

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)	
Review of its Rules for Competitive Retail)	Case No. 12-1924-EL-ORD
Electric Service Contained in Chapter)	
4901:1-21 Through 4901:1-24 of the)	
Ohio Administrative Code)	

**INTERSTATE GAS SUPPLY INC.'S
MEMORANDUM CONTRA APPLICATIONS FOR REHEARING**

On December 18, 2013, the Public Utilities Commission of Ohio ("Commission") set forth a Finding and Order in the above-captioned proceeding amending the rules that pertain to competitive retail electric service ("CRES") in Ohio. On January 17, 2014, Interstate Gas Supply, Inc. ("IGS") filed an Application for Rehearing in this proceeding. In furtherance of the Commission's policy of limiting duplicative arguments that are already made by other parties in this proceeding, IGS notes its endorsement of the following positions in RESA's Memorandum Contra filed in this proceeding:

- Rule 21-05(A): CRES providers should not have to disclose in their marketing materials or a service contract for residential and small commercial customers, how a proposed variable rate would have performed over the past 12-24 months, or the index/formula for the variable rate.
- Rule 21-05(B): CRES marketing materials should not be required to be provided to OCC whenever requested by the Commission, Staff or OCC.
- Rule 21-11(F): Affirmative customer consent should not be required for any CRES contract with material changes to renew.
- Rule 21-18(D)(3): CRES-consolidated bills should not have to include the total annual electric costs.
- Publication of customer complaints: The Commission made no error in not establishing by rule a format for the public to review CRES complaint information held by the Commission.

Respectfully submitted

/s/ Matthew White

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CERTIFICATE OF SERVICE

I certify that a copy of this document was served via electronic mail this 27th day of January 2014 on the parties listed below.

/s/ Matthew White
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in

Case No(s). 12-1924-EL-ORD

Summary: Memorandum Contra Applications for Rehearing electronically filed by Mrs. Gretchen L. Petrucci on behalf of Interstate Gas Supply Inc.