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May 14, 2015

Docketing Division
Public Utilities Commission of Ohio
180 E Broad Street, 11th Floor
Columbus, Ohio 43215-3793

RE: **PUCO Case No. 14-1297-EL-SSO: Errata and Corrections to the Supplemental Testimony of Tyler Comings**

Dear Docketing Division Staff:

Enclosed please find corrections to the Supplemental Testimony of Tyler Comings, redacted, public version, which was originally filed with the Commission on May 11, 2015. These changes correct a few typographic errors and inadvertent oversights on pages 15 and 16 of Mr. Comings's testimony. These minor corrections do not substantively affect the conclusions and opinions provided in Mr. Comings' testimony.

Sierra Club is filing both a clean and a redlined version of the corrected version of the public, redacted version, pages 15-16. The unredacted, confidential versions of these pages have been filed separately.

Please let us know if you have any questions or concerns.

Sincerely,

/s/ Christopher J. Allwein

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Counsel for Sierra Club

cc: Case Parties

Q Do you have the same concern with the Companies' projected performance for the OVEC units?

A Yes, but not to the same extent. The OVEC units' historical average capacity factor from 2010-2014 was 64 percent and the Companies expect them operate at [redacted] from 2015-2031.[29] This is a small difference. However, it is noteworthy that the OVEC units have operated at 60 percent for the first quarter of 2015 compared to [redacted] for that year. In order to reach this projected level, the OVEC units would have to operate [redacted].[30]

Q Are there other more recent developments that would lead to lower future energy prices than those assumed by the Companies—all else equal?

A Yes. Projections of peak load and energy requirements in the region are now lower than the projections relied on by Mr. Rose in developing his market price forecasts. A decrease in energy requirements should lead to a decrease in energy prices, or would at least reduce projected increases in such prices.

In January of this year, PJM released its 2015 load and energy forecasts for zones in that region. Mr. Rose used the previous year's PJM load forecast for the energy price forecast he provided to the Companies.[31] The 2015 PJM load forecast report explains:

> The introduction of a binary variable into the load forecast model for years 2013 and 2014 resulted in generally lower peak and energy forecasts in this year's report, compared to the same year in last year's report. PJM introduced this change as a short-term solution as it pursues its announced intention to better reflect usage trends such as adoption of more energy efficient end uses and

[29] Companies' projected capacity factor: SC Set 1-INT-10, Attachment 1 - Competitively Sensitive Confidential. Companies' historical capacity factor: SC Set 1-INT-9, Attachment 1 - Competitively Sensitive Confidential, attached as Competitively Sensitive Confidential Exhibit TFC-37.

[30] The calculation is as follows: ((Jan through March hours= 2160)*60% CF+ (April through December hours= 6600)* [redacted]% CF) / (January through December hours= 8760) = [redacted]% annual CF

[31] Direct Testimony of Judah Rose, p. 50, lines 9-10.

behind the meter generation which are not currently captured in the forecast model.[32]

Figure 4 shows, in part, the effect of this change in PJM's load forecasting. The effect is seen immediately in that peak load expectations in 2015 have decreased by 3 percent in the region. Expectations for load in the ATSI zone have decreased by 2 percent for 2015 (274 MW), and such decrease persists through 2029 with an approximately 1.9 percent decrease (266 MW) compared to the PJM 2014 load forecast relied upon by Mr. Rose in this proceeding.[33]

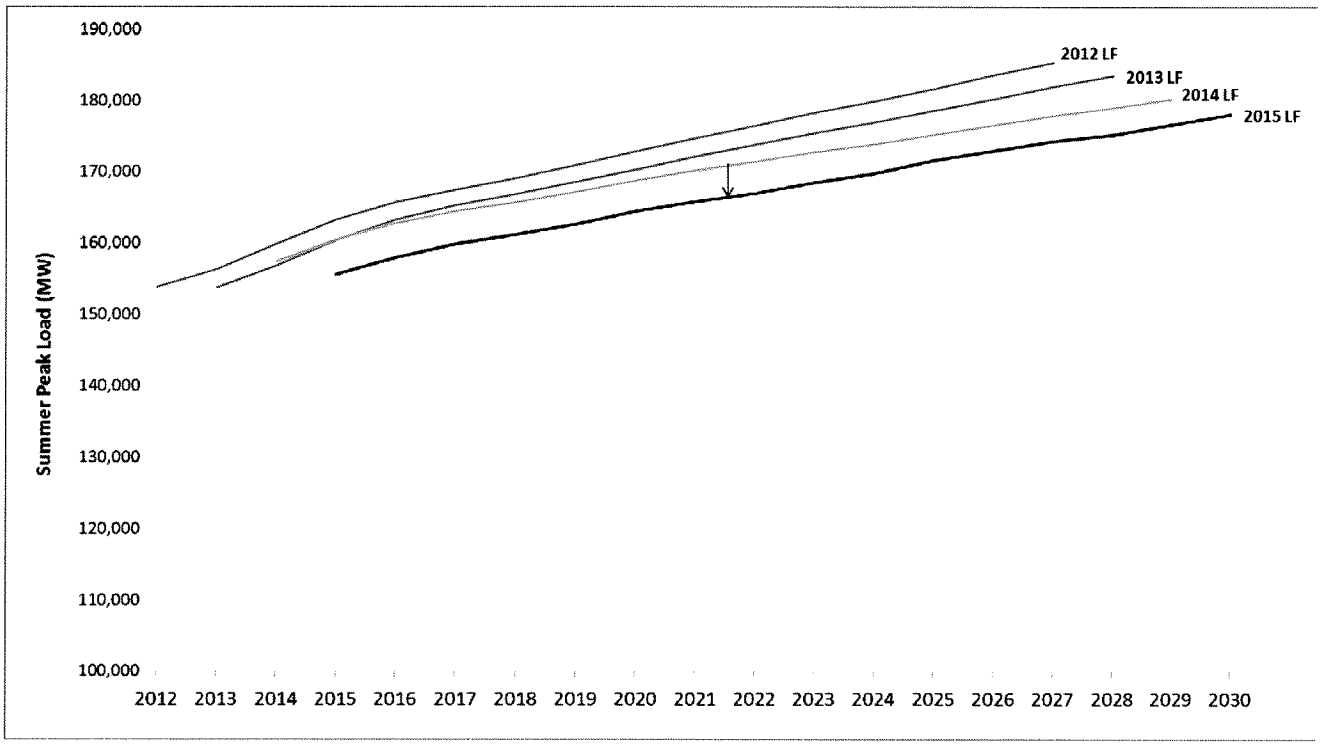

Figure 4: PJM's 2012-2015 Gross Peak Load Forecasts ("LF")[34]

[32] PJM Load Forecast Report, January 2015, p.1. Available here: https://www.pjm.com/~/media/documents/reports/2015-load-forecast-report.ashx
[33] *Id.* Table A-1.
[34] PJM Load Forecast Reports from 2012 through 2015, Table B-1.

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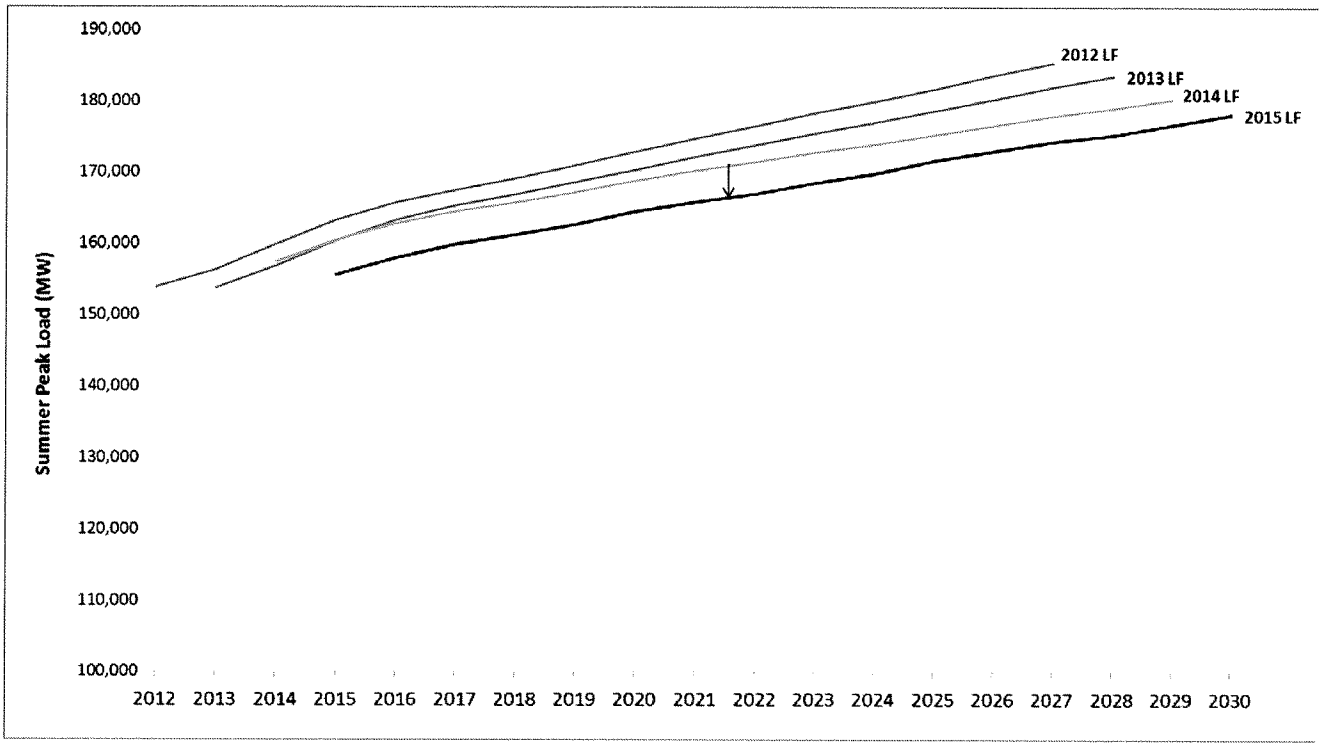

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[33] *Id.* Table A-1.
[34] PJM Load Forecast Reports from 2012 through 2015, Table B-1.

Summary: Testimony Errata and Corrections for the Supplemental Testimony of Tyler Comings (REDACTED, PUBLIC VERSION) electronically filed by Mr. Christopher J. Allwein on behalf of SIERRA CLUB