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Via E-File

April 5, 2013

Public Utilities Commission of Ohio
PUCO Docketing
180 E. Broad Street, 10th Floor
Columbus, Ohio 43215

In re: Case No. 12-2190-EL-POR, 12-2191-EL-POR and 12-2192-EL-POR

Dear Sir/Madam:

Please find attached the APPLICATION FOR CLARIFICATION OF THE OHIO ENERGY GROUP for filing in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



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COUNSEL FOR THE OHIO ENERGY GROUP

MLKkew
Encl.
Cc: Certificate of Service

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of Application of Ohio Edison :
Company, The Cleveland Electric Illuminating Company, : **Case Nos. 12-2190-EL-POR**
and The Toledo Edison Company for Approval of Their : **12-2191-EL-POR**
Energy Efficiency and Peak Demand Reduction Program : **12-2192-EL-POR**
Portfolio Plans for 2013 through 2015. :

**APPLICATION FOR CLARIFICATION
OF THE OHIO ENERGY GROUP**

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**BEFORE THE
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**APPLICATION FOR CLARIFICATION
OF THE OHIO ENERGY GROUP**

The Ohio Energy Group (“OEG”) hereby submits this Application for Clarification of the March 20, 2013 Opinion & Order of the Public Utilities Commission of Ohio (“Commission”) in this proceeding (“Order”). In addressing the PJM Bidding Strategy of Ohio Edison Company, Cleveland Electric Illuminating Company, and Toledo Edison Company (collectively, “FirstEnergy”) in its Order, the Commission explains its finding as follows:

*“The Commission is mindful of the uncertainty of future PJM BRAs, including resources planned, but not yet installed, unknown clearing prices for capacity in incremental auctions, risk of PJM penalties for obligations cleared, but not delivered, and uncertainty whether Riders ELR and OLR will expire. However, the Commission also finds that requiring Companies to bid all planned savings into future PJM BRAs could substantially benefit ratepayers by lowering capacity auction prices and reducing Rider DSE costs. In order to create a reasonable balance between uncertainty and potentially substantial benefits, the Commission finds it appropriate to adopt a portion of Staff’s recommendation. The Commission will require the Companies to bid into the upcoming May 2013 PJM BRA 75 percent of the **planned energy efficiency resources for the 2016/2017 planning year under their program portfolio.**”¹*

It is unclear whether the Commission intended the term “planned energy efficiency resources” to include FirstEnergy’s interruptible load under Riders ELR and OLR. But because that interruptible load can provide the same potentially substantial benefits to customers that the Commission cites in the above-quoted finding, it is reasonable for the Commission to expressly clarify that FirstEnergy is required to bid 75% of its Rider ELR and

¹ Order at 20 (emphasis added).

OLR interruptible load into the upcoming May 2013 PJM Base Residual Auction (“BRA”) for the 2016/17 planning year.

As OEG stated earlier in this proceeding, interruptible load is an ideal capacity resource that can displace higher-priced generation resources and result in lower capacity clearing prices. In addition, payments that FirstEnergy receives from PJM for interruptible load can be flowed back to customers to reduce the Rider DSE charges. These are the same potentially substantial benefits that the Commission seeks to facilitate through its above-quoted finding. Moreover, FirstEnergy has bid interruptible load into PJM capacity auctions in the past.² Further, FirstEnergy has sold interruptible service to most Rider ELR customers for many years, and those customers have provided a long-term, stable supply of interruptible load. Hence, as long as the basic terms and conditions of Rider ELR remain unchanged (or ideally, are improved), FirstEnergy can be reasonably assured that most ELR customers will continue to take interruptible service under Rider ELR or a similar rate offered by FirstEnergy even beyond the term of its current Electric Security Plan.

Consequently, OEG respectfully requests that the Commission clarify its finding by expressly stating that FirstEnergy is required to bid 75% of its Rider ELR and OLR interruptible load into the upcoming May 2013 PJM BRA for the 2016/17 planning year.

Respectfully submitted,



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April 5, 2013

COUNSEL FOR OHIO ENERGY GROUP

² Tr. Vol. VI (October 30, 2012) at 1175:10-15 (reflecting the FirstEnergy bid interruptible load into the PJM Base Residual Auction for the 2013/14 delivery year).

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this 5th day of April, 2013 to the following:



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Summary: Application Ohio Energy Group's (OEG) Application for Clarification electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group