

FILE



## PPG Industries

Bringing innovation to the surface.™

PPG Industries  
[www.ppg.com](http://www.ppg.com)

Bryan Iams  
Vice President  
Corporate and Government Affairs  
412.434.2181  
[Bryan.Iams@ppg.com](mailto:Bryan.Iams@ppg.com)

February 20, 2016

Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215

**RE: Opposition Comment to PPA Cases 14-1693-EL-RDR; 14-1297-EL-SSO**

Dear PUCO:

I am writing to ask that you reject the negotiated settlements of FirstEnergy and AEP that will enable the utilities to implement costly Power Purchase Agreement (PPA) riders and other cost-driving provisions.

PPG, a Fortune 200 company and a leading manufacturer of paints and coatings, has deep roots in Ohio. PPG has eight manufacturing locations across the state, as well as 3,000+ employees supporting high-tech, advanced manufacturing.

Should the PUCO approve the deals, both utilities will be able to collect costs (via non-bypassable PPA riders) from all of their customers to subsidize their generation assets, thus protecting the utilities from cost risk and guaranteeing their profits and cost recovery.

Ohio's Consumers' Counsel has estimated that the FirstEnergy settlement could cost consumers \$3.9 billion over the eight-year duration of the PPA, and the AEP settlement could cost consumers \$2 billion. PPG estimates the additional costs of this new rider to be over \$500,000 during the eight year term of the case.

The markets for electricity in Ohio are working to the benefit of consumers. These deals are a setback to the consumer-friendly efficiency of those markets. Please support Ohio manufacturers in FirstEnergy and AEP territories by not supporting this deal.

In the meantime, if I am able to serve as a resource on this important issue, I may be reached at (412) 434-2181.

Sincerely,

This is to certify that the images appearing are an  
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Technician Re Date Processed FEB 25 2016

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2016 FEB 25 AM 10:29  
PUCO

9



**Carl Johnson**  
PPG Director of Manufacturing, Americas  
Automotive Refinish  
Delaware, Ohio



**Keith Schneider**  
PPG Plant Manager  
Automotive OEM  
Cleveland, Ohio



**Bryan Iams**  
Vice President  
Corporate and Government Affairs  
Pittsburgh, Pennsylvania

FILE



Navistar, Inc.  
2701 Navistar Drive  
Lisle, IL 60532 USA

P : 864-414-2541  
W : navistar.com

Jacqueline W. Gelb  
Director, Government Relations

February 23, 2016

Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215

**RE: Opposition Comment to PPA Cases 14-1693-EL-RDR; 14-1297-EL-SSO**

Dear PUCO:

I am writing on behalf of Navistar, Inc. to request you to reject the negotiated settlements of FirstEnergy and AEP (and a small group of others who have negotiated certain benefits) that will enable the utilities to implement costly Power Purchase Agreement (PPA) riders and other cost-driving provisions.

Navistar is a commercial truck, bus and diesel engine manufacturer that operates and employs over 1000 employees in Springfield, OH. The community has been a cornerstone in the company's manufacturing footprint for over 100 years, having played an important role in producing some of the safest and best quality medium and heavy duty trucks.

Should the PUCO approve the deals, both utilities will be able to collect costs (via non-bypassable PPA riders) from all of their customers to subsidize their uneconomical generation assets, thus protecting the utilities from cost risk and guaranteeing their profits and cost recovery, passing onto their customers for an eight year term.

Navistar is one of those customers of First Energy that could be impacted by this proposed partnership. Our Springfield facility consumes approximately 70,000,000 kWh/year. We estimate the additional costs of this new rider to be over \$3 million during the eight year term of the case. Forcing company leadership to redirect valuable capital resources away from reinvestment in the plant and training our employees to produce market leading commercial trucks.

If approved by the full PUCO, these deals will put an unnecessary and anti-competitive layer of costs on consumers with no commensurate benefits, constrain competition, and dampen technological innovation in Ohio. In addition, both settlements contain other provisions that will increase costs to consumers. Ohio's Consumers' Counsel has estimated that the FirstEnergy settlement could cost consumers \$3.9 billion over the eight-year duration of the PPA, and the AEP settlement could cost consumers \$2 billion.

The markets for electricity in Ohio are working to the benefit of consumers. These deals are a massive setback to the consumer-friendly efficiency of those markets. Please protect Ohio manufacturers and all consumers in FirstEnergy and AEP territories, the lion's share of the state in terms of utilities, from this substantial giveaway.

Sincerely,

RECEIVED-DECKETS DIV  
2016 FEB 25 AM 10:29  
PUCO

cc: Governor John Kasich  
State Representative Bob Hackett  
John Minor, President and Chief Investment Officer, JobsOhio  
Kristi Tanner, Senior Managing Director, JobsOhio



Navistar, Inc.  
2701 Navistar Drive  
Lisle, IL 60532 USA

P : 864-414-2541  
W : navistar.com

Jacqueline W. Gelb  
Director, Government Relations

February 23, 2016

Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215

**RE: Opposition Comment to PPA Cases 14-1693-EL-RDR; 14-1297-EL-SSO**

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Should the PUCO approve the deals, both utilities will be able to collect costs (via non-bypassable PPA riders) from all of their customers to subsidize their uneconomical generation assets, thus protecting the utilities from cost risk and guaranteeing their profits and cost recovery, passing onto their customers for an eight year term.

Navistar is one of those customers of First Energy that could be impacted by this proposed partnership. Our Springfield facility consumes approximately 70,000,000 kWh/year. We estimate the additional costs of this new rider to be over \$3 million during the eight year term of the case. Forcing company leadership to redirect valuable capital resources away from reinvestment in the plant and training our employees to produce market leading commercial trucks.

If approved by the full PUCO, these deals will put an unnecessary and anti-competitive layer of costs on consumers with no commensurate benefits, constrain competition, and dampen technological innovation in Ohio. In addition, both settlements contain other provisions that will increase costs to consumers. Ohio's Consumers' Counsel has estimated that the FirstEnergy settlement could cost consumers \$3.9 billion over the eight-year duration of the PPA, and the AEP settlement could cost consumers \$2 billion.

The markets for electricity in Ohio are working to the benefit of consumers. These deals are a massive setback to the consumer-friendly efficiency of those markets. Please protect Ohio manufacturers and all consumers in FirstEnergy and AEP territories, the lion's share of the state in terms of utilities, from this substantial giveaway.

Sincerely,

cc: Governor John Kasich  
State Representative Bob Hackett  
John Minor, President and Chief Investment Officer, JobsOhio  
Kristi Tanner, Senior Managing Director, JobsOhio

FILE

RECEIVED - DOCKETING DIV  
2016 FEB 23 AM 10:28  
PUCO



Shaun McMackin  
Vice President  
Operations & Engineering  
1 Michael Owens Way  
Perrysburg, OH 43551  
1-567-336-8227  
Shaun.McMackin@o-i.com

February 24, 2016

Chairman Andre T. Porter  
The Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215

**RE: Opposition Comment to PPA Cases 14-1693-EL-RDR; 14-1297-EL-SSO**

Dear Chairman Porter and Commissioners:

On behalf of Owens-Illinois, Inc., I write to oppose the negotiated settlements of FirstEnergy and AEP that will enable the utilities to implement costly Power Purchase Agreement (PPA) riders and other cost-driving provisions that harm manufacturers and consumers alike. As a major Ohio energy user, O-I is sensitive to the competitive electricity markets on a daily basis and believes the proposed agreements will only harm manufacturers operating in the state.

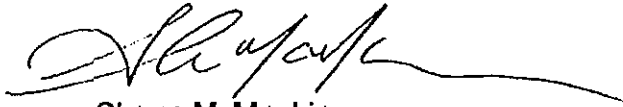
Ohio is home to our global headquarters and research and development center (both located in Perrysburg) and a glass manufacturing plant in Zanesville. O-I has over 1,000 employees in the state. O-I is a customer of both AEP and FirstEnergy.

The proposed settlements and resultant price increases will threaten the competitive advantage Ohio has compared to other states in the region; further, it could force manufacturers to reallocate much needed capital for operational and other investments. Specifically O-I will realize an approximate annual increase of \$400,000, totaling over \$3.2 million over the next eight years.

Should the Commission approve the settlements, both utilities will be able to collect costs (via non-bypassable PPA riders) from all of their customers to subsidize their uneconomical generation assets, thus protecting the utilities from cost risk and guaranteeing their cost recovery. This represents a step backwards in Ohio's transition to a competitive market for electricity.

The Office of the Ohio Consumers' Counsel has estimated that the FirstEnergy settlement could cost consumers \$3.9 billion over the eight-year duration of the PPA, and the AEP settlement could cost consumers \$2 billion. Ohio manufacturers and consumers in FirstEnergy and AEP territories should not bear the cost of these settlements. In the interest of keeping Ohio energy prices competitive, O-I urges the Commission to reject the proposed settlements.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shaun McMackin', with a long horizontal flourish extending to the right.

Shaun McMackin  
Vice President  
Operations & Engineering



FILE



Kenworth Truck Company  
P. O. Box 2345  
65 Kenworth Drive  
Chillicothe, Ohio 45601-0656  
(740) 774-5111

A DIVISION OF PACCAR

February 15, 2016

Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215

RECEIVED-DOCKETING DIV  
2016 FEB 25 AM 10:28  
PUCO

**RE: Opposition Comment to PPA Cases 14-1693-EL-RDR; 14-1297-EL-SSO**

Dear PUCO:

I am writing to urge you to reject the negotiated settlements of FirstEnergy and AEP (and a small group of others who have negotiated certain benefits) that will enable the utilities to implement costly Power Purchase Agreement (PPA) riders and other cost-driving provisions.

Should the PUCO approve the deals, both utilities will be able to collect costs (via non-bypassable PPA riders) from all of their customers to subsidize their uneconomical generation assets. This will protect the utilities from cost risk and guarantee their profits and cost recovery, while putting the burden on the backs of their customers for an eight-year term.

Ohio's Consumers' Counsel has estimated that the FirstEnergy settlement could cost consumers \$3.9 billion over the eight-year duration of the PPA, and the AEP settlement could cost consumers \$2 billion.

Our company consumes approximately 45,000,000 kWh/year. We estimate the new rider will cost us millions of dollars over the eight-year term of the case. That is money that could be used on more productive purposes such as capital investment to increase production capacity, plant investment for new product introductions, or continuing to provide above average wage and benefit packages to our 1,800+ employee workforce.

If approved by the full PUCO, these deals will put an unnecessary and anti-competitive layer of costs on consumers with no commensurate benefits, constrain competition, and dampen technological innovation in Ohio. In addition, both settlements contain other provisions that will increase costs to consumers.

The markets for electricity in Ohio are working to the benefit of consumers. These deals are a massive setback to the consumer-friendly efficiency of those markets.

Please protect Ohio manufacturers and all consumers in FirstEnergy and AEP territories from this substantial giveaway.

A handwritten signature in black ink, appearing to read 'Judy K. McTigue'.

Judy K. McTigue  
Kenworth - Plant Manager

cc: The Honorable John Kasich  
The Honorable Bob Peterson  
The Honorable Gary Scherer