

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Edison Company, The Cleveland)	Case No. 16-743-EL-POR
Electric Illuminating Company, and)	
The Toledo Edison Company for)	
Approval of Their Energy Efficiency and)	
Peak Demand Reduction Program)	
Portfolio Plans for 2017 through 2019.)	

**OHIO PARTNERS FOR AFFORDABLE ENERGY'S
OBJECTIONS TO THE APPLICATION**

Ohio Partners for Affordable Energy ("OPAE") respectfully submits to the Public Utilities Commission of Ohio ("Commission") these objections to the application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (together "FirstEnergy") for approval of their energy efficiency and peak demand reduction program portfolio plans for 2017 through 2019. These objections are filed in accordance with Ohio Administrative Code Rule 4901:1-39-04(D) and the attorney examiner's entry dated May 23, 2016.

FirstEnergy is proposing to continue the shared savings mechanism approved by the Commission in Case No. 12-2190-EL-POR, et al., as modified in FirstEnergy's Electric Security Plan, Case No. 14-1297-EL-SSO. FirstEnergy witness Demiray states, at 5 of his prefiled testimony, that no aspect of the shared savings mechanism included in the portfolio plans has not already been addressed and approved by the Commission.

However, OPAE objects to the recovery from ratepayers of shared savings assigned by FirstEnergy to its Customer Action Programs ("CAPs"). FirstEnergy intends to continue the existing CAPs, which capture energy savings and peak demand reductions achieved through actions taken by customers outside of utility-administered programs pursuant to Revised Code Section 4928.662. To capture the

savings achieved by customers outside of utility-administered programs, FirstEnergy contends that there will be surveying efforts, market research, site verification visits, and other evaluation, measurement and verification activities. The plans propose CAPs for residential customers and nonresidential customers, including small and large commercial and industrial customers.

FirstEnergy's calculation of its shared savings mechanism is described at 99-100 of the Application. Shared savings encourage the three FirstEnergy operating companies, through financial incentives, to exceed their statutorily mandated energy efficiency/peak demand reduction goals and will be recovered through the three operating companies' Riders DSE 2. Shared savings **encourage the utilities to implement programs** that exceed the statutory mandates.

OPAЕ objects to the FirstEnergy operating companies' receiving shared savings incentives as a result of the savings calculated under the CAPs. By definition, the CAPs capture energy savings and peak demand reductions achieved through **actions taken by customers outside of utility-administered programs**. Shared savings award utilities to exceed their statutory energy efficiency and peak demand reduction goals through the activities of the utilities' portfolio programs. The CAPs do not represent any actions taken by the utilities, even if the utilities monitor and survey the actions taken by customers. Therefore, no shared savings should be awarded to the utilities for actions taken by customers independent of utility programs.

Respectfully submitted,

/s/Colleen Mooney

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CERTIFICATE OF SERVICE

A copy of the foregoing Objections will be served on this 14th day of June 2016 by the Commission's e-filing system to these parties who have electronically subscribed to these cases.

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Summary: Objection to the Application electronically filed by Colleen L Mooney on behalf of Ohio Partners for Affordable Energy