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INEOS

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March 10, 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 urge you to act 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, thus protecting the utilities from cost risk and guaranteeing their profits and cost recovery. And, put it all 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.

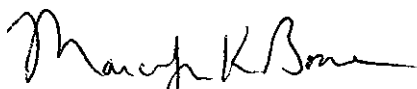
Our company consumes approximately 279,311,816 kwh/year. We estimate the additional costs of this new rider to be \$12.5 million over the eight year term of the case. That is real money that could jeopardize our competitiveness in the U.S. market, deter capital investment in the site and affect our personnel and hiring practices. The plant will have to investigate all options to offset the significant cost increase of doing business in the State of Ohio.

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, the lion's share of the state in terms of utilities, from this substantial bailout/giveaway.

Sincerely,

  
Marcelyn K. Boone  
Site Director

cc Governor John Kasich  
State Senator Sherrod Brown  
State Representative Jim Jordan

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