

# CITIZEN POWER

*Public Policy Research Education and Advocacy*

November 19, 2012

Docketing Division  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215-3793

Re: Case No. 12-2157-EL-ORD

Dear Docketing Division:

Enclosed please find for filing an original of the Comments of Citizen Power .

If you have any questions, please contact me at (412) 421-7029.

Sincerely,



Theodore S. Robinson, Esquire  
Staff Attorney  
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Attachment

**BEFORE THE PUBLIC  
UTILITIES COMMISSION OF OHIO**

In the Matter of the Adoption of Chapter	)	
4901:1-42, Ohio Administrative Code	)	
Regarding Green Pricing Programs, to	)	Case No. 12-2157-EL-ORD
Implement Am. Sub. S.B. 315	)	

**COMMENTS OF CITIZEN POWER**

Citizen Power submits these Comments in response to the October 17, 2012 Entry in Case No. 12-2157-EL-ORD which proposes creating Chapter 4901:1-42, O.A.C. in order to implement Am. Sub. S.B. 315, adopting Section 4928.70, Revised Code, regarding Green Pricing Programs. Citizen Power is in favor of specific guidelines addressing the review of Green Pricing Programs in Ohio. Not only do the proposed rules promote the development of green energy products by creating a level playing field for EDUs and CRES providers offering green pricing programs, but they also allow consumers to be confident that the green products they purchase have the environmental attributes represented in product and marketing materials. Citizen Power does, however, have a few suggested changes to the proposed rules based on our experience in marketing a wind based REC electricity product in Pennsylvania.

4901:1-42-03 (A) should apply to both marketing materials and program materials. In addition, Citizen Power supports the application of the Federal Trade Commission's (FTC) Guides for the Use of Environmental Marketing Claims (see 16 CFR 260.1-260.8 (relating to guides for the use of environmental marketing claims)) in assessing the environmental claims in marketing and product materials. Similarly, the Environmental Marketing Guidelines for Electricity published by the National Association of Attorneys General in 1999, *available at*

<http://www.atg.state.vt.us/assets/files/ENVIRONMENTAL%20MARKETING%20GUIDELINES.pdf>, is

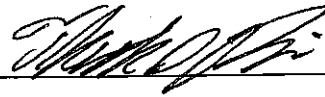
a valuable resource regarding environmental claims in the retail electricity market context.

Citizen Power recommends that the Public Utilities Commission of Ohio explicitly include one or both of these resources in the text of 4901:1-42-03 (A) as a guideline for accurate portrayal of marketing claims.

4901:1-42-03 (B) should have an exception to the 10 business day rule for modifications of previously accepted marketing materials that are de minimis and not related to green marketing claims. For example, if a CRES provider had a newspaper ad that had previously been provided to commission staff for review that stated "50% Ohio Wind Power for Franklin County", they should be able to also advertise "50% Ohio Wind Power for Cleveland" without having to get prior approval. This would allow green pricing programs to be more responsive to advertising opportunities.

4901:1-42-03 (F) requires that the resources used to support participation in the green pricing program be separate from the resources used for compliance with the state's AEPS. Citizen Power agrees with this requirement, but believes there should be one exception to this rule. Green pricing programs meeting 100% of a customer's electricity use with in-state renewable resources should not be required to go above 100% in order to additionally meet the AEPS for renewable resources. In essence, an EDU or CRES provider that provides a 100% in-state renewable product could use the same resources to meet both their green pricing program requirements and their AEPS renewable benchmarks. This methodology would be similar to the Green-e Energy National Standard Version 2.0 on page 9, [http://www.green-e.org/docs/energy/Appendix%20D\\_Green-e%20Energy%20National%20Standard.pdf](http://www.green-e.org/docs/energy/Appendix%20D_Green-e%20Energy%20National%20Standard.pdf).

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Theodore S. Robinson', is written over a horizontal line.

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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Comments* was served electronically or by regular U.S. Mail upon the persons identified below in this case on this 19<sup>th</sup> day of November, 2012.



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