

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application to	:	
Modify, in Accordance with Section	:	Case No. <b>12-1842-GA-EXM</b>
4929.08, Revised Code, the Exemption	:	
Granted to <b>The East Ohio Gas</b>	:	
<b>Company d/b/a Dominion East Ohio</b> in	:	
Case No. 07-1224-GA-EXM.	:	

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**REPLY BRIEF  
SUBMITTED ON BEHALF OF THE STAFF OF  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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This Reply Brief is very limited in nature. Staff files it to simply note that Staff's recommendations have essentially gone unopposed.

Staff's recommendations, as explained in Staff's Initial Brief, focus primarily on developing education materials related to The East Ohio Gas Company, d/b/a Dominion East Ohio's ("DEO") exit of the merchant function for non-residential customers and documenting the results of DEO's proposed exit.<sup>1</sup> Staff notes that no party (except arguably Ohio Partners for Affordable Energy ("OPAE")) expressed opposition to Staff's recommendations during the hearing or in their initial brief.<sup>2</sup> In addition, Staff

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<sup>1</sup> Initial Post Hearing Brief of Staff (November 13, 2012) at 3-8.

<sup>2</sup> OPAE opposes DEO's exit of the merchant function for non-residential customers. While OPAE has not specifically stated that it opposes Staff's recommendations, Staff assumes that OPAE's general opposition to the proposed exit by DEO includes opposition to Staff's recommendations regarding how to properly effectuate the proposed exit.

recommends that the Commission, in any Order issued in this case, clarify that it will continue to monitor DEO's exit from the merchant function to ensure that the exit is in the public interest.<sup>3</sup> OCC agreed with this recommendation in its initial brief.<sup>4</sup>

Because Staff's recommendations were essentially agreed to or not opposed, Staff respectfully requests that the Commission adopt Staff's recommendations.

Respectfully Submitted,

**Michael DeWine**  
Attorney General

**William L. Wright**, Section Chief  
Public Utilities Section

*/s/ Devin D. Parram*

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<sup>3</sup> Initial Post Hearing Brief of Staff at 9.

<sup>4</sup> Initial Post-Hearing Brief of OCC (November 13, 2012) at 16.

## CERTIFICATE OF SERVICE

I certify that a copy of the foregoing **Reply Brief** submitted on behalf of the Staff of the Public Utilities Commission of Ohio was served via electronic mail upon the following parties of record on the 21st day of November, 2012.

/s/ Devin D. Parram

**Devin D. Parram**  
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Summary: Brief Reply Brief of Staff electronically filed by Mr. Devin D Parram on behalf of Staff of the PUCO