



Chief of Docketing  
Public Utilities Commission of Ohio  
180 East Broad St. 13<sup>th</sup> Floor  
Columbus, Ohio 43215-3793

**RE: PUBLIC COMMENTS TO CASE NUMBER 20-103-EL-AGG**

Buckeye Energy Brokers, Inc. would like to provide the following comments about government policy under the First Amendment. Buckeye Energy Brokers was the first electric broker/aggregator certified by the Commission. I appreciate the Commission's stance in case 20-103-EL-AGG (Suvon certification filing) that no electric services company shall provide a competitive retail electric service to a customer in this state without first being certified by the Commission. During a pandemic as devastating this one, it is even more important to safeguard the PUCO certification process to avoid abuse of our elderly and poor.

FirstEnergy Advisors pointed out that the Northeast Ohio Public Energy Council (NOPEC) program is not savings as advertised. NOPEC did not dispute these claims in their comments. Therefore, I request that the PUCO investigate to determine whether NOPEC may have violated Ohio laws by making false statements about saving customers money or favorable rates. My estimate of over \$500,000,000 show alarming losses throughout Ohio and its senior population. The investigation should include whether NOPEC's policy of variable pricing which is not based on an index or futures market and may be more than the local utility rate is elder abuse.

NOPEC also has the policy of using an organization that takes the legal and contractual responsibility for its energy agreement but is not PUCO certified. One NOPEC contract was worth approximately \$1 billion dollars. A copy of their website is attached. This is in violation of R. C. 4928.08(B) and no broker/aggregator paid a PUCO or Ohio Consumers' Council (OCC) annual assessment for this revenue. Commission rules require consequences for NOPEC's unconscionable unlawful acts. The Ohio Consumers' Council should investigate NOPEC as well. But, their partnership with NOPEC appears to be in the way and rendered the OCC useless against NOPEC policies. The OCC/NOPEC partnership is a conflict of interest with the OCC's mission to protect consumers and bad for Ohio utility users. The OCC is supposed to be independent and acting on the behalf of consumer's and not NOPEC's just because they are partners.

**Buckeye Energy Brokers, Inc.**

<b>Services</b>	<b>Benefits</b>	<b>Proven Expertise</b>
<i>Deregulated Energy</i> <ul style="list-style-type: none"><li>▪ Consulting</li><li>▪ Aggregation</li><li>▪ Procurement</li></ul>	<ul style="list-style-type: none"><li>▪ Buying Leverage</li><li>▪ Risk Mitigation</li><li>▪ Budget Predictability</li><li>▪ Cost Control</li><li>▪ Best Combination of Term, Service &amp; Pricing Available</li></ul>	<ul style="list-style-type: none"><li>▪ PUCO Certified</li><li>▪ Customized Energy Management Solutions</li><li>▪ Municipal Aggregation</li><li>▪ Governmental Procurement Programs</li><li>▪ Procedure Management &amp; Procurement Consulting</li><li>▪ Daily Trend Analysis of Energy Markets</li><li>▪ Ohio Brokers Serving Ohio Clients</li></ul>

NOPEC's business practices should be investigated for violation of R.C. 4928.10. The Commission under authority of R.C. 4928.16(A)(2) should order NOPEC to cease and desist and send written notice to their uncertified power broker. The Commission should also impose on NOPEC the maximum amount of civil forfeitures permitted by R.C. 4928.16(B)(3) for each day it has violated and continues to violate Ohio law including reimbursement of losses to its aggregation customers.

The NOPEC program performance was recently in the news. On December 6, 2021, Cleveland.com reporter, Sean McDonnell, stated in an article that "The standard choice offer was relatively low for a long time, and cheaper than NOPEC's default offering, because natural gas prices were low." But, NOPEC continues to claim "savings" and "favorable" rates.

Reckless behavior can undermine municipal aggregation in Ohio and will lead to outlawing the practice. The PUCO needs to re-evaluate their certification status after the investigation. As FirstEnergy Advisors pointed out, NOPEC standard pricing program is causing losses for their customers. During the investigation, the PUCO should consider all options on the table. We've reached the point where we need to quickly act to protect customers or we will lose the opportunity to keep aggregation a viable option for small energy users.

Due to NOPEC's governmental policy, Buckeye Energy Brokers suggests that the following notice should appear on each page of Bricker & Eckler's website and state as follows in upper case, bold letters with a yellow highlighted background:

**BICKER & ECKLER IS NOT LICENSED IN OHIO TO ADVISE CONSUMERS ON  
THEIR CHOICE OF AN ELECTRIC SUPPLY**

## CONCLUSION

Buckeye Energy Brokers requests that the PUCO to enforce their authority of R.C. 4928.16(A)(2). Under the authority of R.C. 4928.16(B)(3), Buckeye Energy Brokers asks the PUCO to:

1. Find that NOPEC and its attorneys, through its active website, has violated R.C. 4928.10 by misleadingly marketing and soliciting consumers for services that it is prohibited from providing per R.C. 4928.08(B) and remove NOPEC's certification status;

### **Buckeye Energy Brokers, Inc.**

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2. Order NOPEC's uncertified broker to immediately publish on each page of its website the notice suggested above;
3. Order all of NOPEC's uncertified power brokers and natural gas brokers be assessed the maximum forfeitures permitted by R.C. 4928.16(B)(3). In this case, NOPEC used Bricker & Eckler for 6,887 days (January 28, 2003 through December 6, 2021). Thus, the PUCO should order Bricker & Eckler to pay a forfeiture of \$68.87 million;
4. Order all of NOPEC's uncertified power brokers and natural gas brokers to reimburse its customer losses that happened due to energy agreements arranged by them; Thus, the PUCO should order Bricker & Eckler to reimburse NOPEC's customers \$545.2 million;
5. Order NOPEC and any uncertified power brokers and natural gas brokers provide written notice to those clients that continue to be served under existing contracts it arranged that they cannot provide further aggregation or power/natural gas brokerage advice and rescission of all current broker contracts;
6. Denial of Application for Rehearing;
7. Denial of any request to obtain a natural gas or electric aggregation certificate.

Respectfully PUCO Certified,

*Thomas M. Bellish*  
President

**Buckeye Energy Brokers, Inc.**

**Services**

*Deregulated Energy*

- Consulting
- Aggregation
- Procurement

**Benefits**

- Buying Leverage
- Risk Mitigation
- Budget Predictability
- Cost Control
- Best Combination of Term, Service & Pricing Available

**Proven Expertise**

- PUCO Certified
- Customized Energy Management Solutions
- Municipal Aggregation
- Governmental Procurement Programs
- Procedure Management & Procurement Consulting
- Daily Trend Analysis of Energy Markets
- Ohio Brokers Serving Ohio Clients



# Dane Stinson

Partner

## BIOGRAPHY

Dane has over 30 years of broad energy and telecommunications law experience. He has served in several public offices before entering private practice, including as the Ohio Supreme Court's Master Commissioner for Public Utility Law and Deputy Legal Director for the Public Utilities Commission of Ohio ("PUCO"). Dane focuses his practice on regulatory proceedings before the PUCO and the Ohio Power Siting Board (OPSB). Dane represents local governments and other large scale aggregators, in aggregating their constituents' energy loads, litigation before the PUCO, and various energy procurement transactions.

Dane also represents developers of new generation facilities and electric/natural gas transmission lines before the OPSB, including combined cycle power plants, wind farms, natural gas pipelines and electric transmission lines. A significant portion of his practice has been assisting competitive retail electric and natural gas suppliers in regulatory proceedings before the PUCO and in procurement/contracting issues.

## Contact Information

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## Experience

## Experience

- Successful prosecution of appeal to Supreme Court of Ohio against energy advisor  
Bricker attorneys successfully prosecuted an appeal to the Supreme Court of Ohio against FirstEnergy Advisors. FirstEnergy Advisors is an affiliate of FirstEnergy Corp's Ohio electric



distribution utilities: Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company. In January 2020, FirstEnergy Advisors filed an application with the Public Utilities Commission of Ohio ("PUCO") to be certified as a competitive retail electric power broker and aggregator. Ohio's electric utility corporate separation rules are meant to ensure that FirstEnergy Advisors does not gain a competitive advantage over other market participants by reason of its affiliation with the monopoly utilities. Bricker attorneys argued, on behalf of the Northeast Ohio Public Energy Council ("NOPEC"), that the PUCO unlawfully granted FirstEnergy Advisors authority to provide the requested services in this state. In a unanimous opinion issued October 14, 2021, the Supreme Court agreed, finding that the PUCO's orders did not establish that FirstEnergy Advisors was fit and capable of providing service; or, that it was fit and capable of complying with the PUCO's rules, including rules that require FirstEnergy Advisors to be structurally separated from its utility affiliates. The Supreme Court reversed the PUCO's decision to certify FirstEnergy Advisors on the merits, and remanded the case for further proceedings. NOPEC is the largest public retail aggregation in Ohio serving about 1 million retail electric and natural gas customers in 244 member communities across 19 Ohio counties. For more, read the decision.

- **Negotiation of a \$1 billion electricity supply contract**

The Northeast Ohio Public Energy Council (NOPEC) is the largest public retail energy aggregation in Ohio, serving about 900,000 electric and gas customers across 14 counties. NOPEC's electric supplier abruptly notified NOPEC that it was terminating its contract, thus leaving NOPEC's nearly half-million electric customers to return to utility service at higher rates. Bricker attorneys sprang into action to prevent NOPEC's customers from paying these increased rates. The team negotiated a new complex electricity supply contract with NOPEC's replacement supplier (worth approximately \$1 billion); and, within 10 days, our client had signed a new three-year contract. With our assistance, NOPEC obtained two waivers from the PUCO to meet the expedited enrollment timeline. Meanwhile, within two weeks, our litigation team settled a TRO and injunction case involving the original supplier, which resulted in a multi-million-dollar settlement payment to NOPEC. In addition, our energy litigation team dissolved an ex parte TRO issued against NOPEC to a competitor regarding the NOPEC customer enrollment process. We also obtained a complete dismissal of the competitor's lawsuit on the basis that the PUCO had exclusive jurisdiction over the matter.

- **Electric procurement and contract for 800 MW supply**

Negotiated affinity agreement and electricity procurement for an affinity group of commercial customers totaling up to approximately 800 MW.

- **Generation supply siting of approximately 4000 MW**

Assisted four developers of combined cycle power plants in successfully siting generation facilities in Ohio totaling approximately 2400 MW. Assisted three wind farm developers in siting approximately 1600 MW of electric generation in Ohio.

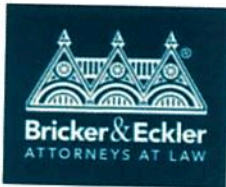
- **Natural Gas Pipeline Siting**

Assisted three entities in siting natural gas pipeline in Ohio.

- **Litigation and successful appeal of an electric security plan to the Ohio Supreme Court**

Represented the Northeast Ohio Public Energy Council (NOPEC) in multi-year regulatory litigation





# Glenn S. Krassen

*Of Counsel*

## BIOGRAPHY

Glenn Krassen has nearly 40 years of broad energy law experience and practices in the areas of energy, oil and gas, public utilities, complex energy finance, corporate law and real estate. He represents the Northeast Ohio Public Energy Council (NOPEC), the largest public retail energy aggregation in Ohio, comprised of about 235 member counties, cities and townships in Ohio, as well as other large public and private energy aggregation groups. He has served as bond and special energy counsel for the issuance of over \$4 billion of municipal electricity and natural gas prepayment bonds nationwide.

Glenn regularly represents public and private entities in Ohio and nationally on complex energy finance issues and electric and gas competitive procurement and contracting issues; represents renewable energy developers and end-users in solar, wind and biomass projects; and regularly appears in utility regulatory matters before the Public Utilities Commission of Ohio. He has served as outside general counsel and local Ohio counsel for oil and gas and other energy companies and represents them in acquisitions, dispositions, joint ventures, partnerships and other business transactions. He also represents municipalities, public agencies, public and private landowners and others on oil and gas leasing, municipal utility, electricity, gas, steam and chilled water, sewer and renewable energy issues.

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*"Glenn Krassen at Bricker & Eckler is THE expert for utility. He is extremely knowledgeable and understands the needs of the industry."*

*Janice Parham, Building Owners and Managers Association of Greater Cincinnati  
quoted in Business Week*

## Experience

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- Successful prosecution of appeal to Supreme Court of Ohio against energy advisor  
Bricker attorneys successfully prosecuted an appeal to the Supreme Court of Ohio against FirstEnergy Advisors. FirstEnergy Advisors is an affiliate of FirstEnergy Corp's Ohio electric distribution utilities: Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company. In January 2020, FirstEnergy Advisors filed an application with the Public Utilities Commission of Ohio ("PUCO") to be certified as a competitive retail electric power broker and aggregator. Ohio's electric utility corporate separation rules are meant to ensure that FirstEnergy Advisors does not gain a competitive advantage over other market participants by reason of its affiliation with the monopoly utilities. Bricker attorneys argued, on behalf of the Northeast Ohio Public Energy Council ("NOPEC"), that the PUCO unlawfully granted FirstEnergy Advisors authority to provide the requested services in this state. In a unanimous opinion issued October 14, 2021, the Supreme Court agreed, finding that the PUCO's orders did not establish that FirstEnergy Advisors was fit and capable of providing service; or, that it was fit and capable of complying with the PUCO's rules, including rules that require FirstEnergy Advisors to be structurally separated from its utility affiliates. The Supreme Court reversed the PUCO's decision to certify FirstEnergy Advisors on the merits, and remanded the case for further proceedings. NOPEC is the largest public retail aggregation in Ohio serving about 1 million retail electric and natural gas customers in 244 member communities across 19 Ohio counties. For more, read the decision.
- International manufacturing facility in central Ohio  
Retained by an Italian-based company to provide all legal services in the construction and development of a 1.4 million-square-foot manufacturing facility in central Ohio. One of the main aspects of the site selection involved the environmental conditions of the site and environmental permitting issues in the project's development. In this engagement, the firm assisted with various real estate, environmental and tax matters, including the negotiation of a variety of easements. The PUCO has approved energy efficiency rebates for the company's combined heat and power systems which will result in significant cost savings and operational benefits.



- **Cleveland-area solar farm development**  
Represented Cuyahoga County in closing a \$10 million financing transaction for the development of a solar farm on former landfill property near Cleveland. The solar farm covers 17 acres and consists of over 35,000 panels – the largest in the state. Likewise, the firm negotiated several related agreements, including a 30-year power purchase agreement. The project was completed in summer 2018 and was named Solar Builder's "2018 Gold Project of the Year."
- **Negotiation of a \$1 billion electricity supply contract**  
The Northeast Ohio Public Energy Council (NOPEC) is the largest public retail energy aggregation in Ohio, serving about 900,000 electric and gas customers across 14 counties. NOPEC's electric supplier abruptly notified NOPEC that it was terminating its contract, thus leaving NOPEC's nearly half-million electric customers to return to utility service at higher rates. Bricker attorneys sprang into action to prevent NOPEC's customers from paying these increased rates. The team negotiated a new complex electricity supply contract with NOPEC's replacement supplier (worth approximately \$1 billion); and, within 10 days, our client had signed a new three-year contract. With our assistance, NOPEC obtained two waivers from the PUCO to meet the expedited enrollment timeline. Meanwhile, within two weeks, our litigation team settled a TRO and injunction case involving the original supplier, which resulted in a multi-million-dollar settlement payment to NOPEC. In addition, our energy litigation team dissolved an ex parte TRO issued against NOPEC to a competitor regarding the NOPEC customer enrollment process. We also obtained a complete dismissal of the competitor's lawsuit on the basis that the PUCO had exclusive jurisdiction over the matter.
- **Representation of purchaser in acquisition of rural natural gas pipeline system**  
Represented a natural gas utility in the negotiation and acquisition of a rural natural gas pipeline system in eastern Ohio. The transaction involved the completion of due diligence and negotiation of a complicated asset purchase agreement and corresponding escrow agreement.
- **Oil and gas transactional assistance**  
Provided representation to a bank trustee controlling nearly 4,000 acres of mineral rights in eastern Ohio. Beginning with the negotiation of an above-market-value oil and gas lease, which resulted in an initial payment to the trust of tens of millions of dollars, we provided related legal services, including the completion of title curative work, lease maintenance activities and the negotiation of ancillary agreements.
- **Advanced energy and energy project structuring**  
Assisted a college with various aspects of environmental regulation, including advanced energy and energy efficiency developments, power purchase agreements and leasing arrangements, in order to help them take full advantage of various financing opportunities.
- **Oil and gas lease negotiation in southeastern Ohio**  
Formed and worked with the Southeastern Ohio Landowners Association (SEOLA) to combine the acreage of landowners in five southeastern counties in order to negotiate oil and gas leases with multiple energy companies. SEOLA blossomed into the longest-lasting and most successful landowners group in Ohio with a dozen deals closed with eight different oil and gas companies, involving approximately 70,000 acres and more than \$300 million in upfront, per-acre bonus payments to SEOLA landowners.





# Devin D. Parram

Partner

## BIOGRAPHY

Devin Parram provides counsel to clients on a wide range of energy and utility issues. A significant portion of his practice focuses on litigating and processing cases before the Ohio Power Siting Board (OPSB) and the Public Utilities Commission of Ohio (PUCO). Devin advises clients on various PUCO matters, ranging from routine regulatory filings to complex rate cases.

Devin regularly represents the Ohio Hospital Association in electric cases before the PUCO and advises hospitals regarding ratemaking proceedings, energy efficiency, energy procurement, distributed energy resource opportunities and all PUCO regulatory matters that potentially impact the unique needs of health care providers. Devin also represents the Northeast Ohio Public Energy Council (NOPEC) before the PUCO in a variety of matters affecting residential and commercial consumers' electric and natural gas rates. NOPEC is the largest public retail energy aggregation in the U.S., with approximately 220 county, township and municipal members. Devin also represents competitive energy suppliers on PUCO matters, including advising suppliers regarding the PUCO's consumer protection rules.

At the OPSB, Devin represents major electric generation facility developers and natural gas utilities. He has served as lead counsel in fully-contested wind farm cases before the OPSB and as regulatory counsel in dozens of cases involving the development of natural gas pipeline infrastructure.

Outside of the regulatory space, Devin has represented a variety of clients regarding energy-related transactions by drafting and negotiating purchase power agreements, lease agreements, energy procurement agreements, utility management/optimization

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agreements and asset purchase agreements related to the purchase of utility systems. He frequently works with hospitals, schools, businesses and municipalities on these various energy transactional matters.

Prior to his career at Bricker, Devin served as an Assistant Attorney General with the Ohio Attorney General's Office Public Utilities Section. In this role, he argued numerous cases in the Ohio Supreme Court regarding PUCO appeals. In addition, while serving as an Assistant AG, Devin represented PUCO staff in cases before the PUCO and OPSB.

## Experience



## Experience

- Energy generation facility counsel

Represent Apex Power Group before the Ohio Power Siting Board (OPSB) for the proposed Guernsey Power Station, a 1650-megawatt, natural gas-fired energy generation facility. In 2017, the project received approval to construct and operate the facility. Our team continues to provide substantial regulatory, legislative, tax, permitting and real estate counsel. In addition, we resolved issues involving interconnection with the local transmission company and the Ohio Department of Natural Resources.

- Wind energy certification and project modification

Represent Hog Creek Wind Farm before the Ohio Power Siting Board. The project successfully received a certificate to construct and operate a wind farm of up to 66 megawatts. We recently assisted in amending the OPSB certificate to incorporate new turbine technology and advised the project in due diligence to support its sale to a major U.S. energy company.

- OPSB certificate for Ohio wind project

Represented 6011 Greenwich Windpark before the Ohio Power Siting Board. In August 2014, the OPSB granted the project a certificate to construct and operate a 60-megawatt wind project in Huron County, Ohio. The firm continued to represent the project against a landowner opposition group, culminating in a successful dismissal of the challenge at the Ohio Supreme Court.

- Negotiation of a \$1 billion electricity supply contract

The Northeast Ohio Public Energy Council (NOPEC) is the largest public retail energy aggregation in Ohio, serving about 900,000 electric and gas customers across 14 counties. NOPEC's electric supplier abruptly notified NOPEC that it was terminating its contract, thus leaving NOPEC's nearly half-million electric customers to return to utility service at higher rates. Bricker attorneys sprang into action to prevent NOPEC's customers from paying these increased rates. The team negotiated a new complex electricity supply contract with NOPEC's replacement supplier (worth approximately \$1 billion); and, within 10 days, our client had signed a new three-year contract. With our assistance, NOPEC obtained two waivers from the PUCO to meet the expedited enrollment timeline. Meanwhile, within two weeks, our litigation team settled a TRO and injunction case involving the original supplier, which resulted in a multi-million-dollar settlement payment to NOPEC. In addition, our energy litigation team dissolved an ex parte TRO issued against NOPEC to a competitor regarding the NOPEC customer enrollment process. We also obtained a complete dismissal of the competitor's lawsuit on the basis that the PUCO had exclusive jurisdiction over the matter.

## Professional & Community Activities

## Presentations & Published Works



NOPEC COMPARISON IN DOMINION TERRITORY										NOPEC COMPARISON IN COLUMBIA GAS TERRITORY										TOTAL	
Flow Month	Supplier	NOPEC Standard	NOPEC New	Dominion SCO	AVERAGE USAGE In MCF	Customer SAVINGS /(LOSS)	Customer	Approx. Customers	Total Dominion SAVINGS /(LOSS)	Flow Month	Supplier	NOPEC Standard	NOPEC New	Columbia Gas Rate	COH USAGE In MCF	Customer SAVINGS /(LOSS)	Customers	Total Columbia SAVINGS /(LOSS)	Estimated SAVINGS /(LOSS)		
May-06	DR	\$ 9.70		\$ 10.93	5.6	\$ 6.91	180,000	180,000	\$1,243,330	May-06									1,243,330		
Jun-06	DR	\$ 9.70		\$ 9.15	2.3	\$ (1.28)	180,000	180,000	(\$230,208)	Jun-06									(230,208)		
Jul-06	DR	\$ 9.70		\$ 9.86	1.5	\$ 0.24	180,000	180,000	\$43,557	Jul-06									43,557		
Aug-06	DR	\$ 9.70		\$ 9.10	1.6	\$ (0.95)	180,000	180,000	(\$170,646)	Aug-06									(170,646)		
Sep-06	DR	\$ 9.70		\$ 9.90	3.2	\$ 0.63	180,000	180,000	\$114,023	Sep-06									114,023		
Oct-06	DR	\$ 9.70		\$ 9.90	7.7	\$ 1.53	180,000	180,000	\$276,008	Oct-06									276,008		
Nov-06	DR	\$ 9.70		\$ 8.59	15.6	\$ (17.33)	180,000	180,000	(\$3,119,014)	Nov-06									(3,119,014)		
Dec-06	DR	\$ 9.70		\$ 9.76	22.4	\$ 1.34	180,000	180,000	\$241,814	Dec-06									241,814		
Jan-07	DR	\$ 9.70		\$ 7.28	25.4	\$ (61.59)	180,000	180,000	(\$11,085,960)	Jan-07	DR	\$ 9.98		\$ 10.10	19.9	\$ 2.39	70,000	\$167,059	(10,918,902)		
Feb-07	DR	\$ 10.12		\$ 8.36	21.3	\$ (37.48)	180,000	180,000	(\$6,747,097)	Feb-07	DR	\$ 9.98		\$ 9.70	20.4	\$ (5.72)	70,000	(\$400,665)	(7,147,762)		
Mar-07	DR	\$ 10.12		\$ 8.99	17.5	\$ (19.81)	180,000	180,000	(\$3,566,329)	Mar-07	DR	\$ 9.98		\$ 10.10	17.4	\$ 2.09	70,000	\$146,025	(3,420,304)		
Apr-07	DR	\$ 10.12		\$ 9.00	10.9	\$ (12.21)	180,000	180,000	(\$2,197,939)	Apr-07	DR	\$ 9.98		\$ 8.85	10.1	\$ (11.46)	70,000	(\$801,991)	(2,999,930)		
May-07	DR	\$ 10.12		\$ 8.97	5.6	\$ (6.44)	180,000	180,000	(\$1,158,695)	May-07	DR	\$ 9.98		\$ 10.20	5.4	\$ 1.20	70,000	\$83,917	(1,074,778)		
Jun-07	DR	\$ 10.12		\$ 9.03	2.3	\$ (2.54)	180,000	180,000	(\$457,475)	Jun-07	DR	\$ 9.98		\$ 10.20	3.4	\$ 0.74	70,000	\$51,994	(405,481)		
Jul-07	DR	\$ 10.12		\$ 8.37	1.5	\$ (2.66)	180,000	180,000	(\$479,401)	Jul-07	DR	\$ 9.48		\$ 10.00	1.9	\$ 1.04	70,000	\$72,525	(406,876)		
Aug-07	DR	\$ 10.12		\$ 7.55	1.6	\$ (4.07)	180,000	180,000	(\$733,376)	Aug-07	DR	\$ 8.60		\$ 9.75	1.9	\$ 2.22	70,000	\$155,535	(577,841)		
Sep-07	DR	\$ 10.12		\$ 6.87	3.2	\$ (10.29)	180,000	180,000	(\$1,852,874)	Sep-07	DR	\$ 7.90		\$ 7.80	1.8	\$ (0.17)	70,000	(\$11,759)	(1,864,632)		
Oct-07	DR	\$ 10.12		\$ 7.86	7.7	\$ (17.33)	180,000	180,000	(\$3,118,890)	Oct-07	DR	\$ 8.93		\$ 9.26	3.0	\$ 1.00	70,000	\$69,891	(3,048,999)		
Nov-07	DR	\$ 10.12		\$ 8.71	15.6	\$ (22.03)	180,000	180,000	(\$3,964,801)	Nov-07	DR	\$ 10.49		\$ 10.26	9.2	\$ (2.11)	70,000	(\$147,706)	(4,112,508)		
Dec-07	DR	\$ 9.99		\$ 8.64	22.4	\$ (30.23)	180,000	180,000	(\$5,440,816)	Dec-07	DR	\$ 10.98		\$ 10.45	15.5	\$ (0.62)	70,000	(\$43,417)	(5,484,233)		
Jan-08	DR	\$ 9.99		\$ 8.61	25.4	\$ (35.09)	180,000	180,000	(\$6,316,526)	Jan-08	DR	\$ 9.71		\$ 10.38	19.9	\$ 13.39	70,000	\$937,199	(5,379,327)		
Feb-08	DR	\$ 9.99		\$ 9.44	21.3	\$ (11.69)	180,000	180,000	(\$2,104,880)	Feb-08	DR	\$ 10.57		\$ 10.95	20.4	\$ 7.77	70,000	\$543,760	(1,561,120)		
Mar-08	DR	\$ 9.99		\$ 10.37	17.5	\$ 6.23	180,000	180,000	\$1,199,297	Mar-08	DR	\$ 11.54		\$ 11.04	17.4	\$ (8.64)	70,000	(\$605,032)	594,264		
Apr-08	DR	\$ 9.99		\$ 11.02	10.9	\$ 11.23	180,000	180,000	\$2,021,319	Apr-08	DR	\$ 11.95		\$ 12.10	10.1	\$ 1.49	70,000	\$104,188	2,125,507		
May-08	DR	\$ 9.95		\$ 12.72	5.6	\$ 15.51	180,000	180,000	\$2,790,944	May-08	DR	\$ 13.98		\$ 12.15	5.4	\$ (9.98)	70,000	(\$698,497)	2,092,447		
Jun-08	DR	\$ 9.95		\$ 13.36	2.3	\$ 7.95	180,000	180,000	\$1,430,816	Jun-08	DR	\$ 14.64		\$ 13.36	3.4	\$ (4.33)	70,000	(\$303,134)	1,127,682		
Jul-08	DR	\$ 9.95		\$ 14.55	1.5	\$ 7.00	180,000	180,000	\$1,260,140	Jul-08	DR	\$ 15.88		\$ 14.30	1.9	\$ (3.01)	70,000	(\$211,001)	1,049,139		
Aug-08	DR	\$ 11.23		\$ 10.66	1.6	\$ (0.91)	180,000	180,000	(\$163,512)	Aug-08	DR	\$ 11.84		\$ 13.54	1.9	\$ 3.31	70,000	\$231,391	67,880		
Sep-08	DR	\$ 11.23		\$ 10.72	3.2	\$ (1.62)	180,000	180,000	(\$290,759)	Sep-08	DR	\$ 11.85		\$ 10.90	1.8	\$ (1.72)	70,000	(\$120,108)	(410,866)		
Oct-08	DR	\$ 10.98		\$ 9.80	7.7	\$ (9.03)	180,000	180,000	(\$1,625,687)	Oct-08	DR	\$ 11.75		\$ 10.26	3.0	\$ (4.46)	70,000	(\$1,938,225)	(1,938,225)		
Nov-08	DR	\$ 10.98		\$ 8.80	15.6	\$ (34.03)	180,000	180,000	(\$6,125,632)	Nov-08	DR	\$ 11.93		\$ 11.93	9.2	\$ -	70,000	\$0	\$0		
Dec-08	DR	\$ 10.88		\$ 9.21	22.4	\$ (37.39)	180,000	180,000	(\$6,730,491)	Dec-08	DR	\$ 11.93		\$ 11.93	15.5	\$ -	70,000	\$0	\$0		
Jan-09	DR	\$ 10.88		\$ 8.47	25.4	\$ (61.28)	180,000	180,000	(\$11,031,034)	Jan-09	DR	\$ 10.24		\$ 9.43	19.9	\$ (16.11)	70,000	(\$1,127,646)	(12,159,680)		
Feb-09	DR	\$ 10.88		\$ 6.81	21.3	\$ (86.53)	180,000	180,000	(\$15,576,111)	Feb-09	DR	\$ 10.24		\$ 9.70	20.4	\$ (11.04)	70,000	(\$772,711)	(16,348,822)		
Mar-09	DR	\$ 10.88		\$ 6.39	17.5	\$ (78.73)	180,000	180,000	(\$14,170,636)	Mar-09	DR	\$ 10.24		\$ 9.50	17.4	\$ (12.86)	70,000	(\$900,491)	(15,071,126)		
Apr-09	DR	\$ 10.88		\$ 5.03	10.9	\$ (63.77)	180,000	180,000	(\$11,478,345)	Apr-09	DR	\$ 10.24		\$ 7.69	10.1	\$ (25.86)	70,000	(\$1,810,370)	(13,288,715)		
May-09	DR	\$ 10.88		\$ 4.72	5.6	\$ (34.48)	180,000	180,000	(\$6,205,568)	May-09	DR	\$ 10.24		\$ 7.68	5.4	\$ (18.88)	70,000	(\$1,321,353)	(7,526,921)		
Jun-09	DR	\$ 8.99		\$ 4.94	2.3	\$ (9.46)	180,000	180,000	(\$1,702,193)	Jun-09	DR	\$ 8.99		\$ 7.30	3.4	\$ (5.69)	70,000	(\$398,250)	(2,100,442)		
Jul-09	DR	\$ 8.99		\$ 5.34	1.5	\$ (5.56)	180,000	180,000	(\$1,000,168)	Jul-09	DR	\$ 8.99		\$ 6.85	1.9	\$ (4.09)	70,000	(\$286,238)	(1,286,406)		
Aug-09	DR	\$ 8.99		\$ 4.78	1.6	\$ (6.88)	180,000	180,000	(\$1,201,653)	Aug-09	DR	\$ 8.99		\$ 5.16	1.9	\$ (7.42)	70,000	(\$519,718)	(1,721,371)		
Sep-09	DR	\$ 8.99		\$ 4.24	3.2	\$ (15.04)	180,000	180,000	(\$5,326,953)	Sep-09	DR	\$ 8.99		\$ 5.39	1.8	\$ (6.51)	70,000	(\$455,423)	(3,161,759)		
Oct-09	DR	\$ 8.99		\$ 5.13	7.7	\$ (29.59)	180,000	180,000	(\$7,671,089)	Oct-09	DR	\$ 8.99		\$ 5.59	9.2	\$ (31.21)	70,000	(\$858,641)	(6,185,595)		
Nov-09	DR	\$ 8.42		\$ 5.89	15.6	\$ (42.62)	180,000	180,000	(\$10,196,493)	Nov-09	DR	\$ 8.99		\$ 4.90	15.5	\$ (63.42)	70,000	(\$2,184,578)	(9,855,667)		
Dec-09	DR	\$ 8.42		\$ 5.69	22.4	\$ (56.65)	180,000	180,000	(\$5,326,953)	Dec-09	DR	\$ 8.99		\$ 4.90	15.5	\$ (63.42)	70,000	(\$4,439,375)	(14,635,867)		
Jan-10	DR	\$ 7.99		\$ 7.21	25.4	\$ (19.83)	180,000	180,000	(\$3,570,210)	Jan-10	DR	\$ 8.30		\$ 4.10	19.9	\$ (83.53)	70,000	(\$5,847,054)	(9,417,264)		
Feb-10	DR	\$ 7.99		\$ 6.67	21.3	\$ (28.07)	180,000	180,000	(\$5,051,712)	Feb-10	DR	\$ 7.98		\$ 5.40	20.4	\$ (52.74)	70,000	(\$3,691,842)	(8,743,553)		
Mar-10	DR	\$ 7.99		\$ 6.22	17.5	\$ (31.03)	180,000	180,000	(\$5,586,197)	Mar-10	DR	\$ 7.98		\$ 4.40	17.4	\$ (22.41)	70,000	(\$3,691,842)	(9,942,624)		
Apr-10	DR	\$ 6.96		\$ 5.04	10.9	\$ (32.14)	180,000	180,000	(\$5,785,290)	Apr-10	DR	\$ 7.86		\$ 5.77	10.1	\$ (22.41)	70,000	(\$1,568,495)	(7,353,785)		
May-10	DR	\$ 6.96		\$ 5.48	5.6	\$ (6.30)	180,000	180,000	(\$1,494,213)	May-10	DR	\$ 7.86		\$ 6.20	5.4	\$ (9.05)	70,000	(\$363,194)	(2,127,407)		
Jun-10	DR	\$ 6.96		\$ 5.36	2.3	\$ (3.73)	180,000	180,000	(\$672,139)	Jun-10	DR	\$ 7.86		\$ 6.09	3.4	\$ (5.98)	70,000	(\$418,315)	(1,090,454)		
Jul-10	DR	\$ 6.78		\$ 5.92	1.5	\$ (1.31)	180,000	180,000	(\$235,591)	Jul-10	DR	\$ 7.86		\$ 6.65	1.9	\$ (2.32)	70,000	(\$162,072)	(397,663)		
Aug-10	DR	\$ 6.78		\$ 5.97	1.6	\$ (1.28)	180,000	180,000	(\$231,422)	Aug-10	DR	\$ 7.70		\$ 6.70	1.9	\$ (1.94)	70,000	(\$135,768)	(366,909)		
Sep-10	DR	\$ 6.78		\$ 4.85	3.2	\$ (6.11)	180,000	180,000	(\$1,100,322)	Sep-10	DR	\$ 7.70		\$ 5.77	1.8	\$ (3.49)	70,000	(\$244,008)	(1,344,330)		
Oct-10	DR	\$ 6.78		\$ 5.04	7.7	\$ (13.34)	180,000	180,000	(\$2,401,269)	Oct-10	DR	\$ 7.70		\$ 5.77	3.0	\$ (5.78)	70,000	(\$404,831)	(2,806,101)		
Nov-10	DR	\$ 6.78		\$ 4.49	15.6	\$ (35.75)	180,000	180,000	(\$6,434,723)	Nov-10	DR	\$ 7.45		\$ 5.22	9.2	\$ (20.46)	70,000	(\$1,432,110)	(7,866,833)		
Dec-10	DR	\$ 6.78		\$ 5.47	22.4	\$ (29.33)	180,000	180,000	(\$5,279,607)	Dec-10	DR	\$ 7.45		\$ 6.20	15.5	\$ (19.39)	70,000	(\$1,357,125)	(6,636,732)		
Jan-11	DR	\$ 6.78		\$ 5.42	25.4	\$ (34.58)	180,000	180,000	(\$6,224,982)	Jan-11	DR	\$ 7.45		\$ 6.15	19.9	\$ (25.85)	70,000	(\$1,809,802)	(8,034,784)		
Feb-11	DR	\$ 6.66		\$ 5.62	21.3	\$ (24.24)	180,000	180,000	(\$4,362,842)	Feb-11	DR	\$ 6.40		\$ 5.51	20.4	\$ (18.19)	70,000	(\$1,273,542)	(5,636,384)		
Mar-11	DR	\$ 6.66		\$ 4.99	17.5	\$ (29.28)	180,000	180,000	(\$5,270,593)	Mar-11	DR	\$ 6.40		\$ 5.72	17.4	\$ (11.82)	70,000	(\$272,478)	(6,985,071)		
Apr-11	DR	\$ 6.66		\$ 5.24	10.9	\$ (15.48)	180,000	180,000	(\$2,786,673)	Apr-11	DR	\$ 6.40		\$ 6.12	10.1	\$ (2.84)	70,000	(\$198,723)	(2,985,396)		
May-11	DR	\$ 6.15		\$ 5.38	5.6	\$ (4.31)	180,000	180,000	(\$775,822)	May-11	DR	\$ 6.15		\$ 6.26	5.4	\$ 0.60	70,000	\$41,959	(733,863)		
Jun-11	DR	\$ 6.15		\$ 5.33	2.3	\$ (1.91)	180,000	180,000	(\$344,471)	Jun-11	DR	\$ 6.15		\$ 6.21	3.4	\$ 0.20	70,000	\$14,180	(330,291)		
Jul-11	DR	\$ 6.15		\$ 5.36																	



NOPEC COMPARISON IN DOMINION TERRITORY					NOPEC COMPARISON IN COLUMBIA GAS TERRITORY					TOTAL								
Flow Month	Supplier	NOPEC Standard	NOPEC New	Dominion SCO	AVERAGE USAGE In MCF	Customer SAVINGS /(\$)	Approx. Customers	Total Dominion SAVINGS /(\$LOSS)	Flow Month	Supplier	NOPEC Standard	NOPEC New	Columbia Gas Rate	COH USAGE In MCF	Customer SAVINGS /(\$LOSS)	Customers	Total Columbia SAVINGS /(\$LOSS)	Estimated SAVINGS /(\$LOSS)
Feb-12 DR	\$	5.95		\$ 3.68	21.3	(48.31)	180,000	(\$ 695.067)	Feb-12 DR		6.32		\$ 4.56	20.4	(36.04)	70,000	(\$ 2,522.758)	(11,217.826)
Mar-12 DR	\$	5.95		\$ 3.45	17.5	(43.83)	180,000	(\$ 7,890.109)	Mar-12 DR		6.32		\$ 3.98	17.4	(40.80)	70,000	(\$ 2,856.015)	(10,746.124)
Apr-12 DR	\$	5.95		\$ 2.79	10.9	(34.45)	180,000	(\$ 201.329)	Apr-12 DR		5.96		\$ 3.67	10.1	(23.22)	70,000	(\$ 1,625.273)	(7,826.602)
May-12 DR	\$	5.95		\$ 2.84	5.6	(18.53)	180,000	(\$ 3,335.027)	May-12 DR		5.96		\$ 3.52	5.4	(13.30)	70,000	(\$ 930.719)	(4,265.745)
Jun-12 DR	\$	5.95		\$ 3.03	2.3	(6.81)	180,000	(\$ 1,226.654)	Jun-12 DR		5.96		\$ 4.31	3.4	(5.57)	70,000	(\$ 389.954)	(1,616.609)
Jul-12 DR	\$	5.95		\$ 3.37	1.5	(3.93)	180,000	(\$ 706.774)	Jul-12 DR		5.96		\$ 4.30	1.9	(3.17)	70,000	(\$ 221.797)	(928.571)
Aug-12 DR	\$	4.22		\$ 3.61	1.6	(0.97)	180,000	(\$ 174.070)	Aug-12 DR		4.93		\$ 4.54	1.9	(0.76)	70,000	(\$ 52.949)	(227.019)
Sep-12 DR	\$	4.22		\$ 3.23	3.2	(3.14)	180,000	(\$ 564.414)	Sep-12 DR		4.93		\$ 4.56	1.8	(0.67)	70,000	(\$ 46.779)	(611.193)
Oct-12 DR	\$	4.22		\$ 3.62	7.7	(4.60)	180,000	(\$ 828.024)	Oct-12 DR		4.93		\$ 4.55	3.0	(1.14)	70,000	(\$ 79.708)	(907.732)
Nov-12 DR	\$	4.70		\$ 4.07	15.6	(9.82)	180,000	(\$ 1,767.441)	Nov-12 DR		5.34		\$ 5.00	9.2	(3.12)	70,000	(\$ 218.349)	(1,985.790)
Dec-12 DR	\$	4.70		\$ 4.30	22.4	(8.96)	180,000	(\$ 1,612.094)	Dec-12 DR		5.34		\$ 5.23	15.5	(1.71)	70,000	(\$ 119.427)	(1,731.521)
Jan-13 DR	\$	4.98		\$ 3.95	25.4	(26.19)	180,000	(\$ 4,714.508)	Jan-13 DR		5.80		\$ 4.86	19.9	(18.69)	70,000	(\$ 1,308.626)	(6,023.135)
Feb-13 DR	\$	4.98		\$ 3.83	21.3	(24.54)	180,000	(\$ 4,416.421)	Feb-13 DR		5.80		\$ 4.76	20.4	(21.26)	70,000	(\$ 1,488.184)	(5,904.605)
Mar-13 DR	\$	4.98		\$ 4.03	17.5	(16.71)	180,000	(\$ 3,007.710)	Mar-13 DR		5.80		\$ 4.95	17.4	(14.78)	70,000	(\$ 1,034.347)	(4,042.057)
Apr-13 DR	\$	4.98		\$ 4.58	10.9	(4.40)	180,000	(\$ 792.828)	Apr-13 DR		5.37		\$ 5.27	10.1	(1.01)	70,000	(\$ 70.973)	(863.801)
May-13 DR	\$	4.98		\$ 4.75	5.6	(1.28)	180,000	(\$ 229.724)	May-13 DR		5.37		\$ 5.44	5.4	0.38	70,000	(\$ 26.701)	(203.023)
Jun-13 DR	\$	5.79		\$ 4.75	2.3	(2.43)	180,000	(\$ 437.731)	Jun-13 DR		5.37		\$ 5.44	3.4	0.23	70,000	(\$ 16.071)	(421.660)
Jul-13 DR	\$	5.32		\$ 4.31	1.5	(2.26)	180,000	(\$ 406.258)	Jul-13 DR		6.19		\$ 5.00	1.9	(2.27)	70,000	(\$ 158.999)	(565.257)
Aug-13 DR	\$	5.32		\$ 4.06	1.6	(2.00)	180,000	(\$ 359.554)	Aug-13 DR		6.19		\$ 4.86	1.9	(2.59)	70,000	(\$ 180.978)	(540.532)
Sep-13 DR	\$	5.32		\$ 4.17	7.7	(3.65)	180,000	(\$ 657.343)	Sep-13 DR		5.73		\$ 4.86	1.8	(1.58)	70,000	(\$ 110.373)	(767.715)
Oct-13 DR	\$	5.32		\$ 4.10	7.7	(9.35)	180,000	(\$ 1,683.649)	Oct-13 DR		5.73		\$ 5.05	3.0	(2.04)	70,000	(\$ 142.635)	(1,826.283)
Nov-13 DR	\$	5.32		\$ 4.10	15.6	(19.09)	180,000	(\$ 3,436.536)	Nov-13 DR		5.73		\$ 5.11	15.5	(9.65)	70,000	(\$ 675.305)	(4,310.577)
Dec-13 DR	\$	5.32		\$ 4.42	22.4	(20.20)	180,000	(\$ 3,635.271)	Dec-13 DR		5.73		\$ 5.70	19.9	(0.66)	70,000	(\$ 45.941)	(1,598.367)
Jan-14 DR	\$	5.32		\$ 5.01	25.4	(7.86)	180,000	(\$ 1,418.930)	Jan-14 DR		5.73		\$ 6.85	20.4	22.83	70,000	(\$ 1,598.367)	4,813.093
Feb-14 DR	\$	5.32		\$ 6.16	21.3	17.86	180,000	\$ 3,214.728	Feb-14 DR		5.73		\$ 6.15	17.4	7.21	70,000	\$ 505.005	931.071
Mar-14 DR	\$	5.32		\$ 5.46	17.5	2.37	180,000	\$ 426.066	Mar-14 DR		5.73		\$ 5.98	10.1	5.51	70,000	\$ 385.807	1,735.970
Apr-14 NE	\$	4.33		\$ 5.01	10.9	7.50	180,000	\$ 1,350.163	Apr-14 NE		5.44		\$ 6.20	5.4	4.11	70,000	\$ 287.836	1,193.633
May-14 NE	\$	4.33		\$ 5.23	5.6	5.03	180,000	\$ 905.797	May-14 NE		5.44		\$ 6.02	3.4	1.95	70,000	\$ 136.744	440.467
Jun-14 NE	\$	4.33		\$ 5.05	2.3	1.69	180,000	\$ 303.723	Jun-14 NE		5.44		\$ 6.00	1.9	0.13	70,000	\$ 9.353	(7.084)
Jul-14 NE	\$	4.89		\$ 4.83	1.5	(0.09)	180,000	(\$ 16.437)	Jul-14 NE		5.93		\$ 5.21	1.9	(1.40)	70,000	(\$ 97.753)	(283.237)
Aug-14 NE	\$	4.89		\$ 4.24	1.6	(1.03)	180,000	(\$ 185.484)	Aug-14 NE		5.93		\$ 5.36	1.8	(1.03)	70,000	(\$ 72.065)	(357.122)
Sep-14 NE	\$	4.89		\$ 4.39	3.2	(3.68)	180,000	(\$ 285.058)	Sep-14 NE		5.93		\$ 5.38	3.0	(1.65)	70,000	(\$ 115.366)	(777.786)
Oct-14 NE	\$	4.89		\$ 4.41	7.7	(3.68)	180,000	(\$ 662.419)	Oct-14 NE		5.88		\$ 5.13	9.2	(6.90)	70,000	(\$ 482.936)	(2,539.799)
Nov-14 NE	\$	4.89		\$ 4.16	15.6	(11.43)	180,000	(\$ 2,056.864)	Nov-14 NE		5.88		\$ 4.59	15.5	(3.07)	70,000	(\$ 214.969)	961.860
Dec-14 NE	\$	4.42		\$ 4.71	22.4	6.54	180,000	\$ 1,176.828	Dec-14 NE		5.88		\$ 4.16	20.4	(35.24)	70,000	(\$ 1,797.273)	(5,463.604)
Jan-15 NE	\$	4.42		\$ 3.62	25.4	(20.37)	180,000	(\$ 3,666.331)	Jan-15 NE		5.88		\$ 3.85	3.0	(1.59)	70,000	(\$ 385.514)	(2,901.394)
Feb-15 NE	\$	4.42		\$ 3.30	21.3	(23.90)	180,000	(\$ 4,301.609)	Feb-15 NE		5.88		\$ 3.50	15.5	(7.60)	63,000	(\$ 478.794)	(3,405.639)
Mar-15 NE	\$	3.96		\$ 3.32	17.5	(11.22)	180,000	(\$ 2,019.868)	Mar-15 NE		4.98		\$ 3.66	19.9	(11.73)	80,000	(\$ 938.711)	(5,611.261)
Apr-15 NE	\$	3.96		\$ 2.61	10.9	(14.72)	180,000	(\$ 2,649.302)	Apr-15 NE		4.98		\$ 3.88	10.1	(11.15)	70,000	(\$ 839.647)	(2,859.515)
May-15 NE	\$	3.96		\$ 2.54	5.6	(7.95)	180,000	(\$ 1,430.737)	May-15 NE		4.98		\$ 3.81	5.4	(6.38)	70,000	(\$ 780.699)	(3,430.001)
Jun-15 NE	\$	3.96		\$ 2.84	2.3	(2.63)	180,000	(\$ 472.598)	Jun-15 NE		4.98		\$ 4.11	3.4	(0.93)	70,000	(\$ 64.992)	(1,877.024)
Jul-15 NE	\$	2.97		\$ 2.79	1.5	(0.27)	180,000	(\$ 48.488)	Jul-15 NE		4.38		\$ 4.06	1.9	(0.61)	70,000	(\$ 42.355)	(90.843)
Aug-15 NE	\$	2.97		\$ 2.91	1.6	(0.10)	180,000	(\$ 17.122)	Aug-15 NE		4.38		\$ 4.18	1.9	(0.39)	70,000	(\$ 27.154)	(44.275)
Sep-15 NE	\$	2.71		\$ 2.66	3.2	(0.16)	180,000	(\$ 28.506)	Sep-15 NE		4.38		\$ 3.93	1.8	(0.81)	70,000	(\$ 56.893)	(85.399)
Oct-15 NE	\$	2.71		\$ 2.58	7.7	(1.00)	180,000	(\$ 179.405)	Oct-15 NE		4.38		\$ 3.85	3.0	(1.59)	70,000	(\$ 111.171)	(290.576)
Nov-15 NE	\$	2.99		\$ 2.05	15.6	(14.63)	172,000	(\$ 2,515.880)	Nov-15 NE		3.99		\$ 3.32	9.2	(6.12)	63,000	(\$ 385.514)	(2,901.394)
Dec-15 NE	\$	2.99		\$ 2.23	22.4	(17.02)	172,000	(\$ 2,926.846)	Dec-15 NE		3.99		\$ 3.50	15.5	(7.60)	63,000	(\$ 478.794)	(3,405.639)
Jan-16 NE	\$	3.14		\$ 2.39	25.4	(19.07)	245,000	(\$ 4,672.551)	Jan-16 NE		4.25		\$ 3.66	19.9	(11.73)	80,000	(\$ 938.711)	(5,611.261)
Feb-16 NE	\$	3.14		\$ 2.21	21.3	(19.77)	245,000	(\$ 4,844.413)	Feb-16 NE		4.25		\$ 3.41	20.4	(17.17)	80,000	(\$ 1,373.709)	(6,218.121)
Mar-16 NE	\$	3.14		\$ 1.73	17.5	(24.72)	245,000	(\$ 6,056.974)	Mar-16 NE		3.92		\$ 3.00	17.4	(15.98)	80,000	(\$ 1,278.071)	(7,335.044)
Apr-16 NE	\$	2.74		\$ 1.85	10.9	(9.70)	245,000	(\$ 2,377.285)	Apr-16 NE		3.92		\$ 3.33	10.1	(5.98)	80,000	(\$ 478.558)	(2,865.843)
May-16 NE	\$	2.74		\$ 1.95	5.6	(4.42)	245,000	(\$ 1,083.408)	May-16 NE		3.92		\$ 3.43	5.4	(2.67)	80,000	(\$ 213.608)	(1,297.015)
Jun-16 NE	\$	2.74		\$ 1.91	2.3	(1.94)	245,000	(\$ 474.582)	Jun-16 NE		3.92		\$ 3.39	3.4	(1.79)	80,000	(\$ 143.152)	(617.734)
Jul-16 NE	\$	2.21		\$ 2.87	1.5	1.00	245,000	\$ 248.093	Jul-16 NE		3.55		\$ 4.35	1.9	1.53	80,000	\$ 122.160	368.253
Aug-16 NE	\$	2.21		\$ 2.62	1.6	0.85	245,000	\$ 159.247	Aug-16 NE		3.55		\$ 4.10	1.9	1.07	80,000	\$ 85.340	244.587
Sep-16 NE	\$	2.21		\$ 2.80	3.2	1.87	245,000	\$ 457.834	Sep-16 NE		3.55		\$ 4.28	1.8	1.32	80,000	\$ 105.478	563.312
Oct-16 NE	\$	2.21		\$ 2.90	7.7	5.29	245,000	\$ 1,298.087	Oct-16 NE		3.55		\$ 4.38	3.0	2.49	80,000	\$ 199.449	1,495.536
Nov-16 NE	\$	2.99		\$ 2.71	15.6	(4.37)	245,000	(\$ 1,070.893)	Nov-16 NE		4.49		\$ 4.19	9.2	(2.73)	80,000	(\$ 218.716)	(1,289.608)
Dec-16 NE	\$	2.99		\$ 3.18	22.4	4.25	245,000	\$ 1,042.263	Dec-16 NE		4.49		\$ 4.56	15.5	1.09	80,000	\$ 86.656	1,129.119
Jan-17 NE	\$	3.63		\$ 3.88	25.4	6.36	245,000	\$ 3,385.880	Jan-17 NE		4.77		\$ 5.36	19.9	11.73	80,000	\$ 938.711	2,496.228
Feb-17 NE	\$	3.63		\$ 3.34	21.3	(13.82)	245,000	(\$ 2,176.952)	Feb-17 NE		4.99		\$ 4.82	20.4	(3.48)	80,000	(\$ 278.012)	(3,663.892)
Mar-17 NE	\$	3.99		\$ 2.58	17.5	(24.72)	245,000	(\$ 1,557.517)	Mar-17 NE		4.99		\$ 4.06	17.4	(16.17)	80,000	(\$ 293.369)	(7,350.342)
Apr-17 NE	\$	3.99		\$ 3.18	10.9	(8.89)	245,000	(\$ 3,056.974)	Apr-17 NE		4.75		\$ 4.63	10.1	(3.70)	80,000	(\$ 296.057)	(2,473.009)
May-17 NE	\$	3.25		\$ 3.24	5.6	(0.60)	245,000	(\$ 148.111)	May-17 NE		4.75		\$ 4.59	5.4	(0.86)	80,000	(\$ 68.878)	(318.907)
Jun-17 NE	\$	3.25		\$ 3.07	2.3	(0.03)	245,000	(\$ 8.005)	Jun-17 NE		4.75		\$ 4.52	1.9	(0.44)	80,000	(\$ 18.907)	(26.912)
Jul-17 NE	\$	3.25		\$ 3.07	1.5	(0.28)	245,000	(\$ 68.235)	Jul-17 NE		4.75		\$ 4.42	1.9	(0.64)	80,000	(\$ 35.579)	(103.814)
Aug-17 NE	\$	3.25		\$ 2.97	1.6	(0.45)	245,000	(\$ 109.142)	Aug-17 NE		4.75		\$ 4.42					







NOPEC VS OHIO EDISON										NOPEC VS ILLUMINATING COMPANY									
MONTH	OE PTC (\$)	NOPEC Standard (\$/kWh)	NOPEC NEW (\$/kWh)	NOPEC Commercial	OE Usage In kWh	SAVINGS	Customers	MONTH	CEI Res PTC (\$)	NOPEC Standard (\$/kWh)	NOPEC NEW (\$/kWh)	NOPEC Commercial	CEI COMM PTC	USAGE In kWh	SAVINGS				
Feb-17	0.0536	0.04906	0.04906	0.0526	900	\$ 4.09	Customers	Feb-17	0.0536	0.04982	0.04982	0.0525	900	\$ 3.40					
Mar-17	0.0536	0.04906	0.04906	0.0526	900	\$ 4.09		Mar-17	0.0536	0.04982	0.04982	0.0525	900	\$ 3.40					
Apr-17	0.0505	0.04906	0.04906	0.0526	900	\$ 1.30		Apr-17	0.0505	0.04982	0.04982	0.0525	900	\$ 0.61					
May-17	0.0501	0.04906	0.04906	0.0526	900	\$ 0.94		May-17	0.0501	0.04982	0.04982	0.0525	900	\$ 0.25					
Jun-17	0.0615	0.04906	0.04906	0.0526	1200	\$ 14.93		Jun-17	0.0615	0.04982	0.04982	0.0525	1200	\$ 14.02					
Jul-17	0.0644	0.05823	0.05823	0.05765	1200	\$ 7.40		Jul-17	0.0644	0.05910	0.05910	0.05714	1200	\$ 6.36					
Aug-17	0.0546	0.05823	0.05823	0.05765	1200	\$ 7.64		Aug-17	0.0546	0.05910	0.05910	0.05714	1200	\$ 6.60					
Sep-17	0.0576	0.05889	0.05889	0.05380	900	\$ (1.16)		Sep-17	0.0576	0.05999	0.05999	0.05110	900	\$ (2.15)					
Oct-17	0.0574	0.05999	0.05999	0.05380	900	\$ (2.33)		Oct-17	0.0574	0.05999	0.05999	0.05110	900	\$ (2.33)					
Nov-17	0.0576	0.05999	0.05999	0.05380	900	\$ (2.15)		Nov-17	0.0574	0.05999	0.05999	0.05110	900	\$ (2.15)					
Dec-17	0.0576	0.05999	0.05999	0.05380	900	\$ (2.15)		Dec-17	0.0576	0.05999	0.05999	0.05110	900	\$ (2.15)					
Jan-18	0.0576	0.06060	0.06060	0.05799	900	\$ (2.70)		Jan-18	0.0576	0.06060	0.06060	0.05799	900	\$ (2.16)					
Feb-18	0.0576	0.05513	0.05513	0.05462	900	\$ 2.22		Feb-18	0.0576	0.05603	0.05603	0.05419	900	\$ 1.41					
Mar-18	0.0576	0.05513	0.05513	0.05462	900	\$ 2.22		Mar-18	0.0576	0.05603	0.05603	0.05419	900	\$ 1.41					
Apr-18	0.0576	0.05513	0.05513	0.05462	900	\$ 2.22		Apr-18	0.0576	0.05603	0.05603	0.05419	900	\$ 1.41					
May-18	0.0576	0.05479	0.05479	0.05462	900	\$ 2.53		May-18	0.0576	0.05603	0.05603	0.05419	900	\$ 1.41					
Jun-18	0.0576	0.05479	0.05479	0.05462	900	\$ 2.53		Jun-18	0.0576	0.05479	0.05479	0.05224	1200	\$ 3.37					
Jul-18	0.0610	0.05479	0.05479	0.05462	1200	\$ 7.45		Jul-18	0.0610	0.05479	0.05479	0.05224	1200	\$ 7.45					
Aug-18	0.0610	0.05479	0.05479	0.05462	1200	\$ 7.45	Aug-18	0.0610	0.05479	0.05479	0.05224	1200	\$ 7.45						
Sep-18	0.0540	0.05974	0.05974	0.05974	900	\$ (5.17)	Sep-18	0.0540	0.05974	0.05974	0.05974	900	\$ (4.90)						
Oct-18	0.0536	0.05974	0.05974	0.05974	900	\$ (5.53)	Oct-18	0.0534	0.05974	0.05974	0.05974	900	\$ (5.71)						
Nov-18	0.0536	0.0633	0.05863	0.0633	900	\$ (8.73)	Nov-18	0.0539	0.0633	0.05863	0.0633	900	\$ (8.46)						
Dec-18	0.0536	0.0633	0.05863	0.0633	900	\$ (8.73)	Dec-18	0.0539	0.0633	0.05863	0.0633	900	\$ (8.46)						
Jan-19	0.0523	0.0633	0.05863	0.0633	900	\$ (9.90)	Jan-19	0.0539	0.0633	0.05863	0.0633	900	\$ (9.90)						
Feb-19	0.0521	0.0633	0.05863	0.0633	900	\$ (10.06)	Feb-19	0.0521	0.0633	0.05863	0.0633	900	\$ (10.12)						
Mar-19	0.0521	0.0633	0.05863	0.0633	900	\$ (10.06)	Mar-19	0.0521	0.0633	0.05863	0.0633	900	\$ (10.12)						
Apr-19	0.0524	0.0633	0.05863	0.0633	900	\$ (9.81)	Apr-19	0.0523	0.0633	0.05863	0.0633	900	\$ (9.90)						
May-19	0.0524	0.0633	0.05863	0.0633	900	\$ (9.81)	May-19	0.0523	0.0633	0.05863	0.0633	900	\$ (9.90)						
Jun-19	0.0588	0.05698	0.05698	0.05698	1200	\$ 2.18	Jun-19	0.0588	0.05698	0.05698	0.05698	1200	\$ 2.16						
Jul-19	0.0591	0.05698	0.05698	0.05698	1200	\$ 2.58	Jul-19	0.0590	0.05698	0.05698	0.05698	1200	\$ 2.40						
Aug-19	0.0591	0.05698	0.05698	0.05698	1200	\$ 2.58	Aug-19	0.0590	0.05698	0.05698	0.05698	1200	\$ 2.40						
Sep-19	0.0512	0.05698	0.05698	0.05698	900	\$ (5.17)	Sep-19	0.0511	0.05698	0.05698	0.05698	900	\$ (5.31)						
Oct-19	0.0505	0.05595	0.05595	0.05595	900	\$ (4.88)	Oct-19	0.0505	0.05595	0.05595	0.05595	900	\$ (4.92)						
Nov-19	0.0505	0.05595	0.05595	0.05595	900	\$ (4.88)	Nov-19	0.0504	0.05595	0.05595	0.05595	900	\$ (4.92)						
Dec-19	0.0505	0.05595	0.05595	0.05595	900	\$ (4.88)	Dec-19	0.0504	0.05595	0.05595	0.05595	900	\$ (5.00)						
Jan-20	0.0512	0.04899	0.04899	0.05	900	\$ 1.98	Jan-20	0.0513	0.04899	0.04899	0.04899	900	\$ 2.03						
Feb-20	0.0512	0.04899	0.04899	0.04899	900	\$ 2.07	Feb-20	0.0512	0.04899	0.04899	0.04899	900	\$ 2.07						
Mar-20	0.0512	0.0490	0.0490	0.04899	900	\$ 1.99	Mar-20	0.0512	0.0490	0.04899	0.04899	900	\$ 1.99						
Apr-20	0.0524	0.0512	0.04899/05072	0.0512	900	\$ 1.12	Apr-20	0.0524	0.0512	0.04899	0.0512	900	\$ 1.06						
May-20	0.0524	0.0512	0.04899/05072	0.0512	900	\$ 1.12	May-20	0.0524	0.0512	0.04899	0.0512	900	\$ 1.06						
Jun-20	0.0545	0.0512	0.05072/0454	0.0512	1200	\$ 3.96	Jun-20	0.0551	0.0512	0.04899	0.0512	1200	\$ 4.71						
Jul-20	0.0533	0.0532	0.05072/0454	0.0512	1200	\$ 0.12	Jul-20	0.0544	0.0532	0.0454	0.0532	1200	\$ 1.39						
Aug-20	0.0533	0.0532	0.05072/0454	0.0512	1200	\$ 0.12	Aug-20	0.0544	0.0532	0.0454	0.0532	1200	\$ 1.39						
Sep-20	0.0533	0.0472	0.0454/0461	0.0512	900	\$ 5.49	Sep-20	0.0544	0.0472	0.0454/0461	0.0512	900	\$ 6.44						
Oct-20	0.0474	0.0477	0.0461	0.0477	900	\$ (0.27)	Oct-20	0.0479	0.0477	0.0461	0.0477	900	\$ 0.22						
Nov-20	0.0474	0.0477	0.0461	0.0477	900	\$ (0.27)	Nov-20	0.0479	0.0477	0.0461	0.0477	900	\$ 0.22						
Dec-20	0.0474	0.0477	0.0461	0.0477	900	\$ (0.27)	Dec-20	0.0479	0.0477	0.0461	0.0477	900	\$ 0.21						
Jan-21	0.0481	0.0497	0.0461	0.0497	900	\$ (1.44)	Jan-21	0.0481	0.0497	0.0461	0.0497	900	\$ (1.42)						
Feb-21	0.0481	0.0497	0.0477/0494	0.0481	900	\$ (1.44)	Feb-21	0.0481	0.0497	0.0477/0494	0.0481	900	\$ (1.42)						
Mar-21	0.0481	0.0529	0.0477/0494	0.0481	900	\$ (4.32)	Mar-21	0.0481	0.0529	0.0477/0494	0.0481	900	\$ (4.30)						
Apr-21	0.0483	0.0529	0.0494	0.0483	900	\$ (4.14)	Apr-21	0.0488	0.0529	0.0494	0.0488	900	\$ (3.73)						
May-21	0.0483	0.0529	0.0494/0497	0.0483	900	\$ (4.14)	May-21	0.0488	0.0529	0.0494	0.0488	900	\$ (3.73)						
Jun-21	0.0620	0.0587	0.0529	0.0587	1200	\$ 3.92	Jun-21	0.0638	0.0587	0.0529	0.0638	1200	\$ 6.16						
Jul-21	0.0601	0.0587	0.0529	0.0587	1200	\$ 1.66	Jul-21	0.0624	0.0587	0.0529	0.0624	1200	\$ 4.42						
Aug-21	0.0601	0.0587	0.0529/0546	0.0587	1200	\$ 1.66	Aug-21	0.0624	0.0587	0.0529/0546	0.0587	1200	\$ 4.42						
Sep-21	0.0524	0.05275	0.0529/0546	0.05275	900	\$ (0.28)	Sep-21	0.0547	0.05275	0.0529/0546	0.0547	900	\$ 1.79						
Oct-21	0.0505	0.05865	0.0546	0.05865	900	\$ (7.35)	Oct-21	0.0520	0.05865	0.0546	0.0520	900	\$ (6.01)						
Nov-21	0.0505	0.05865	0.0546	0.05865	900	\$ (7.35)	Nov-21	0.0520	0.05865	0.0546	0.0520	900	\$ (6.01)						
Dec-21	0.0502	0.05865	0.0546/0615	0.05865	900	\$ (7.65)	Dec-21	0.0521	0.05865	0.0546/0615	0.0521	900	\$ (5.93)						
Jan-22			0.0615	1.33	900		Jan-22			0.0615	0.0615	900							
Feb-22			0.0615		900		Feb-22			0.0615	0.0615	900							
Mar-22			0.0615		900		Mar-22			0.0615	0.0615	900							

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**in**

**Case No(s). 20-0103-EL-AGG**

Summary: Comments electronically filed by Mr. Thomas M. Bellish on behalf of  
Buckeye Energy Brokers