

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

| | | |
|---------------------------------|---|-------------------------|
| In the Matter of the Motion to |) | |
| Modify the Exemption Granted to |) | Case No. 18-1419-GA-EXM |
| the East Ohio Gas Company d/b/a |) | |
| Dominion Energy Ohio. |) | |

**COMMENTS FOR PROTECTING RESIDENTIAL CONSUMERS FROM THE
MARKETERS' MONTHLY VARIABLE RATES IN DOMINION'S SERVICE
AREA BY RE-ESTABLISHING THE STANDARD CHOICE OFFER AS THE
DEFAULT SERVICE
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

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October 11, 2019

*Special Counsel for the
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I. INTRODUCTION

For too long, the “Monthly Variable Rate” program in Dominion’s service area has been used by some energy marketers, such as Verde Energy and North American Power & Gas, among others, to rip-off unsuspecting Ohioans. These poor consumers had the misfortune of being randomly assigned, without their consent, to natural gas marketers. The Public Utilities Commission of Ohio (“PUCO”) should end this charade posing as a competitive market. The PUCO should shut down the program and restore Dominion’s standard offer as the default gas service for residential consumers. We commend the PUCO for considering OCC’s motions for consumer protection.

It is clear that the Dominion Monthly Variable Rate program for residential customers has failed Ohio consumers. In the September 13 to October 13, 2019 time frame, all gas marketers but one are charging above the market price for natural gas service. Some marketers are price-gouging consumers at more than two times the current market rate. And a couple of rip-off artists, Verde and North American Power and Gas,

are currently taking money from their unlucky consumers at more than three times Dominion's Standard Choice Offer rate.

Dominion's Monthly Variable Rate program is a problem at its core. It cannot be fixed. And marketer proposals to fix it now after years of customer abuse should not be entertained.

Dominion automatically assigns choice-eligible customers, without their consent, to the marketers in the Monthly Variable Rate program. That's bad right from the start for consumers. This random assignment of customers to marketers occurs if they drop their supplier (or even drop out of a governmental aggregation program) without informing Dominion that they want to be placed on Dominion's Standard Choice Offer. The marketer can then charge the customer any rate it wants so long as its rate is no higher than the marketer's own rate listed on the PUCO's Apples-to-Apples price comparison chart. So, the only limit on a marketer's charges is the marketer's own charges. In other words, there is no limit on marketer charges (and the rip-off of customers).

As a result of this system of gas marketer roulette, customers often find that their natural gas utility bills increase significantly. For example, 14 of the 21 marketers currently participating in the Monthly Variable Rate program have rates that are at least 50% higher than Dominion's Standard Choice Offer (which is a true competitive rate).¹ That means residential customers who have the misfortune of qualifying for the program have a two out of three chance that their bill for natural gas will increase by at least 50%.

¹ See Attachment 1. Attachment 1 was derived from data available at Dominion Energy's Energy Choice website at <https://www.dominiongaschoice.com/rates-and-suppliers>.

The number of residential consumers who are on the Monthly Variable Rate program at any given time is small compared to Dominion's total number of customers. But that is little comfort to the customers who are left to the devices of high-charging energy marketers.

The Office of the Ohio Consumers' Counsel urges the PUCO to protect residential consumers. The PUCO should eliminate the failed Monthly Variable Rate program for residential consumers and re-establish Dominion's Standard Choice Offer as the default service for all residential consumers.

The PUCO may lawfully make the changes discussed in the Consumers' Counsel's August 16, 2019 Motion in this case and in these Comments. R.C. 4929.08 gives the PUCO the authority to modify or abrogate an order that grants an exemption. The PUCO can do so if, within eight years after the order is effective, it determines that the findings upon which the order was based are no longer valid and that the abrogation or modification is in the public interest.² That legal standard is satisfied here. Modifying the 2013 Order as OCC recommends is lawful and would protect residential consumers.

II. BACKGROUND

On May 26, 2006, the PUCO issued an order approving phase one of Dominion's plan to no longer sell natural gas to consumers.³ On June 18, 2008, the PUCO approved Dominion's request to implement phase two of its plan to exit the merchant function with

² See also *In the Matter of the Application to Modify, in Accordance with Section 4929.08, Revised Code, the Exemption Granted to The East Ohio Gas Company d/b/a Dominion East Ohio in Case No. 07-1224-GA-EXM*, Case No. 12-1842-GA-EXM ("2013 Case"), Opinion and Order (January 9, 2013) ("2013 Order").at 17.

³ *In the Matter of the Application of The East Ohio Gas Company dba Dominion East Ohio for Approval of a Plan to Restructure Its Commodity Service Function*, Case No. 05-474-GA-ATA ("2005 Case"), Opinion and Order (May 26, 2006) ("2006 Order").

modifications.⁴ Phase two of Dominion's plan eliminated the standard choice offer to choice-eligible non-residential customers as the default service. In its 2013 Order, per R.C. 4929.08, the PUCO modified the 2008 Order. Also in the 2013 Order, the PUCO adopted, with modifications, a settlement that continued phase two of Dominion's plan.⁵ Under the settlement, no signatory party would seek PUCO authority to assign Dominion's choice-eligible residential customers to the Monthly Variable Rate before June 1, 2015.⁶ The Consumers' Counsel reserved its right to challenge any request or application filed with the PUCO for Dominion to exit the merchant function for residential customers.⁷

Dominion began the Monthly Variable Rate program for residential customers on April 15, 2015.⁸ Under the Monthly Variable Rate program, residential customers whose marketer contract or opt-out governmental aggregation contract has expired may enroll with a new marketer or aggregation program or may choose the Standard Choice Offer. If the residential customer does not choose one of those three options, then the customer is randomly assigned by Dominion to a marketer under the then-applicable Monthly Variable Rate after two billing cycles on the Standard Choice Offer.

On March 9, 2018, the Consumers' Counsel filed a Motion in the 2013 Case docket asking the PUCO to protect residential consumers by re-establishing the Standard

⁴ See *In the Matter of the Application of the East Ohio Gas Company d/b/a Dominion East Ohio for Approval of a General Exemption of Certain Natural Gas Commodity Sales Services or Ancillary Services*, Case No. 07-1224-GA-EXM, Opinion and Order at 3 (June 18, 2008) ("2008 Order").

⁵ 2013 Order at 16-17.

⁶ See *id.* at 9.

⁷ *Id.*

⁸ See 2013 Case, Tariff Revision (March 27, 2015).

Choice Offer as Dominion's default service and eliminating the Monthly Variable Rate program. The PUCO directed the Consumers' Counsel to refile the Motion in this proceeding and established a procedural schedule, including a comment period. In response to the August 16, 2019 Entry in this case, the Consumers' Counsel submits Comments on the Motion.

III. DISCUSSION

A. The Monthly Variable Rate program has failed to protect Dominion's residential consumers from exorbitant prices for natural gas service.

In its 2013 Order, the PUCO determined that consumers "would be protected by the market" in the transition away from the Standard Choice Offer to the Monthly Variable Rate.⁹ The PUCO explained that "[o]nce a customer is switched to a Monthly Variable Rate, the customer is immediately free to: switch to a different [marketer], enter into a different rate plan with the same supplier, or participate in opt-out government aggregations, without any type of termination fee."¹⁰ But since then energy marketers have shown that they are not synonymous with the market – or at least not with a competitive market. And energy marketers have not protected consumers like "the [competitive] market" that the PUCO relied upon.

As stated above, some of the marketers' Monthly Variable Rates can be way higher than the Standard Choice Offer, resulting in the price-gouging of Ohioans. For instance, during the current period of September 13 through October 13, 2019, Dominion's Standard Choice Offer is very low at \$2.47 per MCF, which is a relatively

⁹ 2013 Order at 15.

¹⁰ *Id.*

safe way for consumers to save a lot of money on their gas bills. Meanwhile, the various Monthly Variable Rates range from \$2.47 to \$9.25 per MCF, with an average price of \$4.53 per MCF.¹¹ Ouch! For a typical consumer using 9 MCF of natural gas per month, the difference between Verde's high (and outrageous) rate of \$9.25 per MCF and Dominion's standard choice rate of \$2.47 per MCF would on average be about \$61.00 per month on a consumer's bill. What a rip off!

As of September 13, 2019, 14 of the 21 marketers participating in the Monthly Variable Rate program have rates that are at least 50% higher than Dominion's Standard Choice Offer rate.¹² That means residential customers have a 67% chance that the commodity (gas) portion of their overall utility bill will increase by at least 50% once they are randomly assigned to the Monthly Variable Rate program.

The gas supplier roulette at the core of the Monthly Variable Rate program results in most of the customers being worse off with their new marketer than they would be on the Standard Choice Offer. They could be considerably worse off, depending on which marketer they are randomly assigned to through the Monthly Variable Rate program. The market has failed to protect such customers.

B. The Monthly Variable Rate program is a failure because it has not fostered innovation in the natural gas marketplace for residential customers in Dominion's service territory.

Another goal stated by the PUCO for establishing the Monthly Variable Rate program was to encourage innovation in the retail natural gas market.¹³ But this has not

¹¹ See Attachment 1.

¹² *Id.*

¹³ 2013 Order at 15.

occurred. The random assignment of customers to a marketer provides no incentive for competition or innovation.

The program does not assign residential customers to the lowest available Monthly Variable Rate. Instead, residential customers in the Monthly Variable Rate program are assigned randomly based on a rotating list of marketers. A customer may receive the highest Monthly Variable Rate, the lowest, or something in between. The customer does not get to choose a marketer or a rate.

Marketers know that to obtain customers on the Monthly Variable Rate program they do not have to compete for customers to select the most beneficial offer. A marketer whose rate is extremely high has the same chance at getting a customer from the Monthly Variable Rate program as a marketer whose rate is extremely low. As such, there is no incentive to charge the lowest possible rate. In fact, the incentive can be to charge the highest rate.

The random assignment of customers through the Monthly Variable Rate program is a fiasco in Dominion's area that does not otherwise exist for natural gas consumers in Ohio. Outside this one program, customers are allowed the discretion to choose a supplier based on various marketer offers (or Dominion's Standard Choice Offer). Conversely, the Monthly Variable Rate program forces customers to take service from a marketer that the customer did not choose, at whatever rate the marketer sets. Often the rate is not based on market rates and is not competitive (as differentiated from the competitive standard offer). Dominion's competitively priced Standard Choice Offer is saving money for consumers through a competitive market price when contrasted with some high marketer prices under the Monthly Variable Rate.

The Monthly Variable Rate program has not fostered innovation for service to residential customers in Dominion's territory. The program is not beneficial to residential consumers. The PUCO should discontinue the program as it applies to residential customers.

C. The Monthly Variable Rate program is a failure because it complicates or thwarts the efforts of Dominion's residential customers to be informed consumers making rational economic decisions about their natural gas service.

Based on experience with the Monthly Variable Rate program, the PUCO should protect consumers by reestablishing Dominion's Standard Choice Offer as the default service for residential customers.¹⁴ The Consumers' Counsel strongly supports the availability of a competitively bid Standard Choice Offer for residential natural gas consumers. But the Monthly Variable Rate program in Dominion's territory has abjectly failed to produce the results the PUCO intended. Instead, it has harmed consumers. Accordingly, the program should be shut down.

The PUCO established the Monthly Variable Rate as a transition mechanism to promote shopping among Dominion's residential customers.¹⁵ This has not happened. In the first quarter of 2015 – just before Dominion instituted the Monthly Variable Rate – 72.4% of Dominion's residential customers were served by a marketer.¹⁶ As of the first quarter of 2019 (the most recent period available), the percentage of residential customers

¹⁴ Filed under Ohio Adm. Code 4901:1-19-11.

¹⁵ 2013 Order at 15.

¹⁶ See Ohio Energy Choice Website, Natural Gas Choice Activity, First Quarter 2015 (available at <https://app.powerbigov.us/view?r=eyJrIjojOGJjOTA2MjYtNzMzNi00Y2RhLTljZjEtZTU3Zjg5ZDZhMDgyliwidCI6IjUwZjhmY2M0LTk0ZDgtNGYwNy04NGViLTM2ZWQ1N2M3YzhhMiJ9>).

who shop for natural gas in Dominion's service territory dropped to 68.2%.¹⁷ During the period that the Monthly Variable Rate program has been in existence, the number of Dominion residential customers who shopped for natural gas dropped from 803,485 to 765,215.¹⁸ By contrast, in the same period natural gas shopping by residential customers statewide increased from 51.6% to 54.8%.¹⁹ Residential customers in Dominion's service territory are shopping less for natural gas, while residential customers in other parts of the state are shopping more.

Shopping for natural gas service by Dominion's residential customers has not kept pace with the rest of the state. Although there is more residential shopping in Dominion's service territory than any other gas company's in Ohio, this has happened despite the Monthly Variable Rate program, not because of it. And the larger shopping statistics may reflect that the successful aggregation of the Northeast Ohio Public Energy Council, which is among the nation's largest government aggregations, operates in Dominion's area.

The Monthly Variable Rate program for residential customers in Dominion's service territory has failed to satisfy its intended purpose while inflicting harm on consumers. The PUCO should eliminate the Monthly Variable Rate program for residential customers in Dominion's service territory and re-establish Dominion's Standard Choice Offer rate as the default for all residential customers.

¹⁷ See Ohio Energy Choice Website, Natural Gas Choice Activity, First Quarter 2019 (available at <https://app.powerbigov.us/view?r=eyJrIjojOGJjOTA2MjYtNzMzNi00Y2RhLTljZjEtZTU3Zjg5ZDZhMDgyIiwidCI6IjUwZjhmY2M0LTk0ZDgtNGYwNy04NGViLTM2ZWQ1N2M3YzhhMiJ9>).

¹⁸ See footnotes 16 and 17.

¹⁹ *Id.*

D. The forced (non-consensual) assignment of Ohio consumers to the Monthly Variable Rate is highly unfair to them.

The PUCO concluded that the 2013 modification to the exemption would provide for an “an expeditious transition to the provision of natural gas services and goods in a manner that achieves effective competition and transactions between willing buyers and willing sellers to reduce or eliminate the need for regulation of natural gas services and goods.”²⁰ That didn’t work. The PUCO also believed that customer education would protect consumers, stating that “with appropriate information and education, customers will be able to make informed decisions when the Standard Choice Offer service is discontinued.”²¹ That didn’t work either. Indeed, relying on industry platitudes to justify deserting consumers to the perils of some high-charging marketers – on the claim that consumers can “educate” themselves to save money and avoid rip-offs – should stop right now. There are millions of consumers in Ohio and they can’t all be reached, and they don’t all have the time to study up on buying energy.

In order to guarantee its intended good result for consumers, the PUCO directed Dominion to provide “the maximum amount of information” to all interested parties, including the Consumers’ Counsel, regarding the effect of Dominion’s exit from the merchant function on the competitive market.²² Specifically, the PUCO directed Dominion to provide to the PUCO Staff, the Consumers’ Counsel, and any other interested party the information recommended in the proceeding by the parties “so that all

²⁰ 2013 Order at 14.

²¹ *Id.* at 15.

²² *Id.* at 17.

parties can become better informed regarding the effect of [Dominion's] exit on competition and customers.”²³

The PUCO later clarified that its Staff was expected to conduct studies and surveys regarding the effects of eliminating the Standard Choice Offer service for non-residential customers. The expectation was that all parties would be informed about the effect of Dominion's exit on non-residential customers prior to considering whether residential consumers should also be denied the opportunity to obtain their natural gas service through the Standard Choice Offer.²⁴

To date, the transition away from the Standard Choice Offer contradicts the PUCO's 2013 findings. Many residential consumers appear to have not been properly educated or informed on the natural gas service offerings by Dominion that the PUCO predicted would lead to informed decision-making. For example, customers often are unaware that their provider has changed, especially in the winter when they think the higher gas bills are due to more usage. And they appear to be unaware that they need to contact Dominion to get on the Standard Choice Offer whenever they drop their natural gas supplier. And we think it patently obvious that Ohioans do not willingly prefer to pay a lot more for natural gas than to save money.

As stated, the PUCO should be highly skeptical about whether it is feasible to reach and adequately inform 1.1 million Dominion residential consumers (and many more decision-makers in Ohio households) on the complexities of buying natural gas service. In reality, it is **not** feasible to educate all those consumers, and PUCO programs

²³ *Id.*

²⁴ 2013 Case, Entry on Rehearing (March 6, 2013) at 12.

should not be created or continued based on a false premise about customer education that the industry may advance.

Ohioans have many priorities for their time, including family matters and work, that rise above trying to surmount the steep challenge of understanding and continually monitoring complicated natural gas service pricing and contracts. The difficulty of this challenge for consumers is reflected in the Columbia shadow-billing data where Columbia customers who purchased from natural gas marketers have paid over \$1.7 billion **more** than they would have paid under the utility's Standard Choice Offer rate.²⁵

E. To protect residential consumers, the PUCO should discontinue the Monthly Variable Rate program and reinstate Dominion's competitively bid Standard Choice Offer as the default service for residential customers.

As demonstrated above, the PUCO's assumptions in establishing the Monthly Variable Rate program have not resulted in more shopping by or more protections for residential consumers. Reinstating Dominion's competitively bid Standard Choice Offer as the default service for residential customers would serve both the short-term and long-term public interest.

Experience shows that customers could generally be expected to pay lower rates under the competitively bid Standard Choice Offer.²⁶ And consumers would be protected without making the market less competitive. Consumers would still have the option to shop for natural gas marketers without being subjected to unregulated variable rates if they drop their marketer or aggregator.

²⁵ See Attachment 2.

²⁶ For example, a recent white paper from the Northeast Ohio Public Energy Council shows that electric customers in Ohio saved more than \$19 million during 2011 through 2018 thanks to a competitively bid standard service offer for electric service. See Update on Electricity Customer Choice in Ohio at 7 (available at https://www.nopec.org/media/1573/19nop32-whitepaper_web.pdf).

In fact, re-establishing the Standard Choice Offer as the default service for residential customers would better serve the goal of achieving competitive markets. Ohioans would benefit because the Standard Choice Offer is set competitively using the New York Mercantile Exchange monthly settlement price to reflect “current market pricing.”²⁷ If marketers were forced to compete with the lower-priced Standard Choice Offer instead of providing service through a noncompetitive Monthly Variable Rate, they would be better incentivized to improve their service, product offerings, and/or lower their rates to attract Ohio customers. The noncompetitive Monthly Variable Rate does not provide those incentives for consumer protection, especially when customers default to the Monthly Variable Rate program and are assigned to random marketers. Instead, the Monthly Variable Rate program is resulting in excessive charges for some consumers.

Ultimately, replacing the Monthly Variable Rate program with the Standard Choice Offer as the default service for all residential customers should provide customers with more competitive rates in the short term and serve the broader public goal of achieving more competitive natural gas markets in years to come. And the change would save money for Ohioans. In any event, the PUCO’s approach to this issue should be about protecting consumers from marketing and not *vice versa*. The current approach has abjectly failed consumers and needs to be modified to protect consumers.

IV. CONCLUSION

The Monthly Variable Rate program is an abject failure for consumer protection (though it may be a big success for high-charging marketers at Ohioans’ expense). The

²⁷ 2013 Order at 13.

PUCO's earlier findings in the 2013 Order, allowing non-consensual assignment of consumers to marketers under the Monthly Variable Rate, are not valid now. And the structure approved in that case is not now a reasonable approach for pricing natural gas service for residential customers. Accordingly, the PUCO should protect Ohio consumers by modifying its 2013 Order to re-establish the Standard Choice Offer as the default service for all residential customers and to eliminate the Monthly Variable Rate.

Dominion's competitively-priced Standard Choice Offer will be a safe harbor for customers from the marketer price gouging that has been occurring in Dominion's service area through the Monthly Variable Rate program. It is time to now close this sad chapter of price gouging of consumers in the Dominion area through the Monthly Variable Rate program. This action by the PUCO is necessary to protect customers and to conform the options available to Dominion's customers to Ohio's policy of "Promot[ing] the availability to consumers of ... reasonably priced natural gas services and goods."²⁸

The Consumers' Counsel's proposal, that led to this case, can be expected to save money for many Ohio natural gas consumers who are assigned without their consent or knowledge to the Monthly Variable Rate by Dominion. It should be patently obvious that saving money is a good thing for Ohioans. To protect residential consumers, the Monthly Variable Rate option for residential customers should be discontinued.

²⁸ R.C. 4929.02(A)(1).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Comments were served via electronic transmission upon the parties this 11th day of October 2019.

/s/ Terry L. Etter

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The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

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Dominion MVR Issue
SCO vs. MVR
September 13, 2019 - October 13, 2019

Dominion SCO: \$2.4710 /Mcf

| <u>Marketer</u> | <u>MVR Rate</u> | <u>Percent of</u> |
|---|------------------------|--------------------------|
| | <u>\$/Mcf</u> | <u>SCO</u> |
| Verde Energy | 9.2500 | 374% |
| North American Power & Gas, LLC | 7.9900 | 323% |
| U.S. Gas & Electric dba Ohio Gas & Electric | 6.5000 | 263% |
| Snyder Brothers Energy Marketing, LLC | 5.9900 | 242% |
| United Energy Trading dba Kratos | 5.1000 | 206% |
| Constellation New Energy | 4.5900 | 186% |
| ENGIE Resources | 4.5000 | 182% |
| Interstate Gas Supply, Inc. | 4.4900 | 182% |
| SouthStar Energy dba Ohio Natural Gas | 4.3900 | 178% |
| Just Energy (Commerce Energy) | 4.3300 | 175% |
| Energy Cooperative of Ohio | 4.1900 | 170% |
| Shipley Energy | 4.1800 | 169% |
| Dominion Energy Solutions | 3.9010 | 158% |
| Titan Gas & Power | 3.7000 | 150% |
| Vista Energy | 3.6310 | 147% |
| Energy 95, LLC dba Quake Energy, LLC | 3.4890 | 141% |
| Direct Energy, LLC | 3.2510 | 132% |
| Volunteer Energy Service, Inc. | 3.2410 | 131% |
| CenterPoint Energy (Lakeshore Energy) | 2.9900 | 121% |
| Mercury Energy Ohio | 2.9500 | 119% |
| DTE Energy Trading dba DTE Energy Supply | 2.4710 | 100% |

| Month | Res. Savings | Com. Savings CAB | Ind. Savings CAB | Com. Savings GAS | Ind. Savings GAS | Total Monthly Choice Savings | Monthly PIPP Savings | Monthly Savings Including PIPP | Cumulative PIPP Savings | Cumulative Savings (Incl PIPP) | Cumulative Savings (Excl PIPP) |
|--------|---------------|---------------------|---------------------|---------------------|---------------------|------------------------------------|----------------------------|--------------------------------------|-------------------------------|--------------------------------------|--------------------------------------|
| Aug-15 | -\$2,236,562 | -\$706,709 | -\$12,089 | -\$34,315 | \$82,867 | -\$2,906,808 | \$0 | -\$2,906,808 | \$23,412,227 | -\$1,256,449,408 | -\$1,279,861,636 |
| Sep-15 | -\$2,421,039 | -\$776,506 | -\$12,446 | \$3,354 | \$49,646 | -\$3,156,991 | \$0 | -\$3,156,991 | \$23,412,227 | -\$1,259,606,399 | -\$1,283,018,627 |
| Oct-15 | -\$3,143,346 | -\$990,394 | -\$20,122 | \$11,751 | \$64,692 | -\$4,077,419 | \$0 | -\$4,077,419 | \$23,412,227 | -\$1,263,683,818 | -\$1,287,096,046 |
| Nov-15 | -\$6,647,549 | -\$2,120,236 | -\$42,765 | \$32,806 | \$78,831 | -\$8,698,913 | \$0 | -\$8,698,913 | \$23,412,227 | -\$1,272,382,731 | -\$1,295,794,959 |
| Dec-15 | -\$11,434,927 | -\$3,771,764 | -\$60,957 | \$8,563 | \$72,641 | -\$15,186,444 | \$0 | -\$15,186,444 | \$23,412,227 | -\$1,287,569,175 | -\$1,310,981,403 |
| Jan-16 | -\$16,112,731 | -\$5,678,615 | -\$94,065 | -\$34,989 | \$9,775 | -\$21,910,625 | \$0 | -\$21,910,625 | \$23,412,227 | -\$1,309,479,800 | -\$1,332,892,028 |
| Feb-16 | -\$18,597,905 | -\$6,753,189 | -\$119,339 | -\$1,951 | \$18,368 | -\$25,454,015 | \$0 | -\$25,454,015 | \$23,412,227 | -\$1,334,933,815 | -\$1,358,346,043 |
| Mar-16 | -\$15,872,469 | -\$5,580,592 | -\$102,175 | \$7,502 | \$13,209 | -\$21,534,525 | \$0 | -\$21,534,525 | \$23,412,227 | -\$1,356,468,340 | -\$1,379,880,568 |
| Apr-16 | -\$10,415,718 | -\$3,156,401 | -\$49,603 | \$10,821 | \$6,722 | -\$13,604,179 | \$0 | -\$13,604,179 | \$23,412,227 | -\$1,370,072,519 | -\$1,393,484,747 |
| May-16 | -\$5,964,571 | -\$1,727,504 | -\$24,245 | -\$11,723 | \$44,730 | -\$7,683,313 | \$0 | -\$7,683,313 | \$23,412,227 | -\$1,377,755,832 | -\$1,401,168,060 |
| Jun-16 | -\$3,487,938 | -\$1,055,352 | -\$14,102 | -\$24,004 | \$55,326 | -\$4,526,070 | \$0 | -\$4,526,070 | \$23,412,227 | -\$1,382,281,902 | -\$1,405,694,130 |
| Jul-16 | -\$1,991,284 | -\$607,071 | -\$6,338 | -\$29,412 | \$71,233 | -\$2,562,872 | \$0 | -\$2,562,872 | \$23,412,227 | -\$1,384,844,774 | -\$1,408,257,002 |
| Aug-16 | -\$2,033,848 | -\$612,147 | -\$6,595 | -\$31,069 | \$86,108 | -\$2,597,551 | \$0 | -\$2,597,551 | \$23,412,227 | -\$1,387,442,325 | -\$1,410,854,553 |
| Sep-16 | -\$2,009,458 | -\$597,987 | -\$7,340 | -\$6,580 | \$55,578 | -\$2,565,788 | \$0 | -\$2,565,788 | \$23,412,227 | -\$1,390,008,113 | -\$1,413,420,341 |
| Oct-16 | -\$2,257,699 | -\$619,928 | -\$10,332 | \$67,158 | \$80,285 | -\$2,740,516 | \$0 | -\$2,740,516 | \$23,412,227 | -\$1,392,748,629 | -\$1,416,160,857 |
| Nov-16 | -\$5,015,771 | -\$1,363,107 | -\$32,609 | -\$46,694 | \$1,689 | -\$6,456,492 | \$0 | -\$6,456,492 | \$23,412,227 | -\$1,399,205,120 | -\$1,422,617,349 |
| Dec-16 | -\$8,848,222 | -\$2,602,060 | -\$39,483 | -\$52,895 | \$77,846 | -\$11,464,815 | \$0 | -\$11,464,815 | \$23,412,227 | -\$1,410,669,935 | -\$1,434,082,163 |
| Jan-17 | -\$8,602,412 | -\$1,932,895 | -\$23,094 | -\$197,580 | \$16,657 | -\$10,739,324 | \$0 | -\$10,739,324 | \$23,412,227 | -\$1,421,409,259 | -\$1,444,821,488 |
| Feb-17 | -\$10,479,905 | -\$3,212,465 | -\$45,344 | -\$189,553 | \$20,621 | -\$13,906,646 | \$0 | -\$13,906,646 | \$23,412,227 | -\$1,435,315,906 | -\$1,458,728,134 |
| Mar-17 | -\$12,403,111 | -\$3,981,768 | -\$66,462 | -\$14,808 | \$13,044 | -\$16,453,105 | \$0 | -\$16,453,105 | \$23,412,227 | -\$1,451,769,011 | -\$1,475,181,239 |
| Apr-17 | -\$7,152,840 | -\$2,079,943 | -\$33,637 | -\$44,992 | \$20,985 | -\$9,290,427 | \$0 | -\$9,290,427 | \$23,412,227 | -\$1,461,059,438 | -\$1,484,471,666 |
| May-17 | -\$4,249,551 | -\$1,084,496 | -\$16,756 | -\$19,605 | \$51,743 | -\$5,318,664 | \$0 | -\$5,318,664 | \$23,412,227 | -\$1,466,378,103 | -\$1,489,790,331 |
| Jun-17 | -\$2,846,544 | -\$749,126 | -\$12,220 | -\$29,457 | \$67,299 | -\$3,570,047 | \$0 | -\$3,570,047 | \$23,412,227 | -\$1,469,948,150 | -\$1,493,360,378 |
| Jul-17 | -\$2,432,674 | -\$673,504 | -\$11,964 | \$17,247 | \$53,984 | -\$3,046,912 | \$0 | -\$3,046,912 | \$23,412,227 | -\$1,472,995,062 | -\$1,496,407,290 |
| Aug-17 | -\$2,371,761 | -\$675,104 | -\$12,487 | \$2,572 | \$16 | -\$3,056,763 | \$0 | -\$3,056,763 | \$23,412,227 | -\$1,476,051,825 | -\$1,499,464,053 |
| Sep-17 | -\$2,539,390 | -\$714,249 | -\$12,382 | \$5,325 | \$60,276 | -\$3,200,419 | \$0 | -\$3,200,419 | \$23,412,227 | -\$1,479,252,244 | -\$1,502,664,472 |
| Oct-17 | -\$2,648,172 | -\$744,642 | -\$15,885 | \$22,212 | \$43,730 | -\$3,342,756 | \$0 | -\$3,342,756 | \$23,412,227 | -\$1,482,595,000 | -\$1,506,007,228 |
| Nov-17 | -\$7,587,488 | -\$1,966,136 | -\$50,909 | \$30,457 | \$50,781 | -\$9,523,295 | \$0 | -\$9,523,295 | \$23,412,227 | -\$1,492,118,295 | -\$1,515,530,523 |
| Dec-17 | -\$12,595,841 | -\$3,405,446 | -\$73,570 | -\$42,110 | \$70,159 | -\$16,046,808 | \$0 | -\$16,046,808 | \$23,412,227 | -\$1,508,165,103 | -\$1,531,577,331 |
| Jan-18 | -\$22,918,445 | -\$6,713,323 | -\$115,325 | \$16,576 | \$56,107 | -\$29,674,409 | \$0 | -\$29,674,409 | \$23,412,227 | -\$1,537,839,513 | -\$1,561,251,741 |
| Feb-18 | -\$11,398,416 | -\$2,573,054 | -\$37,638 | \$32,141 | \$35,553 | -\$13,941,414 | \$0 | -\$13,941,414 | \$23,412,227 | -\$1,551,780,927 | -\$1,575,193,155 |
| Mar-18 | -\$13,701,257 | -\$4,102,488 | -\$71,874 | \$97,706 | \$23,532 | -\$17,754,381 | \$0 | -\$17,754,381 | \$23,412,227 | -\$1,569,535,308 | -\$1,592,947,536 |
| Apr-18 | -\$14,252,376 | -\$4,362,801 | -\$80,331 | \$48,637 | \$20,711 | -\$18,626,161 | \$0 | -\$18,626,161 | \$23,412,227 | -\$1,588,161,468 | -\$1,611,573,696 |
| May-18 | -\$6,279,749 | -\$1,859,047 | -\$35,776 | \$20,324 | \$15,933 | -\$8,138,314 | \$0 | -\$8,138,314 | \$23,412,227 | -\$1,596,299,783 | -\$1,619,712,011 |
| Jun-18 | -\$2,785,837 | -\$866,876 | -\$13,609 | \$15,332 | \$43,914 | -\$3,607,076 | \$0 | -\$3,607,076 | \$23,412,227 | -\$1,599,906,859 | -\$1,623,319,087 |
| Jul-18 | -\$2,391,788 | -\$728,416 | -\$12,355 | \$17,243 | \$71,279 | -\$3,044,037 | \$0 | -\$3,044,037 | \$23,412,227 | -\$1,602,950,896 | -\$1,626,363,124 |
| Aug-18 | -\$2,370,543 | -\$763,545 | -\$11,058 | -\$8,968 | \$73,229 | -\$3,080,885 | \$0 | -\$3,080,885 | \$23,412,227 | -\$1,606,031,780 | -\$1,629,444,009 |
| Sep-18 | -\$2,377,345 | -\$747,286 | -\$11,546 | \$8,187 | \$48,877 | -\$3,079,113 | \$0 | -\$3,079,113 | \$23,412,227 | -\$1,609,110,894 | -\$1,632,523,122 |
| Oct-18 | -\$3,048,855 | -\$877,058 | -\$21,557 | -\$8,173 | \$41,244 | -\$3,914,399 | \$0 | -\$3,914,399 | \$23,412,227 | -\$1,613,025,293 | -\$1,636,437,521 |
| Nov-18 | -\$8,245,795 | -\$2,195,153 | -\$46,857 | \$49,759 | \$57,367 | -\$10,380,680 | \$0 | -\$10,380,680 | \$23,412,227 | -\$1,623,405,972 | -\$1,646,818,201 |
| Dec-18 | -\$7,107,855 | -\$486,892 | -\$11,127 | -\$131,642 | \$36,444 | -\$7,701,071 | \$0 | -\$7,701,071 | \$23,412,227 | -\$1,631,107,044 | -\$1,654,519,272 |
| Jan-19 | -\$14,432,062 | -\$4,330,882 | -\$90,482 | -\$9,463 | -\$117,386 | -\$18,980,275 | \$0 | -\$18,980,275 | \$23,412,227 | -\$1,650,087,319 | -\$1,673,499,547 |
| Feb-19 | -\$20,526,817 | -\$6,533,568 | -\$128,396 | \$24,773 | \$23,583 | -\$27,140,424 | \$0 | -\$27,140,424 | \$23,412,227 | -\$1,636,251,318 | -\$1,659,663,546 |
| Mar-19 | -\$17,106,315 | -\$5,386,552 | -\$109,858 | -\$51,686 | -\$1,770 | -\$22,656,180 | \$0 | -\$22,656,180 | \$23,412,227 | -\$1,658,907,497 | -\$1,682,319,726 |

| Month | Res. Savings | Com. Savings CAB | Ind. Savings CAB | Com. Savings GAS | Ind. Savings GAS | Total Monthly Choice Savings | Monthly PIPP Savings | Monthly Savings Including PIPP | Cumulative PIPP Savings | Cumulative Savings (Incl PIPP) | Cumulative Savings (Excl PIPP) |
|--------|---------------|---------------------|---------------------|---------------------|---------------------|------------------------------------|----------------------------|--------------------------------------|-------------------------------|--------------------------------------|--------------------------------------|
| Apr-19 | -\$11,367,867 | -\$3,623,774 | -\$74,339 | \$49,716 | \$10,455 | -\$15,005,809 | \$0 | -\$15,005,809 | \$23,412,227 | -\$1,673,913,306 | -\$1,697,325,534 |
| May-19 | -\$6,410,621 | -\$1,840,759 | -\$28,594 | \$17,288 | \$30,188 | -\$8,232,499 | \$0 | -\$8,232,499 | \$23,412,227 | -\$1,682,145,805 | -\$1,705,558,033 |
| Jun-19 | -\$3,592,368 | -\$1,200,432 | -\$15,590 | -\$6,574 | \$26,184 | -\$4,788,780 | \$0 | -\$4,788,780 | \$23,412,227 | -\$1,686,934,584 | -\$1,710,346,813 |
| Jul-19 | -\$2,998,675 | -\$1,087,420 | -\$14,994 | \$18,709 | \$39,386 | -\$4,042,994 | \$0 | -\$4,042,994 | \$23,412,227 | -\$1,690,977,578 | -\$1,714,389,806 |

| Month | Res. Savings | Com. Savings CAB | Ind. Savings CAB | Com. Savings GAS | Ind. Savings GAS | Total Monthly Choice Savings | Monthly PIPP Savings | Monthly Savings Including PIPP | Cumulative PIPP Savings | Cumulative Savings (Incl PIPP) | Cumulative Savings (Excl PIPP) |
|-------|--------------|---------------------|---------------------|---------------------|---------------------|------------------------------------|----------------------------|--------------------------------------|-------------------------------|--------------------------------------|--------------------------------------|
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Case No(s). 18-1419-GA-EXM

Summary: Comments Comments for Protecting Residential Consumers from the Marketers' Monthly Variable Rates in Dominion's Service Area by Re-Establishing the Standard Choice Offer as the Default Service by The Office of The Ohio Consumers' Counsel electronically filed by Mrs. Tracy J Greene on behalf of Etter, Terry L.