Your Residential Utility Consumer Advocate



Office of the Ohio Consumers' Counsel

Janine L. Migden-Ostrander Consumers' Counsel

October 15, 2007

Ms. Renee Jenkins, Director Public Utilities Commission of Ohio 180 East Broad Street, 13th Floor Columbus, Ohio 43215-3793

Re: Reply Comments in Case Nos. 07-796-EL-ATA and 07-797-EL-ATA

Dear Ms. Jenkins:

The Office of the Ohio Consumers' Counsel ("OCC") filed Reply Comments in the above-captioned dockets on October 12, 2007. The OCC submits the attached page 12 which is a corrected substitute for the original page 12 contained in the OCC's Reply Comments.

The OCC hopes that the Public Utilities Commission and commenting parties are not inconvenienced by this substitution, which is made on the earliest possible date after the original filing.

Very truly yours,

Jeffrey L. Small

OCC Counsel of Record

Cc: Intervening parties and persons who submitted comments

Corrected Page for OCC Reply Comments

only offers only two different price periods but insists that customers be required to rely upon the most expensive communication system, a dedicated telephone line, when other available communication options such as a wireless networks are much less expensive in geographically concentrated deployments. Because affordable technology is currently available to not just permit but to also automate the customers' responses to prices, FirstEnergy should be required to provide a reasonable residential demand response program that includes an off-peak, shoulder, peak, and critical peak components in its time of use rate.

FirstEnergy has failed to provide a meaningful time of use pricing option for customers. Customers should have other options available to them that more closely align the electricity prices they are charged with the actual cost of producing the electricity. FirstEnergy's failure to provide service that is more reflective of cost is not excusable given the widely available technology. Therefore, FirstEnergy should be required to make available to customers, on a voluntary basis, dynamic critical peak rates in this case. FirstEnergy should develop the needed infrastructure, to the extent it is cost effective, for each of its electric distribution utilities through the Commission ordered investigation regarding Advanced Metering Infrastructure, Case No. 07-646-EL-ORD.