

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Application of The	)	
Dayton Power and Light Company for	)	Case No. 12-426-EL-SSO
Approval of its Market Rate Offer.	)	

In the Matter of Application of The	)	
Dayton Power and Light Company for	)	Case No. 12-427-EL-ATA
Approval of Revised Tariffs.	)	

In the Matter of Application of The	)	
Dayton Power and Light Company for	)	Case No. 12-428-EL-AAM
Approval of Certain Accounting	)	
Authority.	)	

In the Matter of Application of The	)	
Dayton Power and Light Company for	)	Case No. 12-429-EL-WVR
Waiver of Certain Commission Rules.	)	

In the Matter of Application of The	)	
Dayton Power and Light Company to	)	Case No. 12-672-EL-RDR
Establish Tariff Riders.	)	

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**OHIO PARTNERS FOR AFFORDABLE ENERGY AND  
THE EDMONT NEIGHBORHOOD COALITION'S  
APPLICATION FOR REHEARING  
AND MEMORANDUM IN SUPPORT**

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APPLICATION FOR REHEARING**

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Ohio Partners for Affordable Energy ("OPAE") and the Edgemont Neighborhood Coalition ("Edgemont"), advocates for low-income residential customers of The Dayton Power and Light Company ("DP&L"), hereby submit to the Public Utilities Commission of Ohio ("Commission") this application for rehearing from the Commission's September 4, 2013 Opinion and Order and September 6, 2013 Entry Nunc Pro Tunc in the above-captioned matters which are applications of DP&L for approval of an Electric Security Plan ("ESP"), revised tariffs, accounting authority, a waiver of certain Commission rules, and the

establishment of tariff riders. The Commission's Orders are unjust, unreasonable and unlawful in the following respects:

1. The Commission's Opinion and Order, at 52, states: "To the extent that intervenors have proposed modifications to DP&L's ESP that have not been specifically addressed by this Opinion and Order, the Commission concludes that the requests for such modifications should be denied." This decision is contrary to Revised Code ("R.C.") Section 4903.09 and court precedent because it fails to adequately explain why the Commission chose to deny the requests of OPAE and Edgemont for modification of DP&L's ESP application.
2. The Commission's decision lacks support in the record, violating R.C. Section 4903.09, because the Commission does not cite to any record evidence to support its denial of OPAE and Edgemont's requests for modification of DP&L's ESP application.
3. The Commission's decision violates R.C. Section 4928.02 by ignoring R.C. Section 4928.02(L) that makes it the policy of the state of Ohio to "[p]rotect at risk populations, including, but not limited to, when considering the implementation of any new advanced energy or renewable energy resource." While the Commission relied on R.C. Section 4928.02 to grant requests of other intervenors, the Commission ignored the requests of OPAE and Edgemont pursuant to R.C. Section 4928.02(L). The policies articulated by the General Assembly in the legislation that established the standard service offer should have been followed by an order continuing or expanding the DP&L fuel fund.

Given these violations of law, the Commission should grant rehearing and order a continuation or expansion of the fuel fund established in DP&L prior ESP.

The grounds for this Application for Rehearing are set forth in the accompanying Memorandum in Support.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT  
OF THE APPLICATION FOR REHEARING**

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**I. INTRODUCTION**

On September 4, 2013, the Public Utilities Commission of Ohio (“Commission”) issued its Opinion and Order in the above-captioned matters which are applications of The Dayton Power and Light Company (“DP&L”) for approval of an Electric Security Plan (“ESP”), revised tariffs, accounting authority, a waiver of certain Commission rules, and the establishment of tariff riders. The Opinion and Order concluded, at 52, as follows: “To the extent that intervenors have proposed modifications to DP&L’s ESP that have not been specifically

addressed by this Opinion and Order, the Commission concludes that the requests for such modifications should be denied.”

The modification to the ESP requested by OPAE and Edgemont was the continuation and expansion of DP&L’s then-existing fuel fund. OPAE had filed the testimony of its witness David C. Rinebolt in support of the continuation and expansion of the existing fuel fund. Mr. Rinebolt’s testimony described the need for the continuation and expansion of the existing fuel fund. The Office of the Ohio Consumers’ Counsel (“OCC”) filed the testimony of its witness James D. Williams who also testified on the need for the fuel fund. The Commission’s Opinion and Order completely ignored the testimony of OPAE witness Rinebolt and OCC witness Williams. The Opinion and Order also ignored the cross examination of DP&L’s witness Herrington, which demonstrated the unreasonableness of DP&L’s refusal to continue the existing fuel fund.

The Commission cannot ignore the evidence of record, and the Commission cannot make lawful findings unless its findings are based on the evidence of record. The Commission must also explain its findings based upon the evidence of record. R.C. 4903.09. A simple sentence, which states that if the evidence supporting a request was ignored, the request is denied, is not sufficient to satisfy the statute.

Moreover, the Commission ignored the policy of the state of Ohio at R.C. Section 4928.02(L) to protect at-risk populations. This is especially unreasonable given the Commission’s reliance on the policy of the state of Ohio in granting the requests of DP&L and other favored parties. Opinion and Order

at 50-52. Given that the Commission did rely on the policy of the state of Ohio to fulfill the requests of other intervenors, it was unreasonable for the Commission to ignore the request of OPAE and Edgemont made pursuant to R.C. 4928.02(L).

## **II. STANDARD OF REVIEW**

Applications for rehearing are governed by R.C. 4903.10. The statute allows that, within 30 days after issuance of a PUCO order, “any party who has entered an appearance in person or by counsel in the proceeding may apply for rehearing in respect to any matters determined in the proceeding.”

OPAE and Edgemont filed motions to intervene in this proceeding. In addition, OPAE filed the testimony of David C. Rinebolt. OPAE and Edgemont both made appearances in the proceeding.

R.C. 4903.10 requires that an application for rehearing must be “in writing and shall set forth specifically the ground or grounds on which the applicant considers the order to be unreasonable or unlawful.” In addition, Ohio Adm. Code 4901-1-35(A) states: “An application for rehearing must be accompanied by a memorandum in support, which shall be filed no later than the application for rehearing.” OPAE and Edgemont herein apply for rehearing citing grounds upon which the order is unlawful and unreasonable and submit their memorandum in support.

In considering an application for rehearing, R.C. 4903.10 provides that “the commission may grant and hold such rehearing on the matter specified in such application, if in its judgment sufficient reason therefor is made to appear.”



The statute also provides: “If, after such rehearing, the commission is of the opinion that the original order or any part thereof is in any respect unjust or unwarranted, or should be changed, the commission may abrogate or modify the same; otherwise such order shall be affirmed.” As shown herein, the statutory standard to modify the order as requested by OPAE and Edgemont is met.

### **III. ARGUMENT**

- A. The Commission’s Opinion and Order, at 52, states: “To the extent that intervenors have proposed modifications to DP&L’s ESP that have not been specifically addressed by this Opinion and Order, the Commission concludes that the requests for such modifications should be denied.” This decision is contrary to Revised Code (“R.C.”) Section 4903.09 and court precedent because it fails to adequately explain why the Commission chose to deny OPAE and Edgemont’s request for modification of DP&L’s ESP application.

Administrative agencies must adequately explain their decisions. The United States Supreme Court has repeatedly stated:

It is an axiom of administrative law that an agency’s explanation of the basis for its decision must include “a ‘rational connection between the facts found and the choice made.’”

*Bowen v. American Hospital Assn.*, 476 U.S. 610, 625, 90 L. Ed. 2d 584 (1986), citing *Motor Vehicle Mfrs. Assn. v. State Farm Mut. Automobile Ins. Co.*, 463 U.S. 29, 43 (1983) (quoting *Burlington Truck Lines, Inc. v. United States*, 371 U.S. 156, 168 (1962)).

The Commission is required by law to base its decisions on its findings. R.C. 4903.09 requires that “[i]n all contested cases heard by the public utilities

commission, a complete record of all of the proceedings shall be made, including a transcript of all testimony and of all exhibits, and the commission shall file, with the records of such cases, findings of fact and written opinions setting forth the reasons prompting the decisions arrived at, based upon said findings of fact.”

The Supreme Court of Ohio has recognized the need for agencies to adequately explain their decisions, even in the absence of a specific statutory requirement.

The Court has stated: “The purpose of an explanation requirement is ‘to inform the parties and potentially a reviewing court of the basis for the commission’s decision.’” *State ex rel. Ochs v. Industrial Comm’n*, 85 Ohio St. 3d 674, 675; 1999 Ohio 294; 710 N.E.2d 1126; 1999 Ohio LEXIS 1751, quoting *State ex rel. Yellow Freight Sys., Inc. v. Indus. Comm.* (1994), 71 Ohio St. 3d 139, 145, 642 N.E.2d 378.

In this proceeding, the Commission merely states, at 52, as follows: “To the extent that intervenors have proposed modifications to DP&L’s ESP that have not been specifically addressed by this Opinion and Order, the Commission concludes that the requests for such modifications should be denied.” The Commission does not explain why the request of OPAE and Edgemont for modification has been denied. The PUCO points to nothing in the record that led to its conclusion. Therefore, the Commission’s order lacks adequate explanation of the basis for its decision. The order is unjust, unreasonable and unlawful, and should be abrogated or modified.

- B. The Commission's decision lacks support in the record, violating R.C. Section 4903.09, because the Commission does not cite to any record evidence to support its denial of OPAE and Edgemont's request for modification of DP&L's ESP application.

The Ohio Supreme Court has held that a Commission ruling on an issue without record support is an abuse of discretion and reversible error. *In re Columbus S. Power Co.*, 128 Ohio St. 3d 512, 519; 2011 Ohio 1788; 947 N.E.2d 655; 2011 Ohio LEXIS 957, citing *Indus. Energy Users-Ohio v. Pub. Util. Comm.*, 117 Ohio St.3d 486, 2008 Ohio 990, 885 N.E.2d 195, ¶ 30.

In its Opinion and Order the Commission does not cite to any record evidence to support its denial of OPAE and Edgemont's request for modification of the DP&L ESP. In fact, the Commission did not even consider any of the evidence presented by OPAE and OCC on the need for a continuance and expansion of the then-existing DP&L fuel fund. The Commission simply ignored the issue in its entirety. Thus, the Commission's order violates R.C. Section 4903.09 and Supreme Court precedent by issuing rulings without record support.

While there is no basis in the record to support the PUCO's order that denies OPAE and Edgemont's request for modification, this is a moot point in light of the fact that the Commission did not even consider the record or make any finding based on the record in denying OPAE and Edgemont's request for modification. For this reason, the Commission's order is unlawful and should be modified.

- C. The Commission's decision violates R.C. Section 4928.02 by ignoring R.C. Section 4928.02(L) that makes it the policy of the state of Ohio to "[p]rotect at risk populations, including, but not limited to, when considering the implementation of any new advanced energy or renewable energy resource." While the Commission relied on R.C. Section 4928.02 to grant requests of other intervenors, the Commission ignored the requests of OPAE and Edgemont pursuant to R.C. Section 4928.02(L). The policies articulated by the General Assembly in the legislation that established the standard service offer should have been followed by an order continuing or expanding the DP&L fuel fund.

The Commission's Opinion and Order did not ignore all of the policies listed by the General Assembly at R.C. Section 4928.02. In fact, the Commission's order relied upon the policies listed at R.C. Section 4928.02 in granting the requests of DP&L and certain favored intervenors. In finding that the "competitive retail enhancements" advocated by competitive retail electric suppliers ("CRES") were a "qualitative benefit" of the ESP over a market rate option ("MRO"), the Commission modified the ESP to provide DP&L with incentives to modernize its billing system. The Commission did not ignore the testimony of witnesses who indicated that DP&L's billing system is antiquated and incapable of supporting rate-ready billing and percentage-off-the-price-to-compare pricing. Opinion and Order at 51. The Commission found that billing-system modernization would allow CRES providers to offer a more diverse range of products to customers consistent with the provisions of Section 4928.02(B), the policy of the state that ensures the availability of electric service from suppliers that meet consumers' needs. *Id.*

The Commission found that the “competitive retail enhancements, the billing system modernization, and the economic development provisions” of the ESP would encourage economic development and improve the state’s competitiveness in the global market as provided in the state’s policy at R.C. Section 4928.02(N). The Commission also found that the ESP provides DP&L with incentives to submit a plan to modernize its distribution infrastructure in accordance with the state’s policy at R.C. Section 4928.02(D), which encourages innovation in such services as smart grid and advanced metering infrastructure, and the state’s policy at R.C. Section 4928.02(E), which encourages access to the transmission and distribution systems of electric utilities in order to promote customer choice. Opinion and Order at 52.

In short, the Commission did not ignore all evidence and all consideration of the policy of the state of Ohio. In fact, the Commission relied on the policy of the state to justify the policies the Commission chose to advance.

While advancing its favored state policies, the Commission simply ignored the policies of the state that it chose not to advance. The Commission ignored the policy set forth at R.C. Section 4928.02(L) to protect at-risk populations. The Commission also ignored the evidence presented at the hearing in support of action to support at-risk populations in accordance with Section 4928.02(L).

OPAE witness David C. Rinebolt urged DP&L to continue and expand the current fuel fund that DP&L has funded since 2009 as a part of its initial Electric Security Plan to provide bill payment assistance to low-income residential customers. OPAE Ex. 1 at 3. The current funding for the fuel fund began in

2009 at \$400,000 per year with the approval of DP&L's then-current ESP. Id. Mr. Rinebolt recommended an increase of \$350,000 for a total of \$750,000 per year. This need for an increased level of the fuel fund is due to the increase in poverty in DP&L's service territory and the declines in the average household income of poor families in the years since the fuel fund was first established.

The current fuel fund was originally authorized in Case No. 08-1094-EL-SSO, DP&L's then-current ESP proceeding. The same level of funding was authorized for an additional year in DP&L's merger case, Case No. 11-3002-EL-MER. This year will be the final year of the fuel fund if it is not extended. Id. at 4. The need for a fuel fund for bill payment assistance for low-income households is even greater now than in the year the fund was first authorized.

In 2012, over 3,100 customers received assistance from the fuel fund. The average sum necessary to prevent disconnection was \$129. Id. at 5. A majority of beneficiaries of bill payment assistance programs are elderly or disabled. A sizable percentage of the families receiving assistance have children under the age of 5 in the home.

Mr. Rinebolt testified that on a statewide basis, poverty has increased by 57.7% in Ohio from between 1999 and 2011. In most of the counties in the DP&L service territory, more than 30 percent of all households are eligible for benefits from the fuel fund. Id. at 6. While the Ohio poverty level is 14.8% statewide, the poverty level in the DP&L service territory is even higher than the Ohio average. The poverty level in the city of Dayton is 32.5%. OCC Ex. 19 at 23.

In 2012, there were 33,478 residential customers in DP&L's service territory disconnected for nonpayment. Edgemont Ex. 1. The average disconnection amount for each DP&L customer disconnected in 2007 was \$375, and in 2012 the amount for each DP&L customer disconnected had risen to \$469. Id. In 2012, there were 78,502 DP&L residential customers participating in Commission-ordered payment plans to avoid disconnection. In 2012, there were 35,715 residential customers on the Percentage of Income Payment Plan ("PIPP") program in the DP&L service territory. Id. In 2012, there were 5,023 PIPP customers disconnected for non-payment in the DP&L service territory. Id. Although DP&L is one of the smallest electric distribution utilities in Ohio, it has the largest percentage of customers being disconnected for non-payment, on payment plans, and defaulting on payment plans when compared to the data for residential customers of the other Ohio electric distribution utilities. OCC Ex. 19 at 16.

The Office of the Ohio Consumers' Counsel ("OCC") presented the testimony of James D. Williams who recommended that the Commission examine ways to reduce the high number of disconnections being experienced by DP&L residential customers. Mr. Williams, like OPAE witness Rinebolt, also recommended additional bill payment assistance funding for residential customers. Mr. Williams testified that DP&L residential customers are currently struggling to afford electric service under the then-existing ESP rates. Any change in ESP rates that does not reduce the current rates will have a negative financial impact on residential customers. OCC Ex. 19 at 6.

Mr. Williams testified that 7.5% of DP&L's residential customers had been disconnected for non-payment in 2012, that 7.8% of DP&L's residential customers were on PIPP, and that 17.3% of DP&L's residential customers had been on payment plans in 2012. Id. at 6. Mr. Williams estimated that 32.6% of the total number of residential customers served by DP&L (up to 148,606 of the approximate 456,000 residential customers) were struggling or unable to pay their electric bills in 2012.

Moreover, the residential customers of DP&L are far more likely to be disconnected for non-payment than customers of other electric utilities. Whereas 7.5% of all DP&L customers were disconnected in 2012, disconnections for other electric utilities in Ohio averaged 4.8%. OCC Ex. 19 at 17. Whereas 32.5% of DP&L customers on extended payment plans defaulted on payments, the average default rate for the other Ohio electric utilities was 16.94%. In addition, for a three-year period, DP&L disconnections were a much higher percentage of total customers than other Ohio electric utilities. Id. at 19.

One problem for DP&L's customers has been the increase in their electric bills in recent years. DP&L's residential customers went from paying electric bills that were below the average Ohio electric bill in 2008 to paying among the highest average electric bills in the state today. DP&L residential electric bills are now 10.9% higher than the average electric bill in the state. OCC Ex. 19 at 21.

There has also been a 90% increase in the number of PIPP customers being disconnected for non-payment in DP&L's service territory and a 140% increase in the number of customers who need the special Commission winter



reconnection procedures to have services reconnected during the winter months in DP&L's service territory. The amounts owed at the time of disconnection have increased, as have the arrearage amounts. OCC Ex. 19 at 11. Enrollment on PIPP has increased by 68%. Id.

Mr. Williams also described how unaffordable electric service harms customers financially. Residential customers are subject to a delayed payment charge of 1.5% per month if the bill is not paid by the due date. Between 2010 and 2012, residential customers paid \$10,283,015 in delayed payment charges in DP&L's service territory. Id. at 13. In addition, customers who are behind in payments can be assessed an additional security deposit. If customers are disconnected for non-payment, the security deposit can be another impediment to re-establishing service. In 2012, DP&L customers paid approximately \$5,000,000 in security deposits to establish or re-establish creditworthiness. Id. Furthermore, customers who are disconnected for non-payment must pay reconnection charges. For the period 2010 through 2012, DP&L residential customers who were disconnected for non-payment paid approximately \$1,623,154 in reconnection charges. Customers who pay their electric bill at an authorized agent are subject to an additional \$1.50 charge, and bill payments made by credit card or electronic checks are subject to a \$2.95 charge per payment. The Commission has not approved the level of the additional credit card charge. OCC Ex. 19 at 15.

All major Ohio utilities are making fuel funds available to their customers. DP&L's fuel fund was first approved as part of its first ESP. It is logical to

continue this important program. In addition, the authorization and funding for the fuel fund is consistent with the policies established by the Ohio General Assembly in Am. Sub. S.B. 221, specifically, R.C. Section 4928.02(L) that makes it the policy of the state of Ohio to “[p]rotect at risk populations, including, but not limited to, when considering the implementation of any new advanced energy or renewable energy resource”. The policies articulated by the General Assembly in the legislation that established the standard service offer should be followed by continuation of the DP&L fuel fund.

DP&L’s position on this issue was confusing. DP&L witness Philip R. Herrington testified that DP&L’s new ESP advances many of the state’s policies set forth at R.C. Section 4928.02. DP&L Ex. 8 at 4. Mr. Herrington pointed to R. C. Section 4928.02(A), which provides that it is the policy of the state to “ensure the availability to consumers of adequate, reliable, safe, efficient, nondiscriminatory, and reasonably priced retail electric service” and to R. C. Section 4928.02(B), which provides that the policy of the state is to ensure the availability of retail electric service that provides customers with the supplier, price, terms, conditions and quality options they elect to meet their respective needs”. Mr. Herrington testified that these policies of the state would be met because, through the new ESP, DP&L will procure generation to satisfy a portion of its standard service offer obligations through a competitive bidding process. Through the competitive bidding process, consumers can be assured that electric generation will be adequate, reliable, safe, efficient and nondiscriminatory. Id. at

5. The generation procured through the competitive bidding process will be market priced. Customers will also retain the right to shop. Id.

Mr. Herrington also referred to R.C. Section 4928.02(L), the policy of the state to protect at-risk population. However, rather than recommending any action by DP&L such as a continuation and expansion of the fuel fund, Mr. Herrington stated that DP&L's proposed ESP would protect at-risk populations by ensuring that they receive the best available market price. Id. at 7. On cross examination, Mr. Herrington recognized that at-risk populations are having difficulty paying their bills. Transcript ("Tr.") IV at 1122. When asked how DP&L satisfies the state policy to protect at-risk populations but did not include any continued funding for the fuel fund in this ESP filing, Mr. Herrington stated that DP&L remains "committed to the level of funding that we have provided to our low-income customers and intend to continue that within this filing." Id. He testified that "we have money set aside as part of our ongoing operations to support low-income housing, assist those who can't pay their bills." Id. at 1125. He referred to "roughly \$400,000 a year . . . to assist those customers in paying their bills." Id. He testified that although there may be nothing about continuing that funding commitment in this ESP filing, "there's nothing that's inconsistent with that commitment within this filing." Id. at 1134. He agreed that making the commitment to the fuel fund was important but that it was not relevant to the new ESP filing. He stated that the best way to protect at-risk populations is by providing the lowest possible cost of power.

DP&L makes no commitment to protect at-risk populations. The market-based offer merely allows low-income customers to receive the available market price that all other customers should receive. *Id.* at 1127. Without the continuation and expansion of the fuel fund, the state policy specifically to protect at-risk populations has not been met. Moreover, given that it is obvious that DP&L was currently providing the fuel fund and has the resources to provide the fuel fund for the years of the new ESP, there was no financial basis for the Commission not to order a continuation and expansion of the fuel fund. The Commission should have ordered DP&L to continue and expand the fuel fund as recommended by OPAE witness Rinebolt. The Commission should have required DP&L to fund its fuel fund at \$750,000 per year for each year of the new ESP.

In addition, OCC witness Williams recommended that the Commission take action to improve the affordability of DP&L's electric service. Mr. Williams recommended that the Commission seek ways to reduce the number of DP&L's disconnections for non-payment. OCC Ex. 19 at 25. He also recommended that the Commission seek ways to enhance the current credit and collection policies of DP&L to reduce disconnections. Disconnections should be suspended during inclement weather; due dates should be adjusted; payment plan costs should be reduced; delayed payment charges should be suspended; and bill payment charges should be reduced. OCC Ex. 19 at 26. Individualized and customized payment plans could also reduce the number of defaults. Mr. Williams also recommended that the Commission encourage DP&L to initiate a shareholder-

funded bill payment assistance program to help residential customers avoid disconnections. OCC Ex. 19 at 28.

The Commission should have adopted the recommendations of OPAE witness Rinebolt and OCC witness Williams. First, the new ESP should have included the provision for continued and expanded funding of the current fuel fund. The fuel fund should have been funded at \$750,000 per year for each year of the new ESP. The Commission should also have considered other ways to reduce the number of disconnections and defaults of residential customers in DP&L's service territory. The Commission's order which ignored all of this evidence is unlawful. R.C. 4903.09. The Commission's order without any explanation for its findings is unlawful. The Commission's order which denied OPAE and Edgemont's recommended modification to the ESP without any citation to the record evidence is unlawful. R.C. 4903.09. The Commission's order without any record evidence is unlawful. R.C. 4903.09. The Commission must modify its September 4, 2013 Opinion and Order.

#### **IV. CONCLUSION**

The Commission violated Ohio law by not adequately explaining its Order and by issuing an Order whose findings are not based on the evidence of record. R.C. Section 4903.09. As a result, the Order is unjust, unreasonable and unlawful. Residential electric consumers will be harmed through the adoption of a new ESP without the inclusion of a fuel fund. To protect consumers, the Commission should modify its Order.

The Commission should require DP&L to continue or expand the fuel fund approved in DP&L's last ESP. The evidence shows that there is a great and increasing need for low-income bill payment assistance in DP&L's service territory. DP&L should be ordered to contribute at least \$750,000 annually to a fuel fund for bill payment assistance for low-income residential customers in order to comply with the policy of the state of Ohio to protect at risk customers. The DP&L ESP as adopted by the Commission clearly does not conform to the state's policy. The Commission must modify the ESP to assure that it conforms to Ohio law. R.C. Section 4928.02(L).

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application for Rehearing was served electronically upon the parties of record identified below in these cases on this 4th day of October 2013.

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Summary: Application for Rehearing electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy and Edgemont Neighborhood Coalition