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Via E-FILE

July 17, 2020

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

In re: Case No. 20-1143-EL-UNC

Dear Sir/Madam:

Please find attached the COMMENTS OF THE OHIO ENERGY GROUP (OEG) e-filed today in the above-referenced docket(s).

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
Encl.

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Establishing the Clean Air Fund Rider Pursuant to R.C. 3706.46.	:	Case No. 20-1143-EL-UNC
	:	
	:	

COMMENTS OF THE OHIO ENERGY GROUP

The Ohio Energy Group (“OEG”) submits these Comments on Public Utilities Commission of Ohio (“Commission”) Staff’s proposed methodology for allocating and recovering the costs of the nuclear and renewable generation funds established under R.C. 3706.49. Staff recommends that such costs first be allocated to each electric distribution utility (“EDU”) based upon the total number of kWhs sold by that EDU in 2019. Then, after setting a monthly charge for residential customers at \$0.85 for each EDU, Staff recommends that the remaining costs be recovered from non-residential customers through a dollar per kWh rate for each non-residential customer’s usage up to 833,000 kWhs per month, with charges for non-residential customers eligible to become self-assessing purchasers expressly capped at \$2,400 per month.

OEG supports Staff’s proposals. Staff’s proposed allocation is consistent with the directives set forth under R.C. 3706.46(B) and its proposed rate design - capping non-residential charges at the first 833,000 kWh of monthly usage - is reasonable. The 833,000 kWh monthly recovery threshold is easy to administer, having been used for years as a threshold for other cost recovery mechanisms (e.g. Legacy Generation Resource riders, Universal Service Fund riders), is understandable for customers who are already accustomed working with that threshold, and should help maintain all monthly non-residential customer charges associated with the nuclear and renewable generation funds below the \$2,400 per month

cap that expressly applies to self-assessing purchasers. Accordingly, OEG urges the Commission to approve Staff's recommendations.

Respectfully submitted,

/s/ Michael L. Kurtz

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July 17, 2020

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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 the 17th day of July, 2020 to the following:

/s/ Michael L. Kurtz

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in

Case No(s). 20-1143-EL-UNC

Summary: Comments Ohio Energy Group Comments electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group