

FILE
FAX**Buckeye Energy Brokers, Inc.**8870 Darrow Road, #F106
Twinsburg, Ohio 44087
Buckeyeenergybrokers.comChief of Docketing
Public Utilities Commission of Ohio
180 East Broad St. 13th Floor
Columbus, Ohio 43215-3793**RE: In the Matter of the Commission's Review of the Natural Gas Retail Market
Development Case No. 163-1307-GA-COI**

Buckeye Energy Brokers, Inc. would like to address the following questions as they relate to the current structure of the natural gas retail market in Ohio:

(a) What regulatory changes, if any, should be made to further support a fully competitive retail natural gas marketplace? Since customers must commit to gas flow before knowing the SCO rate, the date that the rate is set should be moved up. Having the Standard Choice Offer (SCO) set on the NYMEX close is too late. Regulations provide for 45 days notice before contracts end so 45 days notice for the SCO rate would be consistent. We recommend that the SCO rate be set 45 days prior to gas flow.

(c) Does the SCO provide a competitive level playing field for SCO providers and competitive retail natural gas service (CRNGS) providers? For example, how, if at all, do the following processes differ for SCO and CRNGS providers: data collection; contract administration; customer enrollment and customer service? No, the SCO does not provide a level playing field. Supplier are consistently forced to provide offers at higher rate than the SCO rate. The SCO rate does not contain enough allocated costs. The costs to local utilities spent on the SCO, the auction expenses and customer service time are not place on top of the SCO adder. We do not know what the additional adder should be but zero creates an unlevel playing field.

(e) Is the SCO functioning as a competitive market price? No, suppliers are consistently forced to provide offers at higher rate than the SCO rate. We consistently see offers on the PUCO's Apples-to-Apples Chart that are higher than the SCO rate.

Should you have any questions or additional needs, please call me at (330) 730-4338.

Sincerely,

Thomas M. Bellish
President

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