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Chief of Docketing
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

October 27, 2009

SUBJECT: Case Numbers No. 09-580-EL-EEC; No. 09-581-EL-EEC; and No. 09-582-EL-EEC.

Dear friends:

We are enclosing Comments in the above numbered case, filed on behalf of the Citizens Coalition.

We are also faxing this. Please file it today. We are mailing by regular overnight express mail. Other parties are being served by email and/or regular mail. We have also enclosed an envelope addressed back to us. Please time-stamp one of the enclosed copies and return this to us.

Let us know of any problems.

Thank you.

Very truly yours,


JOSEPH P. MEISSNER, 0022366
ATTORNEY AT LAW

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 LSC

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Energy Efficiency and
Peak Demand Reduction Program Portfolio
of Ohio Edison Company, The Cleveland
Electric Illuminating Company, and
The Toledo Edison Company.

Case No. 09-580-EL-EEC
Case No. 09-581-EL-EEC
Case No. 09-582-EL-EEC

COMMENTS
FROM THE CITIZENS COALITION
ON THE
"LIGHT BULB PROGRAM"

The Neighborhood Environmental Coalition, The Empowerment Center of Greater Cleveland, United Clevelanders Against Poverty, Cleveland Housing Network and The Consumers for Fair Utility Rates (collectively "Citizens Coalition") hereby file the following Comments on the "Light Bulb Program" sponsored by the FirstEnergy Companies. The latter have proposed this as one method for meeting the legally-required energy efficiency goals of SB 221.

1. **PRELIMINARY COMMENT:** SB 221 has established various goals for energy efficiency. The Citizens Coalition generally supports these. Unfortunately, one particular program, which we will call “The Light Bulb Program,” has drawn considerable public comment and criticism from Ohioans. Part of this criticism, may perhaps be justified, but the Coalition very much hopes that the initial problems with this program are not turned into a weapon to destroy the overall program and undermine the whole goals of energy efficiency in Ohio. Moreover, the Citizens Coalition hold the view that residential customers, including low-income families, must be fully included in the energy efficiency programs.

2. **BACKGROUND:** It is our understanding that there are now over three million light bulbs, manufactured in China, which are being stored in several places in Ohio. These bulbs cannot be returned to China, from what we understand. The problem is what should be done with these bulbs now.

3. **NEED FOR PUBLIC INPUT:** These energy efficiency programs need substantial public support in order to succeed. This support can only be gained by seeking out and welcoming public input. It is not enough to conduct phone surveys or even focus groups, although these can be useful. What is needed are ways in which the public and the utility customers can be brought into the education, investigation, and planning stages of all programs as well as their implementation. The Citizens Coalition strong urges the PUCO, the OCC, and other groups directly

involved with Energy efficiency to reach out to the general community. This can be done through open public forums, open seminars, community groups, “energy efficiency fairs,” and other general media efforts. Unless this is done in an open and comprehensive manner, the Citizens Coalition fears that future energy efficiency efforts may be attacked just as the “Light Bulb Program” has been attacked.

4. RECOMMENDATIONS AND SUGGESTIONS FOR LIGHT BULB

DISTRIBUTION:

The most important goal in any bulb distribution program is to insure that the light bulbs are properly installed and appropriately used. Nothing would be worse than for these bulbs to be “thrown to the winds” with a hope and a prayer that they will be so employed. Rather than speed as the driving force, any program for distribution must be carried out methodically and patiently.

The following are some means for effective distribution:

- a. Bulb coupons could be supplied to all customers along with their bills. These coupons could be turned in at various centers and places of distribution. The fact that people had a coupon would prove they are a customer of an FE company. Also it might be required that any bulb recipient show their electric bill. This could then be marked in some way so that people would not return repeatedly and improperly for more bulbs. A limit of, say, up to six bulbs might be allowed per customer.

b. Neighborhood and charitable groups could be used to distribute the bulbs. Any organization seeking to be involved would file an application with the respective utility company. So many bulbs would be allocated to each group, say, up to 500 bulbs. The group would then distribute these to their members and supporters along with instructions on how to install and use the bulbs. These groups could be any charitable organization and would not have to be any kind of weatherization provider.

c. Bulbs could be distributed at various centers, say at Food Distribution Centers when bags of food are provided for the poor. Bulbs could be included for each family.

d. Various social agencies could be provided a supply for bulbs to give out for those people who come to their offices and seek their assistance. This could include the various HEAP offices.

5. **NEED FOR FUNDS FOR DISTRIBUTION:** No matter how the bulbs are distributed, including through neighborhood and charitable groups, funds will be needed to support such efforts. The Citizens Coalition would call everyone's attention to the Telephone Lifeline program which provides funds for promotion and enrolling of lifeline-eligible families. Some may object to financing such real costs, but this runs the risk that bulbs will be distributed haphazardly and wind up sitting on some closet shelf, or even worse in a trash can. The Commission might allow so much funds per bulb distributed. Any distribution should also provide

some procedure for showing that the bulbs were actually installed and used. (Cell phones with a photograph capability might be a novel way of providing proof that the bulbs were installed.)

6. **RECOVERY OF COSTS:**

a. We are not certain at this time what is the Commission's recommendation for any cost recovery by FirstEnergy. The former plan was so badly conceived that customers generally may oppose any recovery by the companies, even of the direct costs of the bulbs. It might be better for FirstEnergy itself to forego cost recovery at this time as a good-will gesture. If the PUCO decides to allow for any cost recovery, we would recommend that the PUCO not provide initially for any cost recovery, even of the bulbs themselves.

b. If any cost recovery is to be allowed, this should only be done after the "Light Bulb Program" has been completed and proven its worth.

c. The Coalition opposes any kind of recovery for alleged "lost revenues" of any kind, including distribution and generation. This idea which is akin to "decoupling" is neither understood nor welcomed by the public and the customers. People object, "You mean we conserve and then we are penalized?" This undermines efforts for energy efficiency, rather than encourages them. If companies really do have some kind of revenue problem, they can always file a rate case.

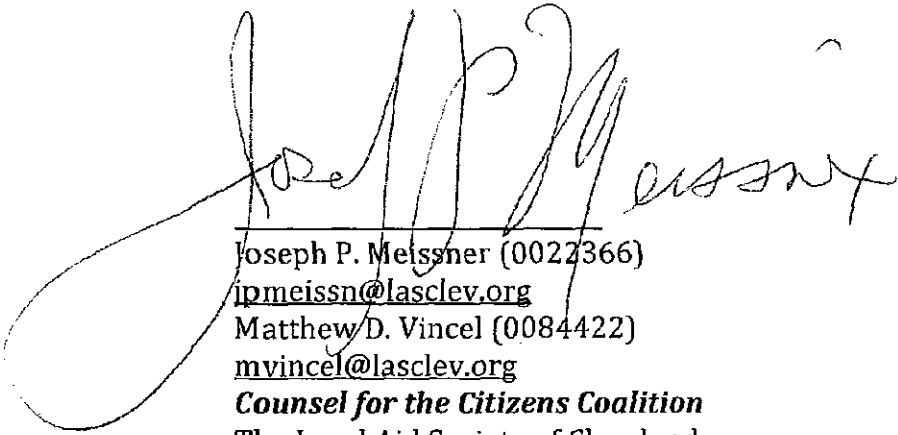
7. **ADDITIONAL RECOMMENDATIONS:**

a. The Citizens Coalition strongly recommends that the PUCO and others involved in this light bulb program reach out to the general public and the customers. This can be done, as stated above, in various ways. The goal is to insure the public is involved actively in these programs.

b. The appropriate collaborative should be involved in carrying out this program. This collaborative, however, needs to be strengthened in various ways so that it operate effectively. These include establishing an independent and objective chair for the collaborative. Roberts Rules of Order need to be followed in requiring motions and seconds for all actions and then a vote of those in favor as well as opposed. Consensus should be the general guideline, but voting should still be conducted. Crudely stated, voting and recording of votes permits later evaluations of what the collaborative did as well as who should be "shot" (figuratively) for failures. Voting would also insure that the collaborative members understand they are committing themselves to a program and thus need to be well-informed. The Citizens Coalition would point to the excellent and comprehensive DSM collaborative which Centerior established and implemented in the 1990's. This was chaired by an individual outside the company (namely this counsel) and did conduct business in an orderly manner with discussion of programs and votes for their implementation after all parties from all sides participated.

8. **CONCLUSION:** The Citizens Coalition offers the above comments on the "Light Bulb Program" and urges the PUCO to adopt these.

Respectfully submitted,



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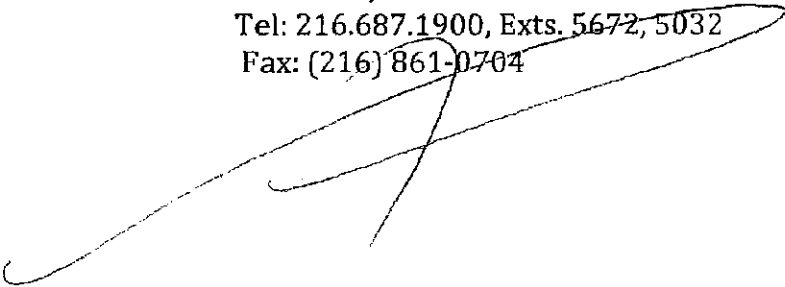
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NOTICE OF SERVICE

I hereby certify that a copy of the foregoing Motion and Memorandum were served upon the address of the parties in this PUCO proceeding listed below by ordinary first class mail, postage prepaid, on this 28th day of October 2009.

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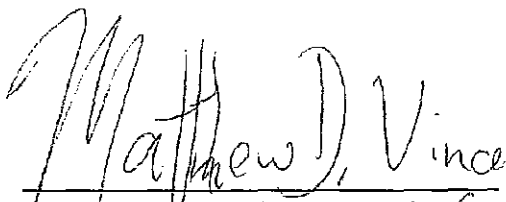
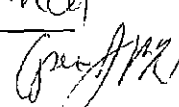
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