

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of The Application of Ohio)	
Edison Company, The Cleveland Electric)	
Illumination Company, and The Toledo)	Case No. 19-2080-EL-ATA
Edison Company for Approval of a)	Case No. 19-2181-EL-AAM
Decoupling Mechanism.)	

COMMENTS OF THE OHIO HOSPITAL ASSOCIATION

The Ohio Hospital Association (“OHA”) submits these initial comments in response to the Administrative Law Judge’s (“ALJ”) December 3, 2019 Entry. OHA reserves the right to supplement these comments in its reply comments.

In general, OHA is not opposed to the concept of decoupling mechanisms being implemented by electric utilities. To the extent decoupling mechanisms remove the disincentive for electric utilities to actively encourage energy efficiency, such mechanisms can serve as an important tool for reaching energy efficiency goals and standards. However, the future of the Companies’¹ energy efficiency efforts and programs is unclear due to H.B. 6. If the Companies’ application is granted, customers will be required to pay the Conservation Support Rider (“Rider CSR”) until the Companies’ next base distribution rate case even though the Companies may no longer actively support robust energy efficiency programs.

In reviewing the Companies’ application, the Commission should determine the reasonableness of an ongoing Rider CSR charge considering that the Companies’ energy efficiency programs may no longer exist in the near future. It may be reasonable for customers to

¹ The “Companies” refers to Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company.

pay for a decoupling mechanism when customers can take advantage of energy efficiency programs that reduce their energy bills. It is more problematic to ask customers to pay for lost distribution revenues well after the utility-sponsored energy efficiency programs have ceased, and customers can no longer benefit from these programs. OHA requests that the Commission closely consider the potential impacts of Rider CSR and determine whether customers receive any corresponding benefit from the proposed decoupling mechanism of the Companies.

Respectfully submitted on behalf of
THE OHIO HOSPITAL ASSOCIATION



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served upon the parties of record listed below this 17th day of December 2019 *via* electronic service.



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Summary: Comments of The Ohio Hospital Association electronically filed by Teresa Orahood
on behalf of Devin D. Parram