BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Investigation of Ohio's Retail Electric Service Market.	)))	Case No. 12-3151-EL-COI

APPLICATION FOR REHEARING OF
OHIO PARTNERS FOR AFFORDABLE ENERGY, AARP, THE OHIO POVERTY LAW CENTER, EDGEMONT 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

In accordance Ohio Revised Code Section 4903.10 and Ohio Administrative Code Rule 4901-1-35, Ohio Partners for Affordable Energy; AARP; The Ohio Poverty Law Center; Edgemont 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 (together "Consumers") hereby apply for rehearing from the Public Utilities Commission of Ohio's ("Commission") Finding and Order dated March 26, 2014, in this proceeding considering the Commission's investigation of Ohio's competitive retail electric service market. The Finding and Order is unreasonable and unlawful in the following respects.

1. The Finding and Order unreasonably and unlawfully orders that costs associated with bill format changes desired by competitive retail electric generation service ("CRES") providers will be recovered from public utility distribution ratepayers.

2. The Finding and Order is unreasonable and unlawful in failing to require that information on the number of customers served and load served in MWh for each CRES provider be provided in the public record.

3. The Finding and Order is unreasonable and unlawful in ordering that the Price to Compare should be provided on customer bills as a “rolling annual average.”

4. The Finding and Order is unreasonable and unlawful in finding that electric distribution utilities (“EDU”) should offer time-differentiated generation rates through their Advanced Metering Infrastructure (“AMI”) programs and should recover the costs through their Advanced Metering distribution riders.

5. The Finding and Order is unreasonable and unlawful in failing to require the participation of various consumer advocates in the Market Development Working Group and in failing to call for independent advisors to inform customers about CRES providers and their offerings.

An explanation of the basis for each of these grounds for rehearing is set forth in the attached Memorandum in Support. Consistent with R.C. 4903.10 and the Consumers’ claims of error, the Commission should modify its Finding and Order to correct the unreasonable and unlawful orders and to address the concerns of residential low-income and fixed-income consumers in the competitive retail electric generation market in Ohio.

Respectfully submitted,

/s/ Colleen Mooney
Colleen L. Mooney
Ohio Partners for Affordable Energy
231 W. Lima Street
Findlay, OH 45840
Phone: (419) 425-8860
cmooney@ohiopartners.org

/s/Luke Russell
Luke Russell
Associate State Director, Advocacy
AARP Ohio
17 S. High Street., #800
Columbus, OH 43215
Tel: 614-222-1523
lrussell@aarp.org

/s/Michael R. Smalz
Michael R. Smalz
Ohio Poverty Law Center
555 Buttles Avenue
Columbus, Ohio 43215-1137
PH: (614) 221-7201
msmalz@ohiopovertylaw.org

/s/Ellis Jacobs
Ellis Jacobs
Advocates for Basic Legal Equality, Inc.
130 West Second Street, Suite 700 East
Dayton, Ohio 45402
PH: (937) 228-8104
FX: (937) 535-4600
ejacobs@ablelaw.org

/s/Noel Morgan
Noel Morgan
Legal Aid of Southwest Ohio, LLC
215 East Ninth Street, Suite 500
Cincinnati, Ohio 45202
PH: (513) 241-9400
FX: (513) 241-0047
nmorgan@lascinti.org
Attorney for Communities United for Action

/s/Michael A. Walters
Michael A. Walters
Pro Seniors, Inc.
7162 Reading Road, Suite 1150
Cincinnati, Ohio 45237
PH: (513) 458-5532
FX: (513) 621-5613
mwalters@proseniors.org

/s/Peggy Lee
Peggy Lee
Robert Johns
Southeastern Ohio Legal Services
964 East State Street
Athens, Ohio 45701
PH: (740) 594-3558
FX: (740) 594-3791
plee@oslsa.org
rjohns@oslsa.org

/s/Julie Robie
Julie Robie
Anne Reese
The Legal Aid Society of Cleveland
1223 West Sixth Street
Cleveland, Ohio 44113
PH: (216) 687-1900
FX: (216) 861-0704
julie.robie@lasclev.org
anne.reese@lasclev.org

/s/Joseph P. Meissner
Joseph P. Meissner
Joseph Patrick Meissner and Associates
5400 Detroit Avenue
Cleveland, Ohio 44102
PH: (216) 912-8818
meissnerjoseph@yahoo.com
Attorney for the Citizens Coalition

/s/ Melissa Baker Linville
Melissa Baker Linville
Legal Aid Society of Columbus
1108 City Park Avenue
Columbus, Ohio 43206
PH: (614) 224-8374
FX: (614) 224-4514
mlinville@columbuslegalaid.org

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MEMORANDUM IN SUPPORT OF THE APPLICATION FOR REHEARING OF OHIO PARTNERS FOR AFFORDABLE ENERGY, AARP, THE OHIO POVERTY LAW CENTER, EDGEMONT 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

In accordance Ohio Revised Code Section 4903.10 and Ohio Administrative Code Rule 4901-1-35, Ohio Partners for Affordable Energy; AARP; The Ohio Poverty Law Center; Edgemont 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 (together "Consumers") hereby submit this memorandum in support of their application for rehearing from the Public Utilities Commission of Ohio's ("Commission") Finding and Order dated March 26, 2014, in this proceeding considering the Commission's investigation of Ohio's competitive retail electric service market. The Finding and Order is unreasonable and unlawful for the following reasons.

1. **The Finding and Order unreasonably and unlawfully orders that costs associated with bill format changes desired by competitive retail electric generation service ("CRES") providers will be recovered from public utility distribution ratepayers.**

The Staff of the Commission had recommended that the Commission authorize the electric distribution utilities ("EDUs") to charge all active CRES providers a one-time setup fee to implement numerous bill format changes desired by CRES providers. Work Plan at 20-22; Finding and Order at 25. In our comments, Consumers had argued that any addition to EDU bills associated with marketing of a CRES provider, beyond the current inclusion of the CRES provider's name, contact information, and rates and charges should be paid for by the CRES providers. Finding and Order at 25-26. CRES providers should be responsible for all costs associated with putting their logos or any other marketing-related material on public utility distribution customer bills.

In rejecting the Consumers and Staff position, the Commission found that, although a cost causer is normally assessed, recovery for such costs by an EDU in a distribution rate case was appropriate. The Commission stated that the EDUs may file applications for recovery of these costs in their next distribution rate cases. Finding and Order at 26. The Commission justified this unlawful order by stating that the bill format changes were necessary "to implement numerous policy directives in R.C. 4928.02, as well as R.C. 4928.07 and 4928.10." The Commission found that displaying the CRES provider's logo was necessary for proper "disclosure of the costs of CRES service" consistent with R. C. 4928.07.

The Commission also found that it would seek to amend its Rule 4901:1-10-33 and other rules to bring them into conformity with its Order. The Commission

stated that Ohio Adm. Code Rule 4901:1-10-33 allows the Commission to order any entity to provide bill content through a consolidated bill. Pursuant to Ohio Adm. Code 4901:1-10-33(F), the Commission ordered the EDUs to file an application within six months of the Finding and Order, to revise their consolidated bill format "to bring it into conformity with R.C. 4828.02, 4928.07, 4928.10, and this Order." Finding and Order at 26.

These Commission orders are unlawful. Ratemaking for regulated, non-competitive, monopoly distribution utilities is governed now, and has been governed for many years, by the ratemaking statutes of the Ohio Revised Code. R.C. 4909.15(A)(4) states that :

> (A) The public utilities commission, when fixing and determining just and reasonable rates, fares, tolls, rentals, and charges, shall determine:
>
> > (4) The cost to the utility of rendering the public utility service for the test period . . .

The Ohio Supreme Court has on numerous occasions reiterated the axiom that the Commission is a creature of statute and as such may only exercise the authority specifically set forth by statute. *Cleveland Electric Illuminating v. Pub.Util. Comm.* (1975), 42 Ohio St.2d 403. A critical component of the statutory ratemaking formula for public utilities is that the costs reviewed during that ratemaking process must be costs that were incurred to render public utility service. Electric public utilities in Ohio provide monopoly distribution service.

The costs to put competitive generation suppliers' logos on public utility distribution customers' bills do not meet the statutory requirement that costs recovered through distribution rates must be costs of rendering public utility

service. Therefore, the PUCO has no statutory authority to order the collection of these costs from public utility distribution customers. Without statutory authority, the Commission has no authority. Id.

In addition to the statutory mandate that the Commission must determine whether costs in public utility distribution rates are costs to render public utility service pursuant to R.C. 4909.15(A)(4), the Ohio Supreme Court has held that "R.C. 4909.15(A)(4) is designed to take into account normal, recurring expenses incurred by utilities in the course of rendering service to the public for the test period." *Consumers' Counsel v. Pub.Util. Comm.* (1981), 67 Ohio St. 2d 153, 164-166. Promotional and advertising costs even of public utilities are not recoverable from ratepayers. The Ohio Supreme Court has held:

> This court is of the opinion that this same presumption must be applied by appellee, if operating expenses are truly to reflect "the cost of rendering the public utility service." Therefore, institutional and promotional advertising expenses are to be disallowed, unless the utility can clearly demonstrate a direct, primary benefit to its customers from such ads.

Cleveland v. Pub.Util. Comm. (1980), 63 Ohio St.2d, 62- 72-73. Therefore, even the advertising and promotional costs of public utilities are not recovered in public utility distribution rates. For the Commission to determine that the costs to place competitive generation suppliers' logos on distribution customers' bills will be recovered from distribution customers is clearly unlawful under Ohio law and Ohio Supreme Court precedent. The costs associated with bill format changes desired by competitive retail electric generation service providers are not related to the provision of distribution service. In a distribution rate case, costs that have

no relationship to the provision of distribution utility service to distribution customers may not be included.

While the Commission's Order ignored Ohio's ratemaking law, R.C. 4909.15(A)(4), and Ohio Supreme Court precedent, the Commission cited other statutes that have no relation to distribution service ratemaking. The Commission cites R.C. 4928.02, which sets forth the state policy for competitive retail generation electric service but does not address what costs are included in public utility distribution service rates. R.C. 4909.15(A)(4) has not been repealed.

The Commission also cites R.C. 4928.07, another of the competitive retail electric generation service statutes, concerning separate pricing of services on customers' bill. R.C. 4928.07 states that the utility "shall separately price competitive retail electric services, and the prices shall be itemized on the bill." There is no reference at all in the statute to distribution ratepayer funds being used to accomplish this statutory directive. However, the effective date of R.C. 4928.07 was October 5, 1999; therefore, this statute is almost fifteen years old. Pursuant to R.C. 4928.07, the price of competitive retail electric generation services is already separately included and itemized on distribution customer bills and has been for many years. The statutory directive has already been met. There is no apparent reason, and no explanation, as to why the Commission now believes that it has not already complied with the fifteen-year old statute or why a competitive supplier's logo is necessary to accomplish the statement of charges owed to the supplier that already appears on EDU bills. Rather, the presence of

a logo is designed as a marketing tool and should not be confused with the statement of the actual charges owed by the customer to the supplier..

The Commission also cites R.C. 4928.10, which concerns "minimum service requirements for competitive services." R.C. 4928.10(C) discusses the minimum content of customer bills, which includes price disclosure, billing units, service components, identification of the supplier of each service, where and how payment may be made, and any changes in rates, terms, and conditions of service. The effective date of R.C. 4928.10 was October 5, 1999; therefore, these items are already included on distribution customer bills. The statutory directive has already been met. There is no apparent reason, and no explanation, as to why the Commission now believes that it has not already complied with the fifteen-year old statute or why a supplier's logo is somehow included in these required disclosures.

In conclusion, the PUCO reliance on irrelevant statutes to publicize and advertise CRES generation providers on distribution customers' bills is unlawful. Public utility distribution ratepayers are not responsible to pay for advertising or marketing tools, such as logos, for competitive retail electric generation suppliers on distribution bills. In order to conform to Ohio statutory law and Supreme Court precedent, the PUCO should grant rehearing on this issue.

2. The Finding and Order is unreasonable and unlawful in failing to require that information on the number of customers served and load served in MWh for each CRES provider be provided in the public record.

The Staff had recommended that the number of customers served and load in megawatt-hours ("MWh") for each CRES provider in each EDU service territory should be made public because this information is not confidential in other industries. Staff Work Plan at 11-12; Finding and Order at 10. Supporters of the Staff's proposal also agreed that the information is commonly available to customers and investors in other markets and that disclosure of the information would assist customers with shopping. Id. at 10-11. CRES providers claimed that market share data are highly sensitive and should remain confidential.

The Commission found that CRES providers have a statutory right to file motions for protective orders. Therefore, the Commission found that any information filed pursuant to Ohio Adm. Code 4901:1-25-02(A)(2)(d), (A)(3), and (A)(4) would be held as confidential until such time as a request for disclosure was filed. If the Commission receives a request for disclosure, it will provide the CRES provider notice so the CRES can request a protective order. Finding and Order at 11-12.

The Commission should have adopted the Staff's recommendation. As the Staff stated, the number of customers served and load in MWh for each CRES in each EDUs service territory should not be confidential because this type of information is not confidential in other industries. Staff Work Plan at 12. The Staff also stated that a crucial step in determining the health and viability of the retail market is to know not only the number of active CRES providers in the

market but also the market share by number of customers and load in MWh. Id. There is also no legal support for keeping the information confidential in Ohio retail electric generation markets. Moreover, the information will help advocates to address issues of market power and will help consumers to be informed about various CRES providers. Hiding information about a CRES provider's number of customers and load served in MWh will distort and inhibit the development of the competitive market. The Commission should grant rehearing and order that information filed with the Commission regarding the CRES providers' number of customers and load in MWh should be filed in the public record.

3. The Finding and Order is unreasonable and unlawful in ordering that the Price to Compare should be provided on customer bills as a "rolling annual average."

The Commission found that standardizing the Price to Compare across the state of Ohio would bring transparency to the market and clarity to customers. Finding and Order at 28. Consumers supported uniform and standardized Price to Compare information on customers' bills so that consumers are better able to compare prices while shopping. Consumers Comments at 11-12.

Unfortunately, the Commission failed to adopt the Staff or consumer groups' recommendations as to how this Price to Compare disclosure should be standardized. Instead, the Commission found that the EDUs should use a "rolling annual average" Price to Compare on customers' bills. According to the Finding and Order, to implement this rolling annual average, the EDU should

calculate the Price to Compare by using the standard service offer ("SSO") rate for the previous 12 months and dividing it by the customer's usage for the previous 12 months. The Commission directed that the EDUs should include this bill format change in their applications to revise their bill format "to bring it into conformity with R.C. 4928.07 and this Order." Finding and Order at 29.

The Commission's Finding and Order with respect to the Price to Compare on customers' bills may not provide customers with very useful information and may even be misleading. A rolling annual average Price to Compare does not represent the current or actual Price to Compare in effect at the time of the disclosure and will, therefore, distort the price comparison necessary to allow the customer to compare the Price to Compare with the current offers by CRES providers. If the current Price to Compare has increased, for example, the rolling average calculation will not provide accurate and timely information to customers comparing current CRES offers. Customers may also be misled into believing that the CRES price is lower than the current Price to Compare when in fact the CRES price may be higher than the current Price to Compare. The Commission's Finding and Order on this matter is a step backward in the development of accurate and useful customer education that is needed to ensure that customers have the proper information to shop and compare offers from CRES providers.

Using a rolling average does nothing to educate consumers and facilitate informed decisions. A customer's monthly usage for the past two years by month is available from distribution utilities. A single rolling annual average Price to

Compare will not tell the consumer what he needs to know about the relationship between his monthly usage and the current Price to Compare. A rolling annual average for the Price to Compare may differ significantly from the actual current Price to Compare.

The Commission should grant rehearing and order that the Price to Compare on a customer's bill should be stated for the month in which the bill is issued, accompanied by a statement about how the Price to Compare will next be changed. The Price to Compare should be stated accurately every month to allow the customer to compare the current offers from CRES providers.

4. The Finding and Order is unreasonable and unlawful in finding that electric distribution utilities ("EDUs") should offer time-differentiated rates through their Advanced Metering Infrastructure ("AMI") programs and should recover the costs of pilot programs through their Advanced Metering riders.

The Commission found that the EDUs should offer time-differentiated rates through their AMI/Smart Grid programs and should recover the costs through their AMI/Smart Grid riders. Finding and Order at 37-38. The Commission encouraged every EDU with AMI/Smart Grid deployment (but without a time-differentiated rate pilot program) to file an application with the Commission to implement a pilot time-differentiated rate program in its next electric security plan ("ESP"). The Commission also encouraged any EDU to include a pilot program in its application to implement an AMI/Smart Grid program.

The Commission believed that time-differentiated rate pilot programs should be available to standard service offer ("SSO") customers until the market

sufficiently develops for CRES providers to begin offering time-differentiated rates. However, the Commission stated that the EDUs should offer the pilot time-differentiated rates only for so long as it takes for the market to develop and for a reasonable number of CRES providers to begin offering time-differentiated rates in each EDU service territory. Finding and Order at 38.

Consumers do not agree that encouragement of time-differentiated rates or statements about rate recovery for such programs are appropriate for this proceeding. Any further development of time-differentiated rate options must occur in individual EDU rate proceedings where costs and benefits can be explored and considered. As for cost recovery by EDUs for time-differentiated rates, customers are already paying the costs of smart meters and systems through smart grid riders. Data made available to CRES providers should be paid for by the CRES providers based on the principle of cost causation.

There is a lack of evidence to date that customers have benefited from the existing time-differentiated EDU pilots in Ohio, and there is a significant lack of reporting by the Ohio EDUs with regard to the costs and benefits of the previously approved pilot programs. What data do exist in Ohio, primarily from the Duke Energy Ohio smart grid pilots, indicate that customers are not interested in time-differentiated rate designs and that savings are marginal at best, while overall participant savings have been virtually non-existent in the Duke Energy Ohio pilots. Another problem is that if customers actually save money in these programs, an EDU might seek to recover lost revenues and be held harmless.

Consumers propose that the Commission not make unsupported statements about the value of time-differentiated rate programs or pilots in the context of a proceeding that was intended to explore retail market enhancement policies. The suggestion that this proceeding should be used to provide a mandate to EDUs about time-differentiated rates (as opposed to actions that the EDU may be required to take to allow CRES providers to make such offers to customers) is directly contrary to the purpose of this proceeding and raises significant procedural and due process notice concerns. The Commission should not approve or require EDUs to design and implement potentially costly time-differentiated rate offerings until an investigation of the actual impacts of such rate offerings on consumers has been made. If these rate offerings are not generally beneficial to consumers, they should not be promoted widely. The Commission should grant rehearing and adopt the Consumers' recommendation.

5. The Finding and Order unreasonably failed to require the participation of consumer advocates in the Market Development Working Group and to call for independent advisors to inform customers about CRES providers and their offerings.

The Commission has set up a Market Development Working Group to assist in the development of proper data exchange protocols to improve the ability of CRES providers to offer time-differentiated rates. Finding and Order at 38. Given this, and other purposes of the Working Group, consumers, including low-income advocates, should be participants in the Working Group in order to address education, privacy, and EDU costs and rate implications important to consumers.

In addition, the Commission should have addressed the need for independent advisors specifically charged with educating and assisting customers in matters about energy suppliers and price and service options. The need for Independent advisors was advocated in the Comments of the Citizens Coalition at 8-12 and the Reply Comments of the Citizens Coalition at 3-5. The Commission's Finding and Order did not address the need for independent advisors to assist consumers.

These advisors should be available for customers to call to get objective, timely, and accurate information on CRES providers and their offerings. When a consumer calls, she should be able to discuss with an independent advisor her own situation. The advisor should be capable of discussing energy and supplier issues with customers regardless of their language, education, or access to the internet. The Commission should grant rehearing to establish the need for independent advisors as described in the Comments and Reply Comments of the Citizens Coalition.

CONCLUSION

The Commission should grant rehearing of its March 26, 2014 Finding and Order for the reasons set forth herein. Consumers urge the Commission to grant rehearing in order to address the concerns of residential low-income and fixed-income consumers in the competitive retail electric generation market in Ohio.

Respectfully submitted,

/s/ Colleen Mooney
Colleen L. Mooney
Ohio Partners for Affordable Energy
231 W. Lima Street
Findlay, OH 45840
Phone: (419) 425-8860
cmooney@ohiopartners.org

/s/Luke Russell
Luke Russell
Associate State Director, Advocacy
AARP Ohio
17 S. High Street., #800
Columbus, OH 43215
Tel: 614-222-1523
lrussell@aarp.org

/s/Michael R. Smalz
Michael R. Smalz
Ohio Poverty Law Center
555 Buttles Avenue
Columbus, Ohio 43215-1137
PH: (614) 221-7201
msmalz@ohiopovertylaw.org

/s/Ellis Jacobs
Ellis Jacobs
Advocates for Basic Legal Equality, Inc.
130 West Second Street, Suite 700 East
Dayton, Ohio 45402
PH: (937) 228-8104
FX: (937) 535-4600
ejacobs@ablelaw.org

/s/Noel Morgan
Noel Morgan
Legal Aid of Southwest Ohio, LLC
215 East Ninth Street, Suite 500
Cincinnati, Ohio 45202
PH: (513) 241-9400
FX: (513) 241-0047
nmorgan@lascinti.org
Attorney for Communities United for Action

/s/Michael A. Walters
Michael A. Walters
Pro Seniors, Inc.
7162 Reading Road, Suite 1150
Cincinnati, Ohio 45237
PH: (513) 458-5532
FX: (513) 621-5613
mwalters@proseniors.org

/s/Peggy Lee
Peggy Lee
Robert Johns
Southeastern Ohio Legal Services
964 East State Street
Athens, Ohio 45701
PH: (740) 594-3558
FX: (740) 594-3791
plee@oslsa.org
rjohns@oslsa.org

/s/Julie Robie
Julie Robie
Anne Reese
The Legal Aid Society of Cleveland
1223 West Sixth Street
Cleveland, Ohio 44113
PH: (216) 687-1900
FX: (216) 861-0704
julie.robie@lasclev.org
anne.reese@lasclev.org

/s/Joseph P. Meissner
Joseph P. Meissner
Joseph Patrick Meissner and Associates
5400 Detroit Avenue
Cleveland, Ohio 44102
PH: (216) 912-8818
meissnerjoseph@yahoo.com
Attorney for the Citizens Coalition

/s/ Melissa Baker Linville
Melissa Baker Linville
Legal Aid Society of Columbus
1108 City Park Avenue
Columbus, Ohio 43206
PH: (614) 224-8374
FX: (614) 224-4514
mlinville@columbuslegalaid.org

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Application for Rehearing was served on the persons stated below via electronic transmission this 25th day of April 2014.

/s/ Colleen L. Mooney

burkj@firstenergycorp.com
stnourse@aep.com
Judi.sobecki@dplinc.com
Amy.Spiller@duke-energy.com
William.wright@puc.state.oh.us
mjsatterwhite@aep.com
gkrassen@bricker.com
mwarnock@bricker.com
tsiwo@bricker.com
marmstrong@bricker.com
sam@mwncmh.com
fdarr@mwncmh.com
joliker@mwncmh.com
mpritchard@mwncmh.com
dboehm@BKLlawfirm.com
mkurtz@BKLlawfirm.com
jklyercohn@BKLlawfirm.com
mswhite@igsenergy.com
haydenm@firstenergycorp.com
jlang@calfee.com
NMcDaniel@elpc.org
mkl@bbrslaw.com
yalami@aep.com
cdunn@firstenergycorp.com
grady@occ.state.oh.us
serio@occ.state.oh.us
berger@occ.state.oh.us
smhoward@vorys.com
mpetricoff@vorys.com
cgoodman@energymarketers.com
srantala@energymarketers.com
toddm@wanenergylaw.com
callwein@wamenergylaw.com
tdougherty@theoec.org

Summary: Application for Rehearing and Memorandum in Support of Ohio Partners for Affordable Energy, AARP, the Ohio Poverty Law Center, Edgemont Neighborhood Coalititon, 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 electronically filed by Colleen L Mooney on behalf of Consumers