## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	)			
Republic Engineered Products Inc. and	)			
Ohio Edison Company for Approval of a	)	Case No.	09-1212-EL-EE	7
Special Arrangement Agreement with a	)			
Mercantile Customer.	)			

#### MOTION TO AMEND JOINT APPLICATION

Pursuant to O.A.C. 4901-1-06, The Ohio Edison Company ("Ohio Edison") moves to amend its Joint Application ("Application") with Republic Engineered Products, Inc. ("Republic") by filing the attached revised Exhibit 2 to the Application. As demonstrated in its Memorandum in Support, which is attached hereto and incorporated herein, Ohio Edison wishes to amend the Application and Exhibit 2 to request commitment payments and cash rebates for Republic's five energy efficiency projects rather than an exemption from payment of the electric utility's energy efficiency/peak demand reduction rider.

Respectfully submitted,

/s/ Lindsey Sacher

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ATTORNEYS FOR OHIO EDISON COMPANY

# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	)			
Republic Engineered Products Inc. and	)			
Ohio Edison Company for Approval of a	)	Case No.	09-1212-EL-EE	$\mathbb{C}$
Special Arrangement Agreement with a	)			
Mercantile Customer.	)			

#### MEMORANDUM IN SUPPORT OF MOTION TO AMEND JOINT APPLICATION

On November 25, 2009, Ohio Edison Company ("Ohio Edison") and Republic Engineered Products, Inc. ("Republic") (collectively the "Applicants") filed an application for approval of a special arrangement agreement ("Application") in the above-referenced matter. On March 29, 2010, the Applicants amended the Application. The Application requested an exemption from payment of the electric utility's energy efficiency/peak demand reduction rider for five projects implemented by Republic.

The Applicants have recently learned that that three of Republic's five projects do not qualify for an incentive. Accordingly, Ohio Edison files the instant Motion seeking to amend the Application by requesting a commitment payment for the three projects that do not qualify for an incentive, and a cash rebate for the remaining two projects instead of an exemption from payment of the energy efficiency/peak demand reduction rider.

O.A.C. 4901-1-06 states that "the commission ... may ... upon motion of any party for good cause shown, authorize the amendment of any application, complaint, long-term forecast report, or other pleading filed with the commission."

Good cause exists for the Commission to authorize amendment of the Application. The amendment is necessary to allow the Applicants to receive credit for the implementation of the five energy efficiency projects implemented by Republic, and to achieve the goals of the Commission's Pilot Program.

For the reasons stated above, good cause exists for the Commission to allow Ohio Edison to file an amended version of the Application, which makes the following change:

- Requesting a commitment payment for the three projects that do not qualify for an incentive instead of an exemption from payment of the energy efficiency/peak demand reduction rider, and
- Requesting a cash rebate for the remaining two projects instead of an exemption from payment of the energy efficiency/peak demand reduction rider.

### Respectfully submitted,

#### /s/ Lindsey Sacher

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ATTORNEYS FOR TOLEDO EDISON COMPANY

{01353800.DOC;1 }

#### Exhibit 2

Revised January 4, 2012

Customer Legal Entity Name: REPUBLIC ENG PROD INC

2009 2008

2007

Average

Site Address: 1807 E 28TH ST LORAIN ,OH
Principal Address: 2633 EIGHTH ST NE CANTON ,OH

280,783,162

515,894,195

Unadjusted Usage, kwh (A) Weather Adjusted Usage, kwh (B) Weather Adjusted Usage, kwh (B) Weather Adjusted With Energy Efficiency Addbacks, kwh (c) Note 1

646,826,400 646,826,400
620,073,024 620,073,024 625,564,788

280,783,162

515,894,195

Project Number	Project Name	In-Service Date	Project Cost \$	50% of Project Cost \$	KWh Saved/Year (D) counting towards utility compliance	KWh Saved/Year (E) eligible for incentive	Utility Peak Demand Reduction Contribution, KW (F)	Prescriptive Rebate Amount (G) \$	Eligible Rebate Amount (H) \$ Note 2	Commitment Payment \$
1	Remove 2-800 HP 700 VDC Mill Stands	08/01/2007	\$3,072	\$1,536	3,759,289		518			\$1,536
2	Replace fully functional 2,000 hp Synchronus motor with new 4021 hp Induction motor & Solid State drive	10/01/2007	\$5,500,000	\$2,750,000	433,400	433,400		\$34,672	\$26,004	
3	Remove 11,000 KVA redundant Power Distribution Xfmr	02/01/2006	\$384	\$192	472,164	-	54			\$192
4	Removal of mobile office trailers to comply with customer ISO standards and customer quality mandates	06/01/2006	\$5,760	\$2,880	812,655	-	185			\$2,880
5	Replace 25 hp air compressor with Curtis 20 hp air compressor	07/01/2006	\$8,913	\$4,456	14,256	14,256	7	\$1,140	\$855	
					-	-	-			
					-	-	-			
		Total	\$5,518,129		5,491,764	447,656	764	\$35,812	\$26,859	\$4,608

283,767,289

520,550,080

**Docket No.** 09-1212 **Site:** 0

Notes

(2) The eligible rebate amount is based upon 75% of the rebates offered by the FirstEnergy Commercial and Industrial Energy Efficiency programs or 75% of \$0.08/kWh for custom programs for all energy savings eligible for a cash rebate as defined in the PUCO order in Case NO.10-834-EL-EEC dated 9/15/2010, not to exceed the lesser of 50% of the project cost or \$250,000 per project. The rebate also cannot exceed \$500,000 per customer per year, per utility service territory.

<sup>(1)</sup> Customer's usage is adjusted to account for the effects of the energy efficiency programs included in this application. When applicable, such adjustments are prorated to the in-service date to account for partial year savings.

This foregoing document was electronically filed with the Public Utilities

**Commission of Ohio Docketing Information System on** 

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in

Case No(s). 09-1212-EL-EEC

Summary: Motion to Amend Joint Application of Ohio Edison Company, Republic Engineered Products, Inc. - with Memorandum in Support electronically filed by Ms. Jennifer M. Sybyl on behalf of Ohio Edison Company and Republic Engineered Products, Inc.