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 Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. §4928.143 in the Form of an Electric Security Plan.	))))))	Case No. 14-1297-EL-SSO

APPLICATION FOR REHEARING OF OHIO SCHOOLS COUNCIL, OHIO SCHOOL BOARDS ASSOCIATION, BUCKEYE ASSOCIATION OF SCHOOL ADMINISTRATORS, AND OHIO ASSOCIATION OF SCHOOL BUSINESS OFFICIALS dba POWER4SCHOOLS

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May 2, 2016

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The Ohio Schools Council, Ohio School Boards Association, Buckeye Association of School Administrators, and Ohio Association of School Business Officials, dba Power4Schools, through counsel and pursuant to R.C. 4903.10, and O.A.C. 4901-1-35, hereby request rehearing of the Opinion and Order issued by the Public Utilities Commission of Ohio ("Commission") in this proceeding on March 31, 2016 ("Order"). Power4Schools submits that the Commission's Order is unlawful and unreasonable based on the following grounds:

A. Rider RRS is unreasonable and unlawful pursuant to R.C. 4905.22, because it will require Power4Schools to pay FES twice for electric generation.

B. Standard of review for approving partial stipulations.

1. The Commission Erred in Finding that the Partial Stipulation is a Product of Serious Bargaining and a Diverse Group of Interests Strongly Oppose It.

2. The Commission Erred in Finding that the Partial Stipulation Does Not Violate Regulatory Principles, Practices, and Statutes.

(a) Rider RRS violates R.C. 4928.143(B)(2).

(b) Rider RRS is cannot be considered an "Economic Development Program" under R.C. 4928.143(B)(2)(i).

(c) The Commission erred in finding that partial stipulation satisfies the ESP v. MRO test provided in R.C. 4928.143(C).

(d) The Order is unlawful because it requires the Companies' distribution customers to subsidize FES's generation.

(e) Rider RRS unlawfully permits the Companies to collect additional transition costs or equivalent revenues from customers in violation of R.C. 4928.38.

(f) Rider GDR is vague, asymmetric, and not authorized by Ohio law.

3. The Commission Erred by Finding that the Partial Stipulation Benefits Ratepayers and the Public Interest.

MEMORANDUM IN SUPPORT

I. INTRODUCTION

The Ohio Schools Council, Ohio School Boards Association, Buckeye Association of School Administrators, and Ohio Association of School Business Officials are a regional council of governments and three non-profit organizations comprised of public school boards and public school administrators who seek to share best practices and information concerning the operation of educational institutions. These groups' members include all of Ohio's 612 public school boards of education, as well as 55 educational service center boards and 49 career technical center boards. Among their services, they offer their members group purchasing programs for a number of goods and services, including an electricity purchasing program, for which they do business as "Power4Schools." Power4Schools is designed to reduce the schools' cost of electricity, which is purchased through FirstEnergy Solutions ("FES"), a competitive retail electric service ("CRES") provider, under a master contract. Savings on the cost of electricity are passed on to school district participants. Power4Schools operates throughout the state, and within the FirstEnergy distribution companies' (the "Companies")[1] service territories. Power4Schools' electricity program has served school districts educating nearly 600,000 Ohio school children and, to date, has saved participating schools an estimated $20 million since its inception.

The Commission's approval of the Companies' electric security plan ("ESP IV") will cause Power4Schools to pay FES twice for electric generation, and will disrupt the competitive generation market under which Power4Schools has been so successful in saving money for the

[1] The Companies are Ohio Edison Company, the Cleveland Electric Illuminating Company, and The Toledo Edison Company.

benefit of its public school districts, their taxpayers and, most importantly, for the benefit of the 600,000 pupils its members educate.

II. RIDER RRS IS UNREASONABLE AND UNLAWFUL PURSUANT TO R.C. 4905.22, BECAUSE IT WILL REQUIRE POWER4SCHOOLS TO PAY FES TWICE FOR ELECTRIC GENERATION.

Central to the Companies' ESP IV is its so-called "Economic Stability Program" under which the Companies will subsidize uneconomic[2] generation assets owned by the Companies' affiliate, FES. Specifically, the Companies will purchase the output of FES' Davis-Besse Nuclear Power Station, the W.H. Sammis Plant, and entitlement to a portion of the output of the Ohio Valley Electric Corporation (collectively, the "PPA Plants"). The purchases would be made under a proposed eight-year purchase power agreement ("PPA") between the Companies and their affiliate, FES. All of the energy, capacity, and ancillary services purchased under the PPA would then be sold by the Companies into the wholesale market operated by PJM Interconnection, L.L.C. ("PJM"). The full costs of the resources, plus a return on invested capital, net of the associated market revenues, would be recovered from customers through the nonbypassable Retail Rate Stability rider ("Rider RRS").

Although the Order finds that Rider RRS will result in a net benefit to customers over a period of eight years,[3] even the Companies acknowledge that customers will incur significant charges for the FES generation through 2019,[4] and the Commission itself acknowledges that net charges or benefits in the later years of ESP IV are simply predictions of future market prices and may be proven wrong.[5]

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[2] Companies Ex. 28 (Moul Direct) at 2 - 3…"The economic viability of the Plants [under the PPA Proposal] is in doubt. Market-based revenues for energy and capacity have been at historic lows and are insufficient to permit FES to continue operating the Plants and to make necessary investments. . . . Markets have not, and are not, providing sufficient revenues to ensure continued operation of the Plants."
[3] Order at 85.
[4] Companies Ex. 33 (Ruberto Direct) at Att. JAR-1.
[5] Order at 86.

Power4Schools position is clear. It already has entered into an agreement for electric supply with FES to serve its member school districts through 2019.[6] As set forth in this brief, it is unreasonable and unlawful to require Power4Schools to pay FES for electric supply twice, pursuant to R.C. 4905.22.

III. STANDARD OF REVIEW FOR APPROVING PARTIAL STIPULATIONS

The Ohio Supreme Court has articulated a three-part test to evaluate a proposed settlement before the Commission:[7]

1. Is the settlement a product of serious bargaining among capable, knowledgeable parties, where there is a diversity of interests among the stipulating parties?
2. Does the settlement package violate any important regulatory principle or practice?
3. Does the settlement, as a package, benefit ratepayers and the public interest?

The Commission erred in finding that the partial stipulation in this proceeding satisfied these three prongs.

A. The Commission Erred in Finding that the Partial Stipulation is a Product of Serious Bargaining and a Diverse Group of Interests Strongly Oppose It.

The Commission found that the signatory parties to the partial stipulation represent a diversity of interests.[8] Even a cursory examination of the signatory parties reveals that they represent anything but a diverse group. The signatory parties did not bargain on behalf of large customer classes, but rather negotiated narrowly-tailored benefits to meet their self-interests, as discussed in third prong of this test.

Standing in stark contrast is the diverse group of intervenors that oppose the stipulated ESP IV and that represent large groups of customer classes. These include: the Ohio Consumers' Counsel (representing the interests of 1.9 million households in the Companies'

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[6] See *Power4Schools v. FirstEnergy Solutions*, Case No 14-1082-EL-CSS, Entry (November 18, 2015).
[7] *Consumers' Counsel v. Pub. Util. Comm.*, 64 Ohio St.3d 123, 126 (1992).
[8] Order at 43.

service territories); the Ohio Manufacturers' Association (representing a large and diverse group of small, medium, and large businesses); the Northeast Ohio Public Energy Council (representing 164 communities in thirteen northern Ohio counties of Ashtabula, Lake, Geauga, Cuyahoga, Summit, Lorain, Medina, Trumbull, Portage, Huron, Columbiana, Mahoning, and Seneca, accounting for approximately 500,000 retail electric customers in the Companies' service territories); the Retail Electric Supply Association (representing competitive retail electric suppliers); the Sierra Club, Environmental Defense Fund, and the Environmental Law & Policy Center (broadly representing the environmental interests of all Ohioans); and the Electric Power Supply Association (resenting thousands of merchant-generated megawatts in PJM). With such diverse opposition to the partial stipulation, the Commission should find that the first prong has not been satisfied.

B. The Commission Erred in Finding that the Partial Stipulation Does Not Violate Regulatory Principles, Practices, and Statutes.

1. Rider RRS violates R.C. 4928.143(B)(2).

As a threshold matter, the Commission is limited to including in an ESP only those items expressly listed in R.C. 4928.143(B)(2)(a) through (i).[9] The Commission found that Rider RRS falls under R.C. 4928.143(B)(2)(d), which provides that an ESP may include:

> Terms, conditions, or charges relating to limitations on customer shopping for retail electric generation service, bypassability, standby, back-up, or supplemental power service, default service, carrying costs, amortization periods, and accounting or deferrals, including future recovery of such deferrals, as would have the effect of stabilizing or providing certainty regarding retail electric service.

Specifically, the Commission found that Rider RRS falls within the above provision because it is a "financial limitation on customer shopping." However, under the plain language

[9] *In Re Application of Columbus Southern Power Co., et al.*, 128 Ohio St. 3d 512, 2011-Ohio-1788 [¶¶ 31-35], 945 N.E.2d 655.

of the statute, only the provisions related to "physical" limitations on customer shopping can be included in an ESP, considering that the term "shopping" is synonymous with a customer "switching" service providers.[10] As a matter of statutory construction, the word "financial" cannot be read into the statute.[11]

2. Rider RRS is cannot be considered an "Economic Development Program" under R.C. 4928.143(B)(2)(i).

In its Order, the Commission's found that Rider RRS may be included in ESP IV under R.C. 4928.1343(B)(2)(i), because it is part of an economic development plan.[12] However, the Commission's finding is against the manifest weight of the evidence, because no evidence of record demonstrates, and the Commission did not find, that the PPA Plants will close if Rider RRS is not approved. Indeed, Companies' witness Rose's wholesale price projections show that FES will receive a generous return of and on its investment, as well as an additional surplus of $2 billion over the initial 15 year term of Rider RRS.[13] Thus, according to the Companies' own projections, market revenues will be sufficient to keep the plants economical without the need for Rider RRS.[14]

3. The Commission erred in finding that partial stipulation satisfies the ESP v. MRO test provided in R.C. 4928.143(C).

Under R.C. 4928.143(C)(1), the Commission may approve or modify and approve an ESP only if it finds "that the electric security plan so approved, including its pricing and all other terms and conditions, including any deferrals and any future recovery of deferrals, is more favorable in the aggregate as compared to the expected results that would otherwise apply under

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[10] See, *e.g.*, R.C. 4928.40(A)(1) ("…such ***shopping incentives*** by customer class as are considered necessary to induce, at the minimum, a twenty per cent load ***switching rate by customer class*** halfway through the utility's market development period but not later than December 31, 2003." [Emphasis added.]

[11] *In Re Columbus S. Power*, 138 Ohio St.3d 448, 2014-Ohio-462, 9 N.E.3d 1064, ¶ 26.

[12] Order at 109-110.

[13] OCC/NOPEC Ex. 7 (Kahal Direct) at 38.

[14] Id. at 39.

section 4928.142 of the Revised Code." In applying the test, the Commission traditionally considers "quantitative" and "qualitative" factors.

In quantifying the benefits of the stipulated ESP, the Commission considered the following alleged "benefits:" Rider RRS credits ($256 million), economic development funding ($24 million), low income funding ($19.1 million), and consumer advisor agency funding ($8 million), for a total alleged benefit of $307.1 million.

However, as explained above, because Rider RRS is not one of the nine factors that can be included in an ESP per *CSP II*, it should be excluded from the ESP v. MRO. Moreover, if the PPA is never filed with and approved by FERC, as required by FERC's recent order,[15] there will never be any of the $256 million "benefit" identified by the Commission to include in the ESP v. MRO test. In addition, because the low income funding and customer advisory agency funding is not provided in the nine items included in RC. 4928.143(B)(2), they should also be excluded from the ESP v. MRO test. The exclusion of these items effectively reduces the alleged benefit of the ESP to $24 million over the ESP's eight year term, or only $3 million per year.[16]

The Commission also erred by not quantifying the costs to consumers of Riders GDR and the Unbundled Distribution Rate Rider.[17] Because the riders currently would be set at zero and unidentified cost recovery would occur in future ESP years, Ohio's consumers currently cannot determine the riders' costs. Without presently knowing how the riders may be quantified in the future, the Commission cannot consider and consumers cannot reasonably contest, under R.C. 4928.143(C)(1), whether the ESP is more favorable than an MRO. The Commission's finding

[15] *Electric Power Supply Assoc., et al. v. FirstEnergy Solutions, et al.*, 155 FERC ¶ 61,101 (2016).
[16] The Commission confuses the state policy in R.C. 4928.02 with the limited items that can be included in an ESP under R.C. 4928.143(B). Low income funding and customer advisory agency funding falls within state policy considerations (R.C. 4928.02(L) (protect at-risk populations)), but do not fall within the limited categories contained in R.C. 4928.143(B).
[17] Order at 98.

unreasonably and unlawfully precludes review of the riders costs to be collected during the ESP's term for purposes of the statutory test.

The Commission also erred by failing to quantify Rider DCR. The Commission refused to quantify these costs as a part of the ESP v. MRO test, on the basis that the revenue requirements associated with the recovery of incremental distribution investments should be considered to be "substantially equal," "over the long term," whether recovered through the ESP or through a distribution rate case, if an MRO were implemented.[18] The Companies' burden of proof is to show that the ESP is "more favorable" than an MRO, not "substantially equal." In addition, the Commission did not identify the period of the "long term" mentioned in its order, in violation of R.C. 4903.09. If the "long term" extends beyond the eight year term of the ESP (which is likely due to Commission's approval of the distribution rate freeze), the DCR costs must be quantified, because the ESP v. MRO analysis pertains only to costs and benefits incurred during the term of the ESP. R.C. 4928.143(B)(1) and (E).

A proper quantification of Rider GDR, DCR and the Unbundled Distribution Rate Rider likely would offset the claimed $3 million per year alleged benefit in this proceeding. By failing to quantify these riders, under a quantitative analysis the Companies have failed in their burden to prove[19] that the stipulated ESP is more favorable than an MRO.

Power4Schools understands that the question whether the ESP v. MRO test can consider qualitative benefits is presently pending before the Ohio Supreme Court. Power4Schools agrees that the Court's precedent limits the Commission's consideration to "costs" or quantifiable

[18] Order at 119.
[19] R.C. 4928.143(C)(1).

benefits.[20] Thus, the quantitative analysis performed above is conclusive of this issue, requiring that the ESP be denied, or modified so that its costs are less than an MRO.

Nevertheless, the Commission's Order considers qualitative benefits. As shown below, many of the qualitative benefits do not fall within R.C. 4928.143(B) as required by the above Ohio Supreme Court precedent (and thus cannot be included in the ESP v. MRO test), are funded by captive customers, and provide no benefit to customers in this proceeding (considering they only commit to take future action dependent on Commission approval in subsequent proceedings). Thus, even if qualitative benefits could be included in the ESP v. MRO test, the benefits recognized by the Commission were unlawfully considered or fail to make the stipulated ESP more favorable than an alternative MRO.

4. The Order is unlawful because it requires the Companies' distribution customers to subsidize FES's generation.

R.C. 4928.02(H) states that it is the policy of the state of Ohio to:

> [e]nsure effective competition in the provision of retail electric service by avoiding anticompetitive subsidies flowing from a noncompetitive retail electric service to a competitive retail electric service or to a product or service other than retail electric service, and vice versa, **including by prohibiting the recovery of any generation-related costs through distribution or transmission rates**. [Emphasis supplied.]

It would be difficult to design a mechanism that violates this provision of state policy more egregiously than Rider RRS. R.C. 4928.02(H) prohibits the recovery of any generation-related costs through distribution rates. Rider RRS is a nonbypassable generation charge assessed through the Companies' distribution rates to all captive distribution customers in clear violation

[20] *See In Re Application of Columbus Southern Power Co., et al.*, 128 Ohio St. 3d 402, 2011-Ohio-958 [¶26], 945 N.E.2d 501; *In Re Application of Columbus Southern Power Co., et al.*, 128 Ohio St. 3d 512, 2011-Ohio-1788 [¶¶ 31-35], 945 N.E.2d 655

of R.C. 4928.02(H).[21] Indeed, FERC agreed with this analysis in its recent order in *Electric Power Supply Assoc., et al. v. FirstEnergy Solutions, et al.*, 155 FERC ¶ 61,101 (2016), at P 65.

5. Rider RRS unlawfully permits the Companies to collect additional transition costs or equivalent revenues from customers in violation of R.C. 4928.38.

As part of Ohio's long transition to a fully competitive market, state law established a well-defined market development period and deadline for stranded cost recovery. During the market development period ultimately ending December 31, 2010, the Companies charged customers nearly $7 billion ($6,911,427,628) in transition costs to adjust to market conditions.[22]

In its Order, the Commission found that Rider RSS charges did not constitute transition costs because R.C 4928.39 defines such costs as those that are unrecoverable in a competitive market.[23] The Order reasons that, over the eight year term of the ESP, Rider RRS provide a net credit to customers. However, the Ohio Supreme Court recently clarified that transition costs are those that are "not recoverable through market-based rates." *In Re Application of Columbus S. Power Co.*, Slip Opinion 2016-Ohio-1608 (April 21, 2016), at 6 ("*Columbus S. Po*wer"). The revenues that the Companies will collect under Rider RRS are not from "market-based rates." Rather, they are collected from customers based upon the legacy costs of the PPA Plants that predated Am.Sub.S.B.3, which were to be collected before the market development period ended. Id.

Moreover, the Order's finding ignores that after the market development period, utilities (and their affiliates) were to stand on their own in the competitive market, without additional

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[21] See, also, *In Re Ohio Power Company*, Case No. 10-1454-EL-RDR, Finding and Order (January 11, 2012).
[22] Id. at 18,, citing *In the Matter of the Application of FirstEnergy Corp. on Behalf of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Approval of Their Transition Plans and for Authorization to Collect Transition Revenues*, Case Nos. 99-1212-EL-ETP, 99-1213-EL-ATA, and 99-1214-EL-AAM, Opinion and Order (July 19, 2000), p. 71 (establishing the total allowable transition costs for the Companies).
[23] Order at 112.

subsidies from captive ratepayers for uneconomic competitive generation.[24] But, as Dr. Rose points out, "that's just what the Companies propose to do" through Rider RSS in this proposed ESP IV.[25] Rider RRS is nothing more than another form of transition charge through which the Companies will recover the costs of uneconomic generation.

6. Rider GDR is vague, asymmetric, and not authorized by Ohio law.

The Commission's Order approved the creation of the Government Directives Recovery Rider ("GDR"), for the purpose of recovering costs related to future government directives. This rider violates a number of regulatory practices and principles.[26] First, it is overly vague, as none of the costs have been defined, leaving the Companies with an open-ended recovery vehicle. Second, Rider GDR, as proposed, is asymmetric because it is designed to recover costs due to government directives—but doesn't allow or facilitate the return of ratepayer money due to a government directive. Finally, R.C. 4928.143(B)(2)(a) through (i) identify the provisions the Commission may authorize in an ESP, and none authorize Rider GDR.

C. The Commission Erred by Finding that the Partial Stipulation Benefits Ratepayers and the Public Interest.

It is inconceivable that the partial stipulation benefits the public interest considering that PJM already is responsible, without assessing an additional surcharges, for assuring the electric system reliability that the proposed ESP IV ostensibly is supposed to provide. And it is even more inconceivable how ratepayers benefit when Ohio law expressly provides that such ratepayer-supported bailouts for uneconomic generation were to end years ago when the market development period expired.

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[24] R.C. 4928.38; OCC Ex. 25 (Rose Direct) at 19.
[25] Id.
[26] See Staff Ex. 6 (McCarter Direct) at 5; Staff Ex. 1 (Pearce Direct) at 5.

Nevertheless, due to the unequal bargaining power of the Companies in ESP proceedings,[27] exacerbated by the Commission's Staff late agreement to settlement terms, a few parties negotiated various terms to the stipulation in this proceeding – not to serve the public interest, but their own narrow, parochial self-interests. These include discounts to large industrial users and payments to low-income interests that are funded with ratepayer dollars.[28] Moreover, many of the Companies' commitments are prospective in nature, subject to further Commission action, provide no benefit to this proceeding, and may not be considered in an ESP because they are not permitted by R.C. 4928.143(B)(2)(d). These include vague and unenforceable commitments for federal advocacy for improvement in the capacity markets, CO_2 emission reductions, grid modernization, and resource diversification.[29]

The Companies' proposal will have significant adverse consequences on Ohio's public schools by taking financial resources that could be directed to educate Ohio's school children and redirecting them to the Companies.

IV. CONCLUSION

For the above reasons, Power4Schools respectfully requests that rehearing be granted consistent with this application.

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[27] OCC/NOPEC Ex. 11 (Kahal Second Supplemental) at 7.
[28] Companies Ex. 8 (Mikkelsen Supplemental) at 12.
[29] Companies Ex. 155 (Mikkelsen Fifth Supplemental) at 13.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Application for Rehearing was served *via electronic mail* upon the parties of record this 2nd day of May, 2016.

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