

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

| | | |
|--|---|-------------------------|
| In the Matter of the Application of Ohio |) | |
| Edison Company, The Cleveland Electric |) | |
| Illuminating Company, and The Toledo |) | Case No. 12-2190-EL-POR |
| Edison Company For Approval of Their |) | Case No. 12-2191-EL-POR |
| Energy Efficiency and Peak Demand |) | Case No. 12-2192-EL-POR |
| Reduction Program Portfolio Plans for |) | |
| 2013 through 2015. |) | |

**APPLICATION FOR REHEARING
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

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December 22, 2014

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FirstEnergy¹ sought and was authorized in these cases to “suspend” the majority of its currently approved energy efficiency programs that would otherwise be available to customers for 2015 and 2016, after the enactment of Senate Bill 310. FirstEnergy was also successful in shifting to its two million customers the potential financial consequences (read charges) that its program reductions will have for creating a shortfall in its energy efficiency commitment to PJM.

Parties submitted comments on October 20, 2014, and reply comments on October 27th in response to FirstEnergy’s Application dated September 24, 2014. The Public Utilities Commission of Ohio (“PUCO”) issued a Finding and Order on November 20, 2014 (“Order”) granting FirstEnergy’s Application, with modifications.

The PUCO’s Order is unreasonable and unlawful because:

- A. The PUCO violated R.C. 4903.09 by failing to set forth its reasons for authorizing the FirstEnergy utilities to charge customers for

¹ The FirstEnergy utilities are Ohio Edison Company (“Ohio Edison”), the Cleveland Electric Illuminating Company (“CEI”), and the Toledo Edison Company (“Toledo Edison”) (collectively, “FirstEnergy” or the “Utility”).

capacity shortfalls that may result from the Utility's decision to eliminate over 60 percent of its energy efficiency programs.

- B. The PUCO erred in its decision that customers be responsible for any "prudently incurred costs of any steps taken to eliminate any [capacity] shortfalls" because FirstEnergy should bear any costs associated with its decision to eliminate the majority of its energy efficiency programs.
- C. The PUCO erred in not clarifying its Finding and Order that, consistent with Ohio Admin. Code 4901:1-39-04(B), FirstEnergy must demonstrate that its amended energy efficiency portfolio is cost-effective.

This Application for Rehearing is filed under R.C. 4903.10 and Ohio Admin. Code 4901-1-35, with reasons explained in the attached Memorandum in Support. Consistent with R.C. 4903.10 and the claims of error above, the PUCO should "abrogate or modify" its Order.

Respectfully submitted,

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MEMORANDUM IN SUPPORT

I. INTRODUCTION

FirstEnergy’s proposal to suspend the majority of its energy efficiency portfolio programs poses a risk to customers with respect to the PJM markets. In this regard, FirstEnergy’s decision to suspend most of its programs could likely result in FirstEnergy not being able to meet its future Base Residual Auction (“BRA”) obligations. The PUCO’s Order confirms that customers will be at risk for capacity-related charges that could arise because of the Utility’s decision.

In legislation this year (Senate Bill 310), the General Assembly froze the cumulative energy efficiency benchmark for two years (2015 and 2016) if a utility elected to file an amended energy efficiency portfolio plan.² Under this legislation, the General Assembly allowed for two different options for energy efficiency programs and charges to consumers for the next two years. In this regard, uncodified Section 6 of Senate Bill 310 states:

² R.C. 4928.66(A)(1)(a).

- (A) If an electric distribution utility has a portfolio plan that is in effect on the effective date of this section, the utility shall do either of the following, at its sole discretion:
 - (1) Continue to implement the portfolio plan with no amendments to the plan, for the duration that the Public Utilities Commission originally approved, subject to divisions (D) and (E) of this section;
 - (2) Seek an amendment of the portfolio plan under division (B) of this section.

FirstEnergy filed an Application seeking the PUCO's approval to amend its energy efficiency and peak demand reduction plans for 2015 through 2016 (under option (A)(2) above). In its Application, FirstEnergy sought to eliminate, or "suspend," the majority of its energy efficiency/peak demand reduction programs (nine programs out of 15) that were to be offered to customers for the next two years.³

Several parties explained in comments⁴ that FirstEnergy's proposal to suspend the majority of its programs is unreasonable because it poses a risk to customers with respect to the PJM Interconnection, LLC ("PJM") markets. This is because the PUCO, in its March 20, 2013 Opinion and Order in 12-2190-EL-POR ("March 20 Order"), required FirstEnergy to bid 75 percent of its energy efficiency into the May 2013 PJM Reliability Pricing Model ("RPM") BRA for the 2016/2017 Delivery Year.⁵ FirstEnergy did so and as a result is now obligated to make available for delivery for planning years 2016 and 2017 its energy efficiency resources that were "planned" as of 2014. But now, First Energy has changed its "planned" energy efficiency resources by drastically reducing its

³ Case No. 12-2190-EL-POR, Application at 2.

⁴ See Case No. 12-2190-EL-POR, OCC Comments at 14-16, Ohio Manufacturers' Association Energy Group ("OMAEG") Comments at 7-9, Environmental Advocates at 9-20, Ohio Partners for Affordable Energy Reply Comments at 5-6.

⁵ Case No. 12-2190-EL-POR, Opinion and Order at March 20, 2013 at 20-21 (March 20, 2013).

portfolio programs. Thus, its earlier commitment for 2016 and 2017 may be difficult to meet and FirstEnergy is asking customers to bear its risk of not meeting its commitment to PJM.

BRAs are held each May, three years prior to the actual delivery date (the year in which the committed capacity resource must be available). These auctions are designed to ensure that adequate resources will be available to serve each zone of the PJM system. At the time the PUCO ordered FirstEnergy to bid 75 percent of its resources into the PJM BRA, FirstEnergy had an entire portfolio of energy efficiency programs in place that could yield resources to be bid into the PJM auctions for the benefit of customers. But that has changed significantly as a result of the Utility's Application in this proceeding.

In its March 20 Order, the PUCO concluded that there is a "substantial benefit" to customers from bidding resources annually into the PJM BRA.⁶ But because FirstEnergy proposed to eliminate the majority of its energy efficiency programs for 2015 and 2016, customers will likely not experience this "substantial benefit." Instead it is likely there will be a capacity shortfall, which could result in increased capacity charges to customers. The PUCO's Order places the risk of this capacity shortfall and its associated costs on customers, rather than the Utility that made this business decision.

In addition to eliminating the majority of its energy efficiency programs, FirstEnergy proposed two new programs, one being the "Customer Action Program." Under the Customer Action Program, the Utility intends to "capture" energy savings and peak demand reductions through actions taken by customers outside of utility-

⁶ Case No. 12-2190-EL-POR, Opinion and Order at 20 (March 20, 2013).

administered programs.⁷ In its Order, the PUCO found that FirstEnergy included little information in its Application as to how to verify savings that result from the Customer Action Program.⁸ And although the PUCO approved the Customer Action Program, the PUCO stressed that any savings resulting from the program could not be counted until the savings are measured and verified.⁹ The PUCO required that the Customer Action Program be subject to the Total Resource Cost Test (“TRC”) to ensure that the program is cost-effective as part of future audits.¹⁰ The PUCO should clarify that FirstEnergy’s overall modified portfolio is *required* to be cost-effective under the PUCO’s rules (Ohio Admin. Code 4901:1-39-04(B)).

II. STANDARD OF REVIEW

Applications for rehearing are governed by R.C. 4903.10. This statute provides that any party may apply for rehearing on matters decided by the PUCO within thirty days after an order is issued.¹¹ An application for rehearing must be written and must specify how the order is unreasonable or unlawful.¹²

In considering an application for rehearing, the PUCO may grant rehearing requested in an application, if “sufficient reason therefore is made to appear.”¹³ If the Commission grants a rehearing and determines that its order is unjust or unwarranted, or

⁷ Application at 8.

⁸ Finding and Order at 9 (November 20, 2014).

⁹ Id.

¹⁰ Id. at 13.

¹¹ R.C. 4903.10.

¹² Id.

¹³ Id.

should be changed, it may abrogate or modify the order.¹⁴ Otherwise the order is affirmed. Under R.C. 4903.10(B), the PUCO is limited on rehearing to granting or denying a “matter[] specified in such application [for rehearing].”

OCC meets both the statutory conditions applicable to an applicant for rehearing pursuant to R.C. 4903.10 and the requirements of the PUCO’s rule on applications for rehearing.¹⁵ OCC is a party to the case. Additionally, OCC actively participated in this case, and thus, may apply for rehearing under R.C. 4903.10. The PUCO should determine that OCC has shown “sufficient reason” to grant rehearing on the matters specified below and should “abrogate or modify” its Order.

III. ARGUMENT

A. The PUCO violated R.C. 4903.09 by failing to set forth its reasons for authorizing the FirstEnergy utilities to charge customers for capacity shortfalls that may result from the Utility’s decision to eliminate over 60 percent of its energy efficiency programs.

The PUCO erred by authorizing the FirstEnergy utilities to charge customers for capacity shortfalls that may result from the Utility’s decision to eliminate over sixty percent of its energy efficiency programs. The PUCO failed to set forth the reasons prompting its decision violating R.C. 4903.09.

As OCC and others explained in comments,¹⁶ FirstEnergy’s proposal to suspend the majority of its programs poses a risk to customers with respect to the PJM markets.

¹⁴ Id.

¹⁵ See Ohio Adm. Code 4901-1-35.

¹⁶ See Case No. 12-2190-EL-POR, OCC Comments at 14-16, Ohio Manufacturers’ Association Energy Group (“OMAEG”) Comments at 7-9, Environmental Advocates at 9-20, Ohio Partners for Affordable Energy Reply Comments at 5-6.

The PUCO previously required FirstEnergy to bid 75 percent of its planned resources into the 2013 BRA.¹⁷ But the potential risk to customers of a capacity shortfall was small because there was a buffer in place for customers if FirstEnergy was unable to realize the full quantity of energy efficiency capacity cleared in the Base Residual Auction.

The PUCO determined in its Order that FirstEnergy will be entitled to recover from customers the prudently incurred costs of any steps taken to eliminate any capacity shortfalls.¹⁸ The PUCO based its finding on the rationale provided in the PUCO's Opinion and Order approving FirstEnergy's previous energy efficiency portfolio (the March 20 Order). That rationale is not applicable here. The PUCO's Order does not comply with R.C. 4903.09.

R.C. 4903.09 requires that the PUCO's decisions be based upon findings of fact in the record. The Ohio Supreme Court has held that "the purpose of R.C. 4903.09 is to provide [the] court with sufficient details to enable [it] to determine, upon appeal, how the commission reached its decision."¹⁹ And only where "there was enough evidence and discussion in order to enable the PUCO's reasoning to be readily discerned" has the Ohio Supreme Court found substantial compliance with R.C. 4903.09.²⁰

A legion of cases establishes that the PUCO abuses its discretion if it renders an opinion on an issue without a record in support.²¹ The need for record support is mandated under R.C. 4903.09. Under R.C. 4903.09 in all contested cases heard, the

¹⁷ Case No. 12-2190-EL-POR, Opinion and Order at 20 (March 20, 2013).

¹⁸ Case No. 12-2190-EL-POR, Finding and Order at 22 (November 20, 2014).

¹⁹ See *Cleveland Elec. Illuminating Co. v. PUC*, 4 Ohio St. 3d 107, 110 (Ohio 1983), citing to, *General Tel. Co. v. Pub. Util. Comm.* (1972), 30 Ohio St. 2d 271.

²⁰ *MCI Telecommunications Corp. v. Public Utilities Com.*, 32 Ohio St. 3d 306, 312 (Ohio 1987).

²¹ *Cleveland Elec. Illum. Co. v. Pub. Util. Comm.* (1996), 76 Ohio St.3d 163, 166.

PUCO “shall file, with records of such cases, finding of fact and written opinions setting forth the reasons prompting the decisions arrived at, based upon said findings of fact.” Some factual support for PUCO determinations must exist in the record, an obligation which the PUCO itself has recognized in its orders.²²

Without adequate facts and reasons to support the PUCO’s decision, the Court would not be able to determine if the Finding and Order is reasonable and lawful under R.C. 4903.10. Additionally, lack of a record stymies a complaining party’s effort in demonstrating prejudice,²³ a necessary element to obtain the Court’s reversal of a PUCO order.²⁴

In the March 20 Order, the PUCO required that FirstEnergy bid 75 percent of its planned energy efficiency resources for the 2016/2017 planning year under their program portfolio. The PUCO found that bidding 75 percent would “appropriately mitigate the Companies’ risk while benefitting [customers].”²⁵ The PUCO’s reasoning in the March 20 Order was logical given that customers would benefit from the majority (75 percent) of FirstEnergy’s planned resources being bid into the BRA. But this rationale is no longer applicable since the Utility decided to eliminate the majority of its energy efficiency programs. This is because the benefit to customers has been largely eliminated and the risk for capacity shortfalls has increased.

The PUCO’s Order does not explain why it is appropriate for customers to bear the risk of any shortfalls that could result from the Utility’s business decision to eliminate

²² See, e.g., *In re Petition of Studer & Numerous Other Subscribers of Neapolis Exchange of ALLTEL Ohio*, Case No. 88-481-TP-PEX. Entry on Rehearing (Sept. 6 1990).

²³ See *Tongren v. Pub. Util. Comm.* (1999), 85 Ohio St.3d 87, 92-93.

²⁴ *Id.*, citing *Holliday Corp. v. Pub. Util. Comm.*, (1980, 61 Ohio St.2d 335, syllabus.

²⁵ Case No. 12-2190-EL-POR, Opinion and Order at 21 (March 20, 2013).

the majority of its energy efficiency programs. The circumstances have changed significantly as a result of FirstEnergy's proposal to eliminate the majority of its energy efficiency programs for 2015 and 2016. In this regard, it was estimated with regard to Ohio Edison that the eliminated programs represented 78.6 percent of the portfolio and total lifetime MWh savings.²⁶ Cleveland Electric Illuminating eliminated 82.2 percent of its portfolio and total lifetime MWh savings.²⁷ And Toledo Edison eliminated 81.1 percent of the portfolio and total lifetime MWh savings.²⁸

It can be concluded that in light of the PUCO's requirement that FirstEnergy bid 75 percent of its eligible, planned savings into the 2013 BRA, the elimination of energy efficiency programs accounting for between 78 and 82 percent of its 2013-2015 portfolio will yield capacity shortfalls. But because of the PUCO's Order, the expense of these potential shortfalls (caused by the Utility) will become a burden on customers.

The PUCO's decision fails to set forth the reasons why customers should be charged for any capacity shortfalls that may result from the Utility's decision to eliminate its energy efficiency programs. The PUCO has failed to comply with R.C. 4903.09. Rehearing should be granted on this issue.

B. The PUCO erred in its decision that customers be responsible for any "prudently incurred costs of any steps taken to eliminate any [capacity] shortfalls" because FirstEnergy should bear any costs associated with its decision to eliminate the majority of its energy efficiency programs.

The PUCO determined that customers, and not the Utility, should be responsible for prudently incurred costs of any steps that FirstEnergy takes to

²⁶ Environmental Advocates at 15-16 (October 20, 2014).

²⁷ Id.

²⁸ Id.

eliminate capacity shortfalls. But it is not reasonable to hold customers responsible for capacity shortfalls and potential increased rates that could result from the Utility's own business decision to reduce its energy efficiency portfolio.

Specifically, a capacity shortfall potentially would negatively affect customers in at least three ways. First, customers would have to pay for any needed replacement capacity. To meet its capacity obligations, FirstEnergy would need to find replacement capacity for the energy efficiency that cleared the BRA for each involved delivery year by, most likely, purchasing the additional new capacity through PJM's incremental auctions. Under the PUCO's March 20 Order, customers would pay for this additional new capacity. Prices for the newly acquired capacity could be more expensive than that which was purchased during the BRA, thus increasing charges to customers.

Conversely, if the incremental auction prices are lower than that which cleared the BRA, customers should be held harmless from any additional capacity charges. And, in fact, if customers are responsible for additional capacity charges, they should be refunded the incremental gain via the financial arbitrage.

Second, eliminating the energy efficiency capacity resources that cleared the annual auctions will potentially increase the capacity prices that customers pay. This result occurs because eliminating the efficiency resources will reduce capacity supply and tend to increase capacity prices. Under the PUCO's March 20 Order customers will pay these increased prices.

Third, FirstEnergy's captive customers could have to pay its penalties from PJM for nonperformance. That situation (penalties) would occur if FirstEnergy fails to deliver capacity resources that have cleared the BRA. Under any of these scenarios, FirstEnergy

-- not its customers -- should bear the risks and any associated costs for removing from the market any capacity resources that have already cleared the BRA. That is, customers should be held harmless from FirstEnergy's business decisions to remove energy efficiency programs from its capacity resource product portfolio.

If the PUCO nonetheless determines that customers will be responsible, the PUCO should require FirstEnergy to share the potential risk with customers. In this way, the Utility would have a financial incentive to make prudent decisions regarding its capacity commitments related to its energy efficiency portfolio.

The Environmental Advocates pointed out that Senate Bill 310 did not "hold the utilities and their shareholders harmless...." for the consequences of any actions on their part to reduce their energy efficiency portfolios for 2015 and 2016."²⁹ It was FirstEnergy itself that sought -- and was allowed -- to significantly reduce its energy efficiency programs. Rehearing should be granted to align FirstEnergy's decision to abandon much of its energy efficiency portfolio with a responsibility for it to bear the negative financial consequences of its decision.

C. The PUCO erred in not clarifying its Finding and Order that, consistent with Ohio Admin. Code 4901:1-39-04(B), FirstEnergy must demonstrate that its amended energy efficiency portfolio is cost-effective.

In Comments, several parties, including OCC, questioned the cost-effectiveness of FirstEnergy's modified energy portfolio plan for customers.³⁰ FirstEnergy's bare-bones Application lacked data demonstrating that its modified energy efficiency plan is cost-effective under the Total Resource Cost Test. That outcome of cost-effectiveness is

²⁹ Case No. 12-2190-EL-POR, Environmental Advocates Comments at 19 (October 20, 2014).

³⁰ OCC at 17-18; OMAEG at 8-9; Environmental Advocates at 6; OPAE at 1-3.

required by Ohio Admin. Code 4901:1-39-04(B). FirstEnergy contends that because its existing portfolio was cost effective under the Total Resource Cost test, its modified plan would also pass the test.³¹ The PUCO rejected FirstEnergy's argument in its Order.³² Specifically, the PUCO found that with respect to cost-effectiveness, "alteration of the program mix may cause a different result" and the PUCO was not persuaded by FirstEnergy's argument.

The PUCO required FirstEnergy to demonstrate the cost-effectiveness of its newly proposed Customer Action Program.³³ The PUCO also directed FirstEnergy to "work with its collaborative to ensure that the overall portfolio remains cost-effective."³⁴ Those requirements are appropriate. However, the Utility should also be required to *demonstrate* the cost-effectiveness of its entire modified energy efficiency portfolio, in accordance with Ohio Admin. Code 4901:1-39-04(B). The PUCO should clarify this point in its Order.

IV. CONCLUSION

The PUCO should grant OCC's application for rehearing. The PUCO erred in its November 20, 2014 Finding and Order by authorizing FirstEnergy to charge customers for capacity shortfalls that may result from the Utility's own proposal to eliminate over 60 percent of its energy efficiency programs.³⁵ The PUCO did not set forth the reasons

³¹ FirstEnergy Reply Comments at 19.

³² Case No. 12-2190-EL-POR, Finding at Order at 12-13 (November 20, 2014).

³³ Id. at 9.

³⁴ Id. at 13.

³⁵ Case No. 12-2190-EL-POR, Finding and Order at 22 (November 20, 2014).

explaining why³⁶ it found that customers, and not the Utility, should be at risk for any shortfalls that may result. This violated R.C. 4903.09. Additionally the PUCO's decision to require customers to bear the costs of the utility's decision is an unreasonable result for FirstEnergy's 1.9 million customers. Those customers are not, under the law, the guarantors of decision-making by FirstEnergy's management. The Utility should be responsible for capacity shortfalls that could result from the changes it elected to make to its energy efficiency portfolio for 2015 and 2016.

Finally, the PUCO should clarify that FirstEnergy's modified energy efficiency/peak demand reduction portfolio, as a whole, must be cost effective. That result is consistent with Ohio Admin. Code 4901:1-39-04(B).

Respectfully submitted,

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³⁶ As required by R.C. 4903.09.

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Application for Rehearing was served on the persons stated below via electronic service this 22nd day of December 2014.

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