

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

| | | |
|--|---|------------------------|
| In the Matter of the Application of Ohio |) | |
| Power Company for an Increase in |) | Case No. 20-585-EL-AIR |
| Electric Distribution Rates. |) | |
| |) | |
| In the Matter of the Application of Ohio |) | |
| Power Company for Tariff Approval. |) | Case No. 20-586-EL-ATA |
| |) | |
| In the Matter of the Application of Ohio |) | |
| Power Company for Approval to Change |) | |
| Accounting Methods. |) | Case No. 20-587-EL-AAM |
| |) | |

**RESPONSES OF THE OHIO ENVIRONMENTAL COUNCIL TO THE
OFFICE OF THE OHIO CONSUMERS' COUNSEL'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
(APRIL 22, 2020)**

INTERROGATORIES

- INT-1-001. The report "Estimating the Benefits of Waste Reduction in Ohio," attached to the Direct Testimony of Brendon J. Baatz as Exhibit OEC-3, states (at p. 2) that "This report was commissioned by Ohio Hospital Association, Environmental Law & Policy Center, Ohio Environmental Council, Ceres, E2, and Natural Resources Defense Council." Please identify:
- a. The total amount of money paid to Brendon Baatz and/or Gabel Associates, Inc. to prepare the report; and
 - b. The amount of money paid to Brendon Baatz and/or Gabel Associates, Inc. by each entity that commissioned the report.

RESPONSE: OBJECTION. OEC objects to the extent that the Interrogatory seeks irrelevant information. Subject to and without waiving the foregoing objection, Gabel Associates was paid \$33,500 for the report by the Ohio Environmental Council. Brendon Baatz was not compensated individually for the report.

INT-1-002. Has the report “Estimating the Benefits of Waste Reduction in Ohio,” attached to the Direct Testimony of Brendon J. Baatz as Exhibit OEC-3 been published in any journal or publication? If the answer is affirmative, please identify all journals and publications in which the report has been published and provide the date of the publication.

RESPONSE: No.

INT-1-003. If the answer to INT-1-002 is affirmative, was the report peer reviewed?

RESPONSE: N/A

REQUESTS FOR PRODUCTION OF DOCUMENTS

RPD-1-001. If the report “Estimating the Benefits of Waste Reduction in Ohio,” attached to the Direct Testimony of Brendon J. Baatz as Exhibit OEC-3, was peer reviewed, provide (i) copies of all drafts of the report that were part of the peer review process, including any drafts with comments resulting from the peer review process, and (ii) any other documents containing edits, suggestions, or other comments on the report resulting from the peer-review process.

RESPONSE: N/A

RPD-1-002. Provide a copy of all workpapers Mr. Baatz or Gabel Associates, Inc. created in preparing the report “Estimating the Benefits of Waste Reduction in Ohio,” attached to the Direct Testimony of Brendon J. Baatz as Exhibit OEC-3. Provide these in native format with all formulas intact.

RESPONSE: The supporting workpapers for Exhibit OEC-3 are confidential and subject to a Non-Disclosure Agreement. These workpapers will be provided following OEC receiving executed Non-Disclosure Agreements for parties wishing to receive them.

RPD-1-003. Provide a copy of all public records requests submitted by OEC to the PUCO in connection with the above-captioned proceedings and the PUCO’s responses to such public records requests.

RESPONSE: None.

/s/Miranda Leppla
Miranda Leppla (0086351)
Counsel of Record
Trent Dougherty (0079817)
Chris Tavenor (0096642)
1145 Chesapeake Avenue, Suite I
Columbus, Ohio 43212-3449
(614) 487-7506 - Telephone
mleppla@theOEC.org
tdougherty@theOEC.org
ctavenor@theOEC.org

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Responses of Ohio Environmental Council to the Ohio Consumers' Counsel's First Set of Interrogatories and Request for Production of Documents was served upon all parties of record in the above-mentioned cases this 29th day of April, 2021 via electronic delivery.

/s/ Miranda R. Leppla
Miranda R. Leppla



Public Utilities
Commission

Electric Choice Activity by Customer Class

Select Utility Territory

Ohio Power

Select Year

2021

2020

2019

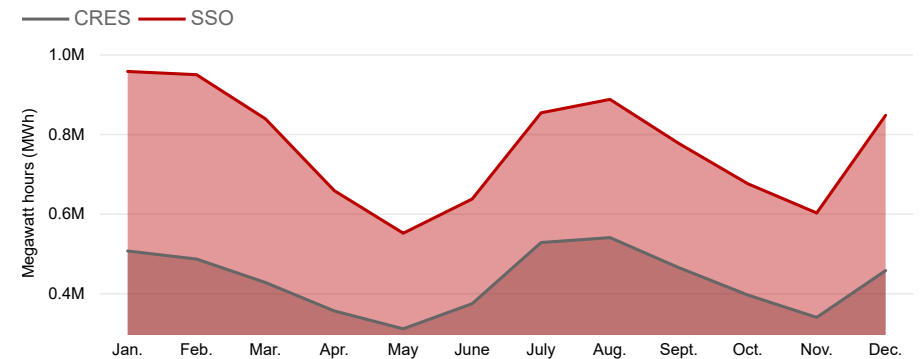
Select Customer Class

- ☐ Select all
- ☒ Residential
- ☐ Commercial
- ☐ Industrial
- ☐ Other

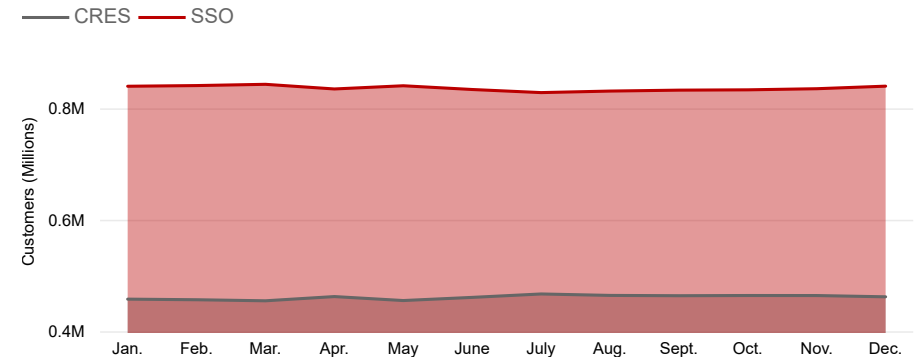
Electric Choice by Customer Class (MWh Sales)

| Month | CRES (MWh) | SSO (MWh) |
|-------|------------|-----------|
| Jan. | 505,580 | 956,590 |
| Feb. | 485,261 | 948,490 |
| Mar. | 426,382 | 837,584 |
| Apr. | 354,859 | 656,999 |
| May | 310,066 | 550,235 |
| June | 373,200 | 636,213 |
| July | 526,812 | 852,736 |
| Aug. | 539,156 | 886,420 |
| Sept. | 463,627 | 775,651 |
| Oct. | 394,959 | 674,530 |
| Nov. | 338,720 | 601,085 |
| Dec. | 456,392 | 846,468 |

Sales in MWh by Selected Customer Class



Customer Count by Selected Customer Class



1. The Retail Market Activity dashboard is based on data submitted by Ohio's electric distribution utilities pursuant to [ORC 4935.01](#) and [OAC 4901:5](#) (SE-1 or forecasting data).

Questions: MarketMonitoring@puco.ohio.gov



Public Utilities
Commission

Electric Choice Activity by Customer Class

Select Utility Territory

Ohio Power

Select Year

2021

2020

2019

Select Customer Class

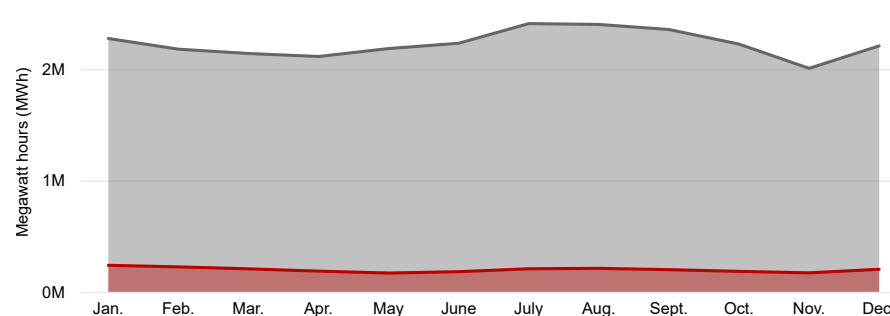
- ☐ Select all
☐ Residential
☒ Commercial
☒ Industrial
☒ Other

Electric Choice by Customer Class (MWh Sales)

| Month | CRES (MWh) | SSO (MWh) |
|-------|------------|-----------|
| Jan. | 2,272,764 | 237,970 |
| Feb. | 2,177,106 | 223,739 |
| Mar. | 2,138,190 | 206,109 |
| Apr. | 2,111,371 | 185,559 |
| May | 2,182,688 | 168,582 |
| June | 2,230,201 | 180,607 |
| July | 2,406,667 | 206,746 |
| Aug. | 2,399,111 | 210,655 |
| Sept. | 2,353,461 | 198,819 |
| Oct. | 2,222,783 | 183,427 |
| Nov. | 2,005,143 | 170,241 |
| Dec. | 2,206,542 | 202,156 |

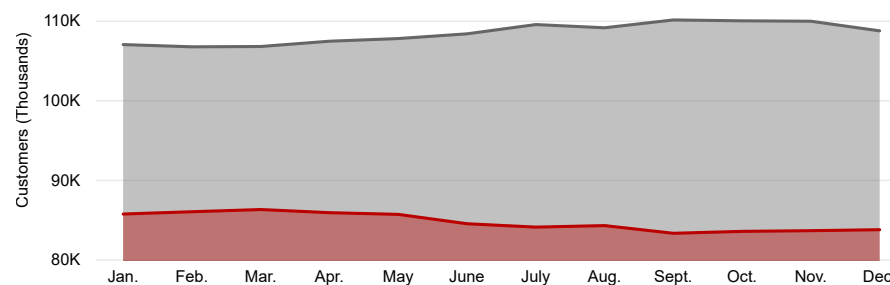
Sales in MWh by Selected Customer Class

— CRES — SSO



Customer Count by Selected Customer Class

— CRES — SSO



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Public Utilities
Commission

Electric Choice Activity by Customer Class

Select Utility Territory

Ohio Power

Select Year

2021

2020

2019

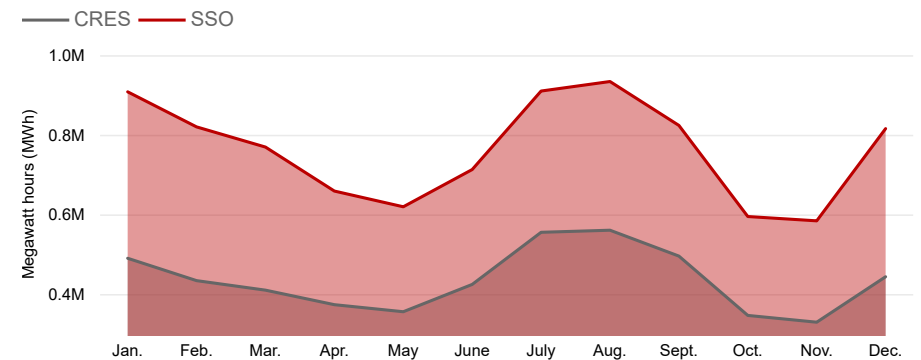
Select Customer Class

- ☐ Select all
- ☒ Residential
- ☐ Commercial
- ☐ Industrial
- ☐ Other

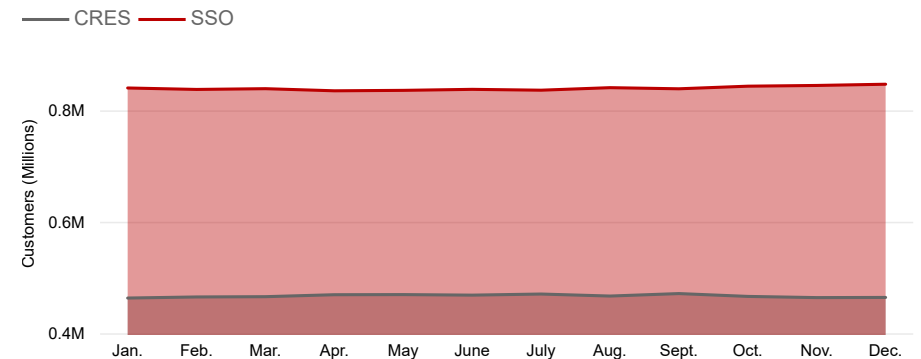
Electric Choice by Customer Class (MWh Sales)

| Month | CRES (MWh) | SSO (MWh) |
|-------|------------|-----------|
| Jan. | 489,801 | 907,985 |
| Feb. | 433,605 | 819,860 |
| Mar. | 409,687 | 769,153 |
| Apr. | 373,197 | 658,649 |
| May | 355,471 | 619,151 |
| June | 424,077 | 712,686 |
| July | 555,034 | 909,912 |
| Aug. | 560,275 | 933,838 |
| Sept. | 495,261 | 823,532 |
| Oct. | 346,203 | 594,667 |
| Nov. | 329,172 | 583,829 |
| Dec. | 443,389 | 815,524 |

Sales in MWh by Selected Customer Class



Customer Count by Selected Customer Class



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Public Utilities
Commission

Electric Choice Activity by Customer Class

Select Utility Territory

Ohio Power

Select Year

2021

2020

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Select Customer Class

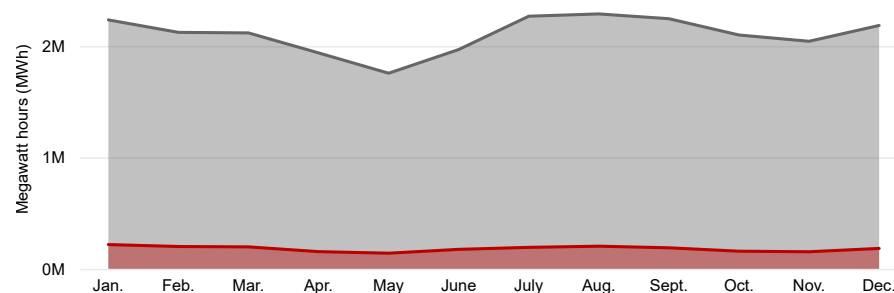
- ☐ Select all
☐ Residential
☒ Commercial
☒ Industrial
☒ Other

Electric Choice by Customer Class (MWh Sales)

| Month | CRES (MWh) | SSO (MWh) |
|-------|------------|-----------|
| Jan. | 2,233,491 | 217,580 |
| Feb. | 2,121,537 | 200,128 |
| Mar. | 2,116,648 | 196,778 |
| Apr. | 1,937,284 | 154,132 |
| May | 1,754,949 | 140,100 |
| June | 1,967,477 | 174,578 |
| July | 2,266,533 | 192,415 |
| Aug. | 2,286,977 | 203,027 |
| Sept. | 2,243,921 | 188,541 |
| Oct. | 2,097,799 | 157,997 |
| Nov. | 2,041,517 | 153,082 |
| Dec. | 2,183,422 | 183,009 |

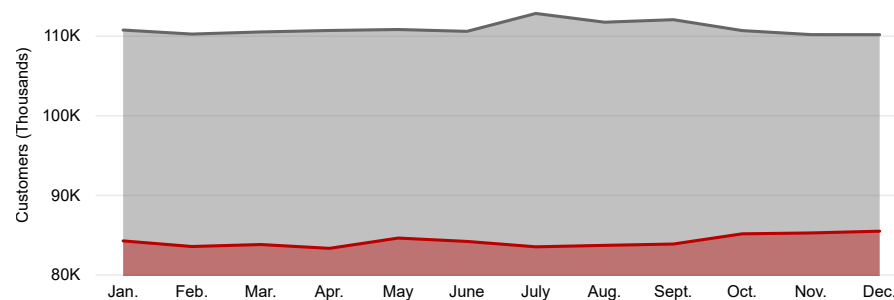
Sales in MWh by Selected Customer Class

— CRES — SSO



Customer Count by Selected Customer Class

— CRES — SSO



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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/21/2021 12:13:09 PM

in

Case No(s). 20-0585-EL-AIR, 20-0586-EL-ATA, 20-0587-EL-AAM

Summary: Exhibit OCC Exhibits 3, 12-15 electronically filed by Mr. Ken Spencer on behalf of Armstrong & Okey, Inc.