

Northwest Ohio **Aggregation Coalition**



Cities

Maumee

November 25, 2019

Northwood

Commissioners
Public Utilities Commission of Ohio
VIA ELECTRONIC FILING

Oregon

Perrysburg

Subject: Comments on Energy Efficiency Programs in Case No. 16-743-EL-POR

Rossford

Sylvania

Dear Commissioners:

Toledo

Waterville

The fourteen member communities of the Northwest Aggregation Coalition serve about 120,000 residential and 12,000 small commercial customers in their individual electric aggregations. In its October 23 entry, the Commission asked for comments on the continuation of EDU energy efficiency programs in light of HB 6. As the Commission knows, our EDU is Toledo Edison, one of FirstEnergy's three Ohio distribution utilities and our experience is with its portfolio. We thank you for this opportunity to comment.

Villages

Delta

Holland

Ottawa Hills

Walbridge

**Comments on Commission Question 1:
“Whether the commission should terminate the energy efficiency programs
once the statutory cap of 17.5 percent is met?”**

Townships

Lake

Perrysburg

NOAC believes that the mandated energy efficiency programs fulfilled their purpose and should be terminated once the 17.5% goal is achieved.

All the NOAC communities are engaged in and committed to energy efficiency programs. More importantly, our residents and businesses, invested heavily in energy efficiency primarily outside the FirstEnergy portfolio. The issue is not whether the communities and their citizens support EE, but whether additional investments in EDU EE programs offer sufficient incremental benefits to justify continuation. NOAC believes that they do not.

Counties

Lucas

Many customers who participated in the FirstEnergy programs have not stopped to consider where the money came from to pay for the programs. In truth, all rate payers paid

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not just for the offered goods or services, but also paid the additional costs of the program,

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shared savings and other costs. Years ago, at the start of the EE effort, it may have been

Oregon

necessary to “prime the pump” with the EE portfolios. But now, more stringent federal

Perrysburg

standards and changed consumer behavior have made voluntary, unsubsidized energy

Rossford

efficiency a common and widespread choice.

Sylvania

Today people are better educated and self-motivated on energy efficiency. The shelves at

Toledo

home improvement and hardware stores are lined with LED bulbs that replaced the less

Waterville

efficient lighting technologies and an innovative array of other EE products. Kids learn

about it in school. To attract customers businesses tout not just their energy efficient

Villages

offerings, but also highlight their own energy efficiency investments and sustainable behavior.

Delta

Holland

It is difficult to know how much of energy saved by the EDU programs was directly

Ottawa Hills

attributable to the programs and how much would have occurred anyways. NOAC believes

Walbridge

the EE programs played some part of the increase in Ohio’s energy efficiency in its early

phases. But, NOAC strongly believes the time has come for the Commission to sunset the

FirstEnergy EDU EE programs as soon as possible.

Townships

Lake

Comments on Commission Question 2:

Perrysburg

“Whether it is appropriate for the EDUs to continue to spend ratepayer provided funds on energy efficiency programs after the statutory cap is met?”

Counties

Lucas

NOAC believes that it is not appropriate to continue the EDU EE programs after the

statutory mandate is met. Ongoing residential and commercial consumer focus on energy

efficiency has increased to the point that eliminating the EE EDU programs after the

statutory cap is met is justified.

Northwest Ohio **Aggregation Coalition**



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Maumee Please contact us if you need more information or we would be glad to meet with you to
Northwood discuss to discuss these opportunities.

Oregon Sincerely,
Perrysburg

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Summary: Comments NOAC Comments on Energy Efficiency Programs in Case No. 16-743-EL-POR electronically filed by Mr. Thomas R. Hays on behalf of NOAC