BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

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

COMMENTS OF DUKE ENERGY OHIO, INC.

I. Introduction

The Public Utilities Commission of Ohio (Commission) initiated this proceeding on December 12, 2012, to investigate the health, strength, and vitality of Ohio's retail electric service market. Beginning May 29, 2013, the Commission created a series of workshops to allow discussion among interested parties and directed the Commission Staff (Staff) to file a status report and market development work plan. The Staff's status report and work plan (Staff Report) was filed on January 16, 2014.

At the outset of this docket, Duke Energy Ohio, Inc., (Duke Energy Ohio) pointed out that there are no barriers to customers exercising their right to choose and suppliers offering competitive services in the Duke Energy Ohio service territory. As of third quarter, 2013, approximately fifty-one percent of residential customers, fifty-two percent of commercial and approximately seventy percent of industrial customers receive generation from competitive suppliers. The remaining standard service offer customers receive generation supply through an auction. As of the time of this filing, there are also approximately fifty active competitive retail electric service (CRES) providers operating in the Duke Energy Ohio territory, and Duke Energy

Ohio recognizes the Commission's desire to ensure that competition across the state continues to be active and robust.

It is in that spirit that Duke Energy Ohio has continued to participate in the Commission's inquiry and has provided comments and engaged in discussion and debate. Pursuant to an Entry issued by the Commission on January 16, 2014, inviting comments on the Staff Report, Duke Energy Ohio submits the comments below.

II. Discussion and Comment

1. Standardizing the Retail Electric Service Market

Staff comments that, in order to enhance the market, efforts must be taken to standardize practices, processes, and market rules of the various electric distribution utilities (EDUs) in Ohio. Staff urges the Commission to "consider consistency impacts across the state when implementing policy." Staff does recognize that changes to the market should be made with careful deliberation and consideration as to how standardizing the market across the state affects customers, utilities, and suppliers.

Duke Energy Ohio agrees with Staff's observations that changes should be made with careful deliberation and consideration. Standardization that reduces customer confusion, enhances competition, or otherwise provides value to customers is a positive change. However, where changes can be made, the potential value of those changes to customers must be weighed against the costs to make those changes in order to be justified. Many of the changes recommended by Staff are not justified either because they add no value to customers or because they will cost considerably more in terms of operating expense or capital investment than the benefits that would accrue to customers. To the extent the Commission accepts Staff's recommendations that require the EDUs to incur additional expense, the Commission must ensure that the EDUs are eligible to recover the costs for such mandated changes. Duke Energy Ohio urges that the Commission move judiciously to weight the ultimate value of such changes against the cost at the same time and make its decisions accordingly.

2. Ohio Retail Electric Service Market Definition and Measurements

The discussions that took place in a working subcommittee prior to Staff's formulation of its recommendation for a definition of the qualities of an effectively competitive market were lengthy and involved much debate. The various stakeholders participating in these discussions shared their respective views and attempted to facilitate a working and viable definition. The resulting definition proposed by the Staff includes some of the suggested elements that were discussed. While the debate was spirited, the result is unnecessary and redundant. The U.S. Department of Justice, Antitrust Division engages in enforcement with respect to anticompetitive conduct in collaboration with the Federal Energy Regulatory Commission. Likewise, the various Regional Transmission Organizations (RTOs) across the country, such as PJM Interconnection, L.L.C., (PJM) also independently monitor competition to ensure effective competition. Thus, to some extent, it is unnecessary to create new ways in which to evaluate the Ohio marketplace. The data that Staff recommends that the Commission gather will do little, if anything, to inform either the Commission or the public about the status of competition in the state. The data requested ignores the well-established methodologies already being used by the federal agencies and results in a collection of meaningless and non-applicable information. For example, in any given analysis of a competitive market, it is essential to determine a definition of *geographic* market and *product* market. With respect to the retail electric service in Ohio, the market is not necessarily comprised simply of EDU service territories. Likewise, the product market must be determined, and in this case, retail load is supplied through the RTO where anticompetitive conduct is already monitored.

3. Corporate Separation

Staff's comments regarding corporate separation and codes of conduct are unclear and problematic in that they suggest a need for regulatory oversight that is already in place. Staff also recommends remedies that are, in some instances, outside the Commission's jurisdiction.

Staff notes initially that utilities and their affiliates' activities should be vigilantly monitored to ensure compliance with corporate separation rules and laws. But, as Staff further correctly notes, since 1999, Ohio EDUs have been required to file corporate separation plans with the Commission. Thus, the Commission already monitors adherence to state law and its regulations.

Staff next makes a recommendation that no further Commission action is necessary pertaining to the requirement that electric utilities fully divest generation and supplier functions from transmission and distribution entities, maintaining their own shareholders and operating completely separate from affiliate structure.

In responding to these observations and recommendations, Duke Energy Ohio notes that its CRES affiliate is not owned by Duke Energy Ohio, Inc. Thus, Duke Energy Ohio does not own any supplier function that it could be required to divest. This assumes that Staff is referring to a CRES provider when it refers to "supplier function." Duke Energy Ohio owns certain generation assets that will be divested pursuant to the Commission's Opinion and Order in Case No. 11-3549-EL-SSO, *et al.*, on or before December 31, 2014.

Staff's observation that there is potential for utilities to share competitive information with a non-regulated affiliate is one that has already been considered and extensively addressed in existing law and regulation. Concern with respect to cross-subsidization and other anticompetitive conduct arose with the deregulation of the electric market in 1999, and gave rise to the existing requirements for corporate separation and codes of conduct. Existing law and regulation are in place specifically to monitor ongoing utility operations to ensure against anticompetitive conduct, as it has since 1999. Nothing has changed in the interim to suggest that the existing law and regulation are inadequate. Thus, Staff's recommendations here are unnecessary, redundant of existing law and regulation, and otherwise beyond the Commission's jurisdiction. Revised Code 4905.05 provides that the Commission may supervise and regulate public utilities and railroads, it does not allow the Commission to regulate parent corporations or affiliates of those corporate entities. This same law explicitly states that nothing in R.C. 4905.05 gives the Commission authority to regulate a holding company or its subsidiaries. Thus, the Commission's authority to control ownership of generation or supplier affiliates is circumscribed.

4. Electronic Data Interchange

Staff recommends that an EDI Policy Working Group be formed, comprised of Staff, utilities and supplier representatives and one representative from the original Ohio EDI Working Group (OEWG) that was formed in 1999. The main objective should be to prioritize EDI change requests and recommend EDI changes and to serve as a forum to resolve issues that cannot be resolved in the OEWG working group. Duke Energy Ohio agrees that the formation of such a working group is needed and would be helpful in the near future to work through and resolve issues related to providing customer data to CRES suppliers wishing to receive advanced meter data.

5. Seamless Moves/Contract Portability

Staff explains that it defines a "seamless move" is the ability of a customer's supplier to move with the customer to a new address without interruption in the supplier contract. Staff believes that customers would derive overall benefit from implementation of seamless moves. Staff recommends that the Commission order the OEWG to provide, within six months of an Order, an operational plan to put a seamless move process into effect. Staff recommends that the OEWG work with counterparts from Pennsylvania for lessons learned and opportunities for standardization across states.

This recommendation is very troubling in its lack of understanding with respect to the logistics and details around systems needed to allow for this procedure. There are significant regulatory and logistical impediments to implementing the hypothetical seamless move. Overcoming these obstacles will be costly and labor intensive, and not likely justified when weighed against the perceived benefits. All of these suggested changes are for the benefit of CRES providers rather than for customers. Customers have not complained of any problems related to the current practice and CRES providers are currently receiving sufficient notice through a "drop transaction" when a customer moves. As CRES providers must have business relationships with their respective customers, they must also have sufficient information to contact the customer to ascertain whether the customer wishes to remain with the CRES provider. There are very few electric utilities across the country offering some form of contract portability. Due to the complexities of competitive retail electric markets, there is no standard industry methodology for implementing this process.

Involving the EDU in this process creates added business expenses that customers will ultimately pay. It also unnecessarily puts the EDU in the middle of a business transaction between the CRES provider and the customer. Call center representatives of the EDUs will be placed in the unreasonable position of arbitrating between the customers and their CRES providers. Naturally, customers will expect their electric distribution company to provide advice about whether they should remain with the supplier or not. All of this places costs and efficiency burdens on the EDUs' call center representatives, all simply to benefit unregulated suppliers. At the same time, it detracts for the EDU's ability to focus on the distribution business. The electric distribution utilities will be required to make information technology changes to enable the warm transfer of the customer to the supplier. Again, these are solutions in search of problems.

During recent Ohio working group discussions regarding contract portability, CRES providers did not want contract portability fully automated. The CRES providers' preference was not to automatically provide the customer their current price at their new location. CRES providers prefer to be notified of a customer's move, so that they can evaluate whether to offer the customer their current price, a new price, or no offer for the new location. All of this has nothing to do with "customer choice" and has everything to do with "supplier choice". Duke Energy Ohio prefers to remain customer focused.

Finally, Staff suggests that Ohio should follow the direction of the Pennsylvania Public Utilities Commission (PAPUC) and refers to a docket wherein EDUs were ordered to file plans to implement seamless moves. The PAPUC's investigation into the competitive retail market may provide some informative data, but the participants and the development of the competitive retail market involves different stakeholders and different systems and parameters. If the Commission deems it worthwhile to proceed down the path of providing these facilities to enhance supplier services, the Commission should submit the issue to a stakeholder working group first to ensure that the Staff and interested parties fully understand the systems involved and the potential costs that should be balanced against the benefits to be gained.

6. Bill Format (Standardized Bill Format)

Staff held working group discussions related to standardized bill formatting. Duke Energy Ohio has not received complaints from customers related to bill format, nor has any customer complained that the Duke Energy Ohio bill is different from other EDU bills. Thus, the drive to standardize bill format seems to be a solution looking for a problem.

Nonetheless, as a result of the discussions, Staff made the following specific recommendations to the Commission:

- Each EDU should file an application for bill format changes within six months of an Order in this case.
- The EDUs should adjust bill language to reference supply and delivery charges. Supply charges refer to all bypassable charges or supplier billed charges. Delivery charges refer to all non-bypassable charges and cost associated with distribution and transmission.
- EDUs should adjust bills to distinguish the supply charges from delivery charges in a separate defined section of the bill. The supply charges would be separated from delivery in the same manner for customers served by SSO or a CRES provider.
- The EDUs should include the supplier's logo in the area containing supply charges of the bill. CRES logo to be same size as the EDU's logo and in color if EDU's in color.
- All EDU's price to compare calculations should be standardized. Calculated by dividing the dollar amount of the current month's bill that could be avoided with switching by the number of kWh used that month.
- Price to compare language should be modified to describe that it is the utility price that is being compared. (explicit language provided in comments)
- Costs should be paid for by all active CRES suppliers in an EDU service territory. EDU's bear burden of proof to demonstrate cost of IT changes.
- EDU's should file costs with Staff for review and Staff to file a recommendation to the Commission with an automatic approval process.

Changing EDU bill formats is costly and time consuming. Some of the Staff's recommendations with respect to bill formatting are presently not possible and will require significant investment to accomplish. For example, Duke Energy Ohio's logos are printed on the paper stock used for billing; so, even the Company's own logo is not electronically incorporated on the bill. This is a lower cost and more efficient use of resources as it is less expensive to customers for the utility to procure letterhead in bulk and print in a single color negating the need to logos in multiple colors on a monthly basis. It is not possible to add logos for the approximately sixty different suppliers as this would require stationery that would necessarily be hand-fed into printers for each supplier. Duke Energy's billing systems are used to serve six states and cannot be easily modified. As the other EDUs are also multi-jurisdictional, this may be an issue for other EDUs as well. Implementing a change such as this for Duke Energy Ohio will require the Company to acquire or develop its own new and complex billing system capable of printing the now, over sixty different CRES logos, and no longer be able to benefit in a currently in rate base and system shared among multiple jurisdictions.

As suppliers' relationships with customers begin and end pursuant to supplier contracts, this is a system that would be unworkable and is not automated. Changes to Duke Energy Ohio's billing system would necessarily impact operations in five other states. Thus, the addition of a supplier logo on the Duke Energy Ohio bill is not presently feasible in any respect. If CRES providers truly wish to have their logo appear on a customer bill, then they are free to elect to bill their customers directly and not participate in Duke Energy Ohio's current system.

Additionally, unlike other Ohio EDUs, Duke Energy Ohio also bills for gas distribution service on the same bill with electric charges. The sample bill format that was discussed during the stakeholder workshops did not take into account this fact. Likewise, the sample bill format that was provided by the Office of the Ohio Consumers' Counsel, included a "side-by-side" format that would not be possible for Duke Energy Ohio. Implementation of such format changes would require significant system changes, including testing, and yield questionable value. Duke Energy Ohio does not agree that billing format changes are necessary or desirable merely to satisfy a questionable need for format consistency across the state.

Price-to-compare is a fleeting concept. The only meaningful way to compare prices is to ensure that each product is the same. Because CRES provider offers vary widely in terms of length and pricing structure (*e.g.* percentage off, fixed price term, seasonal, *etc.*)and the SSO offer changes for each delivery period, a comparison is meaningless. Calculating a price-to-compare on a customer bill for each individual customer will require significant information technology investment and will yield questionable assistance to customers, at best.

Customers need to consider more than just the price-to-compare when considering a CRES provider's offer. While Staff's suggestion that the price be calculated by dividing the dollar amount of the current month's bill by the number of kWh used that month does provide a methodology that is consistent across EDUs, it does not account for differences in CRES provider contracts that can have a significant impact on the value of the offer. It also could inappropriately influence a customer decision as the customer's usage pattern in a given prior month may change the average rate in a manner that isn't reflective of the customer's usage in an upcoming month. In other words, the total dollars divided by kWh in April may give a customer some information in May when he gets his bill but it may not be at all representative of what the customer will pay in June, as the rate changes from a winter rate to a summer rate. In addition, the price-to-compare for the current bill cannot predict the price-to-compare for the next twelve months, which is the timeframe for typical supplier offers.

The current price-to-compare should not be solely relied upon by the customer when making a decision to accept a CRES provider's offer. Focusing the customer's attention on this single number can be misleading.

Staff recommends that costs be recovered directly from CRES providers in the EDU's territory; however, this requires that a particular CRES provider be mandated to pay for a service that it may not wish to use. Duke Energy Ohio appreciates the Staff's recommendation to build in an automatic approval process for such billing enhancements; however, to the extent Staff disagrees with the proposed EDU costs for implementation of these billing format changes, there is no recommended due process. It is likely that such proceedings will be contested by stakeholders that do not agree, either with the proposed format change or the costs associated with them. Automatic approval is unlikely in this context.

The overarching concern is that the Staff seems to have concluded, without any particular support, that bill format standardization is necessary. It should be noted that gas choice has been entirely successful in the state without standardization. In the absence of customer complaints, or customer surveys, it is not advisable to make changes that can cost millions of dollars with no obvious benefits.

7. Customer Enrollment

Staff made recommendations related to interactions with customers on an EDU's business website. Duke Energy Ohio supports Staff's efforts to simplify interaction with the EDUs and the Company is currently engaged in deliberations related to making this possible and at the same time, protecting customer security and privacy. While the changes suggested by Staff are possible, from an internet technology perspective, they require careful deliberation so that the privacy of customer information is not compromised. Also, changes to customer systems can be time consuming and costly and the Commission must enable cost recovery for such changes.

8. Advanced Metering Infrastructure

Staff observes that the detailed nature of customer energy usage data (CEUD) from Advanced Metering Infrastructure (AMI) creates a new facet of personal information that must be evaluated and addressed before new customer services can be developed. Staff recommends that the costs associated with providing the data access and availability for AMI CEUD need to be formally investigated. Duke Energy Ohio appreciates the Staff's recommendation and believes that the Commission should allow additional time and study to enable stakeholders to engage in further discussion and development – possibly through the OEWG – around data access standards as noted below in the Data Access and Time Differentiated Rates section of this document.

9. Data Access and Time Differentiated Rates

Staff makes the following recommendations with respect to data access and time-differentiated rates:

- A formal investigation into the costs of providing this data access is necessary.
- Commission should require utilities who have deployed AMI to file amendments to supplier tariffs, which specify the terms, conditions and charges associated with providing interval usage data.
- The Commission should encourage an opportunity for CRES to work with utilities to specify options for granularity, frequency, quality and format so that costs associated with each option may be specified.
- Commission should recognize the interactions of these recommendations with the EDI issues enumerated above and require utilities to demonstrate the extent to

which the filing of tariff amendments are consistent with the OEWG deliberations and rules.

- Until real time-of-use rates are offered in the market by CRES, EDUs should offer pilot time-differentiated rates.

Duke Energy Ohio agrees with Staff's observation that the Commission should allow additional time and study to enable stakeholders to engage in further discussion and development around data access and time-differentiated rates. The OEWG groups could include these matters in their discussions. Time-differentiated rate offers by EDUs that hold auctions to serve standard service offer customers are illogical. Requiring EDUs to continue to offer time-differentiated pilot rates under such circumstances is contrary to the development of a competitive marketplace. When each EDU has CRES providers interested in providing time-differentiated rates and has the ability to facilitate the exchange of data to allow the CRES provider to proceed, the EDUs will amend supplier tariffs as needed. There is no need for the Commission to order EDUs to amend supplier tariffs prior to the OEWG deliberations regarding data access considerations such as costs and standards noted above.

III. CONCLUSION

Duke Energy Ohio appreciates this opportunity to provide comments and looks forward to working with the Commission Staff and other stakeholders to continue discussions on these issues.

Respectfully submitted,

Elizabeth H. Watts
Associate General Counsel
Rocco O. D'Ascenzo
Associate General Counsel
Duke Energy Shared Services, Inc.
155 East Broad Street, 21st Floor
Columbus, Ohio 43215
Phone: 614-222-1330
Fax: 614-222-1337
Rocco.DAscenzo@duke-energy.com
Elizabeth.Watts@duke-energy.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served this 6th day of February 2014, by U.S. mail, postage prepaid, or by electronic mail upon the persons listed below.

Elizabeth Watts (0031092)

Maureen R. Grady
Joseph P. Serio
Edmund Berger
Michael J. Schuler
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
grady@occ.state.oh.us
serio@occ.state.oh.us
berger@occ.state.oh.us
schuler@occ.state.oh.us

Attorneys for Ohio Consumers' Counsel

M. Howard Petricoff
Stephen M. Howard
Vorys, Sater, Seymour and Pease LLP
52 E. Gay Street
Columbus, OH 43215
mhpetricoff@vorys.com
smhoward@vorys.com

Attorneys for Exelon Generation Company, LLC, and
Constellation NewEnergy, Inc.

Christopher J. Allwein
Williams, Allwein & Moser LLC
1500 West Third Avenue, Suite 330
Columbus, Ohio 43212
Mahila.christopher@puc.state.oh.us

Attorney for The Sierra Club

David F. Boehm
Michael L. Kurtz\
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 E. Seventh Street, Suite 1510
Cincinnati, Ohio 45202
dboehm@bkllawfirm.com
mkurtz@bkllawfirm.com
jkylercohn@bkllawfirm.com

Attorneys for Ohio Energy Group

Colleen L. Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45839-1793
cmooney@ohiopartners.org

Attorneys for Ohio Partners for Affordable Energy

Steven T. Nourse
Matthew J. Satterwhite
Yazen Alami
American Electric Power Service Corporation
1 Riverside Plaza 29th Floor
Columbus, Ohio 43215
stnourse@aep.com
mjsatterwhite@aep.com
yalami@aep.com

Attorneys for Ohio Power Company

Trent A. Dougherty
Ohio Environmental Council
1207 Grandview Avenue, Suite 201
Columbus, Ohio 43212
trent@theoeg.org

Attorney for Ohio Environmental Council

Todd M. Williams
Williams Allwein & Moser, LLC
Two Maritime Plaza, 3rd Floor
Toledo, Ohio 43604
toddm@wamenergylaw.com

Attorney for Advanced Energy Economy Ohio

Thomas R. Hays
7107 Cannons Park Road
Toledo, Ohio 43617
trhayslaw@gmail.com

Attorney for Northwest Ohio Aggregation Coalition

Glenn S. Krassen
Matthew W. Warnock
J. Thomas Siwo
Bricker & Eckler LLP
100 South Third Street
Columbus, Ohio 43215
gkrassen@bricker.com
mwarnock@bricker.com
tsiwo@bricker.com

Attorney for Northeast Ohio Public Energy Council

Judi Sobecki
Joseph Strines
The Dayton Power and Light Company
1065 Woodman Drive
Dayton, Ohio 45432
judi.sobecki@aes.com

Attorneys for The Dayton Power and Light Company

M. Howard Petricoff
Stephen M. Howard
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
Columbus, Ohio 43216-1008
mhpetricoff@vorys.com
smhoward@vorys.com

Attorneys for NRG Energy, Inc.

Matthew White
Vincent Parisi
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
mswhite@igsenergy.com
vparisi@igsenergy.com

Attorney for IGS Energy

Gregory Poulos
EnerNOC, Inc.
471 East Broad Street, Suite 1520
New Albany, Ohio 43215
gpoulos@enernoc.com

Attorney for EnerNOC, Inc.

M. Howard Petricoff
Stephen M. Howard
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
Columbus, Ohio 43216-1008
mhpetricoff@vorys.com
smhoward@vorys.Com

Attorneys for the Retail Energy Supply Association

Joseph Patrick Meissner
Law Firm of Meissner and Associates
5400 Detroit Avenue
Cleveland, Ohio 44102
meissnerjoseph@yahoo.com

Attorney for The Citizens Coalition

Michael R. Smalz
Joseph V. Maskovyak
Ohio Poverty Law Center
555 Buttles Avenue
Columbus, Ohio 43215-1137
msmalz@ohiopovertylaw.org
jmaskovyak@ohiopovertylaw.org

Attorneys for Ohio Poverty Law Center

Ellis Jacobs
Advocates for Basic Legal Equality, Inc.
130 West Second Street, Suite 700 East
Dayton, Ohio 45402
ejacobs@ablelaw.org

Attorney for the Edgemont Neighborhood Coalition

Nicholas A. McDaniel
Environmental Law and Policy Center
1207 Grandview Avenue, Suite 201
Columbus, Ohio 43212
NMcDaniel@elpc.org

Attorney for ELPC

Michael A. Walters
Pro Seniors, Inc.
7162 Reading Road
Suite 1150
Cincinnati, OH 45237
mwalters@proseniors.org

Noel Morgan
Legal Aid of Southwest Ohio, LLC
215 East Ninth Street, Suite 500
Cincinnati, Ohio 45202
nmorgan@lascinti.org

Attorney for Communities United for Action

Scott Torguson
Legal Aid Society of Columbus
1108 City Park Avenue
Columbus, Ohio 43206
storguson@columbuslegalaid.org

Attorney for Legal Aid Society of Columbus

William Sundermeyer
Associate State Director, Advocacy
AARP Ohio
17 S. High Street, #800
Columbus, OH 43215

Craig G. Goodman, Esq.
President
Stacey Rantala
Director, Regulatory Services
National Energy Marketers Association
3333 K Street, NW, Suite 110
Washington, DC 20007
cgoodman@energymarketers.com
srantala@energymarketers.com

Jay L. Kooper
Hess Corporation
One Hess Plaza
Woodbridge, NJ 07095
jkooper@hess.com

Attorney for Hess Corporation

Mark Brooks
Utility Works Union of America
521 Central Avenue
Nashville, TN 37211
markbrooks@uwua.net

Attorney for UWUA

Samuel C. Randazzo
Frank P. Darr
Matthew R. Pritchard
Joseph E. Olliker
McNees Wallace & Nurick LLC
21 E. State Street, 17th Floor
Columbus, Ohio 43215
Sam@mwncmh.com
fdarr@mwncmh.com
mpritchard@mwncmh.com
jolliker@mwncmh.com

Attorney for Industrial Energy Users of Ohio

James W. Burk
Carrie M. Dunn
FirstEnergy Service Company
76 S. Main Street
Akron, Ohio 44308
burkj@firstenergycorp.com
cdunn@firstenergycorp.com

Attorney for FirstEnergy Service Company

Peggy Lee
Robert Johns
Southeastern Ohio Legal Services
964 East State Street
Athens, OH 45701
plee@oslsa.org
rjohns@oslsa.org

Gary Benjamin
Community Legal Aid Services, Inc.
50 South Main Street, Suite 800
Akron, OH 43308
gbenjamin@communitylegalaid.org

Julie Robie
Anne Reese
The Legal Aid Society of Cleveland
1223 West Sixth Street
Cleveland, OH 44113
Julie.robie@lasclev.org
Anne.reese@lasclev.org

Amy B. Spiller
Jeanne W. Kingery
Duke Energy Retail
139 East Fourth Street
Cincinnati, OH 45202
Elizabeth.Watts@duke-energy.com
Rocco.DAscenzo@duke.energy.com

Attorneys for Duke Energy Ohio

Mark A. Hayden
Scott J. Casto
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308
haydenm@firstenergycorp.com
scasto@firstenergycorp.com

Attorneys for FirstEnergy Solutions Corp.

Michael K. Lavanga
Brickfield Burchette Ritts & Stone, PC
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington D.C. 20007
mkl@bbrslaw.com

Attorney for Nucor Steel Marian, Inc.

Gary A. Jeffries
Assistant General Counsel
Dominion Resources Services, Inc.
501 Martindale Street
Suite 400
Pittsburgh, PA 15212
Gary.a.jeffries@dom.com

Kimberly W. Bojko
Rebecca L. Hussey
Carpenter, Lipps, & Leland, LLP
280 North High St., Suite 1300
Columbus, OH 43215
Bojko@carpenterlipps.com
Hussey@carpenterlipps.com

Attorneys for OMA Energy Group

Gretchen L. Petrucci
Vorys, Sater, Seymour and Pease LLP
52 E. Gay Street
Columbus, OH 43215
glpetrucci@vorys.com

Attorney for Direct Energy Services LLC and Direct Energy Business LLC

Barth E. Royer
Bell & Royer Co., LPA
33 South Grant Avenue
Columbus, Ohio 43215
barthroyer@aol.com

Attorney for Dominion Retail, Inc.