

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application)	
of Ohio Power Company to)	Case No. 13-0345-EL-RDR
Update Its gridSMART Rider.)	
)	

**INITIAL COMMENTS OF
DIRECT ENERGY SERVICES, LLC AND DIRECT ENERGY BUSINESS, LLC**

On February 1, 2013, Ohio Power Company (“AEP Ohio”) filed its 2013 Application to update its gridSMART Rider (“Application”). The Application reflects actual gridSMART project spending and revenue recovery during 2012 and projected project costs for 2013. On August 2, 2013, Staff of the Public Utilities Commission of Ohio (“Staff”) filed comments on AEP Ohio’s Application. AEP Ohio filed reply comments in response to Staff on August 23, 2013. On October 1, 2013, the attorney examiner set a procedural schedule for intervention, initial comments, and reply comments. Direct Energy filed a timely motion to intervene on October 24, 2013. Direct Energy does not have initial comments but reserves its right to file reply comments in response to AEP Ohio’s Application.

Respectfully Submitted,

/s/ Jennifer L. Lause

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Initial Comments of Direct Energy Services, LLC and Direct Energy Business, LLC was served this 31st day of October, 2013 by electronic mail delivery upon the persons listed below.

/s/ Jennifer L. Lause

Jennifer L. Lause

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Case No(s). 13-0345-EL-RDR

Summary: Comments Initial Comments electronically filed by Ms. Jennifer L. Lause on behalf of Direct Energy Business, LLC and Direct Energy Services, LLC