

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's)
Review of the Natural Gas Retail) Case No. 13-1307-GA-COI
Market Development.)

REPLY COMMENTS OF OHIO PARTNERS FOR AFFORDABLE ENERGY, THE OHIO POVERTY LAW CENTER, EDMONT NEIGHBORHOOD COALITION, PRO SENIORS, INC., SOUTHEASTERN OHIO LEGAL SERVICES, LEGAL AID SOCIETY OF COLUMBUS, LEGAL AID SOCIETY OF CLEVELAND, COMMUNITIES UNITED FOR ACTION, AND THE CITIZENS COALITION

Ohio Partners for Affordable Energy (“OPAE”), the Ohio Poverty Law Center, the Edgemont Neighborhood Coalition, Pro Seniors, Inc., Southeastern Ohio Legal Services, the Legal Aid Society of Columbus, the Legal Aid Society of Cleveland, the Legal Aid Society of Southwest Ohio on behalf of Communities United for Action, and the Citizens Coalition, collectively the Low Income Advocates (“LIA”), submit these reply comments in response to the Entry issued June 5, 2013 (“Entry”) in this Commission-order investigation of Ohio’s retail natural gas market.

I. General Comments

The fundamental issue raised by these questions is whether customers have the right to choose the competitive option that best meets their needs. R.C. 4929.02(A)(2). The General Assembly has been clear that its intent is to maximize the number of competitive options available to customers and encourage innovation in the types of competitive natural gas services. R.C. 4929.02(A)(3)&(4). At the time of the passage of Am. Sub. HB 9 in 2001, the General Assembly expanded the range of competitive

options for customers. The Commission should take no action, such as elimination of the Standard Choice Offer (“SCO”), that would eliminate and minimize the competitive options available to customers.

The General Assembly was particularly aware of the challenges faced by small customers in a competitive market. Transaction costs associated with bilateral contract offers – primarily marketing costs – were much discussed during the consideration of HB 9. It was widely recognized that these transaction costs could minimize or even eliminate the advantages of a competitive market for small consumers. Costs of customer acquisition were considered to be in the \$5-10/per month range on an annual contract, which can be the difference between a customer saving money and not saving money.

Aggregation was the tool the General Assembly chose to enable small consumers to band together and buy in bulk. R.C. 4929.02(A)(11). This approach minimizes marketing costs and transaction costs. Franchisees and businesses with common ownership have successfully aggregated to maximize the savings available in the competitive market. Governmental aggregation, particularly opt-out aggregation, has proven to be especially effective at minimizing transaction costs and bringing the financial benefits – the only benefit that really matters – to small customers that otherwise may have stayed out of the market. Suppliers that choose to compete for these aggregations can provide lower costs than they can afford to offer via a bilateral contract. Buying in bulk and selling in bulk leads to lower prices and greater savings. The General Assembly recognized this economic reality and Ohio’s statutory framework authorizes and promotes these innovative mechanisms to ensure that small customers

can access the market in a manner that allows them to secure pricing similar to the larger industrial and commercial customers.

The act of shopping is nothing new. Consumers do it every day. It is a basic part of life. There is nothing innovative about forcing customers to shop for natural gas, nor was this the end goal that the General Assembly sought to promote. The General Assembly made a policy decision to substitute competitive markets for regulation when setting the commodity price for natural gas. Aggregations, governmental aggregation, bilateral contracts, and the SCO are all mechanisms to harness competitive forces rather than regulation to price natural gas. As it should, the Commission's website, above the link to the Apples-to-Apples chart, trumpets 'Save Money'. Any market-based approach to achieve that outcome is what the General Assembly envisioned and explicitly sanctioned. Limiting competitive choice is not an option under Ohio law.

II. Commission Questions

- a.** *What regulatory changes, if any, should be made to further support a fully competitive retail natural gas marketplace?*

A wide variety of commenters aver that no changes are necessary to further support a competitive retail natural gas marketplace. See Comments of Columbia Gas of Ohio ("COH") at 1; Comments of Vectren Energy Delivery of Ohio ("VEDO") at 1; Comments of the Northeast Ohio Public Energy Council ("NOPEC") at 2; Comments of Hess Corporation ("Hess") at 2; Comments of the Office of the Ohio Consumers' Counsel ("OCC") at 7. LIA generally concurs.

AARP Ohio ("AARP") raises two additional issues. AARP views variable monthly pricing as problematic because it fails to provide rate stability. AARP at 4. LIA shares

these concerns, but notes that Ohio retains budget billing for customers. While budget billing does not eliminate monthly rate changes it does stabilize monthly bills, something that is far more important to customers. The budget option effectively levels rate variations. Budget billing does not address volatility in the natural gas wholesale markets, the factor that underlies potentially wide variations in the SCO and other retail rates. However, moving back to a Gas Cost Recovery (“GCR”) structure that uses a mix of short-, medium-, and long-term contracts, along with hedging, to stabilize natural gas prices would be difficult, and is arguably inconsistent with Ohio’s statutory framework. LIA shares AARP’s concerns about price volatility, but given the dominance of the NYMEX in establishing wholesale prices, absent better federal control over market manipulation within this national trading platform, Ohio has few tools at its disposal to achieve the important public policy goal of rate stability.

LIA shares AARP’s concerns about the need to effectively regulate the activities of Competitive Retail Natural Gas Suppliers (“CRNGS”). AARP at 4-5. Organizations participating in LIA have filed comments on the pending CRNGS rules and made a compelling case on the need of the Commission to upgrade its certification standards, require more transparent pricing, and make customers more aware of unscrupulous marketers and the techniques used to dupe consumers. A *caveat emptor* approach is inappropriate when it comes to essential energy services, just as it is for other market transactions covered by the Consumer Sales Practices Act and other statutes. State policy dictates that the PUCO effectively regulate CRNGS and their subcontractors, and it should do so.

The outliers in the comments, unsurprisingly, are Dominion East Ohio (“Dominion”) and the marketer organizations – the Ohio Gas Marketers Group and the Retail Energy Supply Association (“OGMG/RESA”). These two groups contend that the only true competitive market is one based on bilateral contracts and are willing to go to any lengths necessary to deny customers the competitive options that can provide lower customer rates as authorized by the General Assembly.¹ Dominion opines that it is “the Commission’s duty to determine what type of market is needed to comply with the state energy policy....” Dominion at 1-2. Dominion is simply wrong. The Commission’s duty is to “[p]romote the availability of unbundled and comparable natural gas services and goods that provide wholesale and retail consumers with the supplier, price, terms, conditions, and quality options they elect to meet their respective needs.” R.C. 4929.02(A)(2). The Commission is charged to “[f]acilitate additional choices for the supply of natural gas for residential consumers, including aggregation.” R.C. 4929.02(A)(11).

The crux of Dominion’s argument is that so long as there is a default offer of any type, the competitive retail natural gas market cannot be deemed “fully” competitive. Dominion at 1. Nowhere in Ohio law or state policy is the term ‘competitive market’ defined as a ‘competitive retail natural gas market limited to bilateral contracts’. In fact, it is difficult to fathom how the state could fulfill its statutory duty to promote aggregation

¹Under Ohio law, neither Dominion nor any other local distribution company (“LDC”) is permitted to make a profit in the gas provided to customers through a default service. Dominion has moved beyond this and exited the merchant function; under its current SCO, customers have a direct relationship with the CRNGS that won the SCO auction and Dominion is not a part of the transaction in any way. However, Dominion does have a marketing affiliate, Dominion Retail, which does make a profit on natural gas sales and benefits from the exit. Dominion Retail would receive additional customers that would pay higher prices should the SCO be eliminated.

if the entire retail market was meant to be defined as a competitive retail natural gas market limited to bilateral contracts.

In addition, as any economist knows, perfect competition is not achievable. As any observer of the natural gas marketplace knows, the elimination of default service is not possible. One only has to look at the experience in the service territory of Atlanta Gas and Light (“AGL”). Two years after mandating the exit from the merchant function and implementing a market based solely on bilateral contracts, the state legislature had to create two default pools, one for low income customers and another for customers with poor credit (both of whom now pay substantially higher rates than other customers).² A theory is one thing, but the practical reality of pricing natural gas, which is the issue the General Assembly addressed, requires a regulatory framework that meets the needs of consumers. R.C. 4929.02(A)(1). The policy of the state of Ohio cannot be met unless service is available to all customers. A default service is necessary, as evidenced by the AGL experiment. A default service with a price set through a competitive auction is completely consistent with and is required by Ohio law.

OGMG/RESA continues its campaign to make the world of competitive retail energy one consisting exclusively of bilateral contracts, no matter how economically efficient an SCO or aggregation is in providing reasonable prices. It claims that if customers are engaged in the market (through force or otherwise), there is no need for default service. OGMG/RESA at 2. AGL disproved this myth. OGMG/RESA goes on to argue that “in order to accomplish a true, fully competitive retail natural gas

²In its comments, AARP also notes that prior to deregulation, AGL’s customers were paying the national average for their gas costs and since deregulation in 2000 have consistently paid higher than the national average. AARP at 6, quoting Direct Testimony of Bruce M. Hayes, October 5, 2012, On Behalf of the Office of Ohio Consumers’ Counsel, PUCO Case No. 12-1842-GA-EXM, at 23 and BMH Attachment 1.

marketplace, the default service should be replaced with default suppliers charging market rates. OGMG/RESA at 2-3. Given that the SCO is a direct retail relationship between a CRNGS and the customer with the rates set by a market auction, this has already been achieved. OGMG/RESA may not like the auction process because it drives down rates, but it still provides an opportunity for profit for well-managed suppliers.

OGMG/RESA is so transfixed by the word *default* that it fails to recognize what is actually happening in the market. Customers new to a market can sift through the various offers and still choose to be on the SCO. Customers that have chosen not to extend an existing contract and do not select another marketer choose to receive service from a marketer at the SCO price. A customer that is within the territory of a governmental aggregation can choose whether to remain in a bilateral contract, be served through the aggregation or opt-out and choose another supplier, or be served by a marketer at the SCO price. In short, customers may **choose** to get their service from the SCO, a choice that OGMG/RESA apparently is unwilling or unable to acknowledge.

OGMG/RESA next trots out its standard subsidy argument, bemoaning the fact that they have to shoulder a host of costs that make it difficult to compete with the SCO. They are competing with themselves; customers served through the SCO are served directly by CRNGS and they cost the same to serve, except for the customer acquisition/marketing costs. If a supplier wants to get customers less expensively, the answer is simple: compete in the auction. If the supplier has a cost structure that prevents them from winning in the auction, this is not only acceptable, but an expected result in a competitive market. Not everyone who competes comes out a winner. A

CRNGS has to sink or swim. As LIA stated previously, no marketer is entitled to succeed.

It is widely recognized that government has a role to play in competitive markets. In the case of natural gas service in Ohio, the PUCO approves the LDC tariffs that define how a marketer operates on the system; it establishes billing and payment rules; it certifies CRNGS, ensuring they have adequate customer service and capital to operate in Ohio's markets; it handles customer complaints against CRNGS; and, it oversees a host of other aspects of the retail natural gas market. That is the PUCO's statutory duty. It is not government intervention in the marketplace. As long as prices are set through competitive processes, government action is appropriately focused to ensure that the process works fairly for all.

b. *What types of educational programs, if any, should be implemented to ensure that retail customers are fully aware of the options open to them for purchasing retail natural gas service?*

AARP indicated its support for the Apples-to-Apples chart as “an innovative approach to providing customers with information on which to make choices among competing suppliers.” AARP at 8. It further notes that “[a] key feature of the chart has been and is the SSO or SCO price. This benchmark allows customers to compare options to a market price for a plain vanilla service. Without that benchmark, educational programs can only offer limited information to customers.” Id. LIA wholeheartedly agrees. This view is compelling, particularly given AARP’s active involvement with these issues in a number of other states.

Consumer education is expensive, as noted by Dominion, COH, AARP and LIA. Most agree that since it is CRNGS that benefit from the education programs as they serve all customers, whether through the SCO, aggregations, or bilateral contracts, that they should bear the costs of consumer education. This is true in other competitive industries and should be true in natural gas. Dominion also notes that it has spent \$14 million in billing system changes to accommodate choice. Dominion at 5. These costs should rightfully be paid for by the beneficiaries, the CRNGS, as they were in the Dominion service territory. Id.

VEDO and COH suggest that there should be more surveys to determine what customers need to know, while Dominion proposes a more comprehensive market research approach. LIA agrees that a comprehensive analysis is necessary, but what customers really need is someone they can call or sit down with, that has no vested interest in any of the choices presented, and who can explain Choice and the myriad of offers available. LIA reiterates its suggestion that a mechanism be found to fund community-based organizations to provide customers with assistance in understanding and reviewing their options. The PUCO, through its Office of Retail Competition, regularly gives presentations to community groups and distributes educational information. This needs to be taken a step further. Funding a network of counselors at community based organizations that already provide tax and financial counseling and/or energy assistance, could have a major impact on educating customers about the market, making them more comfortable with the concept of choosing a supplier and more savvy about saving money through that choice by discussing options one on one.

Education should not only be about informing customers to shop as Dominion suggests. Dominion at 5. Rather, it should be focused on how to shop: what prices are good; what terms and conditions are detrimental for this particular customer; whether a different offer would save enough to buy that “free” toaster five times over. Deputizing and funding organizations to help people shop will improve the market and outcomes for consumers. The Ohio market has gone through a significant evolution, but there are still plenty of people that either don’t know about shopping for gas and electricity or don’t know how. There are also a sizeable number who don’t care at all, and these people, whatever their reasons for not shopping, still need to have “reasonably priced natural gas services.” R.C. 4929.02(A)(1). Contrary to what OGMG and RESA may think, it is entirely rational for a customer to decide NOT to choose.

c. *Does the SCO provide a competitive level playing field for SCO providers and competitive retail natural gas service (CRNGS) providers?*

According to the PUCO’s Mission Statement, the purpose of regulation in Ohio is “to assure all residential and business consumers access to adequate, safe and reliable utility services at fair prices, while facilitating an environment that provides competitive choices”. Hess at 4. It is not to ensure ‘a competitive level playing field between CRNGS’. The focus is on consumers and permitting choices among competitive options to obtain adequate service at fair prices. The question, as posed, is irrelevant to the statutory purpose of natural gas regulation in Ohio.

Suppliers offering bilateral contracts cannot maintain high profit margins while competing against the SCO; to succeed in the market they must be willing to sacrifice some of their profit. Apparently, some marketers use a business model based on high

margins from a small number of contracts. The SCO provides a small margin from a large number of contracts. CRNGS have a choice: they can compete in the market as it currently exists or they can choose to do business elsewhere.

Data provided by LDCs indicate that increasing numbers of marketers are soliciting customers within their service territories in spite of the existence of an SCO. VEDO at 3. COH at 4. CRNGS have unabated opportunities to solicit and secure customers. CRNGS have the ability to offer a wide array of innovative contracts with attributes an SCO cannot provide. One could argue that the playing field is currently tilted away from the SCO because it cannot include the 'bells and whistles' marketers can attach to their bilateral contract offers, or the offers they make to aggregations. There are some customers that, for business or personal reasons, prefer fixed price contracts. The SCO is not a fixed price and therefore SCO providers are unlikely to acquire these customers. Does that tilt the playing field in favor of CRNGS who offer fixed price contracts that some customers demand/desire? Certainly. But that is how the competitive market is intended to work. Ohio embraces several methodologies to set natural gas prices – auctions, requests for proposals or bidding, bilateral negotiations, and take-it-or-leave-it offers. There is room for all these competitive options on the current playing field.

Hess makes a particular point of warning the Commission against “developing and incorporating proxy costs into the SCO price that reflect categories of costs that are borne by retail suppliers, but that are not by SCO suppliers.” Hess at 4. Developing a proxy is always difficult in a competitive market. One only has to consider the imperfect nature of determining the rate of return of comparable companies when trying to

ascertain whether an electric utility has failed the Significantly Excessive Earnings Test. Defining the costs would be difficult. First, periodically there are CRNGS that offer prices that are equal to or lower than the SCO. Marketers have noted that they can choose to absorb or discount certain costs – balancing fees, switching fees, pipeline charges – in order to be competitive. Calculating a proxy would be like counting the number of angels on the head of a pin. As Hess notes, “[i]ncorporating “phantom” costs (i.e., those that do not reflect actual costs) into the SCO price solely to make it easier for retail suppliers to compete with the SCO price would have disastrous effects on the Ohio retail market.” *Id.* Attempting to level the playing field by taxing one method of competitive pricing is antithetical to the Ohio statutory framework. CRNGS are free to make offers through any of the options available in the Ohio market. The choice is theirs.

d. *Are there barriers to market entry associated with the SCO and, if so, how are those barriers affecting the growth of Ohio’s competitive market?*

As noted in the response to Question c, the data provided by LDCs clearly indicates that more companies are applying for and being certified as CRNGS regardless of the existence of the SCO. It is clear that the SCO is not the problem. It may well be that the limited oversight and regulation faced by CRNGS makes Ohio an attractive market. Hess sums it up appropriately: “the only barriers to the market are necessary ones.” Hess at 5.

If there are market barriers, they do not seem to be keeping new marketers from entering or driving out those already here. Again, LIA vigorously opposes any notion that the SCO can be characterized as a market barrier; it is a part of the market.

e. *Is the SCO functioning as a competitive market price?*

All but two of the commenters agree that the SCO is a competitive market price. This is not surprising. The SCO price base is the NYMEX, which is viewed as competitive (except when a hedge fund tries to corner the market³). The Retail Price Adjustment, commonly referred to as the ‘adder’, is set by an auction process overseen by an independent third-party. Thus, all the variable components of the SCO are set by competition. Other transactional costs – supplier certification; volumetric and fixed fees charged by LDC tariffs; other regulatory costs; etc. – are all factored into the adder. Clearly, and some of these costs are discounted as a part of the bid. Likewise, winners of the SCO bidding process are probably also obtaining natural gas at a price below the NYMEX. CRNGS offering bilateral contracts live in this same market. They can source gas at a price below the NYMEX, streamline their backroom operations to cut costs to the bone; and, discount the various regulatory and operational costs. That is what a competitive market requires.

Dominion insists on arguing that the SCO “is still a substantially regulated pricing mechanism....” Dominion at 8. It is difficult to understand how Dominion can draw this conclusion. The NYMEX is competitive. The auction is competitive. Regulatory fees and consumer protection and service requirements are the same. One can argue that the entirety of the market remains regulated so long as the Commission is approving utility tariffs and certifying providers. Certifying that an auction was conducted fairly is hardly the heavy hand of regulation.

³See McCullough Research, *Did Amaranth Attempt to Corner the March 2007 NYMEX at Henry Hub?*, September 26, 2006.
<https://docs.google.com/viewer?url=http%3A%2F%2Fwww.mresearch.com%2Fpdfs%2F317.pdf>

OGMG/RESA inadvertently indicated support for the SCO as a default provider because they too want to be considered as default suppliers just like the SCO. The Marketers generally tout the importance of customers being engaged in the market and actively involved in choosing their natural gas provider. At the same time, these marketers champion the MVR process which assigns a customer to a CRNGS contract he/she has not selected. In their comments, they ask that new customers or those that move to a new location in a service territory be assigned unknowingly to a CRNGS at any price the supplier chooses (as opposed to the best price for the customer). OGMG/RESA at 12. In essence, the Marketers want to become the new default suppliers, a concept they theoretically abhor.

But there is a difference between the two. Ohio's gas utilities have traditionally offered natural gas as a part of their service. Under Ohio's regulatory framework they no longer do so. Yet customers expect when they open a new account that they will get natural gas along with access to the distribution system. So, how is that natural gas priced? It is priced through a competitive retail auction and the competition in the NYMEX trading platform. Any marketer can participate in the auction. If a CRNGS wants to be assigned new customers or those that move to a new service territory, they should bid in the SCO auction.

III. Conclusion

Dominion East Ohio's Jeff Murphy said it best in testimony in a case in 2007 that created the SCO: "If DEO's natural gas commodity market is not competitive, it is difficult to imagine one that is." Testimony of Jeffrey A. Murphy, Case No. 07-1224-GA-EXM at 10. The Commission has, up until recently, followed the policies and

implemented the framework enacted by the General Assembly. It has replaced the regulation of natural gas prices by the Commission with the competitive market, allowing multiple suppliers to offer natural gas supply through a variety of mechanisms: bilateral contracts; governmental aggregations; other types of aggregations; and, the SCO. All these options leverage competition in different ways. By their nature, each has its own attributes. Bilateral contracts can include features not available through the plain vanilla SCO. Governmental aggregations can secure funding for a new park as well as lower prices for individual residential customers that they could not possibly hope to bargain for on their own, as they lack the market clout that large-scale aggregations can wield. Business aggregations can obtain bill analysis and other services to keep energy bills low, as well as lower prices. Customers who could care less about shopping can continue to receive service from the SCO by choosing not to choose. This is competition as envisioned by the General Assembly. It is generally working for customers. With enhanced consumer protections, it will work better.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of these Reply Comments was served on the persons stated below via electronic transmission this 30th day of July 2013.

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