

**In the Matter of the Joint  
Applications for Integration of  
Mercantile Customer Energy  
Efficiency or Peak-Demand Reduction  
Programs between Toledo Edison and**

**Toledo Public Schools (Case No. 11-3948-EL-EEC)  
Toledo Public Schools (Case No. 11-3950-EL-EEC)  
Toledo Public Schools (Case No. 11-3951-EL-EEC)  
Toledo Public Schools (Case No. 11-3952-EL-EEC)  
Toledo Public Schools (Case No. 11-3954-EL-EEC)  
Toledo Public Schools (Case No. 11-3955-EL-EEC)  
Toledo Public Schools (Case No. 11-3956-EL-EEC)  
Toledo Public Schools (Case No. 11-3957-EL-EEC)  
Toledo Public Schools (Case No. 11-3958-EL-EEC)  
Toledo Public Schools (Case No. 11-3959-EL-EEC)**

Rule 4901:1-39-05(F), Ohio Administrative Code (O.A.C.), permits a mercantile customer to file, either individually or jointly with an electric utility, an application to commit the customer's existing demand reduction, demand response, and energy efficiency programs for integration with the electric utility's programs. In the above captioned case, Toledo Public Schools and Toledo Edison filed joint applications in accordance with the mercantile application pilot program found in Commission Order 10-834-EL-EEC. These applications all involve lighting efficiency improvements associated with the construction of new school buildings to replace previously existing school buildings.

On August 23, 2011, the automatic approval process was suspended for these cases, pursuant to Commission entry, to allow Staff time to obtain additional information and conduct further review of the filings.

Based on its further review, Staff found that the electricity baseline for these applications was calculated incorrectly. The baselines and energy savings filed by the applicants compared the energy usage of the old schools that were razed to the energy usage of the newly constructed schools. For such newly constructed facilities, the correct comparison would be between the facility that was actually constructed and the potential facility that could have been constructed that would have just met code requirements. Based upon these findings, Staff recommends denial of these applications.

Filed by: Robert Wolfe  
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**Case No(s). 11-3948-EL-EEC, 11-3950-EL-EEC, 11-3951-EL-EEC, 11-3952-EL-EEC, 11-3954-EL-EEC,**

Summary: Staff Review and Recommendation electronically filed by Mr. Robert Wolfe on behalf of PUCO Staff