



*Forging a partnership between farmers and consumers.  
•Working together for Ohio's farmers•*

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January 7, 2013

Mr. Todd A. Snitchler, Chairman  
Public Utilities Commission of Ohio  
180 East Broad Street, 13<sup>th</sup> Floor  
Columbus, OH 43215-3793

**RE: In the Matter of the Commission's Review of Chapter 4901:1-10, Ohio Administrative Code, Regarding Electric Companies, Case Number 12-2050-EL-ORD**

Dear Mr. Snitchler:

The Ohio Farm Bureau Federation ("OFBF" or "Farm Bureau") appreciates the work of the Public Utilities Commission of Ohio ("PUCO" or "Commission") while reviewing rules established in Chapter 4901:1-10, Ohio Administrative Code ("O.A.C") regarding safety standards for services provided by Ohio's investor-owned electric utilities.

We understand that Section 119.032(C) of the Ohio Revised Code ("O.R.C.") requires the Commission to review their rules every five years to determine whether they should be continued without amendment, be amended, or be rescinded; incorporate additional flexibility for implementation and use at the local level; eliminate unnecessary paperwork and/or remove provisions that duplicate or conflict with other rules. The Commission employs additional guidelines as detailed in other sections of the O.R.C., as well as in Executive Order 2011-01K.

In its November 7, 2012 Entry filed in Case Number 12-2050-EL-ORD, the Commission asked for stakeholder suggestions and input on a variety of customer related issues. OFBF's comments are as follows:

**Safeguards for Disclosure of Customer Usage Data:** Farm Bureau agrees with revisions being considered for "Customer Energy Usage Data" that ensure information remains identifiable to a specific, individual customer. The new rules will enhance customer ease of access to his/her specific information, as well as remind them of general consumer and utility responsibilities if and when he/she permits data access to Third Party Developers, CRES Providers, and Governmental Aggregation Projects. Additional revisions proposed for this section enhance customer initiated data access as it pertains to time differentiated pricing tariffs, as well as participation in home energy assistance programs. Paperwork used in conjunction with these new provisions provides clear documentation on customer and utility cooperation for data sharing and use.

**Improving Environmental Disclosure:** Farm Bureau supports rule revisions helping individual customers obtain a report detailing a regional generation "Resource Mix" and related environmental data. While OFBF understands and agrees that this report should not be used as an indicator of an electric utility's compliance with Section 4920.64 O.R.C., the customer-friendly

format showing approximate percentages of traditional, advanced and renewable generation provided could spark additional inquiries from households, small businesses and interested community leaders on how they can become more involved in establishing Ohio's Advanced Energy Initiative as created in SB 221.

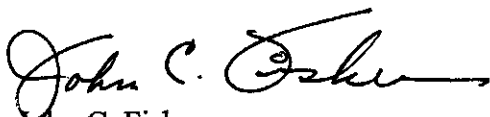
**Net Metering:** Farm Bureau supports proposed revisions better defining a "Customer-Generator." We understand that a Customer-Generator is a person or entity that hosts or leases generation equipment on property that they own, manage or control. Provisions that require using three years of individual customer usage data to determine a performance baseline; focusing on thresholds at least 120 percent of this baseline as service target; ensuring that future Customer-Generator investment in energy efficiency cannot be used against them, as well as providing single, programmable meters are welcomed. Additional measures that ensure net metering can be done without changes in an individual customer's rate classification, as well as imposition of additional, unreasonable technical requirements are encouraged. Moreover, incorporation of the monthly and annual generation crediting and true-ups reflective of the individual customer's specific cost of generation is fully supported. Establishing these rules will ensure that net metering becomes an effective strategy that enhances relationships between individual customers, utilities and service providers as they work together to address energy management issues.

OFBF is a member organization whose mission is to forge partnerships between producers and consumers. Next to labor, energy is the largest single cost input in many farm and small business operations. Consumers living in rural, suburban and urban neighborhoods are looking for opportunities to control their energy costs, too. Over the past several years the organization has enjoyed opportunities to work with the PUCO, government agencies, utilities, energy service providers and other interested organizations to address these issues. The organization was involved in a similar rulemaking and review process concerning many aspects of net metering when they were brought forward in Case Number 05-1500-EL-COI in 2005-06.

The Ohio Farm Bureau Federation is ready to assist the Commission and others to enhance net metering, smart metering, demand response, cogeneration and other initiatives that provide effective strategies that help all of us control energy costs.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Fisher", with a stylized flourish at the end.

John C. Fisher  
Executive Vice President

CC: Steven Hirsch, President, OFBF  
Adam Sharp, Vice President, Public Policy, OFBF