BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143, in the Form of an Electric Security Plan.	)))))	Case No. 13-2385-EL-SSO
In the Matter of the Application of Ohio Power Company for Approval of Certain Accounting Authority.	)))	Case No. 13-2386-EL-AAM

APPLICATION FOR REHEARING OF THE OHIO MANUFACTURERS' ASSOCIATION ENERGY GROUP

Pursuant to Section 4903.10, Revised Code, and Rule 4901-1-35, Ohio Administrative Code (O.A.C.), the Ohio Manufacturers' Association Energy Group (OMAEG) hereby respectfully requests rehearing of the Public Utilities Commission of Ohio's (Commission) May 28, 2015 Second Entry on Rehearing (EOR)[1] issued in the above-captioned matters regarding the electric security plan (ESP) proposed by Ohio Power Company (AEP or the Company). OMAEG contends that the EOR is unlawful and unreasonable in the following respects:

1. The Commission unreasonably determined that it may defer ruling on the parties' assignments of error related to the PPA while simultaneously ruling on the other assignments of error raised by the parties.

2. The Commission erred in increasing the caps associated with the distribution investment rider (DIR) by over $37.8 million from those it previously approved, as AEP did not meet its burden to establish the necessity of recovery at those levels.

[1] *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143, in the Form of an Electric Security Plan*, Case No. 13-2385-EL-SSO, et al., Second Entry on Rehearing (May 28, 2015).

3. The Commission erred in determining that the IRP-D program should be continued only for customers that are currently participating in the program and should not be offered to additional, similarly-situated competing businesses.

4. It was unreasonable for the Commission to dismiss requests for rehearing concerning double billing for transmission-related expenses inasmuch as customers are seeing increases in transmission charges.

For these reasons, and as further explained in the Memorandum in Support attached hereto, OMAEG respectfully requests that the Commission grant its Application for Rehearing.

Respectfully submitted,

/s/ Rebecca L. Hussey
Kimberly W. Bojko (0069402)
Rebecca L. Hussey (0079444)
Carpenter Lipps & Leland LLP
280 Plaza, Suite 1300
280 North High Street
Columbus, Ohio 43215
Telephone: (614) 365-4100
Email: Bojko@carpenterlipps.com
Hussey@carpenterlipps.com
(willing to accept service by email)

Counsel for OMAEG

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143, in the Form of an Electric Security Plan.	))))))	Case No. 13-2385-EL-SSO
In the Matter of the Application of Ohio Power Company for Approval of Certain Accounting Authority.	)))	Case No. 13-2386-EL-AAM

MEMORANDUM IN SUPPORT

I. INTRODUCTION AND PROCEDURAL HISTORY

On December 20, 2013, AEP filed an application for a standard service offer (SSO) in the form of an ESP to be in effect initially from June 2015 through May 2018. The OMAEG, which is comprised of many members with facilities located throughout AEP's service territory, was granted intervention in the above-captioned proceeding on April 21, 2014. A hearing on the ESP proposed in the Application commenced on June 3, 2014 and concluded on June 30, 2014. On December 17, 2014, an oral argument was held before the Commission for the limited purpose of enabling the Commission to clarify the legal and policy implications related to the PPA rider.

On February 25, 2015, the Commission issued an Opinion and Order (Order) which, inter alia, permitted AEP "to establish a placeholder PPA rider, at an initial rate of zero, for the term of the ESP."[2] The Commission also determined that the DIR should continue with recovery capped at certain designated levels for each year of the ESP, with total recovery capped at $543.2

[2] *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer*, Case No. 13-2385-EL-SSO, et al., Opinion and Order at 25 (February 25, 2015).

million over the course of the ESP, the IRP-D program should be expanded to include new and existing shopping and non-shopping customers, and the Basic Transmission Cost Rider (BTCR) should be established.[3]

Numerous parties timely filed applications for rehearing of various aspects of the Order, including issues associated with the PPA rider, the DIR, the IRP-D program, and the BTCR. On May 28, 2015, the Commission issued the EOR in which it determined, inter alia, that it would "defer ruling on the assignments of error related to the PPA at this time."[4] The Commission further determined in the EOR that (a) the annual caps relating to the DIR should be adjusted, resulting in approved recovery of $581 million over the course of the ESP, a $37.8 million increase above the total amounts the Commission previously authorized for recovery in its Order;[5] (b) that the IRP-D program should be continued only for customers that are currently participating in the program and should not be expanded to new customers;[6] and (c) that applications for rehearing expressing concern over double billing for transmission related expenses in the Basic Transmission Cost Rider (BTCR) should be denied as a process exists to protect consumers.[7]

II. ARGUMENT

1. The Commission unreasonably determined that it may properly defer ruling on the parties' assignments of error related to the PPA while simultaneously ruling on the other assignments of error raised by the parties.

[3] Id. at 41, 40, 67.

[4] EOR at 5.

[5] Id. at 24.

[6] Id. at 9.

[7] Id. at 32-33.

As explained above, the Commission determined in the EOR that it would "defer ruling on the assignments of error related to the PPA at this time."[8] As noted in the EOR, the Commission cited to the pendency of (a) the PJM Capacity Performance filing at the Federal Energy Regulatory Commission (FERC), and (b) the U.S. Environmental Protection Agency's Clean Power Plan when determining that it would defer ruling on the assignments of error related to the PPA.[9] In support of its decision to defer ruling on the PPA-related assignments of error, the Commission stated as follows:

> Given that R.C. 4903.10 and 4903.11 permit any party to file an application for rehearing of any order and appeal the order of the Commission within 60 days, no party's right to appeal will be adversely affected by our decision to defer ruling on these assignments of error. *In re Columbus S. Power Co.*, 128 Ohio St.3d 402, 2011-Ohio-958, 945 N.E.2d 501; *Senior Citizens Coalition v. Pub. Util. Comm.*, 40 Ohio St.3d 329, 533 N.E.2d 353 (1988). Finally, we note that we may revisit our decision to defer ruling on these assignments of error.[10]

The Commission contends that no party's right to appeal an order of the Commission will be adversely affected by its decision to defer ruling on assignments of error related to the PPA, including the propriety of its establishment under Section 4928.143(B)(2)(d), Revised Code. However, in coming to this decision, parties' rights could be adversely affected in two ways. First, the Commission's EOR may be viewed as a "final order" under Sections 4903.11 and 4903.13, Revised Code, with regard to all issues other than the PPA-related issues on which the parties do not file additional rehearing requests. The term "final order" in the aforementioned

[8] Id. at 5.

[9] Id.; in so doing, however, the Commission noted that its "acknowledgement of pending PJM reform proposals and environmental regulations should not be construed as placing a limitation upon the timing of or the factors to be considered in the Commission's final resolution of the PPA." Id.

[10] Id. at 5-6.

Revised Code sections is afforded the same meaning as that advanced in Section 2505.02(B), Revised Code.[11] Section 2505.02, Revised Code, provides, in pertinent part:

> (B) An order is a final order that may be reviewed, affirmed, modified, or reversed, with or without retrial, when it is one of the following:
>
> > (2) An order that affects a substantial right made in a special proceeding or upon a summary application in an action after judgment[.][12]

The Supreme Court of Ohio has previously held the following with regard to Commission proceedings and final orders:

> It is to be observed that a distinction is made between an order "in an action" and an order "in a special proceeding." In the former, an order is a final order only "when in effect it determines the action and prevents a judgment" while in the latter the only essential to constitute an order a "final order" is that it be one "affecting a substantial right."
>
> * * *
>
> *That a proceeding before the Public Utilities Commission such as this is a special proceeding seems indisputable.* Then, if the order in question here affects a substantial right, it is a final order within the contemplation of the provisions of Section 544, General Code [R.C. 2505.02], whether or not it "determines the action and prevents a judgment."[13]

Because Commission proceedings are deemed "special proceedings," in order for a Commission order to be determined a final order, and thus appealable, it must affect a substantial right. With regard to any issues (a) upon which the Commission ruled in the EOR, and (b) which are not the subject of another application for rehearing, the EOR affects the substantial rights of a party, given that monetary impacts to parties arise from the Commission's decisions in the EOR on those issues. Such issues must arguably be timely appealed pursuant to Section 4903.11,

---

[11] See generally *Cleveland, Columbus & Cincinnati Highway, Inc. v. Pub. Util. Comm.* (1943), 141 Ohio St. 634, 636, 49 N.E.2d 759.

[12] Section 2505.02(B)(2), Revised Code.

[13] See *Senior Citizens Coalition Pub. Util. Comm.* (1988), 40 Ohio St.3d 329, 332, 533 N.E.2d 353 (emphasis added).

Revised Code, in order to be preserved. Given that the Commission may not have rendered a decision on the PPA-related issues by the time its decision on the remaining issues must be appealed, the appellate process for issues arising from the above-captioned proceedings runs the risk of becoming extremely unwieldy and confusing given that issues arising from the same proceeding, i.e., PPA-related issues versus all other issues, may be appealed separately to the Supreme Court of Ohio (Court). The Court has long held that piecemeal appeals are disfavored.[14] A Commission decision to issue separate, piecemeal entries on rehearing addressing the issues under consideration in these cases will likely render this strongly disfavored result, confusing parties and the public and potentially establishing this practice as precedent.

Conversely, the Commission's decision to defer ruling on the PPA issues, while implying that its order is not final until it has ruled on all of the issues considered in the applications for rehearing submitted to it in the case, runs a significant risk of unjustly delaying resolution of the other issues of interest to parties, resulting in financial and policy impacts. In this case, for instance, on the same day it issued the EOR, the Commission approved certain proposed compliance rates and tariffs that were filed by AEP on April 24, 2015.[15] If the Commission's order is not deemed final until after it issues a determination on the PPA-related issues, rates related to certain other issues, including the BTCR, will have already been in place and charged to customers for any number of months before the possibility of an appeal arises. If subsequently held to be unsupported or excessive, as it presently stands, these charges may not

[14] See generally, *Ashtabula v. Pub. Util. Comm.* (1942), 139 Ohio St. 213, 39 N.E.2d 144; *Cleveland v. Pub. Util. Comm.* (1940), 136 Ohio St. 410, 26 N.E.2d 213; *Toledo Edison Co. v. Pub. Util. Commission* (1983), 5 Ohio St.3d 95, 449 N.E.2d 428; *Senior Citizens Coalition,* supra; see also *In re Ohio Edison Company*, Case No. 03-2144-EL-ATA, Entry on Rehearing at ¶ 6 (July 7, 2004) and Entry on Rehearing at ¶ 7 (September 15, 2004).

[15] *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer*, Case No. 13-2385-EL-SSO, et al., Entry (May 28, 2015).

properly be refunded to customers: the Supreme Court of Ohio has declined, time and again, to grant refunds to utility customers in appeals from Commission orders.[16] The Court's jurisprudence soundly demonstrates that present rates may not make up for excessive rate charges due to regulatory delay. Because of this precedent, it is extraordinarily important for the Commission to either avoid any delay in rendering a "final order" in this case, including a determination on the PPA-related assignments of error, or to specify, with clarity, that for purposes of those issues that are not the subject of further applications for rehearing, its EOR constitutes a final (and appealable) order.

2. The Commission erred in increasing the caps associated with the distribution investment rider (DIR) by over $37.8 million from those it previously approved, as AEP did not meet its burden to establish the necessity of recovery at those levels.

Throughout the proceedings, AEP sought Commission approval of an expanded DIR in its proposed ESP, requesting a total rate cap of $667 million for the DIR over the course of the ESP.[17] In the Order, the Commission appropriately denied AEP's request to expand the DIR; however, the rate caps the Commission established in the Order (infra) for the term of the ESP were unsupported by record evidence. Nevertheless, on rehearing, the Commission increased the DIR rate caps for the term of the ESP. Like the caps approved by the Commission in its Order, the increased DIR rate caps approved by the Commission in its EOR were also not supported by

[16] See generally *Keco Industries, Inc. v. Cincinnati & Suburban Bell Tel. Co.* (1957), 166 Ohio St. 254, 141 N.E.2d 465, paragraph two of the syllabus (R.C. Title 49 "affords no right of action for restitution of the increase in charges collected during the pendency of the appeal; *Lucas Cty. Commrs. v. Pub. Util. Comm.* (1997), 80 Ohio St.3d 344, 348, 686 N.E.2d 501 ("utility ratemaking * * * is prospective only" and R.C. Title 49 "prohibit[s] customers from obtaining refunds of excessive rates that may be reversed on appeal"); *Ohio Consumers' Counsel v. Pub. Util. Comm.*, 121 Ohio St.3d 362, 2009-Ohio-604, 904 N.E.2d 853, ¶ 21, citing *Keco* ("any refund order would be contrary to our precedent declining to engage in retroactive ratemaking"); *Green Cove Resort I Owners' Assn. v. Pub. Util. Comm.*, 103 Ohio St.3d 125, 2004-Ohio-4774, 814 N.E.2d 829, ¶ 27 ("[n]either the commission nor this court can order a refund of previously approved rates, * * * based on the doctrine set forth in *Keco* * * *").

[17] Order at 41.

record evidence. In fact, the increased DIR rate caps approved in the EOR compound the concerns set forth in OMAEG's March 25, 2015 Application for Rehearing on the DIR, as the DIR caps approved by the Commission increased the overall guaranteed recovery for AEP by $37.8 million over the ESP term. A table comparing the rate caps originally sought by AEP, the caps approved by the Commission in the Order, and the modified caps approved in the EOR is set forth herein:[18]

Year	Cap Proposed by AEP	Cap/Recovery Granted by Commission (Order)	Cap/Recovery Granted by Commission (EOR)
2015	$155 million	$124 million	$145 million
2016	$191 million	$146.2 million	$165 million
2017	$219 million	$170 million	$185 million
2018 (Jan.-May)	$102 million	$103 million	$86 million
Total	$667 million	$543.2 million	$581 million

At the evidentiary hearing, when asked if AEP could meet the Commission's distribution reliability standards if the DIR was continued at the level at which it was then capped, witness Dias answered affirmatively.[19] Additionally, when asked whether AEP could maintain its current level of service reliability if, instead of Rider DIR, the Company had to use a base distribution rate case for funding, witness Dias testified that "reliability would deteriorate over time if we were required to use a base case as opposed to the DIR for making investments[;]"[20] however, he had not conducted any analysis demonstrating the degree to which, if any, reliability might deteriorate without Rider DIR.[21]

[18] Id. at 41, 47; EOR at 24.

[19] Tr. Vol. II at 319.

[20] Id.

[21] Id. at 320.

Given that witness Dias testified that AEP could continue to meet the Commission's distribution reliability standards if the DIR was continued at the level at which it had previously been capped at the time of his testimony, and that AEP had not conducted any analysis demonstrating that reliability might deteriorate without the DIR, OMAEG contended in its March 27, 2015 Application for Rehearing that the DIR caps approved by the Commission in its Order were not supported by record evidence.[22] Nonetheless, the Commission expanded the DIR caps by approximately $37.8 million on rehearing.[23] OMAEG submits that the Commission's decision to increase the applicable DIR caps on rehearing was likewise erroneous, and constitutes an unwarranted change that is unsupported by the record.[24] OMAEG respectfully requests that the Commission reconsider its decision on rehearing to expand the DIR caps.

3. The Commission erred in determining that the IRP-D program should be continued only for customers that are currently participating in the program and should not be offered to additional, similarly-situated competing businesses.

Despite determining in its Order that the IRP-D program should be expanded, such that new customers are permitted to benefit from the program's offerings,[25] in the EOR, the Commission reversed course and held that the IRP-D program should be continued only for customers that are currently participating in the program, and should not be expanded to

[22] See *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer*, Case No. 13-2385-EL-SSO, et al., Application for Rehearing of the Ohio Manufacturers' Association Energy Group at 16-20 (March 27, 2015).

[23] EOR at 24.

[24] See Section 4903.09, Revised Code (" * * * the commission shall file * * * findings of fact and written opinions setting forth the reasons prompting the decisions arrived at, based upon said findings of fact").

[25] Order at 40.

accommodate additional customer participation.[26] The Commission's decision is anticompetitive, unreasonable, and should be reversed.

In the Order, the Commission determined, inter alia, about AEP's interruptible rate:

> [T]he IRP-D offers numerous benefits, including the promotion of economic development and the retention of manufacturing jobs, and furthers state policy, which we recognized in the ESP 2 Case. ESP 2 Case, Opinion and Order (Aug. 8, 2012) at 26, 66. We find that the IRP-D should be modified to provide for unlimited emergency interruptions and that the $8.21/kW-month credit should be available to new and existing shopping and non-shopping customers.[27]

Subsequently, in the EOR, the Commission's determination regarding the availability of the IRP-D rate changed significantly, as follows:

> With respect to our modifications to the IRP-D, we expanded the $8.21/kilowatt-month credit to new and existing shopping and non-shopping customers. ESP 3 Order at 39-40. However, upon review of the record in these proceedings and taking into consideration the parties' concerns regarding the potential for increased costs, which are discussed further below, we find that the IRP-D program should be continued only for customers that are currently participating in the program and should not be expanded to new customers.
>
> Also the Commission clarifies that * * * it was our intention to modify the IRP-D to provide for unlimited emergency interruptions only. ESP 3 Order at 37-38, 40. No other modifications to the IRP-D were addressed in the ESP 3 Order and, therefore, the Commission did not intend to make other modifications to the IRP-D. However, in response to * * * requests for elaboration on the IRP-D, the Commission clarifies that, to the extent necessary given our decision to limit the IRP-D program to existing customers, the 1 MW per customer minimum interruptible load commitment and the 525 MW aggregate cap for all customers should be retained, as we agree with the Company and OCC that they provide a reasonable limit on the costs associated with the IRP-D credit. With respect to interruptions under the IRP-D, the program will now consist exclusively of unlimited emergency interruptions; thus, discretionary interruptions will no longer be required. Finally, regarding allocation of the available load, existing customers should continue to receive service to the extent of the existing interruptible load that they previously committed under the IRP-D program, while requests from current customers to include additional load in the program should continue to be

[26] EOR at 9.

[27] Order at 40.

> handled by AEP Ohio on a first come, first served basis, consistent with its current practice.[28]

In spite of its indication that a "review of the record" supports that that the IRP-D program should be continued only for customers that are currently participating in the program and should not be expanded to new or additional customers, the Commission did not elaborate about the manner in which the record supports this result.[29] As noted above, however, the Commission did indicate in its Order that the IRP-D promotes economic development and the retention of manufacturing jobs. OMAEG respectfully submits that although it may be appropriate to continue to utilize interruptible rates as economic development and job retention tools, it is anticompetitive and unreasonable to limit participation under the IRP-D solely to customers that are currently participating in the program. For other customers that meet the requirements to take service pursuant to the IRP-D rate, foreclosing the opportunity for those customers to take service pursuant to this rate may place them at a competitive disadvantage vis-a-vis companies who are able to benefit from the rate during the ESP term simply because they have taken service pursuant to the rate in the past. Further, in foreclosing the availability of the rate to potential new Ohio businesses or to existing Ohio businesses who may not currently have operations in AEP's service territory, but who may be excited about the prospect of locating plants and operations in AEP's service territory, from taking advantage of the rate, the Commission limits the rate's efficacy to serving the economic development interests of only those businesses who already benefit from the rate. Effectively, with the modifications to the IRP-D program approved in the EOR, utilization of the rate may be viewed as an economic retention tool for a very small number of customers. Ohio law and Commission rules suggest

[28] EOR at 9.

[29] See Section 4903.09, Revised Code.

that individual customers seeking support for economic development or retention activities may obtain the same through unique or reasonable arrangements approved by the Commission.[30] To the extent that the Commission's aim is to approve an interruptible rate that will encourage economic development in the state, rather than retention of the status quo, it should make the IRP-D rate more widely available than only to the small number of customers presently taking service under the rate. Creating a rate that only one or two business may avail themselves of is anti-competitive and unreasonable for competing manufacturers.

It is in the interest of all Ohioans for manufacturers located in this state to be successful and thrive throughout the course of the ESP term. Making the IRP-D rate available to all similarly-situated businesses that satisfy the requisite criteria, rather than just one or two companies presently taking service pursuant to the rate, would promote economic development in the state and effectuate the policies of the state set forth in Section 4928.02, Revised Code.

4. It was unreasonable for the Commission to dismiss requests for rehearing concerning double billing for transmission-related expenses inasmuch as customers are seeing increases in transmission charges.

Over the course of the hearing, several parties, including OMAEG, raised concerns that customers could encounter situations of double billing for transmission-related expenses in relation to the transition from AEP's transmission cost recovery rider to the BTCR. Concerns were raised as a result of the establishment of the BTCR, and from transitioning from compensating CRES providers for transmission-related expenses to compensating AEP for the same transmission-related expenses. In the EOR, the Commission dismissed arguments that its decision was unreasonable because it did not "order the inclusion of affected customers in the

[30] See Section 4905.31, Revised Code; see also Chapter 4901:1-35, Ohio Administrative Code.

resolution process to ensure that such customers do not pay twice for the same transmission related expenses."[31]

The Commission noted in the EOR that it "directed AEP Ohio, CRES providers, and, if necessary, Staff to work together to ensure that customers do not pay twice for the same transmission related expenses."[32] While OMAEG appreciates the attempt that the Commission made to protect customers and to work through double billing issues, in practice, it appears that providers have not adequately ensured against double recovery of transmission-related costs for a number of customers as customers have experienced increases in transmission-related costs due to the transition. On the same day as it issued the EOR, the Commission approved the implementation of the BTCR tariff, effective June 1, 2015. A number of OMAEG customers have since received bills, including BTCR charges, and the costs for transmission charges on these customers' bills appear to have significantly increased over previous charges for the same service. Given that the stated goal of approving the BTCR was to more accurately reflect how transmission costs are billed to customers, and given that the Commission did not anticipate that the transmission charges would change significantly due to the implementation of the BTCR, it appears that double billing is occurring or there is some other unanticipated consequence associated with the transition. Although affected OMAEG members are looking into these particular circumstances and discussing with their CRES providers, as directed by the Commission,[33] financial implications for customers faced with this problem are significant and warrant Commission attention thereto. Accordingly, OMAEG respectfully requests that the Commission direct AEP, CRES providers, and Staff to implement, within 30 days of the

[31] EOR at 32.

[32] Id.

[33] Id. ("nothing precludes customer from taking steps to address double-billing issues, if they arise").

issuance of the EOR addressing the applications submitted today, a process for determining which provider, whether AEP or the CRES, will charge certain affected customers the transmission-related charges at issue. Additionally, OMAEG requests that that Commission order AEP, CRES providers, and Staff to work together to ensure that no customer is charged more for transmission-related expenses than what they otherwise would have been charged under the prior ESP and established TCRR rider.

III. CONCLUSION

OMAEG respectfully requests that the Commission grant its application for rehearing of the issues set forth above. Specifically, OMAEG requests that the Commission reconsider its decision to defer ruling on the assignments of error related to the PPA while issuing a decision on the other issues for which parties applied for rehearing. Further, OMAEG requests that the Commission reverse its decision in the EOR to increase AEP's DIR recovery caps by $37.8 million over those previously approved in the Order. OMAEG also requests that the Commission reverse it decision in the EOR to limit the availability of the IRP-D rate during the ESP term to certain customers already taking service under the rate in order to promote economic development for all businesses, and not place competing manufacturers on unlevel playing fields. Finally, OMAEG also requests that the Commission take steps to ensure that customers do not experience an increase in transmission-related charges due to the transition in the collection mechanism to the BTCR.

Respectfully submitted,

/s/ Rebecca L. Hussey

Kimberly W. Bojko (0069402)
Rebecca L. Hussey (0079444)
Carpenter Lipps & Leland LLP
280 Plaza, Suite 1300
280 North High Street
Columbus, Ohio 43215
Telephone: (614) 365-4100
Email: Bojko@carpenterlipps.com
Hussey@carpenterlipps.com
(willing to accept service by email)

Counsel for OMAEG

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon the following parties via electronic mail on June 29, 2015.

/s/ Rebecca L. Hussey
Rebecca L. Hussey

stnourse@aep.com
mjsatterwhite@aep.com
dconway@porterwright.com
maureen.grady@occ.oh.gov
edmund.berger@occ.ohio.gov
joseph.serio@occ.ohio.gov
dboehm@BKLlawfirm.com
mkurtz@BKLlawfirm.com
jkylercohn@BKLlawfirm.com
kboehm@bkllawfirm.com
sam@mwncmh.com
fdarr@mwncmh.com
mpritchard@mwncmh.com
werner.margard@puc.state.oh.us
devin.parram@puc.state.oh.us
Katherine.johnson@puc.state.oh.us
tobrien@bricker.com
dborchers@bricker.com
tsiwo@bricker.com
ricks@ohanet.org
Rocco.dascenzo@duke-energy.com
Elizabeth.watts@duke-energy.com
Philip.Sineneng@ThompsonHine.com
haydenm@firstenergycorp.com
jmcdermott@firstenergycorp.com
scasto@firstenergycorp.com
judi.sobecki@aes.com
joseph.clark@directenergy.com
whitt@whitt-sturtevant.com
campbell@whitt-sturtevant.com
williams@whitt-sturtevant.com
BarthRoyer@aol.com
Gary.A.Jeffries@dom.com
vparisi@igsenergy.com
lfriedeman@igsenergy.com
mswhite@igsenergy.com
gpoulos@enernoc.com
mhpetricoff@vorys.com
glpetrucci@vorys.com
myurick@taftlaw.com
zkravitz@taftlaw.com
NMcDaniel@elpc.org
swilliams@nrdc.org
Stephanie.Chmiel@ThompsonHine.com
Stephen.Chriss@walmart.com
tshadick@spilmanlaw.com
dwilliamson@spilmanlaw.com
lhawrot@spilmanlaw.com
tdougherty@theOEC.org
jfinnigan@edf.org
Schmidt@sppgroup.com
cloucas@ohiopartners.org
cmooney@ohiopartners.org
msmalz@ohiopovertylaw.org
plee@oslsa.org
greta.see@puc.state.oh.us
sarah.parrot@puc.state.oh.us

1325-001.629135

Summary: Application for Rehearing electronically filed by Ms. Rebecca L Hussey on behalf of OMAEG