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CITIZEN POWER

Public Policy Research Education and Advocacy

January 20, 2010

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

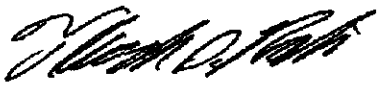
Re: Case No. 09-1820-EL-ATA, 09-1821-EL-GRD, 09-1822-EL-EEC, 09-1823-EL-AAM

Dear Docketing Division:

Enclosed please find for filing an original and (7) copies of *Reply Comments of Citizen Power, Inc.* in the above-referenced proceedings.

If you have any questions, please contact me at (412) 421-7029.

Sincerely,



Theodore S. Robinson, Esquire
Staff Attorney
Citizen Power
2121 Murray Avenue
Pittsburgh, PA 15217

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BEFORE
THE PUBUC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company For Approval of Ohio Site Deployment of the Smart Grid Modernization Initiative and Timely Recovery of Associated Costs.	))))))	Case No. 09-1820-EL-ATA Case No. 09-1821-EL-GRD Case No. 09-1822-EL-EEC Case No. 09-1823-EL-AAM

REPLY COMMENTS OF CITIZEN POWER, INC.

Citizen Power now files these Reply Comments pursuant to the schedule set out in the December 30, 2009 Entry in response to the Comments of the Staff of the Public Utilities Commission of Ohio ("Staff"), the Ohio Partners for Affordable Energy ("OPAE"), the Ohio Consumers' Council ("OCC"), Kroger Co. ("Kroger"), and the Industrial Energy Users-Ohio ("IEU-Ohio").

Citizen Power believes that the concerns regarding the costs of this pilot project as expressed by the Staff, OPAE, and the OCC are reasonable because of the relatively high per meter costs and the lack of significant detail in the Application regarding those costs. We agree with the OCC that the Commission should set this matter for hearing in order to determine the prudence of the costs related to the pilot project. In addition, we support OPAE's assertion that an accurate cost benefit analysis, based on metrics determined by developed in conjunction with interested parties, is necessary for the "Go/No Go Decision" on the deployment of an additional 39,000 meters. It should be required that the pilot program both provides valuable information regarding smart-grid

technology integration into the existing system and also demonstrates net benefits to customers before it is expanded beyond the original 5,000 meters.

Kroger, IEU-Ohio, and the Staff suggested that smart grid costs should be allocated between customer classes based upon their current proportional responsibility for base distribution revenues. Citizen Power disagrees with this approach because this pilot program is being used to develop information, both related to infrastructure and cost/benefits, which is hoped to be useful for possible future smart grid projects. The anticipated advantages of these projects would be lower overall electricity demand and lower peak demand; which should have a greater benefit to customers who use greater amounts of electricity. Therefore, it is appropriate to allocate the AMI costs on a Kwh basis.

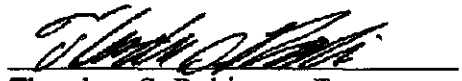
Respectfully Submitted,



Theodore S. Robinson, Esquire
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Reply Comments of Citizen Power, Inc.* was served electronically or by regular U.S. Mail upon the parties of record identified below in these cases on this 20th day of January, 2010.



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