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INDUSTRY:Electric

ACCOUNT INFORMATION:

Company: Ohio Edison
Name on account: Village of Chippewa Lake Street lights
Service address: Chippewa Lake Ohio
Service phone: (330) 769-9600
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COMMENT DESCRIPTION:

Public Comment on Case 16-0470-EL-ATA - Ohio Edison LED Street Light Tariff For the Village of Chippewa Lake Ohio, street lighting is a significant portions of the village's energy consumption. The Village, a current user of HPS street lighting under tariff STL, wishes to upgrade to LED lighting for cost savings and environmental benefits but is unable to do because of the egregious street lighting rate increases contained in Ohio Edison's (OE) LED tariff (initially Case No. 14-1027-EL-ATA now Case No. 16-0470-EL-ATA) 1 - OE's LED Tariff violates the provisions of existing Tariff STL. Despite 20+ year old, fully depreciated HPS fixtures with minimal-to-no book value of existing infrastructure, OE proposes a fixed \$228 charge for each upgrade to a LED device. This provision violates the terms of the original STL tariff terms & conditions in which cost of changes are based on remaining book value. This rate change is one reason the LED tariff is un-economic for the Village. 2 - OE in Case No. 14-1027-EL-ATA now Case No. 16-0470-EL-ATA, violated PUCO regulations in marking the submission as NOT_INVOLVING_INCREASE_IN_RATES. Their change in upgrade pricing methodology between tariff STL and tariff LED is effectively a rate change from existing book value (often \$0 fully depreciated) to a fixed \$228 charge. OE thus illicitly bypasses local hearing review requirements (see, initially Case No. 14-1027-EL-ATA now Case No. 16-0470-EL-ATA) 3 - This illegal change in the method of charging for replacement of remaining infrastructure disadvantages older municipalities with lower wattage HPS devices (low remaining book value) in favor of new municipalities with higher wattage HPS devices in recent subdevelopments (high book value remaining). 4. Despite dramatically reduced energy consumption and significantly reduced maintenance requirements, OE's egregiously tariffs a projected monthly operating charge that is 17% higher for a like-for-like replacement (90W LED for a 100W HPS). This pricing combined with the egregious \$228 transition charge results in ZERO payback for the Village. OE refuses to disclose the cost components and cost assumptions underlying this egregious pricing. 5. The increase in monthly street light charge is a second reason why OE illegally misfiled the original tariff request 14-1027-EL-ATA as NOT_INVOLVING_INCREASE_IN_RATES thereby bypassing public due diligence in local reviews and hearings. 6. There has been zero uptake of this LED offering according to OE. The reason is obvious: egregious and unlawful rate increases between tariff STL and tariff LED that result in no economic payback to an adopting municipality. Yet OE represents this offering as another example of complying with PUCO mandated energy conservation initiatives. The offering is nothing more than hollow

lip service from OE. 7. This situation is yet another example of how Ohio energy providers are non-competitive. We call for the PUCO to reject this tariff and require OE to provide a transparent and economic LED solution that supports the rapid adoption of LED street lighting similar to what has been achieved in, eg. nearby Indiana (11,000 street lights retrofitted in 30+ communities) -- M Krosse, Chippewa Lake resident, taxpayer, & member of Council's lighting task force cell 203.856.6730, <http://www.linkedin.com/in/makrosse>

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Case No(s). 16-0470-EL-ATA, 14-1027-EL-ATA

Summary: Public Comment in opposition filed on behalf of consumer, M. Krosse electronically filed by Ms. Donielle M Hunter on behalf of PUCO Docketing