

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Application of Ohio) Power Company for an Increase in) Electric Distribution Rates.) | Case No. 20-585-EL-AIR |
| 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 |

INITIAL BRIEF OF OHIO PARTNERS FOR AFFORDABLE ENERGY

I. INTRODUCTION

AEP Ohio (“AEP”) seeks approval from the Public Utilities Commission of Ohio (the “Commission”) for a proposed Joint Stipulation (“Stipulation”) filed in this proceeding on March 12, 2021.

Ohio Partners for Affordable Energy (“OPAЕ”) respectfully requests that the Commission either reject or modify the Stipulation in the following manner: (1) adopt and approve the residential customer charge as properly calculated in the Staff Report; reject the proposed Delayed Payment Charge; modify riders established using a percentage of base distribution revenues to riders recovered on a per kilowatt (kWh) basis; and, require AEP to provide demand side management programs, particularly for low-income customers. Absent these modifications the Stipulation, as a package, violates important regulatory principles and provides for unjust and unreasonable rates and should be rejected.

II. STANDARD OF REVIEW

The Commission employs a three-part test to evaluate stipulations.¹ This test asks the following questions:

- Is the settlement a product of serious bargaining among capable, knowledgeable parties?
- Does the settlement, as a package, benefit ratepayers and the public interest?
- Does the settlement package violate any important regulatory principle or practice?

A settlement is not evidence and it is not binding on the Commission. It is a recommendation by parties to a proceeding on how the Commission should address and resolve contested issues and nothing more. Further, a settlement does not empower the Commission, a creature of statute, to disregard statutory requirements.

Absent OPAE's requested modifications, the Stipulation fails the third prong of the test. There are four aspects which violate important regulatory principles and one which also fails to meet a statutory requirement.

III. ARGUMENT

A. The Commission should reject the proposed residential customer charge of \$10 and adopt the \$6.01 residential customer charge calculated in the Staff Report.

In the Staff Report, Staff stated, "The Staff has utilized a minimally compensatory approach which requires little or no judgement with respect to customer related expenses. Using the Staff recommended method for determining residential customer

¹ *Consumers' Counsel v. Pub. Util. Comm'n*, 64 Ohio St.3d 123, 126 (1992). See, also, *AK Steel Corp. v. Pub. Util. Comm'n*, 95 Ohio St.3d 81, 82-83 (2002).

charges, the customer charge per bill would be \$6.01.”² Originally AEP requested the customer charge be raised to \$14.³ The Staff Report concluded that portions of secondary-distribution demand related costs, as identified in the cost of service study, could be included in the customer charge, but the amount proposed by AEP Ohio was excessive.⁴ Instead of the \$14 customer charge requested, the Staff Report recommended \$8.11, which includes \$2.10 of secondary-distribution demand related costs.⁵ Ultimately, the Stipulation proposes a \$10 customer charge⁶, \$3.99 of which represents secondary-distribution demand related costs.

In his testimony, AEP Witness Roush claims there are fixed costs which are included in a volumetric charge for residential customers and the proposed customer charge gradually improves collection of these costs.⁷ However, when questioned if the \$3.99 difference between Staff’s original calculation and the customer charge proposed in the Stipulation constituted a negotiated charge, Witness Roush pointed to his page 4 of his testimony.⁸ In that section, he stated “As a compromise in this case, the residential customer charge will be set at \$10.00 per month.”⁹ Per Staff’s calculation, the fixed costs to which Witness Roush refers are \$6.01. Therefore, the Commission should reject the Stipulation’s “compromise” charge and only approve that which is

² Staff Exhibit 1 at p. 40.

³ Transcript Volume I p. 101 Lines 1-4.

⁴ Staff Exhibit 1 at pp. 40-41.

⁵ Id.

⁶ Joint Exhibit 1 Provision E(3) at p. 9.

⁷ AEP Exhibit 4 p. 4 Lines 14-16.

⁸ Transcript Volume I p. 102 Lines 17-21 and p. 103 Lines 20-23.

⁹ AEP Exhibit 4 p. 4 Lines 10-11.

necessary to connect the customer to the system, which according to Staff's calculation is \$6.01.

To include charges above the \$6.01 in the customer charge results in a tariffed charge that is unjust and unreasonable because it violates the regulatory principal of cost causation and does not reflect the true costs that each customers puts on the system. A cost of service study is a snapshot at a moment in time – much of it based on projections by the Company, of the costs incurred to provide utility service. If these costs were fixed, eleven months of the test year would not be estimated. Ultimately, these costs going forward are variable, changing based on investment decisions by the utility as determined by demand for service, which is also not fixed. Further, if a customer is connected to the system yet uses no electricity, he or she has not contributed to demand. The less the customer uses, the less is contributed to demand.

An embedded cost of service study allocates costs for ratemaking purposes based on demand on a class basis, but that does not mean that the contribution an individual residential customer makes to demand is fixed; in fact, it varies widely among residential homes based on a number of factors including size of the home and income. Cloaking the inclusion of embedded costs in the customer charge as consistent with the concept of gradualism does not render the inclusion of demand related costs in a fixed customer charge just and reasonable.

The size of the distribution system is determined by the collective demand of customers. AEP has estimated eleven months of those costs in the test year. Yet low-use customers place little demand on the system; there is no reason to allocate low-use customers a disproportionate share of distribution system costs. The customer charge

should not be artificially inflated to include costs that are fundamentally variable over a future timeframe and that are affected by individual customer use. The test year estimates capital investment in long-lived assets, and those investment decision are a function of projected volume throughout the distribution system. The demand determines which circuits are upgraded, which circuits benefit the most from automation or investments in Volt/Var technology. Given these variables, volumetric distribution rates better reflect demand for residential and small commercial customers. Volumetric distribution rates send the appropriate price signals to customers and the Company to guide long-term investments in the distribution infrastructure.

An artificially high fixed customer charge discriminates against low-use customers, many of whom are low-income. This is yet another financial inequity these families must face: higher grocery prices; higher mortgage rates; and, higher insurance rates – all things that force too many families to pay more than their fair share. An artificially high fixed customer charge violates the State policy to “[p]rotect at-risk populations....”¹⁰ An artificially high fixed customer charge also violates the State policy to “[e]ncourage innovation and market access for ...demand-side retail electric service...” because it reduces the cost-effectiveness of energy efficiency investments.¹¹

The Commission should reject the Stipulation’s proposed \$10 residential customer charge and modify it in accordance with the basic principles of ratemaking and state policy. The Commission should adopt Staff’s originally calculated residential

¹⁰ O.R.C. §4928.02(L).

¹¹ O.R.C. §4928.02(D).

customer charge of \$6.01 which represents the true fixed cost of connecting a customer to the system.

B. The Commission should reject the proposed residential delayed payment charge because there is no evidence it will improve customer payment behavior and the Company is already made whole for the costs the charge purportedly collects rendering it simply a punitive charge that is unjust and unreasonable.

The Stipulation includes a delayed payment charge on residential customers also known as a residential late fee.¹² The residential late fee is proposed to be a 1.5% monthly charge on the unpaid balance each month but will not be implemented until April 1, 2022.¹³ The charge will be applied on the 22nd day after the bill is rendered, the due date of 14 days plus a 7-day grace period.¹⁴

Those testifying in support of the stipulation clearly acknowledge that the charge will impact low-income customers because they claim one benefit of the stipulation to be the delay in implementation itself. If the delay will result in fewer charges to customers and there is no such charge now, how is delaying it a benefit? And it confirms the basic point that a new charge that has no demonstrated impacts on actual payment behavior, is unjust and unreasonable.

AEP has not commissioned or completed any studies to determine if a delayed payment charge would promote on-time payments.¹⁵ Nor did AEP review any studies regarding the efficacy of delayed payment charges in incenting on-time payment behavior.¹⁶ Further, AEP Witness Moore could not identify how many AEP residential

¹² Joint Exhibit 1 Provision 19 at p. 14.

¹³ Id. at Sheet No. 210-3

¹⁴ Id. Provision 19 at p. 14.

¹⁵ Transcript Volume II page 259 lines 5-7.

¹⁶ Id. lines 13-14.

customers have the money to pay their bill but choose not to pay.¹⁷ Witness Moore was also unable to identify the number of AEP's residential customers who simply do not have enough money to pay their bills.¹⁸ Witness Moore did testify that the Company assumes on-time payments would be incented if there is a financial penalty for late payments.¹⁹

However, AEP has provided no evidence or support for the assumption that the delayed payments charge will result in better payment behavior. This failure alone should be basis for the Commission to modify the Stipulation to reject this punitive measure. AEP has no idea if those residential customers who pay late do so because they simply choose to pay late or if, more plausibly, they pay late because they do not have the money to pay when the bill comes due. Placing a late payment fee on a residential customer who already lacks adequate income to pay their bill serves no purpose but to punish that family, whether they be in Columbus or Athens or anywhere in the AEP service territory. That is the definition of an unjust and unreasonable utility charge.

This is especially true considering the late payment charge does not compensate AEP for any incurred costs. There are no costs associated with recovery during the first 21 days after a bill is rendered. The first 'cost' is in the form of a disconnection notice on the bill that is received roughly a month after the rendering of the initial unpaid bill. A disconnection notice also appears on the bill of a customer who has missed two monthly payments. At that point, collections activities may begin on an individual

¹⁷ Id. Line 18.

¹⁸ Id. Line 24.

¹⁹ Id Lines 7-9.

account, but the cost of those activities is already included in base rates.²⁰ Thus, there is no direct cost to AEP Ohio being paid for through the late fee, unlike the direct charge to customers for notice on the day of disconnection.

Witness Moore testified that AEP imposes a late fee on its commercial customers but she had not studied that data nor could she recall when the late fee was implemented.²¹ Staff Witness Smith testified that based on commercial customer behavior in 2019, when those customers were subjected to a late fee, Staff believes residential customers would likely increase their timely payments.²² However, a review of the evidence in the case does not reveal any significant change in commercial customer behavior between 2019 and 2018. OPAE Exhibit 13 is AEP's response to a data request by Staff and shows the average days late for commercial customers in both 2018 and 2019. The average days late for commercial customers between January and December 2018 was 4 days. Given Staff Witness Smith's reliance on 2019 payment behavior to support the delayed payment charge it would reasonable to expect a significant drop in late payment days. But the record shows the average days late for commercial customers between January and December 2019 was 3.67 days. There was no meaningful difference found as a result of the imposition of a late fee.

The simple fact is that most customers, especially those with adequate funds, pay their bills on time. The balance of customers that will be assessed the delayed payment charge have low-incomes, and are families that face energy insecurity issues.

²⁰ See Application Vol. 2 at 74, Schedule C-2.1, page 2 of 5; Transcript Volume II page 260 lines 10-13.

²¹ Transcript Volume II page 260 lines 14-25 and page 261 lines 1-3.

²² Staff Exhibit 3 at p. 5 Lines 1-7.

Under current tariffs it is only failing businesses that are subjected to the late fees. Low-income households already have challenges paying monthly bills and a late fee will not incent them to pay a bill they already cannot afford, it will just force them onto the Percentage Income Payment Plan (“PIPP”) where all these fees are waived. The State of Ohio is willing to waive fees to reduce PIPP costs. Why impose fees on those who cannot pay, driving them to alternative rates that effect customer costs?

Given that the costs associated with late payment and uncollectible accounts is already included in base rates and the lack of evidence that a delayed payment charge improves payment behavior, the only logical conclusion is that the delayed payment charge is punitive.

The Commission should modify the Stipulation to deny the imposition of the delayed payment charge because there is no evidence in the record that will incent on-time payment and it does not recover any uncollected costs. Therefore, a delayed payment charge is unjust and unreasonable, especially for AEP’s most vulnerable customers.

C. The Commission should modify the Stipulation to convert multiple riders funded through fixed charges to volumetric charges to align the impacts of the riders with state policy.

Ohio has long sought to provide customers with control over their energy choices through both the ability to choose alternative suppliers of generation and with information provided through smart grid deployments, using Advanced Metering Infrastructure (“AMI”). The Commission certifies competitive retail electricity suppliers (“CRES”) to provide supply options, has ensured that distribution utilities have workable supply tariffs in place to provide CRES with access to customers, and authorized the

deployment of smart grid systems in three of the four large electric distribution utilities (“EDUs”).

Fixed charges run counter to the philosophy of increasing customer control over energy services. Customers must pay a fixed charge regardless of the amount of energy consumed (or generated). Thus, fixed charges undermine the ability of customers to lower bills through reducing usage. Fixed charges also hinder or eliminate customers’ ability to control their costs through investing in energy efficiency, weatherization, or solar photovoltaics (“PV”) because the fixed charge, by definition, remains the same regardless of their usage. Reducing fixed charges to the extent feasible, promotes control over energy usage and reduces long-term marginal costs by sending the utility an appropriate price signal regarding the need for future investments.

Low-use customers typically live in smaller than average homes, including small single-family homes, duplexes, and apartments. Low-use customers also tend to have smaller families than those using average amounts of energy or more. Most low-income customers are also low-use customers.

High customer charges and other fixed charges disproportionately impact low-use customers’ bills. Essentially, fixed charges impose the same cost on low-use customers living in a 1,000 square foot apartment as someone living in a 4,000 square foot home. The fixed charges are a higher percentage of a low-use customer’s bill, and these customers will experience a greater percentage increase when fixed charges are increased.²³ It is not in the public interest to design rates that target those that use less

²³ AEP determines the percentage of the customer’s distribution charges assessed by determining the amount of revenue produced through base distribution charges, a part of which is volumetric. This means a fixed charge is being established based on

energy for higher bills, whether they simply conserve, live in smaller homes or apartments, or invest in energy efficiency, weatherization, or PV. Moreover, the shifting of costs from high-use customers to low-use customers is simply discriminatory.

The Stipulation includes several riders that are collected as a fixed charge that should be collected through a volumetric rate. The Economic Development Cost Recovery Rider (“EDR”) recovers the costs of subsidies provided to the largest industrial energy consumers. The EDR is recovered through a fixed charge that is 2.23580% of the customer’s distribution charge.²⁴ Regardless of the efficacy of the charge, there is no justification for designing this rider as a fixed charge. There is no evidence that low-use customers benefit more from the EDR than high use customers. In fact, logic tells you that elderly, disabled, low-income, and other low-use customers are less likely to benefit from these industrial subsidies.

The gridSMART Phase 2 Rider (“SG2”) is a fixed charge applied to customer bills to pay for the deployment of Volt/VAR Optimization (“VVO”), Distribution Automation Circuit Reconfiguration (“DACR”), and the deployment of an Advanced Meter Infrastructure (“AMI”). Schedule 3.14 of the AEP Exhibit 1 indicates SG2 is \$0.99 per month, though the tariffs filed with the Stipulation indicate that the Rider will be \$1.65.²⁵

charges that are variable, a curious phenomenon. It is hard to see the logic that distribution are fixed.

²⁴ Joint Exhibit 1 at Sheet No. 420.

²⁵ Stipulation, Sheet 410-1, Page 308. Though the rider being discussed are fixed in nature, the amount of the various riders is adjusted regularly to true-up expenditures and revenues. For example, both the Distribution Investment Rider and the Enhanced Service Reliability Rider are assumed to be negative in Schedule 3.14 and the bill comparison, but the Riders will both have to be positive to recover the funding levels authorized for the Rider in the Stipulation.

It is well recognized in the industry that the primary benefit of smart grid deployment is improved reliability, though its value for residential and small commercial customers is probably overstated. However, the value of this reliability is minimal to low-use customers; the bulk of the value inures to commercial and industrial customers. Ultimately, the benefits of smart meters are a function of usage. Asking low-use customers to pay a fixed fee for technologies that do not provide them with benefits is unjust and unreasonable.

The Distribution Investment Rider (DIR) is designed to fund costs associated with the distribution system. In most states, these expenses would be part of base rates and residential customers would pay these costs through volumetric charge. However, Ohio has embraced single-issue ratemaking, and in the case of the DIR, recovers the costs through a fixed charge, most recently 45.51414% of a customer's distribution fees, based on the class base distribution fees, or \$3.920602 per month. These costs are not included in the list of expenses that are included in the customer charge, and there is no justification for setting the DIR charge as a monthly fixed percentage charge.

The Enhance Service Reliability Rider ("ESSR") funds vegetation management expenses incurred by AEP Ohio. These costs have traditionally been included in base rates and recovered from residential customers through volumetric rates. These types of costs are not included in the list of expenses that are factored into the customer charge and, again, there is no justification for setting the ESSR as a monthly fixed percentage charge.

The Storm Damage Recovery Rider ("SDRR") is designed to recover costs of repairing storm damage in excess of the funding contained in base rates. The SDRR is

structured as a fixed charge, though it is used to repair equipment paid for through a volumetric charge. The rider design is inconsistent with the charge for the underlying asset itself.

As structured, these charges also run afoul of statutory and policy concerns, also supporting a finding that this approach to recovering costs fails to meet the just and reasonable standard. It is almost impossible for a residential or small commercial customer to reverse engineer his or her bill. Even with the tariffs in front of them, how do they know what the total base distribution revenue which is used to calculate the percentage of the rider is? Then the rider percentage is applied to the customer's distribution charges. But which charges? Riders are excluded, so what remains. And parts of a customer's distribution charges are fixed, while others are volumetric.

An average consumer finds it almost impossible to recalculate a bill. Revised Code 4933.122(B) give a customer the right to dispute a bill. How can a customer reasonably dispute a bill when it is almost impossible to determine how it is calculated, let alone know if the calculations are right or wrong. Per kilowatt hour charges, by comparison, are readily understandable and the bill can easily be recalculated.

There has been much discussion among government policymakers on the importance of transparency. Government decisions should be made clear to citizens. Regulations should be written clearly and concisely. The Commission in particular has been grappling with the issue of transparency, as well as the Power Siting Board. This case provides an opportunity to make utility rates transparent. Make the riders a per kilowatt hour charge. That way, a customer can deduct the customer charge and recalculate his or her bill based on the month's usage. As all these riders are adjustable,

AEP will recover its expenditures. And customers will be able to tell how much they paid for the DIR Rider and the other single-issue rates included in this stipulation.

As currently structured, the design of the aforementioned riders is not just and reasonable and is not in the public interest. Fixed rate riders, established as a percentage or a straight fixed charge, discriminate against low-use customers, many of whom are low-income and are yet another financial inequity these families must face. These fixed rate riders violate the State policy to “[p]rotect at-risk populations....”²⁶ Fixed riders also violate the State policy to “[e]ncourage innovation and market access for ...demand-side retail electric service...” because they reduce the cost-effectiveness of energy efficiency investments.²⁷ Fixed riders also ignore long-run marginal costs and fail to send the appropriate price signals to the utility going forward. The Stipulation should be rejected as neither just nor reasonable, and contrary to the public interest.

The Commission should modify these riders to be collected via volumetric rates. This would eliminate the negative impacts on low-use customers. Further, because each of the riders above contains reconciliation provisions AEP will always recover its costs so there is no negative impact to AEP from switching from fixed cost to volumetric based. Modifying these riders to a volumetric basis will eliminate negative impacts and bring them in align with the State policies of protecting at risk populations and encouraging innovation and market for demand-side retail electric service because customers could see true price signals for reducing their usage.

²⁶ O.R.C. §4928.02(L).

²⁷ O.R.C. §4928.02(D).

D. The Commission should modify the Stipulation to require AEP to include a DSM program pursuant to R.C. 4905.70.

AEP originally proposed a diverse suite of demand side management (“DSM”) programs for the purpose of assisting customers in lowering the peak demand of electricity, optimizing the use of energy, increasing customer satisfaction and supporting economic development in Ohio.²⁸ Included in AEP’s proposal was incentives to encourage customers to make more efficient choices, and low income programs.²⁹ Staff claims to be supportive of DSM programs and recognizes they further state policy but declined to recommend the DSM programs in the Staff Report.³⁰ The Stipulation also fails to include any DSM programs despite AEP Witness William’s testimony that the programs are meant to and have succeeded in helping customers lower their costs.³¹

This failure is a violation of R.C. 4905.70, is contrary to state policy, and simply does not make sense given Witness William’s testimony that the programs originally proposed were an improvement on the prior Commission-approved DSM plan which concluded in 2020.³² The proposed DSM Plan would cost \$36.6 million annually and net benefits of \$100 million annually.³³ AEP projected that that the DSM programs would generate \$3 in benefits for every \$1 spent.³⁴ And, the savings continue to accrue for an average of nine years. So, DSM would cost customers \$35 million, and would save

²⁸ ELPC Exhibit 2 at p. 6 lines 7-9.

²⁹ Id. at p. 4 lines 6-11.

³⁰ Staff Exhibit at p. 21.

³¹ Transcript Volume V p. 923 Lines 19-24.

³² Id. p. 926 line 9.

³³ Id. at p. 929 lines 1-6.

³⁴ ELPC Exhibit 2 at p. 6 lines 7-13.

customers over \$900 million during the life of the measures. To deny customers these benefits is unjust, unreasonable, and violates Ohio law.

DSM programs are not optional under Ohio law. R.C. 4905.70 states, in relevant part:

The public utilities commission **shall** initiate programs that will promote and encourage conservation of energy and a reduction in the growth rate of energy consumption, promote economic efficiencies and take into account long-run incremental costs.

The General Assembly used the mandatory “shall”. The Ohio Supreme Court has held that in statutory construction, the word “shall” shall be construed as mandatory when addressing the Commission’s authority. *In re Application of Ormet Primary Aluminum Corp.*, 129 Ohio St.3d 9, 949 N.E.2d 991, 2011-Ohio-2377, (2011).

Revised Code 4905.70 requires the Commission to ensure utilities have programs that encourage the conservation of energy and reduction in the growth rate of consumption. The exact goals DSM programs are designed to achieve. The Stipulation, as currently drafted, violates R.C. 4905.70 and fails to satisfy the state policy objectives in R.C. 4928.02 of ensuring the availability efficient, nondiscriminatory, and reasonably priced rates; encouraging innovation and market access for cost-effective supply- and demand-side retail electric service including demand-side management; protecting at risk populations; encouraging the use energy efficiency in small businesses; and to facilitate the state’s effectiveness in the global economy.

OPAE respectfully requests that the Commission modify the Stipulation to require AEP to include DSM programs pursuant to R.C. 4905.70 and numerous state policy objectives codified in R.C. 4928.02.

IV. CONCLUSION

The Stipulation, as currently drafted, violates important regulatory principles, state law, fails to achieve state policies, and results in unjust and unreasonable rate for AEP's customers, specifically their low-income customers. OPAE respectfully requests that the Commission make the modifications outline above to ensure the Stipulation's just and reasonableness and compliance with Ohio laws and regulatory principles, or reject the stipulation.

/s/ Robert Dove

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served on all parties of record via the DIS system on June 14, 2021. A courtesy copy has also been sent via electronic mail to all persons identified below.

/s/ Robert Dove

SERVICE LIST

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Summary: Text Post-Hearing Brief electronically filed by Mr. Robert Dove on behalf of Ohio Partners for Affordable Energy