

other joint owners of OVEC to permit transfer of its ownership portion to AEP Generation Resources, Inc. (“GenCo”).³ In that case, the Commission required AEP-Ohio to ensure that the power (capacity, energy, and ancillary service components) from the OVEC assets are sold into the PJM Interconnection, LLC (“PJM”) market. Moreover, AEP-Ohio is not allowed to deviate from the OVEC power into PJM without explicit Commission approval.

DP&L assumes in its’ Supplemental Application that it will be treated similarly to other OVEC Sponsoring Companies from OVEC members. As such, DP&L should assume that the Commission will also treat it similarly to other OVEC Sponsoring Companies. Therefore, Direct Energy recommends that the Commission impose the same requirements on DP&L as it recently did to AEP-Ohio. By doing so the competitive market would receive assurances the OVEC power will be sold at a market price and that in light of a full divestiture, the essential elements of a full divestiture would still be achieved.

It is important that customers taking generation from a CRES provider are not subject to costs/credits for OVEC. The existing DP&L electric security plan was approved based on the assumption that all generation would be sold or divested. For DP&L to not only keep their portion of OVEC but to attempt to pass any costs/credits through to customers would throw off the assumptions used to determine whether the ESP was more favorable in the aggregate than the expected market rate offer.

³ *In the Matter of the Application of Ohio Power Company for Approval of an Amendment to Its Corporate Separation Plan*, Case No. 12-1126-EL-UNC, Application at 2-5 (October 4, 2013).

Respectfully Submitted,

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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 25th day of March, 2014 by electronic mail delivery upon the persons listed below.

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