

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Edison)
Company, The Cleveland Electric Illuminating) Case Nos. 09-1947-EL-POR
Company and The Toledo Edison Company) 09-1948-EL-POR
For Approval of Their Energy Efficiency and Peak) 09-1949-EL-POR
Demand Reduction Program Portfolio Plans for)
2010 and Associated Cost Recovery Mechanisms)

In the Matter of the Application of Ohio Edison) Case Nos. 09-1942-EL-EEC
Company, The Cleveland Electric Illuminating) 09-1943-EL-EEC
Company and The Toledo Edison Company for) 09-1944-EL-EEC
Approval of Their Initial Benchmark Reports.)

In the Matter of the Energy Efficiency and Peak)
Demand Reduction Program Portfolio of Ohio) Case Nos. 09-580-EL-EEC
Edison Company, The Cleveland Electric) 09-581-EL-EEC
Illuminating Company, and The Toledo Edison) 09-582-EL-EEC
Company.)

COMMENTS AND OBJECTIONS
OF INDUSTRIAL ENERGY USERS-OHIO

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**BEFORE
THE PUBLIC 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 Their Energy Efficiency and Peak Demand Reduction Program Portfolio Plans for 2010 and Associated Cost Recovery Mechanisms))	Case Nos. 09-1947-EL-POR
)	09-1948-EL-POR
)	09-1949-EL-POR

In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Approval of Their Initial Benchmark Reports.)	Case Nos. 09-1942-EL-EEC
)	09-1943-EL-EEC
)	09-1944-EL-EEC

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 Nos. 09-580-EL-EEC
)	09-581-EL-EEC
)	09-582-EL-EEC

COMMENTS AND OBJECTIONS
OF INDUSTRIAL ENERGY USERS-OHIO

On December 15, 2009, Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, "FirstEnergy") filed in the above-captioned cases an Application for approval of their respective initial three-year energy efficiency and peak demand reduction program portfolios as well as for approval of their respective initial benchmark compliance reports. Industrial Energy Users-Ohio ("IEU-Ohio") respectfully submits these Comments and Objections for the consideration of the Public Utilities Commission of Ohio ("Commission").

1. IEU-Ohio supports FirstEnergy's proposal to utilize the full year rather than prorated energy savings for projects completed during a calendar year.

FirstEnergy requested that the Commission allow it to use full year rather than partial year savings in the year in which a program is launched. FirstEnergy has projected that if the full year methodology is permitted, it could save customers over \$50 million over the three year plan. For the reasons identified by FirstEnergy in its testimony and filing, including implementing least cost compliance methodologies, IEU-Ohio supports FirstEnergy's proposal to utilize the full year rather than prorated energy savings for projects completed during a calendar year.

2. The portfolio plan description for mercantile customer self directed programs should address commitments for kilowatt ("kW") savings as well as kilowatt hour ("kWh") savings and should be measured across all energy forms.

As drafted, FirstEnergy's portfolio plan description for mercantile customer self directed programs seems to only contemplate that customers will make commitments associated with kWh savings. The program needs to address commitments for kW savings as well, including the process for committing power factor improvement projects.

Respectfully submitted,

/s/ Lisa G. McAlister

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Comments and Objections of Industrial Energy Users-Ohio* was served upon the following parties of record this 16th day of February 2010, via first class mail, postage prepaid.

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Summary: Comments and Objections of Industrial Energy Users-Ohio electronically filed by Mrs. Lisa G. McAlister on behalf of Industrial Energy Users-Ohio