

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's)	Case No. 12-3151-EL-COI
Investigation of Ohio's Retail Electric Service)	
market.)	
)	
In the Matter of the Market Development)	Case No. 14-2074-EL-EDI
Working Group.)	

**COMMENTS OF OHIO EDISON COMPANY,
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, AND
THE TOLEDO EDISON COMPANY**

March 9, 2018

I. INTRODUCTION

On December 12, 2012 in Case No. 12-3151-EL-COI (“COI Case”), the Public Utilities Commission of Ohio (“Commission”) initiated an investigation into Ohio's competitive retail electric service (“CRES”) market. This investigation sought to determine what, if any, enhancements may improve the health, strength, and vitality of the CRES market. As part of the March 26, 2014 Commission Order in the COI Case, the Commission created the Market Development Working Group (MDWG). The Ohio electric distribution utilities (“EDUs”), CRES Suppliers, Commission Staff, and other stakeholders participated in multiple working groups, which evaluated statewide Seamless Move, contract portability, instant connect, and a warm transfer process.

II. FEBRUARY 7, 2018 COMMISSION ORDER

The Commission found in their February 7, 2018 Order (“Order”) that a statewide seamless move mechanism should be adopted.

Seamless Move creates an appropriate balance. In theory, Seamless Move reduces the burden of the already shopping customer by allowing for an already negotiated CRES contract to be moved to the customer's new address, but at the same time, unlike contract portability, Seamless Move requires that the customer affirmatively choose that opportunity when calling the EDU to transfer service.¹

The Commission invited participants from the Market Development Working Group (“MDWG”) to file comments on cost allocation for the implementation of a Seamless Move mechanism in each EDU within thirty days of the Finding and Order.

III. COMMENTS ON COST ALLOCATION

Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (the “Companies”) welcome the opportunity to provide comments on cost

¹ PUCO Case Nos. 12-3151-EL-COI and 14-2074-EL-EDI, Finding and Order (February 7, 2018) Page 13

allocation for implementing Seamless Move within their service territories. Similar mechanisms were implemented or are pending implementation in collaboration with interested parties in Pennsylvania and Maryland. The Companies' affiliated regulated companies have been active participants in these efforts in Pennsylvania and Maryland, and the Companies have gained valuable knowledge from those experiences. The Companies do not currently have an estimate or budget for the cost of the project for implementation in Ohio, which will be dependent upon the specifics agreed to in the operational plan. There are additional factors that could significantly increase the Companies' costs to implement Seamless Move, compared to the experience of their regulated affiliates in Pennsylvania and Maryland. For example, if the scope of Seamless Move is expanded to incorporate changes to the Companies' current practices for addressing name changes on business accounts, this would increase the complexity and cost of implementation. Incremental costs, compared to those incurred by the Companies' affiliates, could also arise from potential new requirements for the Companies to provide customers a rescission letter, and to address Governmental Aggregation contracts as part of the Seamless Move process. Provided that the implementation of this Commission directive is similar to the efforts in Pennsylvania and Maryland and provides benefits to the Companies' customers, then the Companies would not oppose being allocated the costs incurred so long as they receive full and timely recovery of all costs, including a return on and of any capital investment. The Companies are also open to an allocation of those costs to CRES Suppliers, especially if any costs are incurred for the sole benefit or convenience of CRES Suppliers, so long as appropriate provisions are put in place to ensure full and timely recovery of all costs. The Companies will file more details for cost recovery and cost allocation with the filing of the operational plan.

IV. CONCLUSION

The Companies thank the Commission for the opportunity to provide comments on cost allocation for Seamless Move.

Respectfully submitted,

/s/ Carrie M. Dunn-Lucco

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Summary: Comments electronically filed by Ms. Carrie M Dunn-Lucco on behalf of The Toledo Edison Company and The Cleveland Electric Illuminating Company and Ohio Edison Company