was made (perhaps even suggesting that the filing caused the issues to be addressed). As discussed below, however, the reality is that there was not an enrollment problem on AEP Ohio's end of the process to begin with; FES's motion and the entire subject of the supporting affidavit submitted by Mr. Banks, was based on a false premise. As the Commission has already noted on page 35 of the Opinion and Order, "[s]uch misleading statements undermine FES's credibility in presenting its arguments on all issues in this proceeding rather than just this issue." In addition to the underlying factual

assertions being inaccurate, FES seeks burdensome and inappropriate overbroad relief, which would be unjustified even if their allegations were justified.

The Commission should deny all of the requests contained in FES's motion.

**I. The FES requests for special process beyond that already established is unnecessary because the accounts raised by FES as "outstanding" have already been or are being properly processed by AEP Ohio.**

FirstEnergy Solutions contention that AEP Ohio has failed to enroll customers with customer selected CRES providers on a timely basis is incorrect. It is true that AEP Ohio is processing a large number of customer transfers, but that is being done as efficiently as possible and requires the cooperation of the company, customer and CRES provider. AEP Ohio has been in contact with CRES providers and is making every effort to address issues it is made aware of in its effort to process all enrollments.

**A. The accounts underlying FES' inaccurate claims have been properly addressed by AEP Ohio.**

AEP employee William Allen conducted an investigation into the concerns raised by FES after receiving the February 14, 2012 motion. (*See* Affidavit of William Allen). Upon his investigation, Mr. Allen discovered that the overall number of accounts in question was far less than thought by FES and the majority of those accounts had already been processed. Specifically, Mr. Allen contacted FES to validate the 478 accounts proffered by Mr. Banks in the FES motion. Mr. Allen discovered that on February 15, 2012 that FES' list was down to 407. (*Id.* at ¶ 5.) Reviewing AEP Ohio records, it was determined<sup>1</sup> that:

- 1) 333 of the 407 enrollments had already been completed;
- 2) 40 of the 407 enrollments were pending;

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<sup>1</sup> As verified through the attached Affidavit of William A. Allen.

- 3) 11 of the 407 enrollments had been objected to by the customer;
- 4) 7 of the 407 enrollments had been cancelled;
- 5) 6 of the 407 enrollments had not been received by AEP Ohio yet;
- 6) 6 of the 407 enrollments had enrolled with another CRES provider;
- 7) 2 of the 407 enrollments had invalid service delivery identifiers;
- 8) 1 of the 407 enrollments had an AEP system error; and
- 9) 1 of the 407 enrollments had a data error on behalf of AEP Ohio that prevented normal processing.

The overwhelming majority of the enrollments underlying FES' motion are already completed (333, per item 1) or have unique third-party issues that preclude the processing (17, per items 3 and 6). Mr. Allen's review of the data revealed that FES has already provided electronic data interchange (EDI) confirmations reflecting their acknowledgement of receipt of EDI transactions from AEP Ohio for 352 of the 407 enrollments, which indicates FES should have been aware of the status for all of those enrollments. (*Id.* at ¶ 7.) On February 9, 2012, AEP Ohio had also provided FES with a list of all service delivery identifiers served by FES as of January 15, 2012. Mr. Allen compared the February 9<sup>th</sup> list provided to Sharon Noewer and Tony Banks of FES to the February 14<sup>th</sup> list in Mr. Banks' affidavit attached to FES' motion. That comparison showed that out of the 358 accounts with outstanding enrollments of 30 days or more, he discovered that 97 of the 358 were already being served by FES as of January 15, 2012 – yet they were included in FES's complaint.

The investigation into FES' concerns also determined that *FES attempts to contact AEP Ohio on the status of accounts were being sent to an incorrect email address due to an error by FES personnel in entering the address.* After Mr. Allen discussed with FES staff the attempts by FES to inform AEP Ohio of accounts it believed were not

being processed, Mr. Allen discovered that due to an incorrect spelling on the part of FES that it had sent many of their concerns to a non-existent email address. (*Id.* at ¶ 8.) The last email received by the AEP Ohio individual to whom FES had intended to send emails was on October 25, 2011. (*Id.*) AEP Ohio's customer choice website conspicuously instructs CRES providers to use the appropriate email address for addressing concerns and issues to AEP Ohio's attention ([ohiochoiceoperation@aep.com](mailto:ohiochoiceoperation@aep.com)). Instead of using that email address, FES attempted to contact an AEP employee directly but did not use his correct email address and, thus, FES was sending its communications into cyberspace without AEP Ohio ever receiving the communications. After discovering FES's error in attempting to use another AEP email address (which was a nonexistent and erroneous listing), Mr. Allen contacted FES to directly verify that FES has the appropriate email address to use for transmitting such concerns to AEP Ohio in the future. (*Id.* at ¶ 9.)

In sum, although FES complains that these enrollments had not been properly handled, the above verified data shows that AEP Ohio properly handled the enrollments. Had FES examined the data in its own possession, it would have recognized this and not even made its filing. FES's subsequent withdrawal, while disingenuous in its presentation, clearly confirms that there is no enrollment problem.

**B. The lack of any underlying issue makes FES' request for extra process unnecessary.**

As discussed above and in the affidavit of William Allen, the accounts of customers doing business with FES as a CRES provider are being processed properly by AEP Ohio. AEP Ohio continues to efficiently address any problems that may arise in this effort to process transferring accounts. And AEP Ohio provided FES the appropriate

contact information to ensure any future concerns reach the appropriate personnel. The steps FES raises (at 3) in support of its motion are beyond the scope of the problems asserted by FES in its motion and improper.

The first bullet in the list of requests from FES is the request to eliminate enrollment limitations and increase administrative capacity to process all requested enrollments with 2 days. As discussed above, there is not a current backlog of FES accounts. It is incumbent on the CRES provider, as well as AEP Ohio, to ensure it is reviewing the most current data. As evidenced by the fact that FES filed a motion asserting issues with accounts regarding which AEP Ohio had provided prior verification shows that FES was not reviewing all the data provided. Regardless of that fact, the communication should be open and honest to address problems, if they exist. AEP Ohio strives to process all enrollments as soon as possible but problems do arise with data verification or customers enrolling with different suppliers. AEP Ohio understands its responsibility to process enrollments but does not intend to risk errors by rushing through the process faster than appropriate. Moreover, no other EDU is held to such a strict standard and it would be unfair to impose that burden on AEP Ohio.

The second and third bullets in FES' request, at page 3 of its memorandum in support, improperly seek immediate access to customer information. The second bullet seeks CRES access to the queue that includes all customers eligible for RPM-capacity in all years of the ESP and real-time notice of customers entering or exiting the queue. The third bullet requests CRES access to a daily updated list of the customers who have received an allotment of RPM-priced capacity. It would appear that FES is inappropriately seeking to transfer to itself the customer's right to view this type of

information. The customer will have access to its position in the queue, but FES has no right to access the status of all customers in the queue. If a customer doing business with FES chooses to share its position in the queue with FES that is that customer's right, but the electronic access to the queue is not meant to show all customer's private information for public consumption. Since the Stipulation was signed in September 2011 AEP Ohio has been developing electronic systems that will allow individual customers to access their current position in the queue. AEP Ohio has been completing these electronic systems to implement the December 29, 2011 DIP and expects to have the system capable of operating by February 24, 2012. AEP Ohio notes, however, that any changes to the December 29, 2011 DIP may require programming changes (and will require some time to implement such new requirements) and AEP Ohio will make best efforts to implement those as expeditiously as possible. Moreover, as discussed below in more detail in connection with the Cap Tracking System, AEP Ohio cannot provide accurate information to customers about their status in the RPM queue until the "rules of the road" are all established by the Commission (through the rehearing process).

The fourth bullet in FES' request at page 3 of its memorandum seeks to dictate the internal process of AEP Ohio without any justification. The Commission approved a process to inform market participants about the availability of RPM-priced capacity, which process AEP Ohio is following. FES seeks a standard beyond that under the guise of competitive needs. At this point AEP Ohio is manually updating the list of customers receiving the RPM-priced capacity due to the potential for change on rehearing. A more permanent system can be applied by the information technology group once the issues are finalized on rehearing which could increase the pace of the notice.



**II. Consistent with the February 3, 2012 Attorney Examiner Entry, the Cap Tracking System (CTS) cannot be fully implemented until after the rehearing decision**

While AEP Ohio agrees that the December 29, 2011 Revised DIP indicates that the CTS will be operational by February 12, 2012, AEP Ohio maintains that intervening rulings in this proceeding have rendered that deadline outdated. Specifically, FES's attempt to enforce the February 12, 2012 deadline for CTS implementation circumvents the February 3, 2012 Attorney Examiner Entry. The Attorney Examiner recognized the need for a consistent approach while the matters are on rehearing before the Commission. Specifically, the Attorney Examiner stated,

In light of the unique circumstances of this case and in order to avoid customer uncertainty that may arise as a result of multiple DIP revisions being filed in a brief period of time, the attorney examiner finds that permitting AEP-Ohio to file its revised DIP within seven days of the Commission's issuance of its entry on rehearing may lessen the likelihood that AEP-Ohio will have to file multiple DIP revisions based upon decisions the Commission may make.

Because the Commission already approved delay of the final compliance version of the Revised DIP (and the CTS is part of the Revised DIP), AEP Ohio believes it was already relieved of fully implementing the CTS by February 12, 2012.

After all, AEP Ohio cannot fully implement the CTS until the rehearing decision is issued that will establish the "rules of the road" to be followed. As AEP Ohio explained in its January 25 Motion for Relief, the Compliance Entry imposes a requirement on AEP Ohio to file a new version of the Revised DIP to implement five new or enhanced obligations, as follows:

- The Compliance Entry (pages 3-4) indicates that the modification to *pro rata* allocation of the RPM-priced capacity set-aside level "goes back to the initial allocation among the customer classes based on

September 7, 2011, data, regardless of whether any customer class is now over-subscribed.”

- The Compliance Entry (page 4) now explains that the modification “is meant to include all communities that have established governmental aggregation programs, up to and including those communities that approved government aggregation programs in the November 2011 election.”
- The Compliance Entry (page 5) now provides that the aggregation-based modification of the set-aside will be “over and above the pro rata allocation provided to customers in the Stipulation for 2012.”
- The Compliance Entry (page 5) now asserts continuing jurisdiction over the set-aside levels “to ensure that retail shopping through governmental aggregation does not unintentionally displace individual shopping in 2013 and 2014.
- The Compliance Entry (page 6) directs that mercantile customers (large commercial and industrial customers) “should not be excluded from RPM-priced capacity that may be available to non-mercantile customers in eligible governmental aggregation communities.”

As long as the issues regarding the Compliance Entry remain pending on rehearing, the Commission should not require AEP Ohio to implement the Revised DIP, including fully implementing the CTS. For example, if AEP Ohio implemented the CTS in a manner consistent with the five above-listed new and enhanced obligations reflected in the Compliance Entry and then the Commission modified or clarified any of those items on rehearing, it would cause customer confusion.

FES would like to be notified under the CTS that there is space in the RPM queue and take action in reliance on that notification, even though the results may change based on rehearing. As stated in the February 3, 2012 Entry (at 3), waiting until after rehearing to fully implement the Revised DIP would “avoid customer uncertainty that may arise as a result of multiple DIP revisions being filed in a brief period of time ...” Thus,

consistent with the February 3, 2012 Entry, the Commission should reject FES's request and continue its practical approach to determine the scope of the whole program and not entertain piecemeal motions seeking to circumvent existing rulings and that seek to chip away at positions raised on rehearing.

Further, the delay in implementing the CTS has not prejudiced CRES providers – contrary to FES's assertion (at 2) that “CES suppliers do not have ready access to the basic information regarding the status of the queue for RPM-priced capacity.” In the February 3 Entry, the Attorney Examiner found (at 4) that providing a backup filing deadline of March 14, 2012 (to the extent the Commission does not issue a rehearing decision by then) would “avoid any prejudice to customers...” But AEP Ohio has gone even farther in ensuring that customers and CRES providers have timely and sufficient information. AEP Ohio has continued to publish current information about the RPM-priced capacity queue on a regular basis, so that CRES providers and customers have sufficient and current information regarding the status of the RPM queue. (See Allen Affidavit at ¶ 3.)

The Commission has already determined that the implementation plan need not be fully implemented until after rehearing and FES's attempt to circumvent that ruling should not be entertained. And AEP Ohio cannot control the fact that the “rules of the road” have not been fully established or that several important issues remain uncertain as they are pending on rehearing. In any event, it is clear that FES and others have had access to timely and sufficient information from AEP Ohio.

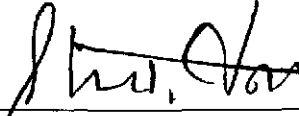
**III. FES's additional requests related to the GS-2 shopping credit are extraneous, untimely and unsupported.**

The fifth, sixth and seventh bullet in FES' request (at 3) seeks to obtain relief related to the GS-2 shopping credit, which was expanded in the Opinion and Order. Per Appendix C of the Stipulation and the Revised DIP, the CTS does not encompass the GS-2 shopping credit. In addition, FES's desire for information about the GS-2 queue is neither related to, nor supported by, FES's (false) allegation about enrollment delays. FES is raising a new issue in an untimely manner, since it did not seek rehearing on this issue or request that additional obligations be imposed on AEP Ohio. In any case, AEP Ohio has provided an update to the CRES community regarding the status of the GS-2 shopping credit queue on January 3, 2012 showing that nearly five months after the stipulation was signed over 1,000,000 MWh of customer load was still eligible for the shopping credit. FES requests that the shopping credit be applied to customer bills effective January 1, 2012 but makes no assertion that AEP Ohio is not currently doing this. While AEP Ohio acknowledges that there was a delay in applying the shopping credit to some customer's bills (as a result of the short period of time available to update all of the billing records), to the extent necessary these customers have been or will be rebilled to reflect the proper shopping credit. FES's proposed relief has not been justified and it should not be adopted.

## CONCLUSION

For the foregoing reasons, the Commission should deny the relief requested in FES's February 14, 2012 motion to compel compliance.

Respectfully Submitted,



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Counsel for Ohio Power Company

## AFFIDAVIT OF WILLIAM A. ALLEN

STATE OF OHIO:  
COUNTY OF FRANKLIN:

I, William A. Allen, being first duly sworn, and upon oath, do hereby state as follows, the same being my own person knowledge:

1. I am employed by American Electric Power Service Corporation as Director of Rate Case Management.
2. In my role as Director of Rate Case Management I have been actively involved in the development of the Cap Tracking System and monitoring shopping activity and issues in the AEP Ohio service territory.
3. Information has been posted to the AEP Ohio CRES Provider website on September 23, 2011 (as of September 7), October 21, 2011 (as of October 14), November 18, 2011 (as of November 11), December 22, 2011 (as of December 16), and February 14, 2012 (as of January 20) indicating 1) the date of the most recent update of the information contained on the webpage, 2) the 2012 RPM set-aside, 3) the awarded allotments, 4) the unallocated allotments, and 5) a contact name and phone number of a utility representative and a monitored e-mail account.
4. On February 14, 2012, I requested from First Energy Solutions (FES) a list Service Delivery Identifiers (SDIs) associated with the "outstanding enrollments" cited in the February 14, 2012, affidavit of Tony C. Banks. In response to this request (FES) provided me a list of SDIs associated with the outstanding enrollments as of February 14, 2012 - one day later than the information included in the affidavit of Tony C. Banks. This list indicated the following results for "outstanding enrollments" based on the records of FES:

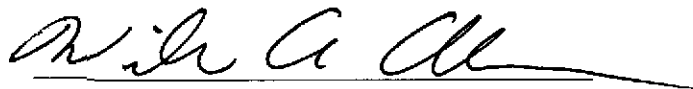
Days Open	Total
153	1
146	1
143	1
130	1
123	1
70	1
62	290
61	1
57	50

55	1
54	7
47	1
42	2
14	1
4	3
3	45
Grand Total	407

5. The list of SDIs associated with the “outstanding enrollments” as of February 14, 2012, as provided by FES, was reviewed against the records of AEP Ohio and it was determined that of the 407 SDIs provided by FES:
  - 1) 333 of the 407 enrollments had already been completed;
  - 2) 40 of the 407 enrollments were pending;
  - 3) 11 of the 407 enrollments had been objected to by the customer;
  - 4) 7 of the 407 enrollments had been cancelled;
  - 5) 6 of the 407 enrollments had not been received by AEP Ohio yet;
  - 6) 6 of the 407 enrollments had enrolled with another CRES provider;
  - 7) 2 of the 407 enrollments had invalid service delivery identifiers;
  - 8) 1 of the 407 enrollments had an AEP system error; and
  - 9) 1 of the 407 enrollments had a data error on behalf of AEP Ohio that prevented normal processing.
6. Of the 40 pending enrollments, 38 had been pending for less than 4 days.
7. Review of the records of AEP Ohio also revealed the fact that FES had provided Electronic Data Interchange (EDI) confirmations reflecting FES’s acknowledgement of receipt of EDI transactions from AEP Ohio for 352 of the 407 enrollments.
8. On February 14, 2012, Sharon L. Noewer, Director, State Competitive Market Policies for FES provided a sample e-mail (attachment 1) that she asserted was sent to Jim Purdy at AEP with the outstanding enrollments cited in the February 14, 2012, affidavit of Tony C. Banks. She further stated that “FES does regularly send this information to Jim Purdy at AEP. He receives an email from FES with the account number information when there are open enrollments greater than 2 days.” Review of this sample e-mail indicated that FES had been using an incorrect e-mail address for Jim Purdy. As such AEP was unaware of the concerns FES had with these enrollments. Further review of e-mails sent by FES to Jim Purdy indicate that FES had not been using a correct e-mail address for Jim Purdy for transmission of this information since October 25, 2011.

9. On February 15, 2012, I had a phone conversation with Sharon Noewer of FES and reminded her of the appropriate e-mail address ([ohiochoiceoperation@aep.com](mailto:ohiochoiceoperation@aep.com)) to use when communicating these types of concerns to AEP Ohio. This e-mail address is prominently displayed on the AEP Ohio CRES Provider webpage.
10. On February 9, 2012, a list of all SDIs served by First Energy Solutions as of January 15, 2012, was provided to Sharon L. Noewer and Tony C. Banks. This list of SDIs was compared to the list of FES "open enrollments" of 30 days or greater as of February 14, 2012, [358] and it shows that 97 of the SDIs listed by FES as outstanding were already being served by FES. This is information that FES had in their possession prior to the filing of Tony C. Banks' affidavit of February 14, 2012, which stated otherwise.
11. On January 5, 2012, AEP Ohio provided information on their CRES Provider webpage stating that as of January 3, 2012, "there are still 1,045,513,542 kWhs available under the shopping credit for GS-2 customers only."

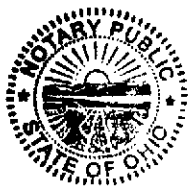
FURTHER AFFIANT SAYETH NAUGHT.



William A. Allen appeared before me, a Notary Public for the State of Ohio, and subscribed and sworn to before me on this 21<sup>st</sup> day of February, 2012.

(SEAL)

  
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NOTARY PUBLIC

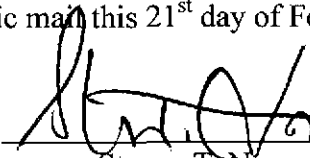


STEVEN T. NOURSE, Attorney At Law  
Notary Public, State of Ohio  
My commission has no expiration date  
Section 147.03 R.C.



## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Ohio Power Company's Memorandum in Opposition been served upon the below-named counsel and Attorney Examiners by electronic mail this 21<sup>st</sup> day of February, 2012.

  
Steven T. Nourse

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