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PUCO

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August 5, 2008

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

In re: Case Nos. 08-777-EL-ORD

Dear Sir/Madam:

Please find enclosed an original and twelve (12) copies of the **RESPONSE COMMENTS OF THE OHIO ENERGY GROUP, THE CHEMISTRY TECHNOLOGY COUNCIL, THE OHIO CAST METALS ASSOCIATION, THE OHIO HOSPITAL ASSOCIATION, THE OHIO AGGREGATES AND INDUSTRIAL MINERALS ASSOCIATION** and **THE OHIO MANUFACTURERS' ASSOCIATION** fax-filed today in the above-referenced matter.

Please place this document of file.

Respectfully yours,



David F. Boehm, Esq.
Michael L. Kurtz, Esq.
BOEHM, KURTZ & LOWRY

MLKkew
Encl.

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**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Adoption of Rules for Standard	:	Case No. 08-777-EL-ORD
Service Offer, Corporate Separation, Reasonable	:	
Arrangements, and Transmission Riders for Electric	:	
Utilities Pursuant to Sections 4928.14, 4928.17, and	:	
490531, Revised Code, as amended by Amended	:	
Substitute Senate Bill No. 221.	:	

**RESPONSE COMMENTS OF THE OHIO ENERGY GROUP,
THE CHEMISTRY TECHNOLOGY COUNCIL,
THE OHIO CAST METALS ASSOCIATION,
THE OHIO HOSPITAL ASSOCIATION,
THE OHIO AGGREGATES AND INDUSTRIAL MINERALS ASSOCIATION
and THE OHIO MANUFACTURERS' ASSOCIATION**

There has been an explosion of Comments on the PUCO draft of rules proposed in an Entry July 2, 2008. The Ohio Energy Group (OEG) has submitted its Comments along with The Chemistry Technology Council, The Ohio Cast Metals Association, The Ohio Hospital Association, The Ohio Aggregates and Industrial Minerals Association and The Ohio Manufacturers' Association on July 22, 2008. Very shortly thereafter all the Ohio utilities have filed their ESP and/or MPO Plans on August 1, 2008. Appreciating the difficulty of promulgating rules a process that is already underway, and after reviewing the extensive and sometimes very specific proposed amendments to the Rules, OEG, et. al., have concluded that our Response Comments should be limited and general.

First, we reaffirm our initial Comments. Nothing that we have seen in the initial Comments of others causes us to reconsider any of our initial Comments.

Second, as a general statement we believe that many of the recommendations of the Office of Consumer Counsel have merit. To the extent that these Comments call for greater disclosure by the utilities, for more demanding burdens of proof to support claimed rate increases, and more opportunities for ratepayer participation in the approval process we endorse them.

Respectfully submitted,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

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August 5, 2008