

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Edison )	
Company, The Cleveland Electric Illuminating )	Case Nos. 12-2190-EL-POR
Company, and The Toledo Edison Company )	12-2191-EL-POR
For Approval of Their Energy Efficiency and )	12-2192-EL-POR
Peak Demand Reduction Program Portfolio )	
Plans for 2013 to 2015 )	

**VERIFIED APPLICATION FOR APPROVAL OF AMENDED ENERGY EFFICIENCY  
AND PEAK DEMAND REDUCTION PLANS FOR 2015 THROUGH 2016**

1. Pursuant to Substitute Senate Bill Number 310 (“S.B. 310”), Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, the “Companies”) request approval to amend, effective January 1, 2015, their energy efficiency and peak demand reduction (“EE/PDR”) portfolio plans approved by the Commission in Case Nos. 12-2190-EL-POR, *et al.* (“Existing Plan”). The amendment of the Existing Plan is referenced in this Application as the “Amended Plan” to be in effect from January 1, 2015 through December 31, 2016 (the “Amended Plan Period”). Except as amended by this Application, all Commission-approved provisions of the Existing Plan will continue in effect through the Amended Plan Period.

2. As set forth in this Application, the Amended Plan will meet or exceed the statutory requirements for the Amended Plan Period set forth in R.C. 4928.66, as amended by S.B. 310. *See* Attachment 1. The Amended Plan will: (i) continue a subset of programs in the Existing Plan that the Commission has previously approved or, in one case, is pending approval in a separate docket; (ii) implement a new program authorized by S.B. 310; and (iii) suspend several programs in the Existing Plan. Thus, the Companies request that the Commission review and approve this Application as filed within the sixty-day period provided by Section 6(B)(1) of S.B. 310.

3. The Companies will continue the following programs for the Amended Plan Period: (i) Low-Income Program authorized by the Commission’s July 18, 2012 Order in Case No. 12-1230-EL-SSO (“ESP III Order”); (ii) Mercantile Customer Program, for customers requesting an exemption authorized under R.C. 4928.66(A)(2)(c) and (A)(2)(d)(i)(III) or a commitment payment authorized by Case No. 10-834-EL-POR; (iii) T&D Improvements Program authorized under R.C. 4928.66(A)(2)(d)(i)(IV); (iv) Residential Direct Load Control Program authorized by the Existing Plan; (v) Demand Reduction Program authorized by the ESP III Order and the Existing Plan; (vi) PJM Revenue Sharing Pilot Program approved by the July 17, 2013 Entry on Rehearing in this case; and (vii) Smart Grid Modernization Initiative authorized under R.C. 4928.66(A)(2)(d)(i)(I) and Case No. 09-1820-EL-ATA, *et al.* For the Amended Plan Period, the Companies will also implement: (i) a Customer Action Program as authorized under R.C. 4928.662(A) and (B); and (ii) Experimental Company Owned LED Lighting Program, if approved in Case No. 14-1027-EL-ATA. The aforementioned programs will provide incremental EE/PDR savings that will apply toward the statutory mandates in R.C. 4928.66. All other programs in Sections 2.0 and 3.0 of the Existing Plan will be suspended if not listed above. The Companies also will continue administrative and cost-recovery mechanisms in Sections 4.0 through 7.0 of the Existing Plan to the extent applicable to the Amended Plan, and will count and recognize energy savings and peak demand reduction compliance consistent with R.C. 4928.662.

4. The Companies will also comply with Section 8 of S.B. 310, which allows certain customers to opt out of the Amended Plan beginning January 1, 2015.

5. The Companies may adjust their program mix during the term of the Amended Plan, including, without limitation, restarting programs suspended in the Amended Plan and requesting Commission approval of programs to augment or modify the Amended Plan. The

Companies also retain authority during the term of the Amended Plan to implement modifications in accordance with O.A.C. 4901:1-39-05(C)(2)(c).

6. All previously approved cost recovery provisions of Section 7 of the Existing Plan and under Rider DSE will continue during the Amended Plan Period.

### **Background and History**

7. Each of the Companies is an electric distribution utility (“EDU”) as that term is defined in R.C. 4928.01(A)(6).

8. The Companies were required, starting in 2009, to “implement energy efficiency programs that achieve energy savings equivalent to at least three-tenths of one percent of the total, annual average, and normalized kilowatt-hour sales of the [Companies] during the preceding three calendar years to customers in this state.”<sup>1</sup> The energy savings requirement increased to an additional five-tenths of one per cent in 2010, seven-tenths of one per cent in 2011, and eight-tenths of one per cent in 2012.<sup>2</sup> For the Existing Plan period, the original energy savings requirement increased to an additional “nine-tenths of one per cent in 2013, and one per cent in 2014 and 2015.”

9. In addition, the Companies were required, starting in 2009, to “implement peak demand reduction programs designed to achieve a one per cent reduction in peak demand in 2009 and an additional seventy-five hundredths of one per cent reduction each year through 2018.”<sup>3</sup>

10. O.A.C. 4901:1-39-04 required an electric utility to propose its first comprehensive energy efficiency and peak-demand reduction program portfolio plan by January 1, 2010. On December 15, 2009, the Companies filed their application for approval of their initial EE/PDR

---

<sup>1</sup> Former R.C. 4928.64(A)(1)(a).

<sup>2</sup> *Id.*

<sup>3</sup> Former R.C. 4928.64(A)(1)(b).

plans in Case Nos. 09-1947-EL-POR, 09-1948-EL-POR and 09-1949-EL-POR (the “Initial Plan”) for the period January 1, 2010 through December 31, 2012 (the “Initial Plan Period”). The Commission approved the Companies’ Initial Plan on March 23, 2011. Upon approval, the Companies immediately implemented the Initial Plan.

11. As shown in the Companies’ Portfolio Status Reports filed annually with the Commission, the Companies achieved the EE/PDR savings reductions required by R.C. 4928.66(A)(1) during the Initial Plan Period.<sup>4</sup>

12. The Companies filed their application for approval of the Existing Plan on July 31, 2012, as ordered by the Commission.<sup>5</sup> On March 20, 2013, the Commission issued an Opinion and Order approving the Existing Plan with modifications. On July 17, 2013, the Commission issued an Entry on Rehearing denying in part, and granting in part, applications for rehearing. All references in this Application to the Existing Plan incorporate the Commission’s modifications in the March 20, 2013 Opinion and Order and the July 17, 2013 Entry on Rehearing.

13. As shown in the Companies’ Portfolio Status Report filed May 15, 2014, the Companies achieved the EE/PDR savings required by R.C. 4928.66(A)(1) for 2013.<sup>6</sup>

14. S.B. 310 amended the energy efficiency savings and peak demand reduction benchmarks for 2015 and 2016 if an Amended Plan is filed. By filing this Amended Plan, the

---

<sup>4</sup> See *Energy Efficiency and Peak Demand Reduction Program Portfolio Status Reports to the Public Utilities Commission of Ohio*, Case Nos. 13-1185-EL-EEC, *et al.* (2012), 12-1533-EL-EEC, *et al.* (2011), 11-2956-EL-EEC, *et al.* (2010), and 10-227-EL-EEC, *et al.* (2009). The Companies’ EE benchmarks were amended to zero in 2009, pursuant to the Commission’s January 7, 2010 Finding and Order in Case No. 09-1004-EL-EEC *et al.*

<sup>5</sup> *In the Matter of the Application of [the Companies] for Approval of Their Energy Efficiency and Peak Demand Reduction Program Portfolio Plans for 2013 through 2015*, Case Nos. 12-2190-EL-POR, *et al.* (July 31, 2012). See *In the Matter of the Commission’s Review of the Participation of the [Companies] in May 2012 PJM Reliability Model Auction*, Case No. 12-814-EL-UNC, Entry at 3 (February 29, 2012) (ordering EE&PDR Portfolio Plan filing on or before July 31, 2012).

<sup>6</sup> *Energy Efficiency and Peak Demand Reduction Program Portfolio Status Reports to the Public Utilities Commission of Ohio*, Case Nos. 14-859-EL-EEC, *et al.* (May 15, 2014).

Companies will meet or exceed the 2015 and 2016 energy efficiency savings benchmarks by achieving cumulative energy savings since 2009 of 4.2 percent of the baseline, which is the total annual average, and normalized kilowatt hours sold in the preceding three years.<sup>7</sup> Similarly, the Companies will meet or exceed the 2015 and 2016 peak demand reduction benchmarks by achieving cumulative reductions in peak demand since 2009 of 4.75 percent of the baseline.<sup>8</sup> Also, when applicable, pursuant to R.C. 4928.66(A)(2)(a)(iii), the load and usage of customers that opt out under Section 8 of S.B. 310 will be excluded from the baseline.

### **Benchmark Reports**

15. The Companies have calculated their forecast of the energy efficiency savings and peak demand reduction benchmarks for the Amended Plan Period in accordance with the requirements of R.C. 4928.66. They have appropriately adjusted the energy efficiency savings benchmarks as permitted by law, Commission rules and Commission orders. The adjustments consistently follow the same methodology used by the Companies, and approved by the Commission, in the Initial Plan and the Existing Plan.<sup>9</sup>

16. The energy efficiency baseline calculation for each of the Companies reflects the past “distribution service sold” as reported in the 2014 Long Term Forecast Report (“2014 LTFR”), PUCO Form FE-D1, columns 1 through 5a by individual utility.<sup>10</sup> The peak demand reduction baseline calculation reflects peak demand as reported in the 2014 LTFR, PUCO Form FE-D3, by individual utility.<sup>11</sup> Calculation of the baselines for 2015 and 2016 includes forecasted usage, also as reported on the 2014 LTFR. The Companies will update their benchmarks annually

---

<sup>7</sup> R.C. 4928.66(A)(1)(a), 4928.66(A)(2)(a).

<sup>8</sup> R.C. 4928.66(A)(1)(b).

<sup>9</sup> See O.A.C. 4901:1-39-05(B) (“normalizations for weather, changes in numbers of customers, sales, and peak demand shall be consistently applied from year to year”).

<sup>10</sup> 2014 LTFR, Case No. 14-625-EL-POR, pp. 36-38.

<sup>11</sup> *Id.*, pp. 41-43.

as part of their Annual Portfolio Status Report to reflect the actual usage in the baseline years as well as for adjustments to the baseline as authorized R.C. 4928.66(A)(2)(a). The baselines and benchmarks for the Amended Plan Period are attached to this Application as Attachment 2.

**2015-2016 Energy Efficiency and Peak Demand Reduction Programs**

17. The Amended Plan will continue to offer several programs approved in the Existing Plan, as well as in other dockets: the Low-Income Program; Mercantile Customer Program; T&D Improvements Program; Demand Reduction Program; Residential Direct Load Control Program; and the Smart Grid Modernization Initiative. In addition, the Amended Plan will implement (i) the Customer Action Program in accordance with R.C. 4928.662(A) and (B); and (ii) the Experimental Company Owned LED Lighting Program, if approved in Case No. 14-1027-EL-ATA.

18. The Low Income Program provides weatherization measures, energy efficiency solutions and client education to the Companies' low-income customers at no additional cost to them. It is implemented and is funded through the Community Connections program most recently approved in the ESP III Order, through May 31, 2016.

19. The Mercantile Customer Program encourages mercantile customers to commit their programs implemented during and up to the Amended Plan Period. Under the Amended Plan, customers will be able to continue to seek rider exemptions or obtain commitment payments as part of this program. Applications for approval of mercantile customer-sited programs are separately filed with the Commission in individual dockets, which are approved in those individual dockets.

20. The T&D Improvements Program captures energy and peak demand savings achieved through various transmission and distribution projects undertaken by the Companies that

reduce line losses, which results in a more efficient delivery system. The approval of the projects and resulting energy and peak demand savings are addressed in separate dockets.

21. The Demand Reduction Program captures curtailable capacity for purposes of Peak Demand Reduction compliance through a combination of: i) C&I Interruptible Load Tariffs (Riders ELR or OLR) approved through May 31, 2016,<sup>12</sup> and ii) Demand Response resources, including both contracted demand response and those resources participating in the PJM market within the Companies' service territories, in accordance with the Commission's March 20, 2013 Order approving the Existing Plan. Demand reductions from this program are in addition to peak demand reductions associated with energy efficiency programs. The Companies may use the existing Commission-approved budget for this program to pay CSPs or customers for contracted load reductions realized during the term of the Amended Plan if it is determined by the Companies that the Peak Demand Reduction targets may not be achieved through a combination of the coincident peak demand reduction from the Companies' achieved energy efficiency programs, demand response resources participating in the PJM market, and item (i) above.

22. The Residential Direct Load Control Program offers to residential customers a programmable communicating thermostat that provides the Company the capability to reduce air conditioning loads during the summer. Participating customers can also program the thermostat for their preferred day, night, and seasonal settings to achieve electric and gas energy savings throughout the year. The continued program would support operations of the existing system.

23. The Smart Grid Modernization Initiative was approved in Case No. 09-1820-EL-ATA, *et al.*<sup>13</sup> This program studies the impact of producing an integrated system of protection,

---

<sup>12</sup> The Companies' ESP IV proposes to let expire Riders ELR and OLR effective June 1, 2016.

<sup>13</sup> *In the Matter of the Application of [Companies] for approval of Ohio Site Deployment of the Smart Grid Modernization Initiative and Timely Recovery of Associated Costs*, Case No. 09-1820-EL-ATA.

performance, efficiency and economy on the energy delivery system for multiple stakeholder benefits. Costs are recovered through Rider AMI consistent with the Commission's approval.

24. The new Customer Action Program captures energy savings and peak demand reductions achieved through actions taken by customers outside of utility-administered programs pursuant to R.C. 4928.662. This will be accomplished by employing a variety of approaches to capture customer and market information, which may include, but are not limited to, surveying efforts; market research; reports from retailers, administrators and trade allies; site verification visits; and other evaluation, measurement and verification activities.

25. The Companies filed an application on June 2014 in Case No. 14-1027-EL-ATA requesting approval of the Experimental Company Owned LED Lighting Program. As proposed by the Companies, this program will be offered on an experimental basis through May 31, 2016, unless canceled earlier, to municipalities and governmental authorities that elect to take service from Company Owned LED lights for the lighting of streets, sidewalks, parks, and other public grounds. Program costs will be recovered through Rate STL.

#### **Cost Recovery**

26. The Companies will rely upon their approved Existing Plan budget by sector to achieve benchmark compliance through December 31, 2016 and support the programs and activities contemplated by the Amended Plan unless otherwise noted. The Companies anticipate that the costs of implementing the Amended Plan (with an extra year of compliance) will be less than they would have been under the Existing Plan. The Companies are not seeking to modify their Riders DSE in this proceeding.



### Commission Review

27. Section 6(B)(1) of S.B. 310 directs an EDU seeking to amend its portfolio plan to file an application to amend the plan not later than thirty days after September 12, 2014. Section 6(B)(1) of S.B. 310 also requires the Commission to “review and approve, or modify and approve, the application not later than sixty days after the date that the application is filed.” Recognizing that this time frame may not give the Commission time to amend its current rules pertaining to the review of EE/PDR plans, the General Assembly also directed in Section 6 (B)(1) of S.B. 310 that the Commission “shall review the application in accordance with its rules as if the application were for a new portfolio plan.”

28. The Commission’s current rules, which were promulgated prior to S.B. 310, are not in all cases consistent with the provisions of S.B. 310 and amended plans filed thereunder. For example, the Commission’s rules include procedural requirements for proposed portfolio plans that are inapplicable to an amended plan filed under Section 6 of S.B. 310<sup>14</sup> given the mandate in Section 6 of S.B. 310 that the Commission review and approve, or modify and approve, the application not later than sixty days after it is filed. Therefore, the Commission should review the Companies’ Application and proposed Amended Plan in light of the legislative intent behind S.B. 310 – which was to freeze the 2015 and 2016 statutory benchmarks and “ensure that customers in Ohio have access to affordable energy.” *See* Section 3 of S.B. 310.

29. The Companies’ Existing Plan approved by the Commission met all requirements contained in the current Commission rules. As contemplated by S.B. 310, the Companies are authorized to utilize an Amended Plan to meet their statutory mandates for 2015 and 2016 without the need to maintain all of the programs contained in the Existing Plan. By suspending certain

---

<sup>14</sup> *See* O.A.C. 4901:1-39-04(D) and (E).

programs and extending the budgets (previously approved through 2015) through 2016, the Amended Plan ensures that customers in Ohio have access to affordable energy and should be approved by the Commission consistent with the authority and purposes arising directly from, and the legislative intent underlying S.B. 310, recognizing that certain existing rules are inconsistent with the plain language and meaning of S.B. 310.

30. To the extent the Commission determines that a waiver of any provision of its rules is necessary, the Companies hereby request such waiver under O.A.C. 4901:1-39-02(B).

### **Conclusion**

31. The Companies respectfully ask that the Commission approve this Application and issue an Opinion and Order no later than sixty days from the date of its filing that approves the Companies' Amended Plan as filed, finding it to be just, reasonable, and consistent with statutory requirements and applicable Commission rules.

Respectfully submitted,

/s/ Carrie M. Dunn

Carrie M. Dunn (0076952)

Counsel of Record

FIRSTENERGY SERVICE COMPANY

76 South Main Street

Akron, OH 44308

(330) 384-4580

(330) 384-3875 (fax)

[cdunn@firstenergycorp.com](mailto:cdunn@firstenergycorp.com)

James F. Lang (0059668)

CALFEE, HALTER & GRISWOLD LLP

The Calfee Building

1405 East 6th Street

Cleveland, OH 44114

(216) 622-8200

(216) 241-0816 (fax)

[jlang@calfee.com](mailto:jlang@calfee.com)

Attorneys for Applicants, Ohio Edison Company,  
The Cleveland Electric Illuminating Company, and  
The Toledo Edison Company

VERIFICATION

I, Edward C. Miller, having first been duly sworn according to law, do hereby depose and state as follows:

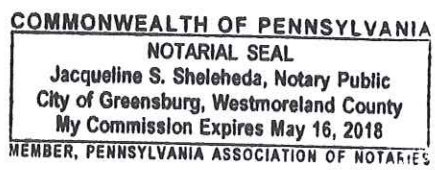
1. I am over 18 years of age, I have personal knowledge of all facts set forth herein, and I am competent to testify thereto.

2. The facts set forth in this Application are based on my personal knowledge and, to the best of my knowledge, information, and belief, all of the facts as alleged are true as I verily believe.

*Edward C. Miller*  
\_\_\_\_\_

SWORN TO BEFORE ME, and subscribed in my presence, this 17 day of September, 2014.

*Jacqueline S. Sheleheda*  
NOTARY PUBLIC



## CERTIFICATE OF SERVICE

A copy of the foregoing Application was served via e-mail this 24<sup>th</sup> day of September, 2014, on counsel listed below for parties to Case No. 12-2190-EL-POR.

/s/ Carrie M. Dunn  
One of Attorneys for Applicants

Devin.parram@puc.state.oh.us  
thomas.lindgren@puc.state.oh.us  
kern@occ.state.oh.us  
bingham@occ.state.oh.us  
mallarne@occ.state.oh.us  
etter@occ.state.oh.us  
cmooney2@columbus.rr.com  
toddm@wamenergylaw.com  
callwein@wamenergylaw.com  
dboehm@BKLawfirm.com  
mkurtz@BKLawfirm.com  
jkylar@BKLawfirm.com  
robinson@citizenpower.com  
ricks@ohanet.org  
gkrassen@bricker.com  
mwarnock@bricker.com  
tobrien@bricker.com  
tsiwo@bricker.com

gpoulos@enernoc.com  
sam@mwncmh.com  
fdarr@mwncmh.com  
mpritchard@mwncmh.com  
mlavanga@bbrslaw.com  
drinebolt@ohiopartners.org  
nicholas.york@tuckerellis.com  
smillard@cose.org  
henryeckhart@aol.com  
cmiller@szd.com  
gdunn@szd.com  
rriley@nrdc.org  
jvickers@elpc.org  
rkelter@elpc.org  
Trent@theOEC.org  
robb.kapla@sierraclub.org  
manuel.somoza@sierraclub.org  
JDuffer@AandO.com

**ATTACHMENT 1**

ENERGY EFFICIENCY COMPLIANCE (MWh)								
Company	2013 Energy Efficiency Savings <sup>1</sup>	2014 Energy Efficiency Savings Estimate <sup>2</sup>	2014 4.2% Energy Efficiency Savings Requirement <sup>3</sup>	2014 Estimated Compliance % <sup>4</sup>	2015 4.2% Energy Efficiency Savings Requirement <sup>3</sup>	2015 Estimated Compliance % <sup>4</sup>	2016 4.2% Energy Efficiency Savings Requirement <sup>3</sup>	2016 Estimated Compliance % <sup>4</sup>
CEI	1,026,203	1,145,000	801,000	143%	798,000	143%	802,000	143%
OE	1,041,849	1,227,000	1,022,000	120%	1,022,000	120%	1,035,000	119%
TE	423,752	484,000	445,000	109%	446,000	109%	451,000	107%
<b>Total</b>	<b>2,491,804</b>	<b>2,856,000</b>	<b>2,268,000</b>	<b>126%</b>	<b>2,266,000</b>	<b>126%</b>	<b>2,288,000</b>	<b>125%</b>

PEAK DEMAND REDUCTION COMPLIANCE (MW)										
Company	2013 Peak Demand Reduction Savings <sup>1</sup>	2014 Peak Demand Reduction Estimate <sup>5</sup>	2014 4.75% PDR Requirement <sup>3</sup>	2014 Estimated Compliance %	2015 Peak Demand Reduction Estimate <sup>6</sup>	2015 4.75% PDR Requirement <sup>3</sup>	2015 Estimated Compliance %	2016 Peak Demand Reduction Estimate <sup>7</sup>	2016 4.75% PDR Requirement <sup>3</sup>	2016 Estimated Compliance %
CEI	438	447	198.3	225%	577	194.0	297%	605	194.0	312%
OE	321	589	261.7	225%	832	254.0	328%	1,008	251.0	402%
TE	277	433	106.0	408%	600	104.0	577%	645	100.0	645%
<b>Total</b>	<b>1,036</b>	<b>1,469</b>	<b>566.0</b>	<b>260%</b>	<b>2,009</b>	<b>552.0</b>	<b>364%</b>	<b>2,258</b>	<b>545.0</b>	<b>414%</b>

**Footnotes:**  
 1- As reported in Table 2-1 of the Companies' 2013 Energy Efficiency and Peak Demand Reduction Program Portfolio Status Report in Case No. 14-0859-EL-EEC, *et. al.*  
 2 - Estimates of the Companies' ex-ante savings as of 8/31/2014  
 3 - Forecasted Energy Efficiency and Peak Demand Reduction requirements as shown on Attachment 2. Forecasts do not account for effects of potential Opt-outs that will further reduce requirements, if elected by Customers.  
 4 - Estimated compliance based on current 2014 estimated progress against forecasted Energy Efficiency from Attachment 2.  
 5 - Peak Demand Reduction estimates include all EE Coincident Peak DR recutions as of 8/31/2013, DR capabilities under the Companies' C&I Interruptible Load Tariffs, and registered DR participant load in the ATSI zone for PJM Delivery Year 2014/2015  
 6 - Peak Demand Reduction estimates include all EE Coincident Peak DR recutions as of 8/31/2013, DR capabilities under the Companies' C&I Interruptible Load Tariffs, and DR resources cleared in the ATSI zone for PJM Delivery Year 2015/2016.  
 7 - Peak Demand Reduction estimates include all EE Coincident Peak DR recutions as of 8/31/2013, DR capabilities under the Companies' C&I Interruptible Load Tariffs, and DR resources cleared in the ATSI zone for PJM Delivery Year 2016/2017.

**ATTACHMENT 2**

<b>Senate Bill 310 Energy Efficiency Baselines and Benchmarks (GWh)</b>											
Company	Year	Retail Sales Before State Energy Efficiency	Retail Adjustments	Adjusted Retail Sales	Mercantile Addbacks	Fully Adjusted Retail Sales	Additional Energy Efficiency Beyond Mercantiles	Fully Adjusted Retail Sales After Energy Efficiency	Baseline	Cumulative Benchmark %	Benchmarks
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
CEI	2011*	18,916	(259)	18,657	373	19,030		19,030			
	2012*	18,805	(110)	18,695	440	19,135		19,135			
	2013*	18,712	(96)	18,617	468	19,084		19,084			
	2014**	18,867	-	18,867	468	19,335	552	18,783	19,083	4.20%	<b>801</b>
	2015	19,495	-	19,495	468	19,963	552	19,411	19,001	4.20%	<b>798</b>
	2016								19,093	4.20%	<b>802</b>
OE	2011*	24,656	(723)	23,933	224	24,157		24,157			
	2012*	24,441	(321)	24,120	276	24,396		24,396			
	2013*	24,305	(151)	24,153	317	24,470		24,470			
	2014**	24,556	-	24,556	317	24,873	729	24,144	24,341	4.20%	<b>1,022</b>
	2015	25,753	-	25,753	317	26,070	729	25,341	24,337	4.20%	<b>1,022</b>
	2016								24,652	4.20%	<b>1,035</b>
TE	2011*	10,437	(124)	10,313	180	10,492		10,492			
	2012*	10,381	20	10,402	185	10,586		10,586			
	2013*	10,529	(13)	10,516	209	10,725		10,725			
	2014**	10,593	-	10,593	209	10,802	243	10,559	10,601	4.20%	<b>445</b>
	2015	10,964	-	10,964	209	11,173	243	10,930	10,624	4.20%	<b>446</b>
	2016								10,738	4.20%	<b>451</b>
Ohio	2011*	54,009	(1,107)	52,903	777	53,679		53,679			
	2012*	53,627	(410)	53,217	901	54,118		54,118			
	2013*	53,545	(259)	53,286	994	54,280		54,280			
	2014**	54,016	-	54,016	994	55,010	1,524	53,486	54,026	4.20%	<b>2,269</b>
	2015	56,212	-	56,212	994	57,206	1,524	55,682	53,961	4.20%	<b>2,266</b>
	2016								54,482	4.20%	<b>2,288</b>

- Notes:**
- (1) The sum of Columns (1) - (5a) in the FE - D1 schedules of FirstEnergy's 2014 Long-term Forecast Report (pages 106 - 108).
  - (2) Weather Adjustment based on normal heating and cooling degree days adjustments and adjustments to reflect the loss of a large customer .
  - (3) = (1) + (2)
  - (4) Baseline years were adjusted for mercantile self directed program savings as filed with the PUCO by December 31, 2013. .
  - (5) Sum of (3) + (4)
  - (6) 2014 & 2015 held at 2014 level in FirstEnergy's 2014 Long-term Forecast Report (pages 106 - 108).
  - (7) = (5) - (6)
  - (8) = average of 3 previous years (7)
  - (9) R.C. § 4928.66 Energy Efficiency Benchmarks
  - (10) = (8) \* (9)
  - \* 2011, 2012, & 2013 are actual data
  - \*\* 2014 are LTFR data after State EE

ATTACHMENT 2

Senate Bill 310 Peak Demand Reduction Baselines and Benchmarks (MW)											
Company	Year	Retail Peaks Before State Demand Reduction	Retail Adjustments	Adjusted Retail Peaks	Mercantile Addbacks	Fully Adjusted Retail Peaks	Additional Demand Reductions Beyond Mercantiles	Fully Adjusted Retail Peaks After Demand Reductions	Baseline	Cumulative Benchmark %	Benchmarks
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
CEI	2011*	4,306.8	-	4,306.8	42.5	4,349.3		4,349.3			
	2012*	4,046.6	-	4,046.6	52.9	4,099.6		4,099.6			
	2013*	4,025.0	-	4,022.6	55.6	4,078.2		4,078.2			
	2014**	4,010.9	-	4,010.9	55.6	4,066.5	19.9	4,046.6	4,175.7	4.75%	198.3
	2015	4,069.5	-	4,069.5	55.6	4,125.2	19.9	4,105.2	4,074.8	4.75%	193.6
	2016								4,076.7	4.75%	193.6
OE	2011*	5,678.9	(40.9)	5,638.0	27.7	5,665.8		5,665.8			
	2012*	5,546.3	(1.2)	5,545.1	35.9	5,580.9		5,580.9			
	2013*	5,242.4	-	5,242.4	39.8	5,282.2		5,282.2			
	2014**	5,235.6	-	5,235.6	39.8	5,275.3	64.7	5,210.6	5,509.6	4.75%	261.7
	2015	5,370.4	-	5,370.4	39.8	5,410.2	64.7	5,345.4	5,357.9	4.75%	254.5
	2016								5,279.4	4.75%	250.8
TE	2011*	2,138.0	-	2,138.0	34.4	2,172.4		2,172.4			
	2012*	2,341.8	-	2,341.8	36.6	2,378.4		2,378.4			
	2013*	2,120.8	-	2,105.7	39.3	2,145.0		2,145.0			
	2014**	2,048.0	-	2,048.0	39.3	2,087.3	37.1	2,050.3	2,231.9	4.75%	106.0
	2015	2,113.6	-	2,113.6	39.3	2,152.9	37.1	2,115.9	2,191.2	4.75%	104.1
	2016								2,103.7	4.75%	99.9
Ohio	2011*	12,123.8	(40.9)	12,082.9	104.7	12,187.5		12,187.5			
	2012*	11,934.7	(1.2)	11,933.5	125.5	12,058.9		12,058.9			
	2013*	11,388.3	-	11,370.7	134.7	11,505.4		11,505.4			
	2014**	11,294.5	-	11,294.5	134.7	11,429.2	121.7	11,307.4	11,917.3	4.75%	566.0
	2015	11,553.5	-	11,553.5	134.7	11,688.3	121.7	11,566.5	11,623.9	4.75%	552.2
	2016								11,459.8	4.75%	544.3

- Notes:**
- (1) FE - D3 schedules of FirstEnergy's 2014 Long-term Forecast Report (pages 111 - 113).
  - (2) Weather Adjustment based on normal heating and cooling degree days adjustments and adjustments to reflect the loss of a large customer .
  - (3) = (1) + (2)
  - (4) Baseline years were adjusted for mercantile self directed program savings as filed with the PUCO by December 31, 2013.
  - (5) Sum of (3) + (4)
  - (6) 2014 & 2015 held at 2014 level in FirstEnergy's 2014 Long-term Forecast Report (pages 111 - 113).
  - (7) = (5) - (6)
  - (8) = average of 3 previous years (7)
  - (9) R.C. § 4928.66 Energy Efficiency Benchmarks
  - (10) = (8) \* (9)
  - \* 2011, 2012, & 2013 are actual data
  - \*\* 2014 are LTFR data after State EE



**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**9/24/2014 12:00:21 PM**

**in**

**Case No(s). 12-2190-EL-POR, 12-2191-EL-POR, 12-2192-EL-POR**

Summary: Application (Verified) for Approval of Amended Energy Efficiency and Peak Demand Reduction Plans for 2015 Through 2016 electronically filed by Ms. Carrie M Dunn on behalf of The Toledo Edison Company and The Cleveland Electric Illuminating Company and Ohio Edison Company