

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review)	
of its Rules for Energy Efficiency Programs)	Case No. 13-651-EL-ORD
Contained in Chapter 4901:1-39 of the Ohio)	
Administrative Code.)	

In the Matter of the Commission's Review)	
of its Rules for the Alternative Energy)	Case No. 13-652-EL-ORD
Portfolio Standard Contained in Chapter)	
4901:1-40 of the Ohio Administrative Code.)	

In the Matter of the Amendment of Ohio)	
Administrative Code Chapter 4901:1-40,)	Case No. 12-2156-EL-ORD
Regarding the Alternative Energy Portfolio)	
Standard, to Implement Am. Sub. S.B. 315)	

**OHIO PARTNERS FOR AFFORDABLE ENERGY'S
COMMENTS**

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David C. Rinebolt
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45840
Telephone: (419) 425-8860
or (614) 488-5739
FAX: (419) 425-8862
drinebolt@ohiopartners.org

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I. INTRODUCTION

Ohio Partners for Affordable Energy ("OPAE") herein submits to the Public Utilities Commission of Ohio ("Commission") these comments in the matters of the Commission's review of its administrative code rules for energy efficiency programs and the alternative energy portfolio standard, including provisions implementing Am. Sub.S.B. 315. OPAE also provides comments on the staff queries contained in the Entry issued January 29, 2014.

Failure to address a particular provision of the rules should not be interpreted as support or opposition to the staff proposal.

II. Comments Regarding Chapter 4901:1-39

4901:1-39-01(E) – The proposed definition of “coincident peak-demand savings” appears to be incorrect for the purpose it is used in these regulations. The term should be “peak demand savings” and should specify the demand savings resulting from energy efficiency as measured against PJM’s peak because the capacity resource created by energy efficiency investments is bid into PJM. In addition, the system is now demonstrating substantial peaks in the winter.

4901:1-39-01(H) – See comments to 4901:1-39-03 (A)(2).

4901:1-39-01(W) – The proposed definition of “Program” should be modified to provide an accurate example of what constitutes an energy efficiency program. OPAE recommends that the provision be altered as follows:

(W) “Program” means a single offering that includes one or more measures provided to electricity consumers. For example, a weatherization program may include insulation replacement, ~~weather stripping~~ air sealing, and ~~window replacement~~ high efficiency heating units.

These changes may seem petty, but the proposed language mischaracterizes what is included in a cost-effective weatherization program. Insulation is not replaced, it is installed. Existing insulation is generally left in place and supplemented with additional insulation. Air sealing is a more accurate term than weather stripping. And, window replacements are not cost-effective and are not a component of weatherization programs.

4901:1-39-01(X) – The proposed definition of “shared savings” should be modified by eliminating ‘distribution’ from the definition of avoided costs used to determine the incentive. Electric distribution utilities (EDUs) recover lost distribution

revenues from ratepayers so those costs are not ‘avoided’ and should not be included in the calculations. Customers pay EDUs for lost distribution revenues through Demand Side Management (DSM) Riders (which have different names depending on the utility); through decoupling; or, through a straight-fixed variable rate design that the Commission has urged EDUs adopt. Recovery of the approved distribution revenue requirement has become an entitlement for EDUs and customers cannot escape paying the charges. Because distribution charges are not avoided, there is no savings and the cost should not be included in shared savings calculations.

4901:1-39-01(AA) – The word ‘distribution’ should be removed from the definition for the reasons cited above. Including distribution in the test is a vestige of the time when utilities were vertically integrated and customers did not pay distribution costs if they reduced usage as a result of utility DSM programs.

Addition to 4901:1-39-01 -- OPAE recommends the Commission insert a definition of the Utility Cost Test (UCT), also known as the Program Administrator Cost Test (PACT), since it is referenced later in the Chapter.

4901:1-39-03 (A)(1) – The current definition, which refers to ‘capital stock’ is consistent with industry practice and preferable to the phrase “electric consumer facilities”. OPAE supports staff’s recommendation to substitute “commercially available” for “alternative”.

4901:1-39-03 (A)(2) – This subsection has been modified to permit the EDU to choose “either” the total resource cost test, “or the utility cost test, whichever is

applicable” when determining economic potential. OPAE supports using the Utility Cost Test (“UCT”) as the threshold test for program approval and cost recovery.¹

This is appropriate for several reasons. The UTC is the most relevant measure because it evaluates the cost effectiveness of the utility expenditures which are recovered from customers. Using the UTC will also expand the ability of utilities to capture savings from a broader range of technologies and services. For example, as noted previously, windows are not viewed as a cost-effective investment in residential and small commercial weatherization programs because it will take over 25 years to recover the cost of the windows through the energy savings. Windows will not pass a TRC test. However, using high efficiency windows does save energy when compared to standard windows. A utility can, however, provide an incentive at a level that can prompt a customer to choose the higher efficiency option, while remaining cost-effective, which can then be counted for the purposes of meeting the benchmarks. Cool roofs are another example. Replacing a roof with a light covered alternative will not pass the TRC but, again, a utility can offer an incentive set at a level that is cost-effective for ratepayers yet prompts the customer to opt for the more efficient option.

A number of policymakers have expressed concern of late that it will become increasingly difficult to meet the benchmarks in R.C. 4928.66. While this is only partially justified, it does support recognizing and capturing the energy efficiency aspects of products that would not pass a TRC test. The UCT allows a utility to cast a wider net in search of savings.

¹Daykin, Elizabeth, Jessica Aiona, and Brian Hedman, *Whose Perspective? The Impact of the Utility Cost Test*, at 8. Available online at: http://www.cadmusgroup.com/wp-content/uploads/2012/11/TRC_UCT-Paper_12DEC11.pdf

4901:1-39-03(A)(2) – The proposed section should be modified to promote the UCT as the primary cost-effectiveness test used to evaluate the portfolio for the reasons discussed above. OPAE recommends the subsection be modified to read as follows:

- (2) Analysis of economic potential. For each ~~available alternate~~ measure identified in the assessment of technical potential, the electric utility shall conduct an assessment of cost-effectiveness using either the total resource cost test or the utility cost test, whichever is applicable. Alternative cost tests may also be included in the plan.

4901:1-39-03(A)(4) – The rules should also require utilities to evaluate cost-effectiveness based on the lifecycle savings of a particular measure. This will reduce the current emphasis on low-cost measures that have a quick payback but are short-lived. The Technical Resource Manual (TRM) treats CFLs as having a 9 year life (which is too long). A heat pump, on the other hand, has an 18 year life. Currently, utilities have chosen to emphasize measures with quick paybacks in order to maximize shared savings. The EDUs should, instead, focus on the payback over the life of the measure which will provide a bigger benefit to customers over time. A lifecycle approach creates a preference for investment in major energy using systems with long lives. It will also assist utilities in reducing the need to acquire as much efficiency in the future, the period when policymakers are concerned that utilities cannot meet the benchmarks. EDUs need to focus on longer term strategies as opposed to reaping short-term profits. OPAE recommends the subsection be modified as follows:

- (4) For each measure considered, the electric utility shall describe all attributes relevant to assessing its value, including, but not limited to potential energy savings or peak-demand reduction, lifecycle cost, and nonenergy benefits.

4901:1-39-03(B)(2) – Again, to reinforce the focus on measures with longer lives, OPAE recommends modifying the proposed subsection as follows: Benefits and lifecycle costs to all members of a customer class, including nonparticipants.

4901:1-39-03(B)(7) – The language in the current rule is a more accurate description and should be retained.

4901:1-39-03(B)(13) – The current provision should be retained. Market transformation is a primary goal of energy efficiency programs. Using efficiency programs to leverage market transformation can potentially obviate the need for efficiency programs in the future by ensuring efficiency is valued by the market and manufacturers maximize efficiency in order to meet market demand.

4901:1-39-04– There is a need to address what has become a problem in the implementation of new DSM portfolios when previous portfolio authorizations expire. The Commission has a busy docket. This has resulted in a failure to approve new portfolios in a timely manner. The Commission has extended current programs when this has occurred, but extensions do not resolve the problems caused by delays in program approval. OPAE is well aware of this as an implementation contractor. Short-term extensions disrupt the momentum and effectiveness of programs. Recently OPAE was only able to give subcontractors a three month extension when a portfolio expired, while parties wrangled slowly over the components of the new portfolio. Then the program was extended for another three months. Implementation contractors need certainty, as do utilities. The regulations should be modified to ensure timely implementation of programs.

Unfortunately, the proposed section is not the appropriate solution to the problem. Under the proposed rules, as the end of the current portfolio approaches, the utility would file any proposed changes with the Commission on September 15th. Interested parties would provide comments. Then the EDU would choose whether or not to accept any of the comments and file a final plan. This proposed section puts the utility plan on autopilot; once a plan is approved customers and other interested parties lose the right to a hearing in a litigated proceeding and, more importantly, have no ability to challenge the costs associated with the programs that will be borne by consumers.

The proposed regulations substitute the process that currently takes place in a collaborative for the filing of an application which requires the Commission to make a decision. Currently, the collaborative works with the utility in good faith to develop a program that all parties agree will meet the benchmarks, and on incentive and cost recovery. When, despite the best efforts of the utility and interested parties, consensus cannot be reached there is a hearing and the issues are litigated. Most of the time there is agreement. There has, however, been disagreement in the past over program components, shared savings, 'lost' distribution revenue, and other cost recovery issues. Utilities should not have the right to make these decisions unilaterally unless they want to pay for the programs out of their own revenues and not seek reimbursement from customers. The prudence of EDU decisions should not be presumed when there is no ability to challenge the presumption.

The proposed regulations amount to a clear denial of due process and foreclose any ability of customers to have an impact on the programs for which they will ultimately

pay. Customers have a right to a hearing when rates are established. See generally R.C. 4909.15(F), referencing Chapters 4901, 4903., 4905., 4907., 4909., 4921., and 4923. While not all those provisions are necessarily relevant to approving a DSM program and the amount of dollars customers will pay, taken together they indicate the requirement of Title 49 that parties in interest have a right to be heard when rates are established. The right to be heard means a hearing and the Commission making a decision based on the evidence before it. It does not mean filing comments and allowing the utility to make the decision.

The proposed rules also fail to resolve the difficulties that have emerged regarding the bidding of capacity into the PJM Base Residual Auction (BRA), with the auction revenues offsetting program costs. Because programs would be annual under the proposed rules, there is no ability to predict what savings will be achieved for the purpose of bidding efficiency and demand response into the PJM BRA auction unless the proposed rules are modified to require the EDUs to bid in capacity based on the statutory benchmarks they must meet. The rules should also require that the risk associated with the bidding be on the utility; if the utility fails to meet its benchmarks, it must also cover its position in the capacity market. This would create an enforcement mechanism to ensure compliance with the law.

OPAE recommends the provision as proposed be deleted. It recommends instead that the following approach be taken:

- 1) Portfolios are to last five years.
- 2) The EDU must file for an extension of the portfolio eighteen months prior to the expiration of the portfolio.

- 3) The proposed program will be litigated unless all intervening parties agree to a settlement, as required by Title 49.
- 4) The EDU is required to bid 100% of the efficiency and demand response required to meet the benchmarks established by R.C. 4928.66 and is responsible for any shortfall which shall act as a penalty for non-compliance with the benchmarks.
- 5) DSM riders are set in annual proceedings which include the filing of the required yearly compliance reports and which require a hearing if any interested party chooses to challenge the application.

This approach meets several goals. It ensures program continuity by lengthening the term of the portfolio. It ensures timely approval of a new portfolio by providing an adequate timeframe to accommodate settlement negotiations and litigation if necessary. It resolves the questions associated with bidding capacity into the forward BRA auctions. And, it establishes a mechanism to ensure EDU compliance with Ohio law in a manner that requires no action by the Commission; i.e., the market is used to discipline performance.

4901:1-39-04(C)(5)(i) – This provision details what must be included in a portfolio plan. At the end of the subsection, the EDU is subjected to a requirement to lay out “customer class allocations, if appropriate.” The phrase “if appropriate” should be removed and replaced with “when costs will be shared among customer classes”.

It would be best if the Commission issued rules that prohibit the shifting of costs associated with DSM programs across customer classes. The cost-shift only goes one way: from industrial customers to everyone else. This should be prohibited and the

prohibition should apply to any action the EDU chooses to count for the purpose of complying with the benchmarks. This would include cost-shifting in the form of interruptible rates; special arrangements which involved energy efficiency or demand response commitments; and, any other mechanism whereby members of one class shift costs to other customer classes.

If the Commission declines to move in this direction, OPAE suggests that the plan should provide a specific explanation of what programs give rise to costs that are paid for by other customer classes; define how the class allocation is determined; and, make clear how much each customer class will pay for each program. There should be transparency. Currently, many special arrangements are confidential. The plan should aggregate the costs of these special arrangements, to the extent the rate subsidy is provided to secure the commitment of DSM resources, so customers know what they are paying for in the DSM rider that must be paid. At this point, it is impossible to ascertain the level of delta revenue associated with these subsidies that small customers are paying. It may well be that as much as half of the current DSM riders consist of inter-class subsidies. Under current rules there is no way to tell.

4901:1-39-05(A)(1)(b) –The language of this section permits utilities to count savings resulting from ‘energy performance standards’ established by law or regulation, citing the Energy Independence and Security Action of 2007 and upgrades of building codes as examples. OPAE opposes this provision. Even though under the proposed rules utilities cannot collect an incentive or incur a cost associated with these standards, it still allows an EDU to take credit for savings from something it did not have any involvement in. This provision will minimize the level of programming available to

customers and will undermine the point of Ohio's law: to provide for additional energy efficiency and demand response above and beyond transformations that occur in the market. The utilities already benefit from standards and codes indirectly; codes and standards reduce energy use, reducing the baseline used by the utility and, in turn, reducing the level of energy efficiency it must achieve. The current regulatory approach already factors in these changes through the averaging of three years of consumption to establish the benchmark. Standards and codes reduce the benchmarks, reducing the amount of efficiency an EDU must procure.

If the Commission does move forward with this proposal, preventing EDUs from paying for or receiving incentives related to savings resulting from laws and regulations is appropriate. In addition, the Commission should require that an EDU undertake a measurement and verification program (M&V) to determine if the standard is actually implemented and if it is having an impact on energy use within the EDU service territory. Ohio is an entire code cycle behind in implementing the International Energy Conservation Code ("IECC"). Providing credit for a code that has not been implemented is absurd. In addition, even when Ohio adopts a code, there is little enforcement, so the reduced energy use that should result does not actually occur. An M&V process can determine whether the code is actually being used. Counting something that does not actually happen is not permitted elsewhere in these rules and should not be authorized by this provision. See proposed rule 4901:1-39-04(A)(2)(b) which provides details on M&V requirements.

The Commission should also eliminate the provision that permits an EDU to compensate a customer for the "inconvenience of undertaking a commitment process".

Administrative costs are one thing, but the inconvenience of taking an action that permits a customer to avoid paying a rider should not be compensated, particularly when it is shifted to residential and small commercial customers. It is equally inconvenient for a person to have his wallet thinner because the money was used to compensate a corporation for its inconvenience. The rules propose no standards for evaluating what constitutes ‘inconvenience’ or quantifying what ‘inconvenience’ is worth. The same is true for administrative costs; the proposed rule sets no standards and fails to provide any direction on how to quantify the costs. There are costs of doing business. Utility charges are part of this. Actions taken to reduce those costs should not be reimbursed by ratepayers. Paying the delta revenue associated with such agreements should be punishment enough for the small customer.

The proposed section should be modified as follows:

- (b) A comparison of actual annualized energy savings and peak-demand reductions achieved by electric utility programs with the applicable benchmarks. ~~An electric utility shall not provide a financial or rider exemption incentive for, but may count in meeting any statutory benchmark, the adoption of measures that are required to comply with energy performance standards set by law or regulation, including but not limited to, those embodied in the Energy Independence and Security Act of 2007, or an applicable building code. The prohibition against a financial or rider exemption incentive does not preclude the electric utility from compensating a customer for the administrative costs and inconvenience of undertaking the commitment process, in the form of a commitment payment.~~

4901:1-39-05(A)(2)(a)(iii) – The words “transmission and” should be deleted from the proposed subsection. There is no guarantee that investments in transmission upgrades by an EDU affiliate will directly affect Ohio customers. Moreover, transmission is overseen by the Federal Energy Regulatory Commission; the PUCO

does not have jurisdiction. Transmission owners are already incentivized to make these investments by FERC through enhanced rates of return and the provision for incentive payments by PJM for new transmission. The point of R.C. 4928.66 is to spur energy efficiency investments in Ohio, not in regional transmission systems owned by an affiliate of the EDU.

4901:1-39-05(C)&(D) – Subsection (C) provides for comments to be filed on an EDU’s annual portfolio report and the independent evaluator’s report thirty days after the latter is filed. Subsection (D) indicates that the Commission “shall schedule a hearing” or “issue its opinion and order.” Obviously, an opinion and order is issued after a hearing. However, the provision implies that the Commission can issue an opinion and order without a hearing on the plan. The subsection should require that a hearing will be held absent a unanimous agreement of the parties.

4901:1-39-07(A) – In order to ensure transparency and provide all customers with information on the costs of complying with R.C. 4928.66, the costs of reasonable arrangements that involve the commitment of DSM resources to an EDU should be publicly available. OPAE recommends that the following sentence be inserted at the end of the proposed subsection: The delta revenue associated with the reasonable arrangement shall not be considered confidential and shall be reported as a part of the filing made pursuant to 4901:1-39-06.

4901:1-39-07(B)(2)(a)&(b) – This proposed section appears to endorse counting capacity as defined by any “regional transmission organization” approved by FERC. The language creates the potential that a utility could count as capacity something recognized in MISO or the New England ISO. The provision should be modified to only

count capacity as defined by the regional transmission organization in which the EDU participates. In the case of all Ohio utilities, this would be PJM. Capacity costs in MISO do not directly affect Ohio consumers. If an EDU opts to move to another regional transmission organization, the rules that define capacity within that organization should apply. Subsection (b) should be eliminated and subsection (a) should be modified to read as follows:

- (a) A peak-demand reduction program meets the requirements to be counted as a capacity resource under the tariff or capacity auction of the regional transmission organization approved by the federal energy regulatory commission in which it is a member.

4901:1-39-07(B)(3) – OPAE has long supported the “as found” method of calculating savings, which this section embraces. However, OPAE does not support counting ‘as found’ savings from installing new equipment unless it is installed as a part of a comprehensive energy improvement plan where new systems replace old systems. The portion of the subsection that limits incentives to the customer only for the savings above current standards is appropriate because it limits the cost if the incentives.

OPAE opposes compensating customers for administrative costs and inconvenience for the reasons cited in comments to 4901:1-39-05(A)(1)(b). There are costs to obtaining an incentive or bypassing a rider and those should be absorbed by the applicant.

III. Comments Regarding Chapter 4901:1-40

4901:1-40-04(A)(8) – It is unclear what is meant by a storage facility that “promotes the better utilization of a renewable energy resource.” The term ‘promote’ needs to be defined. Otherwise, a technology that simply demonstrates attributes that

prove it could be used to store power generated from a renewable resource is not the same as a technology that stores energy produced by a renewable energy resource. A better approach would be as follows:

- (8) A storage facility, ~~if it promotes the better utilization of a renewable resource~~ that stores energy produced by a renewable energy resource. The amount of energy that may qualify from a storage facility is the amount of electricity dispatched from the storage facility.

4901:1-40-04(G) – This subsection would provide the Commission with broad discretion to define what constitutes an advanced- or renewable-energy resource. This is not authorized by statute. The subsection should be eliminated. If it is not eliminated, there should be a mandatory hearing; authorizing an interested person to request a hearing is not the same as having a hearing.

IV. Response to Staff Questions

- (a) OPAE has no comments regarding this question at this time, but reserves the right to file reply comments.
- (b) OPAE has no comments regarding this question at this time, but reserves the right to file reply comments.
- (c) This is not a question.
- (d) OPAE has no comments regarding this question at this time, but reserves the right to file reply comments.
- (e) OPAE has no comments regarding this question at this time, but reserves the right to file reply comments.
- (f) OPAE has no comments regarding this question at this time, but reserves the right to file reply comments.

- (g) Presuming that the Commission accepts OPAE's recommendation that portfolios be approved for five years through a litigated proceeding, OPAE would recommend the TRM be updated every three years and that utilities be required to revise their plans as necessary if the changes are significant enough that they would affect meeting the benchmarks.
- (h) OPAE has no comments regarding this question at this time, but reserves the right to file reply comments.

V. Conclusion

The intent of the General Assembly at the time Am.Sub.SB 221 was passed was to implement a conventional energy efficiency and demand response portfolio and an alternative energy portfolio in a manner consistent with industry-standard monitoring and verification requirements and, most importantly, industry-standard definitions of what counts as efficiency and demand response. The General Assembly also presumed that the proposed portfolio plans would be filed like any other utility application and intervenors would be given the right to offer evidence for or against the proposal. It is easy to understand what the General Assembly intended given the fact that these elected representatives of the people are currently debating legislation that would change R.C. 4928.66 and 4928.64.

Some of the changes proposed by staff attempt to achieve through administrative action what the General Assembly is debating in the legislative realm. It is axiomatic that the Commission is a creature of statute and can only take actions authorized by statute. While many of the proposed rule revisions simplify and streamline procedures, provisions that equate to a change in the law are inappropriate and should be removed.

It is not within the Commission's rulemaking authority to deny ratepayers due process. It is not appropriate to give EDUs credit for something they did not do for the purpose of determining compliance with R.C. 4928.66. Including efficiency produced by a transmission affiliate or resulting from the actions of the federal government or rules and standards independent of the utility and its portfolio is inappropriate and contrary to the intent of the General Assembly.

Ohio ratepayers are facing an uncertain future. Old coal plants that can produce electricity cheaply are closing because they are at the end of their useful lives. Ohio has deregulated generation and is now dependent on the competitive market to set prices and determine the development of new generation. There is a promise of additional natural gas supply, but it is unclear if increased production will stabilize the price of a commodity that has traditionally been very volatile.

Two policies – the requirement that distribution utilities achieve energy efficiency and demand response goals, and the requirement for alternative energy resources – are insurance policies that will protect customers from volatile and excessive rates. Controlling demand for electricity simply makes sense at a time when the generation fleet is turning over. Requiring a diverse mix of generation to replace retiring powerplants also makes sense. Ensuring that renewable technologies with their non-existent or stable fuel prices is good policy. Yet these investments – and they are investments – have a cost as any good investment does. Ohio asks taxpayers (and ratepayers) to support investments by businesses all the time to promote economic growth and provide jobs for a hungry populace. We pay that price. We should also pay for investments in the utility sector that will ensure a supply of adequate and reasonably

priced power. Homeowners pay for insurance to protect their homes. Paying for energy efficiency, demand response, and alternative generation supply is an insurance policy we will use.

Respectfully submitted,

/S/ David C. Rinebolt

David C. Rinebolt
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45840
Telephone: (419) 425-8860
FAX: (419) 425-8862
drinebolt@ohiopartners.org

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Comments was served electronically on these persons on this 3rd day of March 2014, the Commission being closed on the 28th day of February 2014.

/s/ David C. Rinebolt
David C. Rinebolt

burki@firstenergycorp.com
stnourse@aep.com
Judi.sobecki@dplinc.com
Amy.Spiller@duke-energy.com
William.wright@puc.state.oh.us
mjsatterwhite@aep.com
gkrassen@bricker.com
mwarnock@bricker.com
tsiwo@bricker.com
marmstrong@bricker.com
sam@mwncmh.com
fdarr@mwncmh.com
joliker@mwncmh.com
mpritchard@mwncmh.com
dboehm@BKLawfirm.com
mkurtz@BKLawfirm.com
jklyercohn@BKLawfirm.com
mswhite@igsenergy.com
haydenm@firstenergycorp.com
jang@calfee.com
NMcdaniel@elpc.org
mkl@bbrslaw.com
yalami@aep.com
cdunn@firstenergycorp.com
grady@occ.state.oh.us
serio@occ.state.oh.us
berger@occ.state.oh.us
smhoward@vorys.com
mpetricoff@vorys.com
cgoodman@energymarketers.com
srantala@energymarketers.com
todd@wanenergylaw.com
callwein@wanenergylaw.com
tdougherty@theoec.org

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Summary: Comments Ohio Partners for Affordable Energy's Comments electronically filed by Mr. David C Rinebolt on behalf of Ohio Partners for Affordable Energy