BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Investigation of Ohio's Retail Electric Service Market.

REPLY COMMENTS OF THE OMA ENERGY GROUP

I. <u>INTRODUCTION</u>

The OMA Energy Group ("OMAEG") respectfully submits these Reply Comments in response to the other interested party comments filed on March 1, 2013, regarding the Public Utilities Commission of Ohio's ("Commission") investigation of Ohio's retail electric service market.

II. REPLY COMMENTS

With respect to standardized billing, the OMAEG opposes the assertion by DP&L that any standardization of billing different from the current requirements would "provide the customer very little benefit." Similarly, the OMAEG disagrees with Duke Energy's dismissal of standardized billing for electric utilities as "provid[ing] very little benefit to the customer." Rather, the OMAEG emphasizes that standardized billing could lead to more detailed and easier to understand electricity bills that include use-data needed for shopping comparisons. In this regard, the OMAEG agrees with the initial comments

¹ See DP&L Comments at 6.

² See Duke Energy Ohio, Inc. Comments at 9.

regarding standardized billing submitted by the Industrial Energy Users – Ohio,³ FirstEnergy Solutions,⁴ the Ohio Consumers' Counsel,⁵ and the National Energy Marketers Association.⁶

Many of Ohio's manufacturers are high electricity-intensive users that spend two percent (2%) or more of their total annual expenditures on electricity. For many manufacturers, this amounts to millions of dollars. Therefore, a greater ability for customers to discern electricity costs and make comparisons for shopping purposes is substantially more valuable than a "very little benefit to the customer."

III. CONCLUSION

The OMAEG appreciates the opportunity to work with the Commission to improve Ohio's retail electric service market. The OMAEG remains supportive of its Initial Comments filed in this proceeding on March 1, 2013, and respectfully requests the Commission to consider and adopt its recommendations provided in its Initial and Reply Comments in this proceeding.

³ See Industrial Energy Users – Ohio Comments at 28 ("Where possible, measurement of billing determinants should be standardized based on measurement practices in the wholesale market to facilitate 'apples to apples' comparisons and to better predict actual bill outcomes.").

⁴ See FirstEnergy Solutions Corp. Comments at 19 (stating that "a clear price-to-compare that is provided to customers [on their bills] will enable customers to more readily evaluate any savings that may be available in the competitive market").

⁵ See The Office of the Ohio Consumers' Counsel Comments at 19 ("A bill should be structured in a manner that provides consumers with useful information to evaluate the cost effectiveness of potential Marketer charges and to determine the savings being obtained, or which could be obtained, by switching to a different provider.").

⁶ See National Marketers Association Comments at 11 ("Unbundled rates expose consumers to price signals that permit them to compare competitive options.").

Respectfully submitted on behalf of THE OMA ENERGY GROUP

J. Thomas Siwo Frank L. Merrill

BRICKER & ECKLER LLP

100 South Third Street

Columbus, OH 43215-4291 Telephone: (614) 227-2389 Facsimile: (614) 227-2390

E-mail: tsiwo@bricker.com

fmerrill@bricker.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Reply Comments of the OMA Energy Group was served upon the parties listed below this 5th day of April 2013 *via* electronic mail.

J. Thomas Siwo

mhpetricoff@vorvs.com smhoward@vorys.com grady@occ.state.oh.us serio@occ.state.oh.us fdarr@mwncmh.com sam@mwncmh.com dboehm@BKLlawfirm.com mkurtz@BKLlawfirm.com cmooney2@columbus.rr.com drinebolt@ohiopartners.org, msmalz@ohiopovertylaw.org jmaskovyak@ohiopovertylaw.org william.wright@puc.state.oh.us burki@firstenergycorp.com judi.sobecki@dplinc.com gkrassen@bricker.com mwarnock@bricker.com amy.spiller@duke-energy.com elizabeth.stevens@puc.state.oh.us stephen.bennett@exeloncorp.com cynthia.brady@constellation.com david.fein@constellation.com stnourse@aep.com mjsatterwhite@aep.com yalami@aep.com

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