

**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
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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
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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
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COMMENTS AND OBJECTIONS  
OF INDUSTRIAL ENERGY USERS-OHIO

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Samuel C. Randazzo (Counsel of Record)  
Lisa G. McAlister  
Joseph M. Clark  
MCNEES WALLACE & NURICK LLC  
21 East State Street, 17<sup>TH</sup> Floor  
Columbus, OH 43215  
Telephone: (614) 469-8000  
Telecopier: (614) 469-4653  
sam@mwncmh.com  
lmcAlister@mwncmh.com  
jclark@mwncmh.com

**February 16, 2010**

**Attorneys for Industrial Energy Users-Ohio**

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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

Samuel C. Randazzo (Counsel of Record)

Lisa G. McAlister

Joseph M. Clark

McNEES WALLACE & NURICK LLC

Fifth Third Center

21 East State Street, 17<sup>th</sup> Floor

Columbus, OH 43215-4228

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

sam@mwncmh.com

lmcAlister@mwncmh.com

jclark@mwncmh.com

**Attorneys for Industrial Energy Users-Ohio**

## 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 16<sup>th</sup> day of February 2010, via first class mail, postage prepaid.

/s/ Lisa G. McAlister

Lisa G. McAlister

Kathy J. Kolich  
Arthur Korkosz  
Ebony Miller  
FirstEnergy Service Company  
76 S. Main Street  
Akron, OH 44308  
kjkolich@firstenergycorp.com  
korkosza@firstenergycorp.com  
elmiller@firstenergycorp.com

James F. Lang  
Laura McBride  
N. Trevor Alexander  
Kevin P. Shannon  
Calfee, Halter & Griswold  
1400 KeyBank Center  
800 Superior Ave.  
Cleveland, OH 44114  
jlang@calfee.com  
lmcbride@calfee.com  
tallexander@calfee.com  
kshannon@calfee.com

**ON BEHALF OF OHIO EDISON COMPANY,  
THE CLEVELAND ELECTRIC ILLUMINATING  
COMPANY, AND THE TOLEDO EDISON  
COMPANY**

Janine Migden-Ostrander  
Ohio Consumers' Counsel  
Gregory J. Poulos  
Christopher J. Allwein  
Jeffrey L. Small  
Richard Reese  
Assistant Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus, OH 43215-3485  
small@occ.state.oh.us  
poulos@occ.state.oh.us  
allwein@occ.state.oh.us  
reese@occ.state.oh.us

**ON BEHALF OF THE OFFICE OF THE OHIO  
CONSUMERS' COUNSEL**

David C. Rinebolt  
Colleen L. Mooney  
Ohio Partners for Affordable Energy  
231 West Lima Street  
Findlay, OH 45839-1793  
cmooney2@columbus.rr.com  
drinebolt@ohiopartners.org

**ON BEHALF OF OHIO PARTNERS FOR  
AFFORDABLE ENERGY**

Will Reisinger  
Trent Dougherty  
Nolan Moser  
1207 Grandview Avenue, Suite 201  
Columbus, OH 43212-3449  
will@theOEC.org  
trent@theOEC.org  
nolan@theOEC.org

**ON BEHALF OF OHIO ENVIRONMENTAL  
COUNCIL**

Michael Heintz  
1207 Grandview Avenue, Suite 201  
Columbus, OH 43215  
mheintz@elpc.org

**ON BEHALF OF ENVIRONMENTAL LAW AND  
POLICY CENTER**

Todd Jones  
Christopher Miller  
Andre Porter  
Gregory Dunn  
Schottenstein Zox & Dunn Co., LPA  
250 West Street  
Columbus, OH 43215  
tjones@szd.com  
cmiller@szd.com  
aporter@szd.com  
gdunn@szd.com

**ON BEHALF OF AICUO**

David F. Boehm  
Michael L. Kurtz, Esq.  
Boehm, Kurtz & Lowry  
36 East Seventh St., Ste. 1510  
Cincinnati, OH 45202  
dboehm@BKLawfirm.com  
mkurtz@BKLawfirm.com

**ON BEHALF OF OHIO ENERGY GROUP**

Joseph P. Meissner  
Matthew D. Vincel  
The Legal Aid Society of Cleveland  
1223 West 6<sup>th</sup> St.  
Cleveland, OH 44113  
jpmessin@lasclev.org  
mvincel@lasclev.org

**ON BEHALF OF THE NEIGHBORHOOD  
ENVIRONMENTAL COALITION, CONSUMERS  
FOR FAIR UTILITY RATES, THE  
EMPOWERMENT CENTER OF GREATER  
CLEVELAND AND CLEVELAND HOUSING  
NETWORK**

Theodore Robinson  
Staff Attorney and Counsel  
Citizen Power  
2121 Murray Ave.  
Pittsburgh, PA 15217  
robinson@citizenpower.com

**ON BEHALF OF CITIZEN POWER**

Thomas J. O'Brien  
Bricker & Eckler LLP  
100 South Third Street  
Columbus, OH 43215  
tobrien@bricker.com

**ON BEHALF OF THE OHIO  
MANUFACTURERS' ASSOCIATION AND THE  
OHIO HOSPITAL ASSOCIATION**

Henry W. Eckhart  
50 West Broad Street, #2117  
Columbus, OH 43215  
henryeckhart@aol.com

**ON BEHALF OF THE NATURAL RESOURCES  
DEFENSE COUNSEL**

Richard Sites  
Ohio Hospital Assoc.  
155 East Broad Street, 15<sup>th</sup> Floor  
Columbus, OH 43215  
ricks@ohanet.org

**ON BEHALF OF THE OHIO HOSPITAL  
ASSOCIATION**

Jacqueline Lake Roberts  
101 Federal Street, Suite 1100  
Boston, MA 02110  
jroberts@enernoc.com

**ON BEHALF OF ENERNOC, INC.**

Matthew W. Warnock  
Bricker & Eckler LLP  
100 South Third Street  
Columbus, OH 43215  
mwarnock@bricker.com

Glenn S. Krassen  
Bricker & Eckler  
1375 East Ninth St, Suite 1500  
Cleveland, OH 44114  
Gkrassen@bricker.com

**ON BEHALF OF OHIO SCHOOLS COUNCIL**

Robert J. Triozzi  
Steven L. Beeler  
City of Cleveland  
Cleveland City Hall  
601 Lakeside Avenue, Room 106  
Cleveland, OH 44114  
rtriozzi@city.cleveland.oh.us  
sbeeler@city.cleveland.oh.us

**ON BEHALF OF THE CITY OF CLEVELAND**

John W. Bentine  
Mark S. Yurick  
Chester, Willcox & Saxbe LLP  
65 East State Street, Suite 1000  
Columbus, OH 43215  
jbentine@cwslaw.com  
myurick@cwslaw.com

Garrett A. Stone  
Michael K. Lavanga  
Brickfield, Burchette, Ritts & Stone,  
1025 Thomas Jefferson Street, NW  
8th Floor, West Tower  
Washington, DC 2007  
gas@bbrslaw.com  
mkl@bbrslaw.com

**ON BEHALF OF NUCOR STEEL MARION,  
INC.**

Duane Luckey  
Thomas Lindgren  
Attorney General's Office  
180 East State Street, 6<sup>th</sup> Fl.  
Columbus, OH 43216  
Duane.luckey@puc.state.oh.us  
Thomas.lindgren@puc.state.oh.us

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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