

also believes that the dialogue, which developed from the Staff-run workshops and subcommittees, brought into focus workable solutions that can reduce current barriers holding back the development of the Ohio's retail electric service market. Finally, RESA believes that there are a few additions not in the Staff Report that the Commission should consider when issuing its Opinion and Order in the Investigation.

B. Specific Goals

The Staff's MDWP sets forth a number of specific goals to promote development of Ohio's retail electric service market. The Staff's specific goals are as follows:³

- **Standardize:** The Commission in its regulation should standardize the practices, processes, and market rules of the various electric distribution utilities ("EDUs").
- **Streamline:** The Commission should streamline the state electric service market policies to increase competition and provide for cost efficiencies, potentially leading to savings for customers.
- **Code of Conduct:** EDU and affiliate activities should be monitored to ensure compliance with Section 4928.17, Revised Code, and with Chapter 4901:1-37, Ohio Administrative Code ("OAC").
- **Pricing:** Cost causation should be aligned with cost recovery.⁴

RESA agrees with the Staff that articulating goals and then comparing how the goals are achieved by a particular suggestion makes for a thoughtful, orderly method to weigh the merits of particular proposals. RESA suggests that the Commission in its Opinion and Order adopt these goals and, then, use the goals to weigh whether particular suggestions should be adopted.

³ The bolded headings were composed by RESA.

⁴ MDWP at 8, 11, 12.

C. Specific Actions

Based on the workshops, subcommittee meetings and its own expertise, the Staff has made numerous recommendations for the Commission's consideration and action. RESA fully supports a number of the Staff's action recommendations, namely:

- Definition of "effective competition," its use as a goal for Ohio's retail electric service market, and the eight measures recommended by the Staff.
- Audits of the EDUs' policies and procedures pertaining to Code of Conduct rules with affiliates.
- A purchase of receivables ("POR") program will streamline bad-debt collection issues, will increase the number of active suppliers, and will increase the number of products available. All EDUs that do not currently have a POR program should file within a year an application to commence one, and all EDUs should have implemented a POR program within two years.
- Seamless Moves (which will allow a supplier, whose customer moves to a new address, to continue to serve the customer without interruption) will benefit customers. The implementation work and lessons learned in Pennsylvania should be analyzed for the implementation process in Ohio.
- The price-to-compare calculation and related bill message should be standardized.⁵

Although RESA agrees with many points and suggestions made by Staff, RESA finds that some suggestions if acted upon as proposed would not contribute towards the above-stated goals and should be amended. Therefore, RESA recommends a few limited modifications and clarifications for Commission consideration:

- RESA supports making generalized market information available, such as the number of suppliers and market concentration. RESA believes that which particular supplier has what percentage of the market should be kept confidential. This is the current practice by the Commission in accordance with approved settlements involving Columbia Gas of Ohio, Inc. ("Columbia") and The East Ohio Gas Company dba Dominion East Ohio,

⁵ MDWP at 9, 13, 16-17, 19, 21.

wherein they permit public access to information on market concentration, but not by supplier name.

- The EDUs should provide the necessary data that suppliers need to perform their collections, even when a POR program is offered. Also, all EDUs should adopt similar final-bill language that, when triggered, advises customers that outstanding supplier charges will be collected by the supplier, even when a POR program is offered.
- The Staff's recommended policy working group should not be limited to just electronic data interchange ("EDI") transactions. Rather, the policy group should also address issues for the EDU web portals for CRES data access and the File Transfer Protocol ("FTP") sites used by the EDUs and competitive retail electric service ("CRES") suppliers to exchange information.
- More appropriate bill language regarding the price-to-compare must be adopted. The Staff proposal is an improvement, but first there must be standardization on how the price-to-compare is calculated, before there can be standardized bill language.
- The recommended one-time set-up fee for logos on the bill needs clarification to apply to CRES suppliers who are actively soliciting customers and who are using EDU-consolidated billing. RESA believes that, if a supplier only wants to do dual billing, the supplier should not have its name on the EDU bill and should not pay for not listing its name and logo. In addition, the Commission should waive this requirement if the EDU costs prove to be prohibitive to the market.
- Instant Connect⁶ (as is being implemented in Pennsylvania) should be implemented, along with Seamless Moves in Ohio. The Commission should also order the Ohio EDI working group to include Instant Connect in its operational plan that it will deliver to the Commission within six months after an Order, under the MDWP.
- Customers should be permitted to delegate to the CRES suppliers the task of looking up the account number.
- Availability and costs to access customer usage data from advanced metering infrastructure ("AMI") should be finally determined so that the CRES market can further develop and CRES suppliers can offer new services from the AMI in place now, and being deployed to hundreds of thousands of customers in the near future.

⁶ "Instant Connect" is the ability of supply service to start on "day one" of the customer's new utility service, without the customer first having to go on default service.

II. Confidentiality of Supplier Information

Staff stated that, “[w]hen evaluating a market, companies’ market share is an important contributing factor to the health and vitality of the market.”⁷ The Commission’s current rules require the CRES suppliers to provide information regarding the number of customers served and the amount of load, but that it be kept confidential. *See*, Rule 4901:1-25-02(A)(5), Ohio Administrative Code (“OAC”). However, Staff is proposing a different approach for suppliers’ statistical information. Staff concluded that a “crucial step” in determining the health and viability of the retail electric service market is to know the market share of the active CRES suppliers by the number of customers and load. More specifically, Staff recommended that the number of customers served and the load in megawatt-hours for each CRES supplier in each EDU service territory not be confidential because it is not confidential in other industries.⁸

RESA understands that supplier information is important to the Commission as it monitors the retail electric service market. However, RESA is extremely concerned with the proposed “about face” as to the treatment of confidential information. Nothing about the information has changed, and the Staff’s rationale is insufficient to justify public treatment of the information.⁹ Suppliers keep the information about their market share concealed, especially when further delineated by customer class and load amount. This is highly sensitive information in a competitive market. Moreover, the Commission has not modified Rule 4901:1-25-02(A)(5), OAC, which declares that the information is deemed to be confidential.¹⁰ The fear is that, if competitors know who has what market share, the focus will be negative and against particular suppliers. The important information is how stratified the market is and whether concern for

⁷ MDWP at 11.

⁸ *Id.* at 12.

⁹ The Staff indicated that other industries, which were not identified, do not have such restrictions. (MDWP at 12)

¹⁰ The Commission is reviewing the rules in Chapter 4901:1-25, OAC, in *In the Matter of the Commission’s Review of Chapter 4901:1-25, Ohio Administrative Code Regarding Market Monitoring*, Case No 12-2053-EL-ORD.

market power is warranted by virtue of the concentration of either sales or customer counts. Such can be analyzed by making public the concentration numbers, but without attributing the market share figure (sales or customer count) to specific identified suppliers.

RESA supports the approach now being used by the two largest local gas distribution companies. For example, Columbia provides, on a regular basis, charts which show the number of active suppliers, number of customers, sales in Mcf, and aggregation data on a separate basis. However, the Columbia data only identifies the suppliers by an unrelated alphabet letter or number.¹¹ This approach has worked to provide the public with information about the competitive market, while also maintaining the confidentiality of the supplier information.

III. Purchase of Receivables

Staff recommended that all EDUs that do not currently have a POR program should file within a year an application to commence one, and that all EDUs have implemented a POR program within two years. Staff also proposed an alternative if its POR program proposal is not accepted by the Commission. Specifically, Staff proposed alternatively that two things be accomplished: (1) the EDUs provide the data needed for suppliers to perform their collections via a secure FTP website that is hosted and paid for by the CRES suppliers; and (2) all EDUs adopt final-bill language that advises customers that all outstanding supplier charges will be collected by the supplier, similar to what is included by The Dayton Power and Light Company (“DP&L”) in its final-bill messages.¹²

The EDUs should provide the data that suppliers need to perform their collections, even when a POR program is offered. There are two reasons. First, a POR program is not going to be

¹¹ *In Re: Columbia Gas of Ohio*, Case No. 08-1344-GA-UNC, Second Opinion and Order at 13 (September 7, 2011).

¹² During the subcommittee meetings, DP&L shared its current language on the last bill with a particular supplier. That language states: “This is your last bill for [Supplier A’s name]. Effective with your next DP&L billing statement, payments on unpaid supplier charges must be remitted directly to [Supplier A’s name.]”

offered by all EDUs immediately. Even the Staff is suggesting that the EDUs have up to two years to implement a POR program. Thus, there will be a period of time in which suppliers will continue to struggle from a lack of necessary data for collections. Second, there is no guaranty that all active suppliers will elect a POR program after it becomes available. In that situation, the non-electing CRES supplier should not be made to suffer by not having access to the data needed when performing its collections.

Likewise, all EDUs should adopt similar final-bill language that, when triggered, advises customers that outstanding supplier charges will be collected by the supplier if the customer is not on POR, even when a POR program is offered. The reasoning is the same as above – a POR program will not be implemented right away and, even after it is available, not all suppliers will elect POR. Moreover, consistent clear bill language is appropriate, which is something that the Staff has advocated on a broader level. The stakeholders found DP&L’s specific language to be clearer than what is used by several EDUs now. There is no reason to not implement this final-bill language irrespective of the implementation of a POR program offering.

In sum, adopting a POR would meet all four of the Staff’s goals. POR would standardize how receivables were treated among all the gas and electric utilities, it would streamline the collection process, and it would not interfere with enforcement of the Commission’s rules on Code of Conduct. Finally, whether the EDU uses a bad-debt tracker or charges CRES suppliers for the risk of the bad debt based on the actual historic experience of the utility, the business expense of uncollectable accounts should be based on the cost and priced accordingly. The two “alternatives” suggested likewise meet with the Staff’s goals and should be adopted along with the Staff’s recommendation for POR programs.

IV. Electronic Data Interchange

Staff pointed out that the Ohio EDI Working Group (“OEWG”) was discussed during the subcommittee meetings. Staff believes that a policy working group should be formed to assist the OEWG with direction and guidance.¹³ RESA agrees and supports this idea. RESA believes the new policy working group should not be limited to addressing just EDI standards and transactions. In addition to EDI issues, the workshops touched on many important data exchanges that are taking place. Web Portals are being implemented by Duke Energy Ohio Inc. and Ohio Power Company,¹⁴ and DP&L will be instituting a web portal as soon as practicable.¹⁵

The web portals are an important way of transmitting large volumes of data in a standard format and at very low cost. This is important for fulfilling not only the current requirement for 12 to 24 months of customer data on request, but the upcoming availability of hourly or even quarter-hour data. On the subject of customer migration, the Staff recommended that FTP sites be created for file exchanges when customers move. This is a way to assist customers electing to “port” or not port their contracts (addressed more below). Given these and other existing/upcoming means for interaction and communications between the EDUs and CRES suppliers, the Commission should be proactive in this area and not limit the recommended policy working group to just addressing EDI transactions (change requests and changes). The area of data exchange is a dynamic one. Everyone who has watched the information revolution of the last 20 years has observed how the revolution has brought access to mass data from few A-frame computers to the cell phone in your pocket. Thus, the ongoing policy discussions should be extended from EDI to other means of access to data.

¹³ MDWP at 18.

¹⁴ Duke’s web portal is working. Ohio Power Company’s web portal is in the final stages and will be operational by May 2014.

¹⁵ *In the Matter of the Application of The Dayton Power and Light Company for Approval of its Electric Security Plan*, Case Nos. 12-426-EL-SSO et al., Opinion and Order at 39 (September 4, 2013).

Finally, once the new policy working group is formed and given the wider mandate to look at all information exchanges, the Commission should provide some detail on how the policy working group will decide how suggestions are brought to the Commission. In this regard, RESA believes that fairness must reign so that no one entity or interest group, including RESA, should control the agenda or be able to veto bringing suggestions to the Commission.

V. Instant Connect along with Seamless Moves

Staff found that capacity issues once considered to make Seamless Moves “impossible” are not impediments to the implementation of Seamless Moves in Ohio.¹⁶ Per a proposal being considered by the Pennsylvania Public Utilities Commission, interested stakeholders in that state believe that capacity will still be part of the supplier’s portfolio of existing accounts and, therefore, capacity concerns are already taken into consideration.¹⁷ Staff recommended that the OEWG develop an operational plan for Seamless Moves in Ohio.¹⁸ RESA concurs, particularly with the Staff’s suggestion that the work and lessons learned in Pennsylvania be gleaned for the implementation process in Ohio. RESA, however, adds that Instant Connect is being implemented in Pennsylvania at the same time as Seamless Moves and in a coordinated fashion. Instant Connect should likewise be implemented, along with Seamless Moves, in Ohio. Though Staff did mention Instant Connect, the Staff did not directly address this issue in the MDWP, but Instant Connect is beneficial for customers and its implementation can be coordinated in an efficient fashion for Ohio.

¹⁶ MDWP at 19.

¹⁷ Plans to implement seamless moves in Pennsylvania by June 1, 2015, have been filed by nine EDUs: Duquesne Light (Case No. M-2014-2401127), PECO (Case No. M-2014-2401085), PPL (Case No. M-2014-2401103), Pike Light and Power (Case No. M-2014-2401119), Metropolitan Edison (Case No. M-2014-2401130), Penelec (Case No. M-2014-2401155), Penn Power (Case No. M-2014-2401151), West Penn Power (Case No. M-2014-2401148), and UGI Electric (Case No. M-2014-2401126). Those filings also include proposals for implementing Instant Connect. The Pennsylvania Public Utilities Commission is evaluating those filings.

¹⁸ MDWP at 19.

Instant Connect as it is being practiced in Pennsylvania would meet two of the Staff's goals. It would standardize part of the practice of moving accounts, which now differs from utility to utility in Ohio, and it would streamline the moving process for citizens familiar with customer choice and new to the state. Instant Connect poses no Code of Conduct issues and it does not require a subsidy, so it does no harm to the other two goals.

VI. Price-to-Compare on the Bills

Staff correctly noted that, during the subcommittee meeting discussions, it was determined that the price-to-compare is not being calculated consistently by the EDUs in Ohio. The Staff concluded that this inconsistency creates an additional hurdle for the market.¹⁹ This hurdle is unreasonable and the calculation should be standardized. RESA concurs that the price-to-compare must be calculated in a consistent manner.

The Staff also recommended that the price-to-compare language in the bills be modified to state:

Price-to-compare: In order for you to save money off of your utility's supply charges, a supplier must offer you a price lower than (utility name)'s price of X.XX cents per kWh for the same usage that appears on this bill. To review available competitive supplier offers, visit the Public Utilities Commission of Ohio's "Energy Choice Ohio" website at www.XXXX.com. [Footnote omitted.]²⁰

RESA believes that the Staff's proposed language only can apply in one situation—namely, on the bill to a customer who is receiving default service from the EDU at the time of the bill. Once a customer changes suppliers, the new supplier would indeed have to beat the former supplier's offer to save the customer money. Using the utility default price as the only benchmark once a customer switches may lead a customer to avoid looking at all of the CRES options. In addition, this bill language is very

¹⁹ MDWP at 20.

²⁰ *Id.* at 21.

problematic for use with customers who are currently receiving a product from a supplier. Also, this language creates issues because, in the near future, EDU capacity costs will be changing and, thus, the comparison period is short-lived. Finally, this bill language does not educate a customer or address the economics of a long-term offer, which are very different when compared with a snapshot of the default service price. Given these points, RESA has concerns with the Staff's proposed bill language and does not recommend adoption of Staff's proposed language. However, as noted earlier, RESA believes that the price-to-compare calculation needs to be standardized across the EDU service territories, including how it applies once a customer has switched. Once the calculation is standardized, then the bill language can be standardized.

VII. Set-Up Fee for Logos on the Bills

Staff has recommended that all supplier logos be included on the EDU-consolidated bills. Staff specified that the supplier logo should be in the area containing the supply charges and be the same size as the EDU logo.²¹ Staff recognized that specific IT changes will be required for the supplier logos to be on the bills, and has recommended a one-time set-up fee to be paid by "all active CRES" suppliers in each EDU service territory, based on IT costs being evenly split among the CRES suppliers. Staff added that any new CRES suppliers in the first five years after the IT changes will also pay the set-up fee, and those funds will offset the expenses charged to "all suppliers for consolidated billing."²²

RESA does not oppose the set-up fee, but is concerned that the Staff's recommendation is not specific enough. RESA would interpret "active" to mean more

²¹ MDWP at 21.

²² *Id.* at 22

than just those CRES suppliers who hold a certificate and who have registered to provide CRES in a particular service territory. However, there is still some question as to the meaning of the Staff's language. For instance, does "all active CRES" suppliers means all CRES suppliers actively soliciting customers in the service territory, or all CRES suppliers actively using EDU-consolidated billing? In RESA's view, the one-time set-up fee should apply to all active CRES suppliers who are soliciting customers in the service territory *and* who are using EDU-consolidated billing. It is not fair to impose the set-up fee on CRES suppliers who do not use EDU-consolidated billing, and who are not soliciting customers. Accordingly, the Commission should further clarify the intended scope of the set-up fee as detailed by RESA.

VIII. Customer Enrollment -- Obtaining Account Numbers

RESA's suggestion to the Staff on account numbers was simple and straight forward. If the customer does not have or cannot find the multi-digit account number, the customer should be able to either contact the EDU to get the account number or authorize the CRES supplier to obtain the account or SDI number on the customer's behalf. There does not seem to be much risk in this process because, if the customer does sign up with the CRES supplier, the EDU then on its own will supply the CRES supplier with the account number so the CRES supplier can administer the account. The only risk seems to be that when the CRES supplier obtains the account number from the EDU on behalf of a prospective customer and then fails to sign up the customer, but nonetheless takes the account number and enrolls the customer anyway. If that happens, proving that the customer was slammed should be fairly easy as there would not be a signed agreement, voice file or third-party verification which the supplier would be produced to counter a

customer slamming complaint. So in this very unlikely scenario, where an unscrupulous supplier would slam a customer, enforcement is highly likely and the penalties could include loss of license as well as forfeiture. Today, CRES suppliers routinely receive customer account numbers from customers in order to secure usage data from the utility needed to quote a price. If an enrollment does not occur, the CRES supplier still has the account number and similarly could effectuate a slam, and as was discussed in the RMI subcommittee, that has yet to occur in the decade of customer shopping we have had. As indicated through the punitive statutes mentioned above, the risk of getting caught is very high, the punishment for this crime is real and substantive, and the margin from a single customer is low.

The Staff, however, has suggested that the customer and only the customer should be allowed to contact and authorize the EDU to release the customer's account number for enrollment.²³ Staff then proceeds to recommend that all EDUs allow the customers to register on the EDUs' websites (not using the account number) and view their account information, including the account number. In Staff's view, this "will provide the customer with adequate information to switch to a supplier."²⁴ RESA supports the idea of access to account information from an EDUs' website. RESA though urges the Commission to go the extra step and allow the customers to authorize a supplier to obtain the account number and allow customers to delegate the task of looking up the account number, after proper authorization by the customers. It should be recognized that not every retail customer has ready access to the internet. Further, of the subset that does have ready website access, not all such customers desire to create yet another website

²³ MDWP at 22.

²⁴ *Id.*

login and password. Also, under this paradigm, the likelihood that a customer mistakenly enters an errant digit would logically be higher than if a trained employee with a CRES supplier is responsible for transcribing the account number information. Finally, Staff's suggestion does not appear to ban a customer who is meeting with a CRES supplier at a store or kiosk from using the CRES supplier's internet system to obtain the required account or SDI number from the EDU's website. So it appears that the key difference here between the Staff and RESA may only be who keys into EDU's website.

In RESA's view, since there is no meaningful security interest at stake, consumer convenience should be paramount, and the customer should be the one to decide what is the most convenient to obtain or re-obtain their account number. The Staff's proposal is not inappropriate, just customer unfriendly. RESA is suggesting that the CRES salesman do the equivalent of standing in the Bureau of Motor Vehicles line to transfer the auto license as part of a car sale. Customers should be able to authorize a CRES supplier to obtain the customer's account number for them for enrollment purposes only.

Appropriate security measures can be established by the CRES suppliers and EDUs to ensure and document that a valid authorization was obtained by CRES supplier before an enrollment request is processed. The Commission should not eliminate creative options. Even if the Commission adopts the Staff's recommendation in this area, the Commission should also direct the EDUs and CRES suppliers to implement other secure mechanisms so that a customer-friendly enrollment process is established in Ohio.

IX. Advanced Metering Infrastructure

Staff stated that further investigations are needed in this area before these services can develop. Specifically, the Staff mentioned three issues that need additional

investigation and consideration: (a) the customer usage data from AMI is so detailed; (b) the cost of access to the data needs to be considered;²⁵ and (c) the availability of the data needs to be worked out.²⁶ RESA must point out that AMI is being deployed all over Ohio. In Duke's service territory, AMI deployment is nearing completion.²⁷ In Ohio Power Company's service territory, it has deployed some infrastructure and is planning a significant deployment over the next several years.²⁸ The Commission ordered DP&L in September 2013 to develop a deployment plan for the Commission's consideration, which will be filed by July 2014, if DP&L wants to extend its Service Stability Rider.²⁹ Moreover, at the current time, CRES suppliers, including RESA members, are waiting to offer new competitive services to customers with AMI, but cannot make those offers when the EDUs do not have the practices, processes and rules in place to allow CRES suppliers to access the usage data and bill the customers accordingly. Discussions and investigations have taken place already.³⁰ These issues need to be decided, not explored

²⁵ Staff specifically recommended that the EDUs propose amendments for their supplier tariffs to charge for providing interval data. (MDWP at 25) This appears to reflect a belief that it is acceptable to charge CRES suppliers for accessing the AMI data needed to bill the customer. A CRES supplier should not be charged to access the AMI data needed to bill the supplier's customers each month. If the Commission were to allow EDUs to charge CRES suppliers for accessing the necessary billing data from AMI, that cost will end up being a component of the CRES charges. Essentially, then, the customer will be paying to access its own usage data. EDUs should not be permitted to charge CRES supplier for accessing the billing data.

²⁶ MDWP at 23, 24-25.

²⁷ Duke is planning to complete its total deployment in mid-2014. *In the Matter of the Application of Duke Energy Ohio, Inc. to Adjust Rider DR-IM and Rider AU for 2011 SmartGrid Costs*, Case No. 12-1811-GE-RDR, Opinion and Order at 3 (March 27, 2013).

²⁸ *In the Matter of the Application of Ohio Power Company to Initiate Phase 2 of its gridSMART Project and to Establish the gridSMART Phase 2 Rider*, Case No. 13-1939-EL-RDR, Application at 2-3 (September 13, 2013).

²⁹ *In the Matter of the Application of the Dayton Power and Light Company for Approval of its Electric Security Plan*, Case Nos. 12-426-EL-SSO, et al., Opinion and Order at 28 (September 6, 2013).

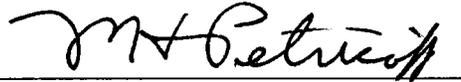
³⁰ In addition to discussions in this investigation, customer usage data from AMI was discussed in *In the Matter of the Commission's Review of Time-Differentiated and Dynamic Pricing Options for Retail Electric Services*, Case No. 12-150-EL-COI; and *In the Matter of the Review of the Consumer Privacy Protection and Customer Data Access Issues Associated with Distribution Utility Advanced Metering and Smart Grid Programs*, Case No. 11-277-GE-UNC.

more; additional investigations should not further delay the development of the competitive market in this area.

X. Conclusion

For the foregoing reasons, RESA respectfully requests that the Commission adopt many of the Staff's recommendations in its MDWP as detailed herein, modify/clarify certain Staff recommendations as detailed herein so that known problems are avoided, and also adopt a requirement that Instant Connect be required for the Ohio CRES market.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Initial Comments was served this 6th day of February 2014 by electronic mail, upon the persons listed below.



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