

**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)	Case Nos. 12-2190-EL-POR
Edison Company For Approval of Their)	12-2191-EL-POR
Energy Efficiency and Peak Demand)	12-2192-EL-POR
Reduction Program Portfolio Plans for 2013)	
through 2015)	
)	

DIRECT TESTIMONY OF

BRADLEY D. EBERTS

ON BEHALF OF

OHIO EDISON COMPANY
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
THE TOLEDO EDISON COMPANY

1 **Q: PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.**

2 **A:** My name is Bradley (“Brad”) D. Eberts and my business address is FirstEnergy
3 Corp. (“FirstEnergy”), 76 South Main Street, Akron, Ohio 44308. I am the
4 Manager of Load Forecasting for FirstEnergy Service Company.

5 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING TODAY?**

6 **A:** I am testifying on behalf of Ohio Edison Company (“Ohio Edison”), The
7 Cleveland Electric Illuminating Company (“CEI”), and The Toledo Edison
8 Company (“Toledo Edison”) (the “Companies”). Unless otherwise stated, my
9 testimony applies equally to all three Companies.

10 **Q: WHAT IS YOUR PROFESSIONAL AND EDUCATIONAL**
11 **BACKGROUND?**

12 **A:** I graduated from the University Of Akron with a Bachelor of Engineering and I
13 am a registered professional engineer in the State of Ohio. I joined Ohio Edison
14 in June 1980 in its Rate Department. For the first 15 years of my career, I was
15 responsible for various aspects of rate design, cost of service, load research, rate
16 case support, electric fuel component, and forecasting. In approximately 1996, I
17 transferred to FirstEnergy Corp.’s (“FirstEnergy”) unregulated affiliate,
18 FirstEnergy Solutions Corp. I became a manager of the newly formed back office
19 for retail pricing. In approximately 1998, I became a manager of The E Group, a
20 newly formed consulting affiliate of FirstEnergy. I supervised its consultants who
21 helped commercial and industrial customers manage their energy. In March
22 2004, I assumed my current position as the Manager of Load Forecasting in the
23 Rates and Regulatory Affairs Department of FirstEnergy Service Company.

1 **Q: PLEASE DESCRIBE YOUR RESPONSIBILITIES AS MANAGER OF**
2 **LOAD FORECASTING FOR THE RATES AND REGULATORY**
3 **AFFAIRS DEPARTMENT.**

4 **A:** I supervise a group which is responsible for all retail load and revenue forecasting
5 for the Companies. This entails, among other things, preparing the Companies'
6 distribution and generation load forecasts in both the short and long term. This
7 group is also responsible for the long-term forecast report required by the Public
8 Utilities Commission of Ohio ("Commission"), and for projecting the revenues
9 associated with those forecasts for internal planning and reporting purposes. In
10 addition, my group is responsible for load research, data management, and cost
11 allocation factors.

12 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
13 **PROCEEDING?**

14 **A:** The purpose of my testimony is to describe the Companies' methodology for
15 calculating their respective baselines and associated benchmarks for the energy
16 efficiency requirements set forth in Section 4928.66(A)(1)(a), Revised Code
17 ("Energy Efficiency Baseline"), and for the peak demand reduction benchmarks
18 set forth in Section 4928.66(A)(1)(b), Revised Code ("Peak Reduction Baseline").
19 I will also describe the methodology for allocating the forecasted usage into plan
20 sectors for the purpose of preparing the three year energy efficiency and peak
21 demand reduction ("EE&PDR") plans that are the subject of this filing
22 ("Proposed Plans").
23

1 **Q: ARE YOU SUPPORTING ANY EXHIBITS?**

2 **A:** Yes, Exhibit BDE-1, which details the calculation of the Energy Efficiency
3 Baseline and Benchmarks for each Company; Exhibit BDE-2, which is an
4 example of the steps taken to weather adjust certain information; and Exhibit
5 BDE-3, which details the calculation of Peak Reduction Baselines and
6 Benchmarks for each Company.

7 **Q: WERE THESE EXHIBITS PREPARED BY YOU OR UNDER YOUR**
8 **DIRECT SUPERVISION?**

9 **A:** Yes, they were.

10 **ENERGY EFFICIENCY BASELINE**

11 **Q: WHAT GUIDELINES DID THE COMPANIES USE IN CALCULATING**
12 **THE ENERGY EFFICIENCY BASELINE?**

13 **A:** Pursuant to Section 4928.66(A)(2)(a), Revised Code the baseline for energy
14 savings “shall be the average of the total kilowatt hours the electric distribution
15 utility sold in the preceding three calendar years. . .” Additional guidance is
16 provided in Rule 4901:1-39-01(J), Ohio Administrative Code developed by the
17 Commission in Docket No. 08-888-EL-ORD (“Rules”), which states that the
18 Energy Efficiency Baseline means “the average total kilowatt-hours [“kWh”] of
19 distribution service sold to retail customers [of the Companies’] in the preceding
20 three calendar years as reported in the [Companies’] most recent long-term
21 forecast report [“LTFR”] The total kilowatt-hours sold shall equal the total
22 kilowatt-hours delivered by the [Companies].”

1 Section 4928.66(A)(2), Revised Code specifically allows the Energy Efficiency
2 Baseline to be adjusted or normalized for several reasons, including new
3 economic growth, numbers of customers, sales, weather, peak demand, and other
4 appropriate factors. Rule 4901:1-39-05(B), Ohio Administrative Code also
5 allows an electric utility to file an application to adjust its baseline for a variety of
6 factors that are outside its control. This Rule further provides that to the extent
7 any adjustments are approved by the Commission, any “normalizations for
8 weather, changes in numbers of customers, sales, and peak demand shall be
9 consistently applied from year to year.”

10 **Q: PLEASE DESCRIBE HOW THE COMPANIES’ ENERGY EFFICIENCY**
11 **BASELINES WERE CALCULATED.**

12 **A:** Each Company calculated an Energy Efficiency Baseline as shown in detail in
13 attached Exhibit BDE-1. In pertinent part, the past “distribution service sold” by
14 each Company matches the usage reported by each Company in the 2012 Electric
15 Long-Term Forecast Report (“2012 LTFR”) LTFR PUCO FORM FE-D1,
16 columns (1) through (5a) by individual utility (See Appendix D Distribution
17 Forecast Form Case No. 12-504-EL-FOR pages 171-173). These amounts do not
18 include line losses and Company use, which is consistent with Rule 4901:1-39-
19 01(J), Ohio Administrative Code. The values for “distribution service sold” have
20 been normalized for weather consistent with both Section 4928.66(A)(2)(c),
21 Revised Code and Rule 4901:1-39-05(B), Ohio Administrative Code. The only
22 other adjustment the Companies made to the Energy Efficiency Baselines is to
23 add back the savings in the baseline years associated with mercantile customer

1 self directed projects that have been filed with the Commission prior to April 24,
2 2012, for approval by the Commission for commitment to the Companies,
3 consistent with Section 4928.66(A)(2)(c), Revised Code.

4 **Q: DO THE COMPANIES' ENERGY EFFICIENCY BASELINES FOR THE**
5 **YEARS 2013-2015 INCLUDE FORECASTED USAGE?**

6 **A:** Yes. As actual usage for 2012-2014 has not yet been determined, calculation of
7 the Energy Efficiency Baseline for 2013-2015 includes forecasted usage, as
8 reported on the 2012 LTFR PUCO FORM FE-D1.

9 **Q: SINCE THE COMPANIES' ENERGY EFFICIENCY BASELINES**
10 **INCLUDE FORECASTED USAGE, COULD THERE BE CHANGES**
11 **BETWEEN THE BASELINE PROVIDED FOR PLANNING PURPOSES**
12 **(“ENERGY EFFICIENCY PLANNING BASELINE”) AND THE**
13 **BASELINE USED FOR COMPLIANCE PURPOSES (“ENERGY**
14 **EFFICIENCY COMPLIANCE BASELINE”)?**

15 **A:** Yes. This result is unavoidable, because the Energy Efficiency Compliance
16 Baseline will be based on actual usage data from the preceding three years rather
17 than on forecasted usage. The Energy Efficiency Compliance Baseline will be
18 more or less than the Energy Efficiency Planning Baseline, and the associated
19 benchmarks will be adjusted accordingly. In addition, actual realized savings
20 from mercantile self directed programs could vary from the forecast. Actual
21 realized mercantile self directed program savings will be added back once the
22 actual realized savings are determined, and will be documented in the Companies'
23 compliance filings.

1 To accommodate the anticipated differences between actual and forecasted
2 usage, as part of future filings of the Companies' Portfolio Status Report required
3 by Rule 4901:1-39-05, Ohio Administrative Code the Companies' Energy
4 Efficiency Planning Baselines will be updated on an annual basis to reflect the
5 actual usage which occurred in the baseline years, and for new forecasts of the
6 baseline years. Also as part of this same report, the Companies anticipate making
7 a compliance demonstration pursuant to Rule 4901:1-39-05(C), Ohio
8 Administrative Code. Absent a significant unforeseen event, the Energy
9 Efficiency Compliance Baseline will include the actual distribution service sold
10 by each Company, as normalized only for weather and the effects of actual
11 realized savings associated with mercantile customer self directed projects.

12 **Q: HOW WAS ACTUAL USAGE ADJUSTED TO NORMALIZE FOR**
13 **WEATHER?**

14 **A:** Actual kWh usage for residential and some small commercial customers is driven
15 by the heating and cooling degree days ("HDD/CDD") associated with the day-to-
16 day weather. To eliminate the effect of weather on the kWh usage in the actual
17 baseline years, the Companies calculate the change in the kWh usage compared to
18 the difference between normal HDD/CDD, and actual HDD/CDD through a
19 regression analysis. To determine HDD/CDD, the Companies rely on monthly
20 rolling 20-year averages. Exhibit BDE-2 illustrates the steps for weather
21 adjusting actual sales. The resulting kWh adjustments can be positive or negative
22 depending on whether the actual weather was warmer or colder than normal. In
23 this example, the actual CDDs were above the normal CDDs, so the adjustment is

1 subtracted from actual sales to arrive at weather adjusted sales to reflect the fact
2 that actual sales would have been lower had the CDDs been normal. The forecast
3 models assume normal weather; therefore, no additional adjustment for weather is
4 made to the forecasted baseline years.

5 **Q: WHAT ADJUSTMENTS HAVE THE COMPANIES MADE TO THE**
6 **ACTUAL USAGE AS REPORTED IN THE 2012 LTFR PUCO FORM FE-**
7 **D1?**

8 **A:** There have been no adjustments other than those for the weather and the effects of
9 the mercantile customer projects that have already been discussed.

10 **Q: DO THE COMPANIES ANTICIPATE FOLLOWING THIS SAME**
11 **METHODOLOGY IN FUTURE YEARS?**

12 **A:** Yes. Unless otherwise directed by the Commission, and absent a significant
13 unforeseen event, the Companies intend to follow this same methodology for the
14 Planning and Compliance Energy Efficiency Baselines in future years.

15 **Q: ARE YOU PERSONALLY FAMILIAR WITH THE ADJUSTED**
16 **AVERAGE “DISTRIBUTION SERVICE SOLD” BY THE COMPANIES**
17 **FOR THE CALENDAR YEARS 2010-2015, AS DEFINED IN SECTION**
18 **4928.66(A)(2) REVISED CODE AND RULE 4901:1-39-01 *et seq.* OHIO**
19 **ADMINISTRATIVE CODE?**

20 **A:** Yes. The Companies’ adjusted average “distribution service sold” for calendar
21 years 2010-2015 are reflected in the attached Exhibit BDE-1.

22
23
24
25
26

PEAK REDUCTION BASELINE

Q: WHAT GUIDELINES DID THE COMPANIES USE IN CALCULATING THE PEAK REDUCTION BASELINE?

A: Pursuant to Section 4928.66(A)(2)(a), Revised Code the Peak Reduction Baseline shall be “the average peak demand on the utility in the preceding three calendar years....” Rule 4901:1:39:01(S), Oho Administrative Code provides further guidance, and states that the peak demand baseline is “the average peak demand on the electric utility’s system in the preceding three calendar years as reported in the electric utility’s most recent long term forecast report....”

The Peak Reduction Baselines have been adjusted for peak demand reductions associated with mercantile self directed projects that have been filed for approval with the Commission before April 24, 2012. The peak demand reduction capability which is available to the Companies for compliance purposes is imbedded in the peak demand reported in the LTFR, therefore no adjustment is needed.

Q: PLEASE DESCRIBE HOW THE COMPANIES’ PEAK REDUCTION BASELINES WERE CALCULATED.

A: The Companies have calculated the Peak Demand Baselines for each Company, as shown in detail in the attached Exhibit BDE-3. In pertinent part, the Companies have reported peak demand as reported in the 2012 LTFR PUCO FORM FE-D3.

1 **Q: DO THE COMPANIES' PEAK DEMAND BASELINES INCLUDE**
2 **DISTRIBUTION AND TRANSMISSION LOSSES?**

3 **A:** The Companies have calculated the Peak Reduction Baselines as a retail system
4 peak that includes both distribution and transmission losses. This is the
5 methodology used to calculate peak demand on the utility's system that currently
6 is reported on the 2012 LTFR PUCO FORM FE-D3.

7 **Q: DO THE COMPANIES' PEAK REDUCTION BASELINES FACE THE**
8 **SAME ISSUES RELATING TO FORECASTING AND ANTICIPATED**
9 **DEMAND REDUCTIONS IN THE MERCANTILE SELF DIRECTED**
10 **PROGRAM AS THE COMPANIES' ENERGY EFFICIENCY**
11 **BASELINES?**

12 **A:** Yes. The Companies' Peak Reduction Baselines will have to be adjusted in the
13 same manner to account for differences between forecasted peaks and actual
14 peaks and anticipated versus actual demand reductions in the mercantile self
15 directed program.

16 **Q: HAVE THE COMPANIES' PEAK REDUCTION BASELINES BEEN**
17 **ADJUSTED FOR ANY OF THE FACTORS IN SECTION 4928.66(A)(2)(c),**
18 **REVISED CODE?**

19 **A:** Yes. The Peak Reduction Baselines have been adjusted for the mercantile
20 program effects discussed above. In addition, the forecasted peak demands will
21 reflect the normal weather that is imbedded in the forecasted usage described
22 above. The peaks in the actual baseline years were not weather adjusted at this
23 time because sufficient data is not available. Weather adjusting the peaks in the

1 actual baseline years would require at least twenty years of daily peak and at least
2 twenty years of the daily temperature humidity index. However, daily peaks are
3 only available since 2002, and any calculation using only ten years of history
4 would not be reliable.

5 **Q: DO THE COMPANIES ANTICIPATE FOLLOWING THIS SAME**
6 **METHODOLOGY IN FUTURE YEARS?**

7 **A:** Yes. Unless otherwise directed by the Commission, and absent a significant
8 unforeseen event, the Companies intend to follow this same methodology for the
9 Peak Reduction Baselines in future years.

10 **Q: ARE YOU PERSONALLY FAMILIAR WITH THE AVERAGE PEAK**
11 **DEMAND FOR THE CALENDAR YEARS 2010-2011, AS DEFINED IN**
12 **SECTION 4928.66(A)(1)(b) REVISED CODE AND RULE 4901:1-39-01(S)**
13 **OHIO ADMINISTRATIVE CODE?**

14 **A:** Yes. The Companies' average peak demand for the calendar years 2010-2011 is
15 reflected in the attached Exhibit BDE-3.

16 **Q: ARE YOU PERSONALLY FAMILIAR WITH THE FORECASTED**
17 **AVERAGE PEAK DEMAND FOR THE COMPANIES FOR THE**
18 **CALENDAR YEARS 2012-2015 AS DEFINED IN REVISED CODE**
19 **SECTION 4928.66(A)(1)(b) AND RULE 4901:1-39-01(S) OHIO**
20 **ADMINISTRATIVE CODE?**

21 **A:** Yes. The Companies' average peak demand for the calendar years 2012-2015 is
22 reflected in the attached Exhibit BDE-3.

1 **Q: WERE THE CALCULATIONS CONTAINED IN EXHIBITS BDE-1 AND**
2 **BDE-3 TO THIS TESTIMONY CONDUCTED IN ACCORDANCE WITH**
3 **SECTION 4928.66, REVISED CODE AND THE RULES ADOPTED BY**
4 **THE COMMISSION IN CASE NO. 08-888-EL-ORD?**

5 **A: In my opinion, yes they were.**

6 **ENERGY EFFICIENCY AND PEAK DEMAND REDUCTION BENCHMARKS**

7 **Q: DID YOU CALCULATE THE APPLICABLE BENCHMARKS USING**
8 **THE BASELINES DESCRIBED ABOVE?**

9 **A: Yes.**

10 **Q: WHAT GUIDELINE DID YOU USE TO CALCULATE THE**
11 **BENCHMARKS?**

12 **A: Sections 4928.66(A)(1)(a) and (A)(1)(b), Revised Code set forth the standards for**
13 calculating energy efficiency and peak demand reduction benchmarks,
14 respectively.

15 **Q: WHAT ARE THE ESTIMATED BENCHMARKS FOR 2013, 2014 AND**
16 **2015?**

17 **A: The estimated benchmarks, using actual data to the extent currently available, are**
18 reflected in the attached Exhibits BDE-1 and BDE-3 and are also discussed in the
19 Companies' Proposed Plans in Section 1.1.

20 **CUSTOMER SECTOR ALLOCATIONS**

21 **Q: ARE YOU RESPONSIBLE FOR ANY OTHER INPUTS INTO THE**
22 **PROPOSED PLANS?**

23 **A: Yes. I provided the 2012 LTFR forecasted usage to the FirstEnergy Energy**
24 Efficiency Team, for the purpose of creating five of the seven plan sectors

1 included in the Proposed Plans. This forecasted usage has been assigned to the
2 following sectors: (i) Residential Low Income; (ii) Residential Other; (iii) Small
3 Enterprise; (iv) Mercantile-Utility; and (v) Governmental. Residential Customers
4 taking service under the RS tariff were split between “low income” and “other”.
5 Because the Companies currently has no way to determine which of its 1.9
6 million residential customers fit within the formal definition of “low income”,
7 customers who were enrolled in the Percentage of Income Payment Plan program
8 (“PIPP”) as of March 2012 were used as a proxy for the low income category for
9 planning purposes. The Small Enterprise group consists of small commercial and
10 industrial (“C&I”) customers who are taking service on the General Service
11 Secondary Rate schedule (“GS”). The Mercantile-Utility group consists of large
12 C&I customers taking service on the General Service Primary (“GP”), General
13 Service Subtransmission (“GSU”), and General Service Transmission (“GT”) rate
14 schedules. The Governmental group consists of customers on the Street Lighting
15 (“STL”) and Traffic Lighting (“TRF”) Rate Schedules. Customers were assigned
16 to these categories based on available information in the billing systems.
17 Company Witness Dargie further explains in his testimony (Company Exhibit 1)
18 why customers were characterized this way.

19 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

20 **A.** Yes, it does.

Energy Efficiency Baselines and Benchmarks

Usage in GWh = kWh times 1 million

Company	Year	Retail Sales Before Energy Efficiency	Retail Weather Adjustment	Weather- Adjusted Retail Sales	Mercantile Addbacks	Fully Adjusted Retail Sales	Additional Energy Efficiency Beyond Mercantiles	Fully Adjusted Retail Sales After Energy Efficiency	Baseline	Cumulative Benchmark %	Benchmarks
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
CEI											
	2010*	18,870.000	(469)	18,401	349	18,750		18,750	19,067	0.8%	153
	2011*	18,916.000	(259)	18,657	374	19,031	-	19,031	18,739	1.5%	281
	2012	18,868.856	-	18,869	477	19,346	126	19,220	18,602	2.3%	428
	2013	19,310.856	-	19,311	477	19,788	156	19,631	19,000	3.2%	608
	2014	19,619.856	-	19,620	477	20,097	334	19,763	19,294	4.2%	810
	2015	19,789.856	-	19,790	477	20,267	539	19,728	19,538	5.2%	1,016
OE											
	2010*	24,155	(547)	23,608	183	23,791		23,791	24,799	0.8%	198
	2011*	24,656	(334)	24,322	224	24,547	-	24,547	24,097	1.5%	361
	2012	24,503	-	24,503	396	24,899	356	24,543	23,847	2.3%	548
	2013	24,740	-	24,740	396	25,136	428	24,708	24,294	3.2%	777
	2014	25,555	-	25,555	396	25,951	637	25,314	24,599	4.2%	1,033
	2015	26,316	-	26,316	396	26,712	896	25,816	24,855	5.2%	1,292
TE											
	2010*	10,333	(159)	10,174	159	10,333		10,333	10,218	0.8%	82
	2011*	10,436	(124)	10,312	180	10,491	-	10,491	10,114	1.5%	152
	2012	10,839	-	10,839	266	11,105	57	11,048	10,170	2.3%	234
	2013	11,310	-	11,310	266	11,576	74	11,502	10,624	3.2%	340
	2014	11,706	-	11,706	266	11,972	197	11,775	11,014	4.2%	463
	2015	11,971	-	11,971	266	12,237	329	11,908	11,442	5.2%	595
Total Ohio											
	2010*	53,358	(1,175)	52,183	692	52,874		52,874	54,084	0.8%	433
	2011*	54,008	(717)	53,291	777	54,068	-	54,068	52,950	1.5%	794
	2012	54,210	-	54,210	1,139	55,349	538	54,811	52,619	2.3%	1,210
	2013	55,360	-	55,360	1,139	56,499	658	55,841	53,918	3.2%	1,725
	2014	56,880	-	56,880	1,139	58,019	1,167	56,852	54,907	4.2%	2,306
	2015	58,076	-	58,076	1,139	59,215	1,764	57,451	55,835	5.2%	2,903

Notes -

- (1) The sum of Columns (1) - (5a) in the FE - D1 schedules of FirstEnergy's 2012 Long-term Forecast Report (pages 171 - 174) corrected with previously omitted traffic lighting sales added (20 GWh for CEI, 19 GWh for OE and 4 GWh for TE).
- (2) Weather Adjustment based on normal heating and cooling degree days
- (3) = (1) + (2)
- (4) Baseline years were adjusted for mercantile self directed program savings as filed with the PUCO by April 24, 2012.
- (5) Sum of (3) + (4)
- (6) 2012 from EE April 2011 Plan; 2013 & beyond = Benchmark (10) less Mercantile (4)
- (7) = (5) - (6)
- (8) = average of 3 previous years (7)
- (9) R.C. § 4928.66 Energy Efficiency Benchmarks
- (10) = (8) * (9)
- * 2010 & 2011 are actual data

Example: Weather-Normalization Process of Historical Sales: June 2012 for OE

Step 1); Regression of CDDs* and daily system load for 21 days resulted in a MWh/CDD slope of 1666 MWh/CDD

Step 2): Actual CDD = 209 for the month, the 20-year normal CDD for June = 149 for a difference of 60 CDD above normal

Step 3): 60 additional CDD * 1666 MWh/CDD estimates that 99,960 MWh of sales in June were due to higher than normal CDD

Step 4): The adjustments are negative because the actual CDD were above the normal CDDs so the negative adjustments were added to the actual sales for the month which reduced the baseline

* CDD: Cooling Degree Days

Same regression analysis is performed for months where heating degree days (HDD) are relevant.

Peak Demand Reduction Baselines and Benchmarks (MW)

Company	Year	Retail Peaks Before State Demand Reduction	Retail Weather Adjustment	Weather- Adjusted Retail Peaks	Mercantile Addbacks	Fully Adjusted Retail Peaks	Additional Demand Reductions Beyond Mercantiles	Fully Adjusted Retail Peaks After Demand Reductions	Baseline	Cumulative Benchmark %	Benchmarks
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
<u>CEI</u>											
	2010*	4,083	-	4,083	40	4,123		4,123	4,002	1.8%	70
	2011*	4,307	-	4,307	43	4,350	-	4,350	3,986	2.5%	100
	2012	4,030	-	4,030	52	4,083	103	3,980	4,099	3.3%	133
	2013	4,050	-	4,050	52	4,103	114	3,989	4,151	4.0%	166
	2014	4,072	-	4,072	52	4,124	143	3,982	4,106	4.8%	195
	2015	4,097	-	4,097	52	4,150	167	3,983	3,983	5.5%	219
<u>OE</u>											
	2010*	5,135	-	5,135	23	5,157		5,157	5,019	1.8%	88
	2011*	5,679	-	5,679	28	5,707	-	5,707	4,954	2.5%	124
	2012	5,378	-	5,378	48	5,426	184	5,242	5,188	3.3%	169
	2013	5,404	-	5,404	48	5,451	167	5,284	5,369	4.0%	215
	2014	5,444	-	5,444	48	5,492	209	5,282	5,411	4.8%	257
	2015	5,491	-	5,491	48	5,539	242	5,297	5,270	5.5%	290
<u>TE</u>											
	2010*	1,980	-	1,980	31	2,011		2,011	1,970	1.8%	34
	2011*	2,138	-	2,138	34	2,172	-	2,172	1,971	2.5%	49
	2012	2,009	-	2,009	52	2,061	45	2,016	2,057	3.3%	67
	2013	2,035	-	2,035	52	2,087	31	2,057	2,067	4.0%	83
	2014	2,063	-	2,063	52	2,115	47	2,068	2,082	4.8%	99
	2015	2,094	-	2,094	52	2,146	61	2,085	2,047	5.5%	113
<u>Total Ohio</u>											
	2010*	11,165	-	11,165	94	11,259		11,259	10,991	1.8%	192
	2011*	11,982	-	11,982	105	12,087	-	12,087	10,911	2.5%	273
	2012	11,332	-	11,332	152	11,484	331	11,153	11,343	3.3%	369
	2013	11,403	-	11,403	152	11,555	312	11,243	11,586	4.0%	463
	2014	11,492	-	11,492	152	11,644	399	11,245	11,599	4.8%	551
	2015	11,595	-	11,595	152	11,747	470	11,277	11,300	5.5%	622

Notes - (1) FE - D3 schedules of FirstEnergy's 2012 Long-term Forecast Report (pages 176 - 179).
 (2) No Weather Adjustment
 (3) = (1) + (2)
 (4) Baseline years were adjusted for mercantile self directed program savings as filed with the PUCO by April 24, 2012.
 (5) Sum of (3) + (4)
 (6) 2012 from EE April 2011 Plan; 2013 & beyond = Benchmark (10) less Mercantile (4)
 (7) = (5) - (6)
 (8) = average of 3 previous years (7)
 (9) R.C. § 4928.66 Energy Efficiency Benchmarks
 (10) = (8) * (9)
 * 2010 & 2011 are actual data

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Summary: Testimony (Direct) of Bradley D. Eberts - Company Exhibit 2 electronically filed by Ms. Carrie M Dunn on behalf of The Cleveland Electric Illuminating Company and Ohio Edison Company and The Toledo Edison Company