[Company Exhibit 21]

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company For Approval of Their Energy Efficiency and Peak Demand Reduction Program Portfolio Plans for 2013 through 2015	)	Case Nos. 12-2190-EL-POR 12-2191-EL-POR 12-2192-EL-POR

REBUTTAL TESTIMONY OF

EDWARD C. MILLER

ON BEHALF OF

OHIO EDISON COMPANY
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
THE TOLEDO EDISON COMPANY

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION.

A. My name is Edward C Miller, and my business address is 631 Excel Drive, Suite 200, Mount Pleasant, Pennsylvania 15666. I am the Manager of Compliance & Development for the Energy Efficiency Department of FirstEnergy Service Company.

Q: ARE YOU THE SAME EDWARD C. MILLER WHO PROVIDED DIRECT TESTIMONY ON BEHALF OF THE COMPANIES IN THIS CASE?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to respond to several issues brought up by the various witnesses in this case. First, I will address the assertion of Sierra Club Witness Reed, Environmental Law and Policy Center ("ELPC") and Ohio Environmental Council ("OEC") Witness Crandall and Sierra Club Witness Loiter that the Companies over rely on energy efficiency kits and question the savings involved with the kits. Second, I will address the assertion of Witness Crandall and Witness Loiter that the Companies should not incentivize standard T-8 lighting. Third, I will respond to Ohio Hospital Association ("OHA") Witness Lanning related to hospital audits and ENERGY STAR® Benchmarking. Fourth, I will address the concerns from Witness Crandall and Witness Swisher related to data centers. Fifth, I will address the continuous energy improvement program assertion by Witness Sullivan on behalf of the National Resources Defense Council ("NRDC").

ENERGY EFFICIENCY KITS

Q. DO YOU BELIEVE THAT THE COMPANIES OVER RELY ON ENERGY EFFICIENCY KITS?

A. No I do not. The Companies Home Performance Program includes 325,882 Opt-In Energy Efficiency Kits for Residential customers over the 3-year period of 2013-2015. This is less than 20% of the residential customers of the Companies. In Pennsylvania, an affiliate of the Companies, West Penn Power Company, implemented an Opt-In Kit program during the second quarter of 2011, and distributed kits to 341,490 residential customers to date, representing approximately 55% of that Company's residential customers. In Maryland, an affiliate of the Companies, Potomac Edison Company, implemented an Opt-In Kit program in the fourth quarter of 2011 and distributed kits to 105,285 residential customers to date, representing approximately 46% of that Company's residential customers. The Opt-In Kit program has proven successful in both Pennsylvania and Maryland and is a major source of energy savings for the companies that are offering them. The kits provided in both of those states are very similar to those being contemplated in the Companies' Energy Efficiency and Peak Demand Reduction Plans ("Plans") and, therefore, we expect similar results in Ohio.

Q. DID THE COMPANIES CONSIDER THE IMPACT OF THE ENERGY INDEPENDENT SECURITY ACT IN ESTIMATING SAVINGS FOR THE KITS?

A. Yes. Witness Reed asserted that the Companies did not incorporate into their savings estimates the impact of the Energy Independent Security Act ("EISA") on the Energy Efficiency Kits since the estimated savings for the kits in the Companies' Plans are constant over the 2013-2015 Plan period. To the contrary, the Companies conservatively included EISA impacts for all CFLs in the Opt-In Energy Efficiency Kits for the entire 2013-2015 Plan period. The savings estimate for kits modeled in the Companies' Plans is a constant value that represents the full reduction of savings for all CFLs for the entire 3-year period in accordance with the baselines established under EISA, regardless of the timing projections associated with the kits. As an example, EISA reduces the baseline for a 60W incandescent lamp to 43 watts effective January 1, 2014. However, the Companies' modeling incorporates the 43 watts baseline for the entire 3-year period including any 60 watt equivalent CFLs distributed in 2013. As such, the Companies' modeling assumptions for its Opt-In Energy Efficiency Kits are conservative as the CFLs included in the kits will achieve greater savings than the measure assumptions included in the Companies' modeling.

INCENTIVES FOR T-8 LIGHTING

Q. WHY ARE THE COMPANIES PROPOSING TO INCENTIVIZE STANDARD T-8 LIGHTING?

A. The Companies propose to continue to incent standard T-8 lighting installations that result in the early retirement of T-12 lighting installations. In Case No. 09-512-GE-UNC, the Commission supported the as-found condition for early retirement as the baseline for determining energy savings, which supports the energy savings associated with a standard T-8 lighting installation replacing a T-12 lighting installation. EISA just this year prohibited the manufacturing or import of T-12 lamps as of July 14, 2012. Based on the likelihood that T-12 lamps remain in retail stock or customer inventory, I believe that there are opportunities to incent standard T-8 lighting installations that provide the early retirement of T-12 lighting installations and achieve greater participation in the Companies' programs. In developing the draft update to the Pennsylvania Technical Reference Manual ("TRM") for the period June 1, 2013 through May 31, 2014, the Statewide Evaluator ("SWE") in Pennsylvania concluded the same, based in part on the 2012 Illinois TRM, and proposes to continue to accept a T-12 baseline condition in the 2013 Pennsylvania TRM supporting the energy savings and continued incentives associated with standard T-8 installations.

ENERGY STAR® BENCHMARKING AND AUDITS FOR HOSPITALS

Q. HOW ARE THE COMPANIES ADDRESSING OHA'S CONCERNS RELATED TO ENERGY STAR® BENCHMARKING AND AUDITS?

A. Mr. Lanning, on behalf of the OHA, has recommended that the Companies' Plans include an ENERGY STAR® Portfolio Manager benchmarking program for OHA member hospitals served by the Companies. He also has recommended that the Companies earmark funds to offset all or a portion of the cost of a hospital or health care facility energy efficiency ASHRAE level I audit ("Health Audit"). Unlike many other recommendations made by parties for the first time in this proceeding, Mr. Lanning's recommendations have been presented to the Companies and Collaborative members as a focus of previous Collaborative meetings. The Companies propose to modify the EEPDR Plans to include OHA's two recommendations as follows:

(1) *Health Audit* – The Companies will expand the Energy Efficient Buildings Program – Large by $200,000 total over the term of the Plans, with such funds being earmarked specifically to offset all or a portion of the cost of a Health Audit. These funds will be paid through OHA in an amount not to exceed the lesser of $5,000 or 50% of the cost of the Health Audit, which requires pre-approval by the Companies' implementation vendor to confirm eligibility. Additionally, the OHA member hospitals may apply for the remainder of the cost of the Health Audit, in an amount not to exceed the lesser of $5000 or 50% of the remaining cost of the Health Audit. The OHA member hospitals must satisfy all prerequisites for participation and all documentation requirements as set forth in the Energy Efficient Buildings Program.

(2) *Benchmarking* – The Companies agree to earmark an additional $50,000 total over the term of the Plans to enable the OHA to conduct ENERGY STAR® Portfolio Manager benchmarking for OHA member hospitals served by the Companies. Hospitals with a benchmark score of 33 or below would automatically qualify for a Hospital Audit, subject to the $200,000 program budget cap.

Q. WHY DO THE COMPANIES SEE MERIT IN MAKING THESE CHANGES?

A. Under the plans as currently proposed, the audit program is geared towards ASHRAE Level II audits. While this level of audit is more comprehensive (and costly), the OHA has communicated its experience and performance with the Level I audits. By expanding the scope of audits to include ASHRAE Level I, based on the OHA experience, the potential number of customers that might be able to benefit from the audit program is expanded, thus providing the Companies with more opportunities to generate savings towards their statutory targets. Further, the OHA has recommended the ENERGY STAR® Portfolio Manager benchmarking for OHA member hospitals to help hospitals understand how their facility compares to other similar buildings. Given the increased customer awareness and education that results from this when coupled with the experience of and the commitment by OHA to support their members with this benchmarking, the Companies' believe that leveraging the OHA to help their member hospitals will result in additional opportunities being identified and pursued, thereby providing the Companies with additional savings opportunities.

Q. WHY IS THE OHIO HOSPITAL ASSOCIATION ADMINISTERING THIS PROGRAM?

A. Given OHA's expertise with hospitals and Level I audits, the Companies felt that this was a good approach.

DATA CENTERS

Q. HOW ARE THE COMPANIES ADDRESSING THE PARTIES' CONCERNS RELATED TO DATA CENTERS?

A. In response to some of the Parties' comments in this case, the Companies plan to target Data Centers through implementation of the Commercial and Industrial ("C/I") Efficient Equipment Program, Small and Large. The Companies will develop a sub-program to specifically target data center participation in the Companies' Plans. As part of this dedicated sub-program, the Companies will develop marketing materials and will contract with an implementation vendor that will support comprehensive participation by data centers in the Companies' Plans. The Companies will leverage the budgets of its C/I Efficient Equipment Program, Small and Large to support this sub-program and anticipate that its budget will be similar to the budget of the AEP Data Center Program as a percentage of the entire Plan, or approximately $3.2M total over the 2013-2015 Plan period.

CONTINUOUS ENERGY IMPROVEMENT PROGRAM

Q. WHY ARE THE COMPANIES NOT PROPOSING A CONTINUOUS ENERGY IMPROVEMENT PROGRAM?

A. The Companies consider a Continuous Energy Improvement Program as a form of customer education, marketing and engagement of energy efficiency opportunities with major C/I customers. In lieu of having a dedicated program and additional operating expenses, the Companies plan to target their major C/I customers through their implementation vendors and their Customer Service Representatives who have regular contacts with their assigned major customers.

As such, the Companies will engage their largest customers to promote energy efficiency opportunities without the added costs associated with a Continuous Energy Improvement Program.

CONCLUSION

Q. BY MAKING THESE CHANGES THAT YOU HAVE EXPLAINED WILL THE TRC ON A PORTFOLIO BASIS FOR ANY OF THE COMPANIES BE SIGNIFICANTLY IMPACTED?

A. No. I believe that the changes being proposed will support an equivalent or improved TRC as these changes are designed to increase participation and benefits with minimal costs. And given the minimal amount of funds involved with these changes, when considering the aggregate cost of the Plans for all three Companies is approximately $250 million, any impact on the TRC on a portfolio basis would likely be negligible.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes, it does.