

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)	
Investigation of Ohio's Retail Electric)	Case No. 12-3151-EL-COI
Service Market)	

SUPPLEMENTAL COMMENTS OF INTERSTATE GAS SUPPLY, INC

I. INTRODUCTION

On December 12, 2012 the Commission initiated this proceeding by Entry seeking comments “regarding the extent to which barriers may exist to a consumer’s means to choose a retail electric service that meets their needs.”¹ After affording interested parties an opportunity to file comments in response to the Commission’s initial inquiry, the Commission has requested additional comments that relate to the state of the retail electric markets in Ohio.²

Interstate Gas Supply, Inc. (“IGS Energy”) is proud that its home state of Ohio is a leader in restructuring the inefficient vertically integrated utility monopoly model and embracing energy competition. There now appears to be few that doubt the benefits that energy competition has brought to consumers in the State.³ However, there is still much to be done to move Ohio’s energy markets forward so that energy consumers can receive the full benefits of electric competition.

¹ Case No. 12-3151-EL-COI, Entry at 2 (December 12, 2012)

² Case No. 12-3151-EL-COI, Entry at 3 (June 5, 2013)

³ These benefits include, lower and more efficient pricing for all customers, more diverse product offerings, a multitude of CRES suppliers creating jobs within the state and more price transparency.

In its Initial Comments, IGS Energy identified the current default rate structure supplied by wholesale auctions as a major barrier to effective and sustainable retail electric competition in Ohio.⁴ The default rate structure in electric markets discourages customer engagement which inhibits customers from becoming knowledgeable about the services they receive.⁵ Furthermore, the default service product provided by wholesale auctions avoids substantial costs that must be incurred by competitive products, ultimately limiting the availability of products to customers and innovation in the marketplace.⁶ The current Ohio electric markets artificially and arbitrarily favor the default service product at the expense of all other products and ultimately to the detriment of all customers.

In competitive markets for other products and services, it is axiomatic that default service is harmful to competition. This is why default service doesn't exist in other markets, including markets for products and services that are often considered essential such as food, housing, banking, and gasoline. In markets where customers receive the full benefit of competition, no product is favored at the expense of others. In a fully competitive market, all customers must engage the market to receive the product or service and there are no products to which an apathetic customer can default by simply not engaging in the market. In a fully competitive market, the preferences of customers drive the market forward, rather than the preferences of utilities, consumer advocates and regulators. While the Ohio competitive electric markets have made great strides

⁴ For purposes of these comments, IGS Energy is generalizing that EDU default rates in Ohio are served by wholesale auctions. IGS Energy recognizes that currently only two of the Ohio electric utilities (Duke and FirstEnergy) utilize 100% wholesale auctions to serve the default rate product; However, AEP is already transitioning to 100% wholesale auction to serve its default rate, and Dayton Power & Light has submitted an application at the Commission to do the same.

⁵ Case No. 12-3151-EL-COI, Comments of Interstate Gas Supply, Inc., at 2 (March 1, 2013).

⁶ The costs avoided by default service include customer acquisition costs, regulatory costs and customer compliance costs. *Id.*

over the years, the characteristics of a *fully* competitive electric market do not exist in Ohio.

In its Initial Comments IGS Energy proposed a number of measures that would reduce the barriers to retail competition caused by the default rate paradigm. These measures include:

- In instances where default service is provided via wholesale auction, assessing a fee to default service providers, which will be returned to all electric customers, to ensure that default service providers are paying for the comparable value of obtaining aggregated load with no associated retail cost.
- Eliminate default service and transition all default service Choice eligible customers to competitive suppliers who would supply a market variable rate with no cancellation fee that would be published each month on the PUCO Apples to Apples.
- Conduct a retail auction that would allow CRES suppliers to bid to serve default service customers at a set price for a defined time period such as one or two years with no cancellation fee. The default customer would then remain with the CRES supplier on a market variable rate with no cancellation fee. The monthly variable rate would be published at the PUCO apples-to-apples website and those default rate customers would remain with the winning supplier until they affirmatively chose alternative competitive service. This approach could

generate a significant amount of dollars through the auction price that could be returned to rate payers.⁷

IGS Energy also proposed a number of measures that would further competition in Ohio under its current default rate paradigm, including 1) implementing purchase of receivables programs for all utilities, 2) eliminating subsidies flowing from the utility distribution rate to default generation service; and 3) granting CRES suppliers access to customer data including customer account numbers.⁸

IGS Energy is appreciative of the Commission's willingness and desire to find constructive solutions to overcome the barriers to effective competition in the retail electric markets. Implementing the measure proposed in comments filed by IGS in this proceeding will break down many of the barriers to full retail electric competition to make Ohio electric markets the most robust, efficient and innovative in the country.

II. RESPONSE TO THE COMMISSIONS QUESTIONS

IGS Energy submits the following responses to the Commission's follow-up questions submitted in the Entry filed on June 5 in this proceeding.

A. Market Design

(a) Comments were filed suggesting that the relationship between an incumbent electric distribution utility (EDU) and a customer should be neither terminated nor encouraged. Does this comment pertain to distribution service or to generation service?

Customers should be encouraged to engage in the competitive market to procure electric generation service. Customer engagement drives innovation, promotes

⁷ Id at 4.

⁸ Id at 2-3.

transparency amongst suppliers, and enables customers to have the tools and knowledge they need to protect their own interests. Ohio law recognizes the benefits of customer engagement and thus encourages competition in the marketplace⁹; however, in practice, electric generation customers are being encouraged not to participate in the Ohio electric markets.

There are two main reasons why customers are encouraged to remain disengaged in Ohio's electric markets. First, status quo bias, which is a tested and verifiable psychological phenomenon, creates a tendency in people to remain with the status quo, regardless of whether there are better alternatives available to them. Since all customers are assigned to EDU default service, unless, and until, the customer affirmatively chooses an alternative supplier, the status quo for most customers is the EDU default rate. Even in EDU territories where there are high migration rates due to opt-out aggregation, the status quo for a customer, is to not engage in the market.¹⁰ By making it the status quo for customer to be disengaged, *de facto*, customers are being encouraged not to participate in the competitive retail electric markets.

The second reason why customers are encouraged not to participate in competitive electric markets is that the wholesale auction EDU default product is

⁹ R.C. 4928.02 provides that it is the policy of the State of Ohio to:

(B) Ensure the availability of unbundled and comparable retail electric service that provides consumers with the supplier, price, terms, conditions, and quality options they elect to meet their respective needs;

(C) Ensure diversity of electricity supplies and suppliers, by giving consumers effective choices over the selection of those supplies and suppliers

(H) Ensure effective competition in the provision of retail electric service by avoiding anticompetitive subsidies flowing from a noncompetitive retail electric service to a competitive retail electric service or to a product or service other than retail electric service, and vice versa

¹⁰ With community opt-out aggregation, the customer's community makes the choice of a preferred supplier for the customer, and the customer is automatically enrolled with that supplier, unless the customer affirmatively chooses not to enroll. This process is very similar to the assignment of customers to a default rate product in that both forms of enrollment do not require a customer to affirmatively choose their supplier.

subsidized and otherwise advantaged in the current market structure. The EDU default product avoids many of the costs competitive products incur to compete in the market place. These costs include the costs to acquire a customer and the often hefty compliance and regulatory costs incurred to enroll and maintain customers.

The procurement of the EDU default rate is also directly subsidized through distribution rates paid for by all customers, including customers with a competitive supplier.¹¹ For instance, in utilities without purchase of receivables programs, the EDU collections infrastructure and personnel which is paid for out of distribution rates is utilized to collect on default rate accounts, effectively shielding default suppliers from all collection risk and cost. On the other hand, CRES suppliers must develop and pay for their own collections mechanisms, even though shopping customers are paying for EDU default rate collection costs through distribution rates.¹² These subsidies and other advantages given to the default rate product, artificially inflate the benefits of default rate in the minds of the consumer, at the expense of other available products, thus making it even less likely a customer will participate in the competitive electric market.

The Commission and the state of Ohio should be applauded for recognizing that participating in competitive energy markets is in the best interest of customers. However, in an attempt to protect customers from the perceived ills of the competitive market, a subsidized default rate paradigm has been created in Ohio, that actually encourages customers not to participate in the competitive market. It is self-defeating to, on the one hand, have a policy that recognizes the benefit of competition, but on the

¹¹ See IGS Energy Initial Comments at 2.

¹² For these reasons, among others, IGS Energy has advocated for implementing purchase of receivables programs for all electric utilities, just as POR is part of all gas programs in Ohio.

other hand, implement that policy in such a way that severely restricts those benefits from occurring.

IGS Energy believes that customers *should* be encouraged to leave the default EDU generation service. Until customers fully engage in the market, the benefits of electric competition will not be realized. For these reasons the Commission should take necessary measures to encourage customers to leave the default rate and participate in competitive electric markets.

(b) If predatory pricing or other market factors become a barrier to a fully functional competitive retail electric service market, can and should the Commission regulate predatory pricing or other market factors?

Predatory pricing is the act of artificially suppressing prices in order drive competition out of the market. Predatory pricing is undesirable because it is understood that artificially suppressing prices reduces or eliminates competition, which is detrimental to all customers. Put in another way, while it may be beneficial to *some* customers in the short run to subsidize or otherwise advantage a particular product, in the long run, *all* customers are harmed by driving competition out of the market. Yet this is currently what is occurring with the current default rate structure in Ohio.

It is unquestionably an advantage in a marketplace to assign all customers to a particular product by default, but not another. It is unquestionably an advantage to waive numerous compliance and regulatory costs for one product but not others. It is also unquestionably an advantage to use costs paid for by all customers to support just one product in the market.

The default rate product is also permitted to operate under a set of rules that is significantly less restrictive than products offered by CRES providers; is provided the

optimal position in the market as the “status quo” and/or “price to compare”; is provided the good will of the EDU name and market presence; and has the appearance of “protection” by the state (through the commission approval processes). These advantages given to electric default rate product will necessarily have the effect of artificially suppressing the price of the advantaged product creating a dysfunctional market and disengaged consumers.

Basic economics teaches us that artificially suppressing the prices of products in the marketplace ultimately raises prices in the long run because it forces competition out of the market. Once the competition has effectively been forced out of the market, prices rise above normal levels, because the price suppression effect of competition is unable to work. Further, limited competition in the market place reduces innovation and the development of alternative products.

The Commission has a responsibility to take active steps to maintain a robust competitive market for energy. A helpful first step in doing so would be to remedy the effective predatory pricing that is occurring as a result of the EDU default rate product. To do so the Commission should implement some or all of the measures already recommended herein including either: 1) Eliminating the utility provided default service; 2) charge default wholesale providers an administrative fee that reflects all the inherent advantages given to the default rate or 3) restructuring the default structure to ensure predatory effects of the default rate do not occur.¹³

When all is said and done, the key to vibrant sustainable competition is customer engagement. Default structures encourage apathy and limits engagement. Default rate

¹³ See IGS' introductory comments and also IGS' discussion on time differentiated rates for further details on these recommendations.

products that avoid most of the costs of engagement in the market by their nature are predatory, driving retail competition out of the market in favor of a single default service. This must be corrected if competitive markets are going to remain viable long term.

As to CRES actions that create concerns regarding predatory pricing, the Commission should act in such instances directly or inform the Attorney General's office and / or the Justice Department.

(c) In a fully functional retail market, with no merchant or wholesale based default service, should the Commission and/or an independent market monitor have the ability to regulate market power?

The Commission has the authority to regulate retail distribution utilities and rates. The Commission also has authority to regulate the activities of retail suppliers in the marketplace, albeit not their pricing. The Commission should work with the Federal Energy Regulatory Commission, the Federal Trade Commission and State and Federal prosecutors to ensure abuse of market power is not occurring and the proper adjudicatory body is overseeing these matters.

d) Regarding government aggregation, should the Commission require public disclosure of any information in addition to commodity pricing, such as inducements or incentives related to commodity contracts? In general, should the Commission require public disclosure of any information in addition to commodity pricing, such as inducements, incentives, or broker commission related to commodity contracts?

Government Aggregations should be required to disclose all pertinent information necessary for the customer to make an informed decision as to whether the customer wishes to participate in the aggregation. In truth, however, many government aggregation customers do not read the actual disclosures provided to them. Unlike

CRES suppliers that organically enroll customers, government aggregations are not required to receive affirmative consent for enrollment.¹⁴ This creates a scenario where many government aggregation customers are being subjected to often steep and erroneous cancellation fees, without the customer's affirmative consent.

As a general principle, customers do not like being subjected to cancellation fees. However, subjecting customers to cancellation fees for a service in which they may not even know they are enrolled is patently egregious. It is easy to imagine a scenario where price volatility in the electric market increases, and a customer tries to lower their electric costs by switching to a more competitive offer, only to find out they must pay a substantial cancellation fee to a government aggregation supplier. In such a case customers will understandably be upset about being forced to pay a cancellation fee for a service they are not even aware they are receiving. This will most certainly lead to bad publicity for the industry and is something that should be avoided.

Cancellation fees for opt-out aggregations also create barriers to enrollment of customers organically. Many of the CRES suppliers that advocate for eliminating EDU minimum stay requirements and switching fees are also charging substantial cancellation fees to their government aggregation customers. However, the same rationale for eliminating EDU switching fees holds true for eliminating cancellation fees for opt-out aggregations; charging a fee to customers that wish to exercise their right to switch to a competitive supplier severely restricts customer participation and

¹⁴ Customers organically enrolled by a CRES supplier must affirmatively give their consent to the terms of service, either through a signed contract, a verbal recorded telephonic verification, or both. Further, the disclosure in the CRES rules require that cancel fees are prominently displayed and disclosed to the customer before enrollment. For opt-out aggregations, customers are simply sent a contract in the mail, and if they do not respond within 21 days to that mail piece, the customer is automatically enrolled in the aggregation for up to 3 years. Given the amount of miscellaneous mail received by customers today, and the limited understanding most people have of governmental electric aggregations, it is easy to see how, many, if not most, opt-out government aggregation customers are being enrolled in a service, without actually knowing they are receiving that service.

engagement in the competitive market. As already noted in these comments, customer engagement in the market should be encouraged, not discouraged.

Charging cancellation fees to customers that have not affirmatively consented to these fees creates a negative customer experience and is bad for the industry in the long run. Accordingly, the Commission should prohibit opt-out government aggregations from charging cancellation fees, unless the customer gives their affirmative consent upon enrollment.

(e) Would a time-differentiated standard service offer (SSO) rate cause more shopping based upon customer preference for avoiding uncertainty?

Time differentiated standard service offer rate structure could be an effective tool to help break the status-quo bias default service, but only if prices are 1) hourly and real-time, 2) unsubsidized, 3) sufficient customer education occurs and 4) is the only EDU rate available to customers.

The current limited time of use rates ("TOU") made available by Ohio EDU's are subsidized, not market based, and marketed as alternative products to the EDU default rate.¹⁵ These practices are counterproductive and harmful to customers. If the Commission wishes to utilize a TOU rate as a default product it should be based on real-time market prices. Time-differentiated rates are only effective, if customers are engaged and can switch their consumption from periods of higher costs to periods of lower costs. Market prices encourage customers to make decisions and behavior changes based on actual costs. Subsidies, on the other hand, distort price signals, thus

¹⁵ For instance Duke Energy Ohio offers a pilot TOU rate that is subsidized by other electric customers and is an alternative to the EDU standard default rate.

prevent customers from altering their consumption behavior as the cost of service increases.

Further, because time differentiated rates can subject consumers to both the highs and the lows of the market, some stakeholders have a tendency to “protect” consumers from the nature of the product creating further challenges to educating customers on how their energy consumption truly impacts costs. There also may be some reluctance to move to this type of rate structure since it interferes with a product in the market that is easily differentiable from the current and past default service structures and other products.

However, time differentiated standard service offer may provide some value in moving the competitive market forward and encouraging customer engagement if:

1. Pricing differentiates in hourly intervals based on the real-time electric market rates to reflect the true cost of serving customers;
2. There are no subsidies to the default rate or in the default structure. These subsidies including the current subsidies being provided in the current default rate structure through electric distribution rates or otherwise;
3. Consumers are properly educated in advance of moving to TOU pricing for default service so they can know to alter consumption at periods of higher costs, or switch to an alternative competitive product that has a more stable rate;
4. The costs of education are borne by those on the default service product and/or the provider of that product because those that remain on the service and those providing the service are benefited by the existence of the service.

5. Time differentiated pricing is the only default service permitted;

Engagement by customers is critical to fully developed competitive markets. Engagement by consumers is less likely with a default service in place, and when that service is subsidized “less likely” becomes unlikely over the long term. Long term sustainability of competition then requires engagement and ideally the elimination of default service. If default service is not simply eliminated then the default service requires significant restructuring to encourage customer engagement. As such, time differentiated standard service offer may help in achieving these ends.

All that being said, the failure to develop robust time-differentiated pricing in the market is a microcosm of why the EDU default rate model is flawed. As technologies come online that allow more products to be offered in the marketplace, customers must be engaged in order to make new products successful. If customers are not engaged, customers will remain with the default status quo, regardless of the innovative products that are available.

A great example of how fully competitive electric markets are working to bring better time-of-use products to the market is in the State of Texas. In Texas, which has the most robust competitive electric markets in the country, there are more time-of-use products available to customers than any other market in the country. In particular, many customers are enrolling in time-of-use pricing that offers free electricity on nights and weekends. The free nights and weekends concept wasn't developed in a rate case, collaborative or some other regulatory proceeding, but rather was a result of testing many products in the market place and seeing which products customers prefer.

It is impossible to know whether the free nights and weekend product or any other time-of-use product will resonate with customers in Ohio. What is known is that customers are choosing time-of-use products in Texas because it meets their preferences, not the preferences of others. If the Commission wishes this to occur in Ohio, the Commission should take the steps to make the Ohio market better so that CRES suppliers are better able to offer time-differentiated pricing. This includes making customer usage information available to CRES suppliers, moving forward with smart meter deployment, but most important, fixing the broken default rate paradigm that promotes customer apathy and disengagement.

(f) Are competitive retail electric service providers better positioned to manage uncertainty in a retail market than EDUs that offer a flat SSO rate?

CRES providers are better positioned to manage uncertainty because while there is only one EDU in the market place, there are dozens of CRES providers. Also, competitive providers are by contract compelled to absorb volatility that occurs once contracts are executed with consumers, whereas EDUs tend to look to the regulatory construct to reconcile these risks and costs. In a competitive market all customers are not reliant on just one provider for electric service, but rather the entire market can support customers. Further, CRES providers can adapt much quicker to changing conditions in the market place. Conversely, it usually takes a rate case, which could take a year or longer, to modify the SSO pricing structure to respond to market conditions.

Moreover, the presence of an EDU default rate actually increases uncertainty in the market because it discourages CRES providers from entering into the market place, limits products that are available to customers and creates a market anomaly that is

harmful to competition. Further, administering a default generation rate distracts the EDU from executing its main function which is to ensure its distribution system is safely, reliably and efficiently serving customers. Even in instances where a default generation rate is procured by a wholesale auction, the EDU must take valuable time and resources to administer this service to customers, that otherwise could be used to provide distribution service.

(g) Is integrated resource planning compatible with a retail market construct? If yes, how can such planning be done, given the current construct of functionally separated business units? If no, how can investment in transmission, generation, and demand management be co-optimized?

Traditional integrated resource planning is not compatible with the current state of the wholesale and retail electric markets. With the development of integrated RTOs, electric generation markets have become multi-state regional markets. With regional electric markets, resources can be deployed to most efficiently serve the market and geographic areas that need them, without having to be constrained by the arbitrary distinction of utility service territories.

Under the current regional electric market structure, decisions made in one state will affect the market in many other states. This means that if one state decides to conduct traditional resource planning by using ratepayer dollars incentivizing or subsidizing the construction of a particular generation resource, the benefit of these subsidies will flow to multiple states throughout the region; thus, the ratepayers in one state will be subsidizing lower electric rates for surrounding states.

PJM has created capacity markets to in-part overcome the limitations of state resource planning. Capacity markets incentivize investment in electric generation

where the generation is most needed and where it will be most effective in promoting reliability for the region. A much better way to ensure resource reliability is to let capacity markets work, and not attempt to partake in statewide and utility specific generation resource planning.

Electric generation resource planning also runs the danger of artificially favoring one resource to the detriment of other more viable generation resources in the market. It is almost impossible to predict new technologies that will be used to serve our energy needs over the next 30 years. Rather than rely on the preferences of law makers and regulators, it is more efficient and a better use of capital to allow the market to decide where resources should be deployed throughout the region. It will also result in more system reliability and lower costs in the long run.

(h) Could integrated resource plans be done on a statewide basis? If so, how would such planning be accomplished? Could the Commission be helpful in facilitating this type of planning?

As noted in the previous answer, traditional state wide electric generation resource planning has many limitations and should not be conducted in today's regional electric markets. To promote long term electric generation reliability, the Commission should instead create rules that put non-traditional distributed generation resources on the same playing field as large scale centralized generation. Part of the problem with traditional generation resource planning is that has artificially favored large centralized generation at the expense of distributed generation. To start, the Commission should eliminate the arbitrary restrictions on the price and amount of electricity net metering customers can deliver back into the system. The Commission should also avoid subsidizing utility scale generation projects. Enabling all generation technologies to

compete in the electric markets is much more effective to ensure an adequate supply of generation, than subsidizing large generation projects. It also decreases our dependence on the unreliable transmission and distribution system.

B. Corporate Separation

(a) How can the Commission ensure that decisions made on behalf of the jurisdictional EDU are not providing preferential outcomes for non-regulated entities?

The Commission should fully enforce corporate separation requirements to ensure that incumbent EDU affiliates are not getting unfair advantage in the market place. This includes ensuring that regulated utilities are not giving their affiliated suppliers in the market subsidized generation contracts. The Commission should also ensure that all marketing by a non-utility affiliate is done with proper disclosures.

(b) Is there a corporate structure that will ensure decisions made by non-EDU affiliates minimize costs to ratepayers of the EDU?

Full corporate separation is the appropriate structure. This means there should be no shared resources between the unregulated affiliate and the regulated utility. The unregulated affiliate should have separate buildings, separate infrastructure, separate personnel, separate accounts and separate accounting etc. Only by eliminating all shared resources will you ensure no EDU costs are going to subsidize an unregulated affiliate. Further, eliminating shared resources is the only way to ensure an unregulated affiliate is not getting an unfair advantage in the marketplace.

(c) Since generation has been declared competitive in Ohio, should return on investment for EDUs be reduced in order to reflect lower risk?

EDU's should be allowed to earn a reasonable rate of return on their electric distribution infrastructure. However, EDU base distribution rates should not, in any way, be utilized to support EDU default generation service. The full cost of service should be included in default service generation rates.

(d) Should the capital structure of EDUs be more heavily weighted toward debt in light of the reduced risk associated with a wires-only company?

IGS Energy has no opinion on this topic at this time.

(e) FERC Order 1000 requires and/or enables regional transmission organizations to consider non-transmission options and merchant transmission options in their planning processes. Would a statewide integrated resource plan or shadow plan provide the market with guidance on where and/or how to make investments in conjunction with the PJM planning process?

As noted in its previous comments, IGS Energy opposes a state wide electric generation resource plan. State electric generation resource plans are not compatible with the current electric markets in Ohio. IGS Energy has no opinion at this time as to whether resource plan for transmission resources is reasonable.

(f) How could a competitive process be developed to provide all transmission developers, including incumbent transmission owners, with a fair chance to bid a transmission solution to a reliability problem identified by PJM?

IGS Energy has no opinion on this topic at this time.

(g) Should competitive bidding for transmission construction be considered in order to ensure the lowest possible cost?

IGS Energy has no opinion on this topic at this time.

(h) Does the current treatment of capacity injection rights adequately address units that retire and are later reactivated?

IGS Energy has no opinion on this topic at this time.

III. CONCLUSION

IGS Energy is appreciative of the opportunity to submit these comments to the Commission. It is IGS' belief that by adopting the recommendations made herein, Ohio electric markets can continue to move forward to full retail electric competition for the benefit of all customers.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was served by electronic mail this 8th day of July, 2013 upon the persons listed below.

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Summary: Comments Supplemental Comments electronically filed by Mr. Stephen M Howard on behalf of Interstate Gas Supply, Inc.