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Via E-FILE

June 15, 2020

Public Utilities Commission of Ohio
PUCO Docketing
180 E. Broad Street, 10th Floor
Columbus, Ohio 43215

In re: Case No. 18-1191-EL-ORD

Dear Sir/Madam:

Please find attached the MEMORANDUM CONTRA APPLICATION FOR REHEARING OF THE OHIO ENERGY GROUP e-filed today in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

MLKkew
Attachment

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review of Chapter 4901:1-38 of the Ohio Administrative Code.	:	Case No. 18-1191-EL-ORD
	:	

**MEMORANDUM CONTRA APPLICATION FOR REHEARING
OF THE OHIO ENERGY GROUP**

The Ohio Energy Group ("OEG") submits this Memorandum Contra the Application for Rehearing filed by Ohio Manufacturers' Association Energy Group ("OMAEG") on June 5, 2020. OMAEG's Application for Rehearing reiterates (frequently verbatim) arguments already raised by OMAEG and rejected by the Commission in its May 6, 2020 Finding and Order.¹ And again, OMAEG pushes for unreasonable and unnecessary limitations on the structure of reasonable arrangements that would undercut the Commission's currently flexibility in crafting those arrangements along with unduly burdensome requirements for reasonable arrangement applicants that could discourage capital investment in Ohio. The Commission rightly rejected these arguments in its Order and OMAEG has failed to present any new and compelling reason for the Commission to find otherwise. Accordingly, OMAEG's Application for Rehearing should be denied.

Respectfully submitted,

/s/ Michael L. Kurtz

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June 15, 2020

COUNSEL FOR OHIO ENERGY GROUP

¹ Compare Application for Rehearing at 6-10 (Assignment of Error No. 1) to OMAEG Comments at 3-9; Application for Rehearing at 11 (Assignment of Error No. 2) to OMAEG Comments at 9-10; Application for Rehearing at 12-13 (Assignment of Error No. 3) to OMAEG Comments at 10-11; Application for Rehearing at 13-14 (Assignment of Error No. 4) to OMAEG Comments at 12-13; Application for Rehearing at 14-15 (Assignment of Error No. 5) to OMAEG Comments at 13-14.

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on this 15TH day of June, 2020 to the following:

/s/ Michael L. Kurtz

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in

Case No(s). 18-1191-EL-ORD

Summary: Memorandum Ohio Energy Group (OEG) Memorandum Contra Application for Rehearing electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group