

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application to Modify,)
in Accordance with Section 4929.08,)
Revised Code, the Exemption Granted to) Case No. 12-2637-GA-EXM
Columbia Gas of Ohio, Inc., in Case No.)
08-1344-GA-EXM)

**MEMORANDUM CONTRA
JOINT MOTION FOR EXTENSION
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

I. INTRODUCTION

This case involves a Settlement that was negotiated by the Ohio Consumers' Counsel, Columbia Gas of Ohio, the PUCO Staff, and others to resolve an issue of great significance to a million natural gas consumers – the continued availability of Columbia's competitively priced standard offer. Now, several parties have filed a motion ostensibly to continue the terms of the Settlement past March 31, 2018. But the Settlement continues in effect by its terms, as it has for the past six months, without the need for a motion or a ruling by the Public Utilities Commission of Ohio ("PUCO"). The joint motion filed by the parties should be denied so as not to create a problem that does not exist, which could hinder and distract from further settlement discussions, among other things.

II. DISCUSSION

On August 24, 2018, several of the parties to this proceeding¹ ("Joint Movants") filed a Joint Motion for Extension ("Joint Motion") asking the PUCO to extend the Amended Joint

¹ Joint Movants are Columbia Gas of Ohio, Inc.; PUCO Staff; Retail Energy Supply Association; IGS Energy; Direct Energy Services, LLC and Direct Energy Business, LLC; Dominion Energy Solutions, Inc.; Stand Energy Corporation; and Volunteer Energy Services, Inc.

Stipulation and Recommendation (“Settlement”) that was filed in this case on November 27, 2012² and approved by the PUCO on January 9, 2013.³ The initial term of the Settlement lasted until March 31, 2018, and continues thereafter until the PUCO orders otherwise.⁴ The Settlement itself states that “After [March 31, 2018], the provisions of this [Settlement] including the then-approved method of supplying commodity for standard service offer and Standard Choice Offer (“SCO”) service shall continue until modified by the Commission unless otherwise stated herein.”⁵ Accordingly, the Settlement itself expressly mandates that it continue until modified by the PUCO. The Joint Motion for an extension of the Settlement filed by the Joint Movants is unnecessary and will only act to create uncertainty and an unnecessary arbitrary deadline.

Essentially, the Joint Motion would change the terms of the Settlement. The Joint Motion would create an artificial end to the Settlement that was a considerable compromise between Columbia and the representative (OCC) of its consumers on an issue of great consequence to Ohio consumers – the continued protection of consumer bills through Columbia’s competitive standard offer.

The Joint Movants assert that their Motion would not result in a PUCO action that modifies the ongoing Settlement.⁶ But setting an end date for the effectiveness of the Settlement would modify the Settlement. If the Joint Motion truly would not modify the Settlement, then it serves no purpose. In reality, the Motion would establish an artificial deadline (where one presently does not exist) while the parties engage in negotiations around the issue of whether

² See Amended Joint Motion to Modify Orders Granting Exemption (November 27, 2012) (Amended Stipulation).

³ See Opinion and Order at 48 (January 9, 2013) (January 9 Order).

⁴ Settlement at 3; January 9 Order at 7, 11.

⁵ *Id.*

⁶ Joint Motion at Footnote 3 (“The Movants agree that the Commission’s disposition of this Motion to Extend is not a Commission action that modifies the ongoing Amended Stipulation and Recommendation . . . Further, Columbia’s joining this motion shall not compromise Columbia’s position that the Amended Stipulation and Recommendation continues automatically pursuant to the terms of that agreement.”).

Columbia, if ever, should have a so-called “exit” from the merchant function (meaning end the Columbia standard offer that is important for consumers as a choice and as a comparison for considering marketer offers).

Allowing the Settlement to continue as it has for the past six months does not inhibit the parties from negotiating whether a new or modified settlement is needed and, if so, what that settlement should look like. The Joint Motion does not advance these negotiations. Rather, it would artificially create an urgency towards resolving the issues in this case when the agreed upon inputs in the Settlement have not been met. In this regard, Columbia has greatly benefited its consumers with lower prices for the competitive standard offer that it arranges – and it would be terrible for its million consumers if the standard offer were to end. The consumer problems with marketer proposals to end Columbia’s standard offer can be seen in Columbia’s “Shadow Billing” information reflecting the hundreds of millions of dollars that consumers have paid to marketers above the standard offer’s market prices.⁷ There is no need for the PUCO to modify or extend the Settlement that is currently operational and will be until the PUCO orders otherwise.

The Joint Movants assert that the Joint Motion is necessary because there is some uncertainty as to what provisions of the Settlement continue after March 31, 2018. However, this alleged uncertainty has not stopped the Settlement from continuing by its own terms for the six months between March 31 and the date the Joint Movants filed their Joint Motion.

The Joint Motion would create uncertainty where none currently exists. The Joint Movants ask the PUCO to impose two new non-binding deadlines: (1) an extension of the

⁷ See Attachment A, Shadow Billing Information – Demonstrating Cumulative Savings/Losses of Columbia consumers who have entered choice agreements with marketers compared to what those customers would have paid had they been served on Columbia’s standard offer (i.e. GCR, SSO or SCO) -\$1,561,251,741 (a loss to consumers of nearly \$1.6 billion).

Settlement to December 31, 2018, and (2) a commitment for the parties to use “best efforts” to reach a negotiated solution by October 15, 2018.⁸ These deadlines are entirely unnecessary because the Settlement already continues by its own terms beyond March 31, 2018. And without PUCO modification or extension, the Settlement will also continue beyond December 31, 2018. Further, the parties do not need a motion to be granted by the PUCO to use “best efforts” to negotiate an agreement. The existing Settlement that OCC, Columbia, and the PUCO Staff negotiated is testament to the best efforts that have preceded the Joint Motion. The Joint Motion should be denied.

III. CONCLUSION

The Joint Motion is a solution in search of a problem. But it could contribute to a real problem for a million natural gas consumers. When parties filed the Amended Stipulation, they considered the possibility of the Amended Stipulation’s expiration and explicitly provided a solution for continuing its terms upon such an event. OCC, as a principal in that Settlement, does not agree to changing the terms at issue in the Joint Motion. The PUCO should allow the Settlement (Amended Stipulation) to work as intended by those that negotiated it. The Settlement should continue, pursuant to its terms, until the PUCO orders otherwise. Accordingly, the PUCO should deny the Joint Motion.

⁸ Joint Motion at 5.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Memorandum Contra was served on the person stated below via electronic transmission this 10th day of September 2018.

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Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Apr-11	-\$9,382,832	-\$2,899,984	-\$22,843			-\$12,305,658	\$0	-\$12,305,658	\$23,412,227	-\$701,379,096	-\$724,791,324
May-11	-\$5,043,450	-\$1,581,832	-\$15,485			-\$6,640,768	\$0	-\$6,640,768	\$23,412,227	-\$708,019,864	-\$731,432,092
Jun-11	-\$2,526,502	-\$908,185	-\$7,605			-\$3,442,292	\$0	-\$3,442,292	\$23,412,227	-\$711,462,156	-\$734,874,384
Jul-11	-\$1,869,945	-\$802,740	-\$6,252			-\$2,678,937	\$0	-\$2,678,937	\$23,412,227	-\$714,141,094	-\$737,553,322
Aug-11	-\$1,695,636	-\$671,399	-\$4,174			-\$2,371,209	\$0	-\$2,371,209	\$23,412,227	-\$716,512,303	-\$739,924,531
Sep-11	-\$2,030,481	-\$881,393	-\$7,308			-\$2,919,182	\$0	-\$2,919,182	\$23,412,227	-\$719,431,485	-\$742,843,713
Oct-11	-\$3,140,807	-\$1,164,355	-\$10,329			-\$4,315,491	\$0	-\$4,315,491	\$23,412,227	-\$723,746,976	-\$747,159,204
Nov-11	-\$6,997,438	-\$2,263,598	-\$34,310			-\$9,295,346	\$0	-\$9,295,346	\$23,412,227	-\$733,042,322	-\$756,454,550
Dec-11	-\$12,557,750	-\$3,945,419	-\$64,240			-\$16,567,409	\$0	-\$16,567,409	\$23,412,227	-\$749,609,731	-\$773,021,959
Jan-12	-\$18,651,178	-\$5,916,444	-\$76,824			-\$24,644,446	\$0	-\$24,644,446	\$23,412,227	-\$774,254,177	-\$797,666,405
Feb-12	-\$20,382,726	-\$6,813,519	-\$80,778			-\$27,277,024	\$0	-\$27,277,024	\$23,412,227	-\$801,531,201	-\$824,943,429
Mar-12	-\$16,793,300	-\$5,589,328	-\$60,396			-\$22,443,024	\$0	-\$22,443,024	\$23,412,227	-\$823,974,225	-\$847,386,453
Apr-12	-\$9,349,064	-\$3,600,962	-\$45,096			-\$12,995,122	\$0	-\$12,995,122	\$23,412,227	-\$836,969,347	-\$860,381,575
May-12	-\$7,406,658	-\$2,572,108	-\$29,530			-\$10,008,296	\$0	-\$10,008,296	\$23,412,227	-\$846,977,643	-\$870,389,871
Jun-12	-\$3,202,658	-\$1,327,809	-\$13,942			-\$4,544,409	\$0	-\$4,544,409	\$23,412,227	-\$851,522,052	-\$874,934,280
Jul-12	-\$2,380,923	-\$1,043,505	-\$7,700			-\$3,432,128	\$0	-\$3,432,128	\$23,412,227	-\$854,954,180	-\$878,366,408
Aug-12	-\$1,986,608	-\$848,902	-\$8,092			-\$2,843,602	\$0	-\$2,843,602	\$23,412,227	-\$857,797,782	-\$881,210,010
Sep-12	-\$2,321,318	-\$1,044,077	-\$11,926			-\$3,377,321	\$0	-\$3,377,321	\$23,412,227	-\$861,175,104	-\$884,587,332
Oct-12	-\$3,653,559	-\$1,102,057	-\$11,358			-\$4,766,974	\$0	-\$4,766,974	\$23,412,227	-\$865,942,077	-\$889,354,306
Nov-12	-\$7,303,123	-\$2,016,031	-\$30,021			-\$9,349,175	\$0	-\$9,349,175	\$23,412,227	-\$875,291,253	-\$898,703,481
Dec-12	-\$10,718,224	-\$3,009,674	-\$34,951			-\$13,762,849	\$0	-\$13,762,849	\$23,412,227	-\$889,054,102	-\$912,466,330
Jan-13	-\$17,561,829	-\$5,237,632	-\$51,727			-\$22,851,187	\$0	-\$22,851,187	\$23,412,227	-\$911,905,289	-\$935,317,517
Feb-13	-\$18,925,582	-\$5,598,939	-\$45,406			-\$24,569,927	\$0	-\$24,569,927	\$23,412,227	-\$936,475,216	-\$959,887,444
Mar-13	-\$16,218,739	-\$4,350,721	-\$28,889			-\$20,598,350	\$0	-\$20,598,350	\$23,412,227	-\$957,073,565	-\$980,485,793
Apr-13	-\$9,824,400	-\$2,408,704	-\$10,098			-\$12,243,202	\$0	-\$12,243,202	\$23,412,227	-\$969,316,767	-\$992,728,995
May-13	-\$3,969,390	-\$1,005,427	-\$8,133			-\$4,982,951	\$0	-\$4,982,951	\$23,412,227	-\$974,299,717	-\$997,711,946
Jun-13	-\$2,415,361	-\$657,077	-\$4,765			-\$3,077,203	\$0	-\$3,077,203	\$23,412,227	-\$977,376,921	-\$1,000,789,149
Jul-13	-\$2,215,582	-\$723,016	-\$6,497			-\$2,945,095	\$0	-\$2,945,095	\$23,412,227	-\$980,322,016	-\$1,003,734,244
Aug-13	-\$2,138,758	-\$765,977	-\$8,254			-\$2,912,988	\$0	-\$2,912,988	\$23,412,227	-\$983,235,004	-\$1,006,647,232
Sep-13	-\$2,047,364	-\$639,512	-\$6,073			-\$2,692,950	\$0	-\$2,692,950	\$23,412,227	-\$985,927,954	-\$1,009,340,182
Oct-13	-\$2,815,864	-\$818,831	-\$16,192			-\$3,650,886	\$0	-\$3,650,886	\$23,412,227	-\$989,578,840	-\$1,012,991,068
Nov-13	-\$7,562,682	-\$2,155,379	-\$62,083			-\$9,780,144	\$0	-\$9,780,144	\$23,412,227	-\$999,358,984	-\$1,022,771,212
Dec-13	-\$13,763,019	-\$3,797,676	-\$51,496			-\$17,612,191	\$0	-\$17,612,191	\$23,412,227	-\$1,016,971,175	-\$1,040,383,403
Jan-14	-\$15,981,935	-\$4,344,835	-\$46,431			-\$20,373,200	\$0	-\$20,373,200	\$23,412,227	-\$1,037,344,376	-\$1,060,756,604
Feb-14	-\$8,748,912	-\$792,898	\$6,411			-\$9,535,399	\$0	-\$9,535,399	\$23,412,227	-\$1,046,879,775	-\$1,070,292,003
Mar-14	-\$15,113,887	-\$4,423,825	-\$45,744			-\$19,583,455	\$0	-\$19,583,455	\$23,412,227	-\$1,066,463,230	-\$1,089,875,458
Apr-14	-\$9,661,541	-\$2,203,349	-\$20,533			-\$11,885,423	\$0	-\$11,885,423	\$23,412,227	-\$1,078,348,653	-\$1,101,760,881
May-14	-\$4,308,980	-\$879,750	-\$7,338	\$38,047	\$34,335	-\$5,123,687	\$0	-\$5,123,687	\$23,412,227	-\$1,083,472,340	-\$1,106,884,568
Jun-14	-\$2,499,474	-\$638,593	-\$5,820	-\$5,630	\$61,031	-\$3,088,486	\$0	-\$3,088,486	\$23,412,227	-\$1,086,560,826	-\$1,109,973,054
Jul-14	-\$2,327,035	-\$625,615	-\$6,631	-\$42,096	\$59,117	-\$2,942,259	\$0	-\$2,942,259	\$23,412,227	-\$1,089,503,084	-\$1,112,915,312
Aug-14	-\$2,581,985	-\$750,265	-\$8,389	-\$63,833	\$77,033	-\$3,327,439	\$0	-\$3,327,439	\$23,412,227	-\$1,092,830,524	-\$1,116,242,752
Sep-14	-\$2,569,170	-\$632,911	-\$6,336	-\$17,212	\$67,644	-\$3,157,984	\$0	-\$3,157,984	\$23,412,227	-\$1,095,988,508	-\$1,119,400,736
Oct-14	-\$3,731,082	-\$814,930	-\$12,555	\$37,077	\$73,254	-\$4,448,236	\$0	-\$4,448,236	\$23,412,227	-\$1,100,436,744	-\$1,123,848,972
Nov-14	-\$8,519,324	-\$1,952,682	-\$35,137	\$30,825	\$67,232	-\$10,409,087	\$0	-\$10,409,087	\$23,412,227	-\$1,110,845,831	-\$1,134,258,059

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Dec-14	-\$12,884,435	-\$3,090,609	-\$61,504	\$47,032	\$48,796	-\$15,940,721	\$0	-\$15,940,721	\$23,412,227	-\$1,126,786,552	-\$1,150,198,780
Jan-15	-\$24,103,802	-\$6,731,228	-\$96,765	\$101,261	\$40,306	-\$30,790,227	\$0	-\$30,790,227	\$23,412,227	-\$1,157,576,779	-\$1,180,989,007
Feb-15	-\$27,342,772	-\$7,357,262	-\$106,216	\$169,688	\$18,540	-\$34,618,022	\$0	-\$34,618,022	\$23,412,227	-\$1,192,194,801	-\$1,215,607,029
Mar-15	-\$23,346,881	-\$6,432,525	-\$96,751	\$245,073	\$25,336	-\$29,605,747	\$0	-\$29,605,747	\$23,412,227	-\$1,221,800,548	-\$1,245,212,776
Apr-15	-\$13,206,425	-\$3,819,985	-\$60,265	\$73,304	\$18,404	-\$16,994,968	\$0	-\$16,994,968	\$23,412,227	-\$1,238,795,516	-\$1,262,207,744
May-15	-\$5,874,990	-\$1,659,536	-\$24,504	\$63,709	\$19,577	-\$7,475,743	\$0	-\$7,475,743	\$23,412,227	-\$1,246,271,259	-\$1,269,683,488
Jun-15	-\$3,022,034	-\$953,870	-\$14,081	\$6,185	\$31,353	-\$3,952,446	\$0	-\$3,952,446	\$23,412,227	-\$1,250,223,705	-\$1,273,635,933
Jul-15	-\$2,517,799	-\$838,616	-\$11,460	\$13,055	\$35,924	-\$3,318,895	\$0	-\$3,318,895	\$23,412,227	-\$1,253,542,601	-\$1,276,954,829
Aug-15	-\$2,236,562	-\$706,709	-\$12,089	-\$34,315	\$82,867	-\$2,906,808	\$0	-\$2,906,808	\$23,412,227	-\$1,256,449,408	-\$1,279,861,636
Sep-15	-\$2,421,039	-\$776,506	-\$12,446	\$3,354	\$49,646	-\$3,156,991	\$0	-\$3,156,991	\$23,412,227	-\$1,259,606,399	-\$1,283,018,627
Oct-15	-\$3,143,346	-\$990,394	-\$20,122	\$11,751	\$64,692	-\$4,077,419	\$0	-\$4,077,419	\$23,412,227	-\$1,263,683,818	-\$1,287,096,046
Nov-15	-\$6,647,549	-\$2,120,236	-\$42,765	\$32,806	\$78,831	-\$8,698,913	\$0	-\$8,698,913	\$23,412,227	-\$1,272,382,731	-\$1,295,794,959
Dec-15	-\$11,434,927	-\$3,771,764	-\$60,957	\$8,563	\$72,641	-\$15,186,444	\$0	-\$15,186,444	\$23,412,227	-\$1,287,569,175	-\$1,310,981,403
Jan-16	-\$16,112,731	-\$5,678,615	-\$94,065	-\$34,989	\$9,775	-\$21,910,625	\$0	-\$21,910,625	\$23,412,227	-\$1,309,479,800	-\$1,332,892,028
Feb-16	-\$18,597,905	-\$6,753,189	-\$119,339	-\$1,951	\$18,368	-\$25,454,015	\$0	-\$25,454,015	\$23,412,227	-\$1,334,933,815	-\$1,358,346,043
Mar-16	-\$15,872,469	-\$5,580,592	-\$102,175	\$7,502	\$13,209	-\$21,534,525	\$0	-\$21,534,525	\$23,412,227	-\$1,356,468,340	-\$1,379,880,568
Apr-16	-\$10,415,718	-\$3,156,401	-\$49,603	\$10,821	\$6,722	-\$13,604,179	\$0	-\$13,604,179	\$23,412,227	-\$1,370,072,519	-\$1,393,484,747
May-16	-\$5,964,571	-\$1,727,504	-\$24,245	-\$11,723	\$44,730	-\$7,683,313	\$0	-\$7,683,313	\$23,412,227	-\$1,377,755,832	-\$1,401,168,060
Jun-16	-\$3,487,938	-\$1,055,352	-\$14,102	-\$24,004	\$55,326	-\$4,526,070	\$0	-\$4,526,070	\$23,412,227	-\$1,382,281,902	-\$1,405,694,130
Jul-16	-\$1,991,284	-\$607,071	-\$6,338	-\$29,412	\$71,233	-\$2,562,872	\$0	-\$2,562,872	\$23,412,227	-\$1,384,844,774	-\$1,408,257,002
Aug-16	-\$2,033,848	-\$612,147	-\$6,595	-\$31,069	\$86,108	-\$2,597,551	\$0	-\$2,597,551	\$23,412,227	-\$1,387,442,325	-\$1,410,854,553
Sep-16	-\$2,009,458	-\$597,987	-\$7,340	-\$6,580	\$55,578	-\$2,565,788	\$0	-\$2,565,788	\$23,412,227	-\$1,390,008,113	-\$1,413,420,341
Oct-16	-\$2,257,699	-\$619,928	-\$10,332	\$67,158	\$80,285	-\$2,740,516	\$0	-\$2,740,516	\$23,412,227	-\$1,392,748,629	-\$1,416,160,857
Nov-16	-\$5,015,771	-\$1,363,107	-\$32,609	-\$46,694	\$1,689	-\$6,456,492	\$0	-\$6,456,492	\$23,412,227	-\$1,399,205,120	-\$1,422,617,349
Dec-16	-\$8,848,222	-\$2,602,060	-\$39,483	-\$52,895	\$77,846	-\$11,464,815	\$0	-\$11,464,815	\$23,412,227	-\$1,410,669,935	-\$1,434,082,163
Jan-17	-\$8,602,412	-\$1,932,895	-\$23,094	-\$197,580	\$16,657	-\$10,739,324	\$0	-\$10,739,324	\$23,412,227	-\$1,421,409,259	-\$1,444,821,488
Feb-17	-\$10,479,905	-\$3,212,465	-\$45,344	-\$189,553	\$20,621	-\$13,906,646	\$0	-\$13,906,646	\$23,412,227	-\$1,435,315,906	-\$1,458,728,134
Mar-17	-\$12,403,111	-\$3,981,768	-\$66,462	-\$14,808	\$13,044	-\$16,453,105	\$0	-\$16,453,105	\$23,412,227	-\$1,451,769,011	-\$1,475,181,239
Apr-17	-\$7,152,840	-\$2,079,943	-\$33,637	-\$44,992	\$20,985	-\$9,290,427	\$0	-\$9,290,427	\$23,412,227	-\$1,461,059,438	-\$1,484,471,666
May-17	-\$4,249,551	-\$1,084,496	-\$16,756	-\$19,605	\$51,743	-\$5,318,664	\$0	-\$5,318,664	\$23,412,227	-\$1,466,378,103	-\$1,489,790,331
Jun-17	-\$2,846,544	-\$749,126	-\$12,220	-\$29,457	\$67,299	-\$3,570,047	\$0	-\$3,570,047	\$23,412,227	-\$1,469,948,150	-\$1,493,360,378
Jul-17	-\$2,432,674	-\$673,504	-\$11,964	\$17,247	\$53,984	-\$3,046,912	\$0	-\$3,046,912	\$23,412,227	-\$1,472,995,062	-\$1,496,407,290
Aug-17	-\$2,371,761	-\$675,104	-\$12,487	\$2,572	\$16	-\$3,056,763	\$0	-\$3,056,763	\$23,412,227	-\$1,476,051,825	-\$1,499,464,053
Sep-17	-\$2,539,390	-\$714,249	-\$12,382	\$5,325	\$60,276	-\$3,200,419	\$0	-\$3,200,419	\$23,412,227	-\$1,479,252,244	-\$1,502,664,472
Oct-17	-\$2,648,172	-\$744,642	-\$15,885	\$22,212	\$43,730	-\$3,342,756	\$0	-\$3,342,756	\$23,412,227	-\$1,482,595,000	-\$1,506,007,228
Nov-17	-\$7,587,488	-\$1,966,136	-\$50,909	\$30,457	\$50,781	-\$9,523,295	\$0	-\$9,523,295	\$23,412,227	-\$1,492,118,295	-\$1,515,530,523
Dec-17	-\$12,595,841	-\$3,405,446	-\$73,570	-\$42,110	\$70,159	-\$16,046,808	\$0	-\$16,046,808	\$23,412,227	-\$1,508,165,103	-\$1,531,577,331
Jan-18	-\$22,918,445	-\$6,713,323	-\$115,325	\$16,576	\$56,107	-\$29,674,409	\$0	-\$29,674,409	\$23,412,227	-\$1,537,839,513	-\$1,561,251,741

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
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Case No(s). 12-2637-GA-EXM

Summary: Memorandum Memorandum Contra Joint Motion for Extension by The Office of the Ohio Consumers' Counsel electronically filed by Ms. Jamie Williams on behalf of McKenney, Bryce A. Mr.