

**BEFORE THE
OHIO POWER SITING BOARD**

In the Matter of the Ohio Power Siting)
Board's Report to the General Assembly) Case No. 21-796-EL-UNC
Regarding the Power Transmission System.)

**CONSUMER PROTECTION COMMENTS FOR REGULATORY REFORM
REGARDING THE OHIO POWER SITING BOARD'S
DRAFT REPORT TO THE GENERAL ASSEMBLY
REGARDING THE POWER TRANSMISSION SYSTEM
BY
OFFICE OF THE OHIO CONSUMERS' COUNSEL**

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I. INTRODUCTION

There exists a regulatory gap that enables electric utilities to invest hundreds of millions of dollars in transmission projects that escape state and federal review for prudence of the utility spending. The Ohio Power Siting Board (“OPSB”) is required under R.C. 4906.105 (as part of the partial repeal of tainted House Bill 6)¹ to submit a report to the Ohio General Assembly no later than December 1, 2021 “on whether the current requirements for the planning of the power transmission system and associated facilities investment in this state are cost effective and *in the interest of consumers.*” (Emphasis added). Unfortunately, the OPSB’s Draft Report fails Ohio consumers on both counts.

In comments filed with the OPSB on August 4, 2021,² the Office of the Ohio Consumers’ Counsel (“OCC”) advocated for the OPSB to recommend legislation giving consumers long overdue regulatory reforms for oversight of transmission charges for supplemental projects.

¹ H.B. 128 (134th General Assembly).

² *Comments in Support of Legislation to Protect Ohio Consumers from Unjust and Unreasonable Charges for Investments in Supplemental Transmission Projects*, Case No. 21-796-EL-UNC (Aug. 4, 2021) (“Initial Comments”).

Alternatively, OCC advocated for a reform requiring competitive bidding of projects, for consumer protection. OPSB's report is lacking on both counts.

Specifically, OCC advocated for granting the OPSB authority to review the cost effectiveness and necessity of electric utility investments in supplemental projects in excess of 69 kV. Electric utilities charge Ohio consumers *billions of dollars* for investments in these supplemental projects with virtually no regulatory oversight of whether they are necessary or cost-effective.

On September 24, 2021, the OPSB filed its Draft Report to the General Assembly Regarding the Power Transmission System ("Draft Report"). The Draft Report largely dismisses the consumer protection recommendations by OCC and others. In an unfortunate twist, the OPSB instead focuses in its Draft Report on protecting electric utilities from OPSB review of supplemental projects over 69 kV. Accordingly, the OPSB should modify its Draft Report for submission to the General Assembly to include the recommendations proposed by OCC below and in its Initial Comments.

II. COMMENTS REGARDING OPSB'S DRAFT REPORT TO THE GENERAL ASSEMBLY AND THE NEED FOR REGULATORY REFORM.

A. The benefits to consumers of Ohio regulatory reform – for requiring OPSB oversight of supplemental transmission projects rated 69 kV and above – outweigh any costs to utilities of expanded regulatory oversight.

The OPSB's chief concern seems to be that regulating supplemental transmission projects would be burdensome to utilities.³ That OPSB approach has it backwards. Indeed, R.C. 4906.105 expressly requires the OPSB to consider the "interest of consumers." Consumer's interests, not transmission owners, should have been the focus of the report.

³ OPSB Draft Report, at p. 10.

The OPSB's Draft Report indicates that over the past four years, electric utilities in Ohio invested over \$5.8 *billion* in supplemental projects for charging to Ohio consumers.⁴ That data point should be understood to mean that the utilities are charging consumers vast sums of money for these projects. This is a prime example of the Averch-Johnson Effect where regulated entities will engage in excessive capital investment in order to increase profits.⁵ These virtually unchecked projects will increase transmission owners rate base and in turn, their profits. All of this is paid for by consumers. And these utility charges to consumers will be made even though nearly all of the supplemental projects will escape regulatory review because they do not exceed 100 kV.⁶ Essentially, it's a loophole – an enormous, costly loophole through which utilities and not consumers are given preferential treatment by government. Consequently, Ohio consumers will likely foot the bill for millions of dollars for supplemental projects that are unnecessary in the first place.

The OPSB expressly acknowledges that consumers would benefit from OPSB review of supplemental projects 69 kV and above by stating “there would be benefits to these customers from the OPSB's review of these projects . . . ” OPSB says those benefits should be weighed against the costs to electric utilities from expanded regulatory oversight.⁷ However, the benefit to consumers of OPSB review of supplemental projects 69 kV and above far outweigh any additional regulatory costs to electric utilities.

The OPSB provides no data whatsoever to support its contention that costs to electric utilities will outweigh benefits to consumers if the OPSB reviews the necessity and cost

⁴ OPSB Draft Report, at p. 5.

⁵ <https://www.oxfordreference.com/view/10.1093/oi/authority.20110803095437613>

⁶ OCC Initial Comments, at 5.

⁷ OPSB Draft Report, at p. 10.

effectiveness of supplemental projects 69 kV and above. Nor does the OPSB opine on the necessity of the supplemental projects for which consumers have paid billions of dollars. The OPSB simply accepts the electric utilities' claims that they will be harmed by expanded regulatory oversight. Instead, the OPSB should accept the premise that Ohioans need government oversight of electric utilities and what utilities charge to consumers.

In regulation of electric utilities, a key function of government is to protect consumers from investment (such as utility "gold-plating") that is unneeded for utility service. Electric utilities should be required to justify the necessity and cost of those investments to the OPSB. The OPSB should recommend that the General Assembly grant the OPSB authority to review the need for, and cost-effectiveness of, new investment in transmission for all proposed transmission facilities rated at 69 kV and above.

Just recently we saw how the PUCO lost its way by failing to give utility consumers the correct protection of the law from paying for utility investments that were not "used and useful" for consumers' utility service.⁸ It's a similar concept for consumer protection that should be recommended in the OPSB draft report for enacting a law.

B. Reasons for Ohio regulatory reform include that PJM cannot be relied on to protect customers from potential unnecessary and excessive supplemental transmission project costs. The PJM M3 Process for supplemental transmission project review is inadequate to protect consumers.

The OPSB Draft Report notes that while stakeholders have raised concerns about the PJM review process, particularly in relation to the FERC-approved PJM Tariff framework for planning Supplemental Projects under PJM Open Access Transmission Tariff (OATT) Attachment M-3 (the "M-3 Process").⁹ The OPSB further notes that the avenue for review of

⁸ *In re Application of Suburban Natural Gas Company*, Slip Opinion No. 2021-Ohio-3224.

⁹ OPSB Draft Report, at p. 6-7.

these PJM processes is through PJM whose processes are then ultimately approved by FERC.¹⁰ Therefore, the OPSB notes that, in addition to the existing review of transmission infrastructure projects and their costs through PJM's RTEP process, transmission infrastructure replacement and associated costs can be and are presently under review at FERC¹¹. This is where state commissions, such as the PUCO may timely intervene as a matter of right.¹²

The OPSB maintains there are many processes, cases, and other efforts currently underway at the federal and regional levels to address regional and national concerns regarding transmission costs and transmission planning.¹³ The OPSB's reliance on either FERC or PJM to adopt the necessary regulatory reforms to protect consumers is unfounded and misplaced.

As explained in more detail below, both the OCC¹⁴ and the PUCO Federal Energy Advocate¹⁵ ("FEA") each unsuccessfully challenged, as inadequate to protect consumers, the PJM Transmission Owners' Attachment M3 updated tariff at FERC filed by PJM.¹⁶ FERC rejected both the OCC's and FEA's concerns regarding the inadequacy of the PJM Transmission Owners' proposal and rejected OCC's and FEA's recommendations to improve the PJM Attachment M3 Tariff.¹⁷

¹⁰ *Id.*

¹¹ *Id.* p. 7-8.

¹² *Id.*

¹³ *Id.* p 7-9.

¹⁴ PJM Interconnection, L.L.C. et al., FERC Docket No. ER20-2046, Comments and Protest of the PUCO's Office of the FEA to PJM (Jul. 6, 2020), ("FEA Comments").

¹⁵ PJM Interconnection, L.L.C. et al., FERC Docket No. ER20-2046, Protest by the Office of the Ohio Consumers' Counsel (Jul. 6, 2020) ("OCC Protest").

¹⁶ PJM Interconnection, L.L.C. et al., FERC Docket No. ER20-2046, PJM Interconnection, L.L.C. proposed tariff filing per 35.13(a)(2)(iii): Amendments to Attachment M-3 (Jun. 12, 2020).

¹⁷ *PJM Interconnection, L.L.C. et al.*, 172 FERC ¶ 61,136 (2020), *order on reh'g*, 173 FERC ¶ 61,225 (2020).

In its Protest at FERC, OCC observed that in something of a regulatory “Catch-22,” FERC delegated its authority over transmission project planning to PJM. But PJM does not review these local, supplemental projects for need or for the cost-effectiveness of the proposed project. There is virtually no federal or state regulation³ over the planning, selection, or cost of local transmission projects to protect customers from unnecessary transmission system investments (including gold-plating).¹⁸ Hence there is limited protection for the consumers that pay for these projects.

OCC also noted that Ohio retail consumers should be able to rely on PJM’s independently managed markets and transmission grid for access to adequate supplies of electricity at just and reasonable prices to power their homes and businesses. That reliance has become increasingly compromised by the lack of a robust PJM transmission planning policy governing all Supplemental Projects. Moreover, PJM’s Attachment M3 process does not allow for and adequate opportunity for review to determine if and why these projects are necessary, how they are planned, whether they are prudent and represent the most cost-effective solutions for identified problems, and whether the costs of the projects are just and reasonable.¹⁹

OCC also stated that FERC should clarify that PJM has an obligation to determine the most cost-effective solution for all locally identified transmission planning needs and must review and approve the cost estimates associated with all such projects. This independent review is necessary to mitigate inherent incentives Ohio electric utilities have to expand their transmission systems regardless of cost efficiencies or demonstrated need. Transmission investment remains one of the primary opportunities Ohio utilities have to earn a profit,

¹⁸ OCC Protest p. 1-2.

¹⁹ OCC Protest p. 3.

especially in restructured states where there is no longer a guaranteed return on power plants. That investment must be subject to independent regulatory review to safeguard against cost inefficiencies.²⁰

Consequently, OCC recommended that FERC and PJM should find that the Transmission Owners' proposals are woefully inadequate to protect Ohio consumers, and instead should adopt reforms providing for greater regulatory oversight and consumer protection. OCC also recommended that if FERC accepts the Transmission Owners' Proposal, it should condition it on PJM developing a transparent planning process where PJM is required to review whether proposed Supplemental Projects are needed to meet electric reliability objectives, conduct a thorough cost/benefit analysis of expenditures for all such projects determined necessary, and subject all proposed Supplemental Projects to competitive bids where the most cost-effective solution is selected. OCC argued that FERC should make certain that only the most cost-efficient and necessary Supplement Projects are approved for charges to consumers.²¹

Similarly, the PUCO's FEA commented that improvements are needed for PJM's Attachment M3 proposal, and the proposal does not go far enough given current and anticipated circumstances that indicate that the rapid pace of transmission plant investment and sharp escalation in transmission service prices are likely to continue. The FEA indicated that PJM, as the independent regional transmission planner, is in the best position to identify a cost-effective solution to replace, if needed, an EOL [end of life] facility or to identify the intersection of a potential EOL need and a regional planning need effectively and efficiently and by utilizing competitive window processes under FERC Order No. 1000, where appropriate. Consequently,

²⁰ OCC Protest p. 15.

²¹ OCC Protest p. 3-4.

the FEA recommended that, among other things, FERC eliminate any ambiguity regarding the scope of PJM's authority that results in no—or a deficient—review of TO transmission investment proposals and confirm PJM's responsibility to equip itself with the required expertise to function comprehensively and effectively as a regional planner.²²

As noted earlier, FERC rejected both OCC's and the FEA's individual proposals intended to protect consumers from potential unnecessary and excessive charges for Supplemental Transmission Projects. FERC and PJM therefore cannot be trusted or relied upon to protect consumers from these potential unnecessary and excessive rates.

C. Competitive solicitations for Supplemental Transmission Projects should be used to provide consumers with lower charges and greater innovation.

To protect Ohio consumers the OPSB must step in and review for cost and need transmission projects rated at 69kV and above. Alternatively, once a 69kV project has been determined to be prudent, it should be subject to competitive bid and only the cost-effective offer from a reliable bidder should be selected. Competitive solicitations will result in lower prices and greater innovation for consumers. These protections already exist in the PJM Tariff for regional projects – there is no reason they should not be extended to local projects by the Ohio General Assembly. Competitive procurement will bring the most efficient and least cost options to consumers and should not be ignored because it may “slow down the certification process”²³

Allegations of economic development should not be the reason transmission owners bypass a competitive process. The Ohio General Assembly has given the OPSB this unique opportunity to fix the regulatory gap that currently exists in which nobody (state or federal) oversees the billions spent on Supplemental Transmission Projects in Ohio each year. This

²² FEA Comments p. 7-9.

²³ OPSB Draft Report p. 14-15.

regulatory Catch 22 is allowing the utilities to effectively evade regulatory review at both the state and federal levels. The OPSB should seize this opportunity and request authority from the Ohio General Assembly to regulate transmission projects rated at 69kV and above.

D. Reasons for regulatory reform include that FERC, like PJM, cannot be relied on to protect consumers from potential unnecessary and excessive Supplemental Transmission Project charges

On July 2, 2020, the PJM Stakeholders filed an alternative to the PJM Transmission Owners' proposal for Supplemental Transmission Projects, which would promote competition and would provide for more regulatory oversight and transparency for the provision of these services.²⁴ The Stakeholders' proposal was endorsed by both the OCC²⁵ and the PUCO's FEA.²⁶

OCC noted that the Stakeholders' proposal would provide the comprehensive regulatory oversight and cost containment discipline needed to protect Ohio consumers. Specifically, OCC noted that the alternative proposal would protect consumers by requiring transmission owners to develop and provide the criteria they use to determine end-of-life needs, requiring competitive bidding for project solutions to end-of-life concerns, and by requiring PJM to select the most cost-effective solution for each end of life transmission need.²⁷

Consequently, OCC recommended that FERC act now to protect consumers' interests by adopting the Stakeholders' proposal. That is, FERC should require increased regulatory oversight of the cost of these transmission projects, provide greater transparency in the process

²⁴ PJM Interconnection, L.L.C., FERC Docket No. ER20-2308, PJM Interconnection, L.L.C. tariff filing per 35.13(a)(2)(iii: End of Life Joint Stakeholder Proposal (Jul. 2, 2020) ("PJM Stakeholders' Filing").

²⁵ PJM Interconnection, L.L.C., FERC Docket No. ER2020-2308, OCC Comments in Support (Jul. 23, 2020) ("OCC Comments in Support").

²⁶ PJM Interconnection, L.L.C., FERC Docket ER20-2308, Comments of the PUCO's Office of the FEA (Jul. 23, 2020).

²⁷ OCC Comments in Support at p. 1-3.

by which they are planned, and incorporate competitive bidding for the proposed projects, and require PJM to select the most cost-effective solution for each end-of-life need identified.²⁸

FERC rejected the PJM Stakeholders' alternative proposal to improve the PJM Attachment M3 process to protect consumers and promote competition for the provision of Supplemental Transmission Projects.²⁹ It should also be noted that the PUCO's FEA joined various parties³⁰ and filed at FERC for reconsideration of its decision rejecting the alternative Stakeholder proposal.³¹ FERC rejected those rehearing requests.³² After FERC issued its decision denying all requests for rehearing, the FEA again joined various parties³³ to challenge at the U.S. Court of Appeals for the D.C. Circuit³⁴ FERC's decision rejecting the PJM Stakeholders' reasonable proposal intended provide for more regulatory oversight and transparency over Supplement Transmission Projects.

OCC questions, based on FERC's (in tandem with PJM's) inaction to protect consumers from potential unnecessary and excessive charges for Supplemental Transmission Projects, how the OPSB can defer to either PJM or FERC to undertake the needed regulatory reforms to protect

²⁸ *Id.*

²⁹ *PJM Interconnection, L.L.C.*, 173 FERC ¶ 61,242 (2020), *order on reh'g*, 176 FERC ¶ 61,053 (2021).

³⁰ American Municipal Power, Inc. Old Dominion Electric Cooperative, PJM Industrial Customer Coalition, LSP Transmission Holdings, LLC, Central Transmission, LLC, Public Power Association of New Jersey, Office of the Peoples' Counsel for the District of Columbia, West Virginia Consumer Advocate, Delaware Division of the Public Advocate, Blue Ridge Power Agency, Maryland Office of People's Counsel, and the New Jersey Board of Public Utilities.

³¹ *PJM Interconnection, L.L.C.*, Docket No. ER20-2308-000, Request for Rehearing of the Joint Stakeholders (Jan. 19, 2021).

³² *PJM Interconnection, L.L.C.*, 176 FERC ¶ 61,053 (2021).

³³ American Municipal Power, Inc. Delaware Division of the Public Advocate, LSP Transmission Holdings II, LLC, Central Transmission, LLC, Old Dominion Electric Cooperative, PJM Industrial Customer Coalition, Blue Ridge Power Agency, West Virginia Consumer Advocate, and the Office of the People's Counsel (DC).

³⁴ *American Municipal Power, Inc. et al. v. FERC*, Petition for Review filed in Case Nos. 21-1090 and 21-1173 in the United States Court of Appeals for the District of Columbia Circuit, filed Mar. 23, 2021 and Aug. 23, 2021 respectively.

consumers. Likewise, when the PUCO's own FEA is appealing FERC's rejection of the Stakeholders' alternative proposal intended to protect consumers, how can the OPSB defer to FERC to adopt the necessary regulatory reforms? Based on FERC's and PJM's past actions (or inactions) to protect consumers, the OPSB is relying on a solution for the supplemental transmission problem that FERC and PJM consider nonexistent. In addition, the OPSB is relying on processes at the federal level that, at least for Supplemental Transmission Projects, are not working to protect consumers from unnecessary and excessive charges. The current process is one in which most individual consumers are ill equipped to participate. Given PJM's and FERC's reluctance to protect consumers, the OPSB should recommend to the Ohio General Assembly it be afforded the authority to review and approve transmission projects rated at 69kV and above.

E. FERC's recent Advanced Notice of Proposed Rulemaking on transmission cost recovery reform and planning cannot be relied upon to halt potential unnecessary and excessive Supplemental Transmission Project charges to consumers.

The OPSB Draft Report reflects that there are many processes, cases, and other efforts currently underway at the federal and regional levels to address regional and national concerns regarding transmission costs and transmission planning.³⁵ Regardless of the direction the General Assembly chooses going forward, the OPSB maintains that these pending federal and regional matters should be carefully monitored for their impact on the matters raised in this report.³⁶ Among other things, the OPSB Draft Report mentions FERC's recent Advanced Notice of

³⁵ OPSB Draft Report p. 8.

³⁶ *Id.* p. 8-9.

Proposed Rulemaking³⁷ on transmission cost recovery reform and generation interconnection charges, and the FERC-NARUC [transmission] Task Force.³⁸ The OPSB Draft Report also mentions that FERC is seeking comments on the Supplemental Transmission Project planning process in its Advanced Notice of Proposed Rulemaking proceeding on transmission planning and cost recovery.³⁹

The central focus of FERC's Advanced Notice of Proposed Rulemaking and the FERC-NARUC Task Force is on whether reforms to the existing regional transmission and generation interconnection cost recovery rules are needed considering the increasing reliance on renewable resources. It is not focused on resolving consumer concerns about the Supplemental Transmission Project planning process. FERC's Advanced Notice of Proposed Rulemaking consists of 188 paragraphs and only one is dedicated to the Supplemental Transmission Projects inquiry. Moreover, there are approximately 172 inquiries contained within the Advanced Notice of Proposed Rulemaking and only a handful involve inquiries involving Supplemental Transmission Projects. Finally, the Advanced Notice of Proposed Rulemaking will not result in any new transmission rules or policies, but rather is likely to lead only to the issuance of a formal Notice of Proposed Rulemaking where FERC will finetune and focus its transmission reform proposals regarding transmission planning, cost allocation and generation interconnection policies for renewable resources.

³⁷ *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection*, FERC Docket No. RM21-17, Advanced Notice of Proposed Rulemaking, 176 FERC ¶ 61,024 (Jul. 15, 2021).

³⁸ Order Establishing Task Force and Soliciting Nominations, FERC Docket No. AD21-15-000, 175 FERC ¶ 61,224 (Jun. 17, 2021).

³⁹ OPSB Draft Report p. 8.

The issuance of that Notice of Proposed Rulemaking will generate another round of public input and comments. The process is years away from any actual reforms to existing FERC transmission planning processes, and there is no guarantee any reforms will include those critically needed to the Supplemental Transmission Project planning process. The OPSB has an opportunity now to protect consumers by increasing the review over Supplemental Transmission Projects.

FERC's past actions indicate that it is reluctant to protect consumers from potential unnecessary Supplemental Transmission Project charges. In addition, there is no FERC proceeding to resolve the serious deficiencies in the Supplemental Transmission Project review and cost recovery process any time soon. Therefore, the OPSB should act now to protect consumers by recommending that the Ohio General Assembly afford it the authority to review for cost and prudence transmission projects rated at 69kV and above.

III. CONCLUSION

For the reasons explained above and in OCC's Initial Comments, OPSB should be recommending reforms in its Draft Report to protect Ohio consumers from electric utilities (and not vice versa). But the Draft Report is woefully inadequate for consumer protection.

Instead of deferring to utilities in the Draft Report, the OPSB should be seizing this legislative opportunity for reform of Supplemental Transmission Projects to protect Ohioans from unjust and unreasonable charges on their electric bills. Reform should be through effective state regulation in the public interest or, alternatively, by requiring a competitive bidding process. The OPSB should modify its Draft Report consistent with OCC's recommendations here and in its Initial Comments.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of these Comments was served on the persons stated below via electronic transmission, this 8th day of October 2021.

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