

**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Ohio Power Siting )  
Board's Review of Ohio Adm.Code Chapters ) Case No. 21-902-GE-BRO  
4906-1, 4906-2, 4906-3, 4906-4, 4906-5, )  
4906-6, and 4906-7. )

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**REPLY COMMENTS  
OF  
THE OHIO MANUFACTURERS' ASSOCIATION ENERGY GROUP**

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Respectfully submitted,

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**REPLY COMMENTS**

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**I. INTRODUCTION**

Pursuant to R.C. 111.15(B) and 106.03(A), the Ohio Power Siting Board (Board) is required to conduct a review of its rules contained in the Ohio Administrative Code every five years. In this proceeding, the Board is conducting a review of Ohio Adm.Code Chapters 4906-1 through 4906-7, which establish the requirements for applications to site and construct new, improved, and adjusted electric power transmission lines and substations, including the form and content of the applications. On July 14, 2022, the Board set an August 5, 2022 deadline for interested persons to file initial comments on proposed amendments to Ohio Adm.Code Chapters 4906-1 through 4906-7, and a September 2, 2022 deadline for reply comments.

Pursuant to the Board's directive, the Ohio Manufacturers' Association Energy Group (OMAEG) submitted its initial comments, recommending modifications to the Ohio Administrative Code that will ensure that customer-funded investments in the transmission system are cost-effective, transparent, and sensible, and that any proposed investments will produce reliability benefits to customers and the Ohio transmission system.<sup>1</sup> These proposed modifications

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<sup>1</sup> See Petition to Intervene, Memorandum in Support, and Comments of The Ohio Manufacturers' Association Energy Group (Aug. 5, 2022) (OMAEG Comments).

are much needed given that, despite significant customer-funded investments,<sup>2</sup> Ohio customers have recently suffered from failures and deficiencies in Ohio’s transmission system. In order to alleviate these issues, the Board should carefully monitor spending on utility-owned, ratepayer-funded projects, but treat customer-owned, customer-funded projects with a light regulatory touch to prevent increased costs. Additionally, OMAEG submitted proposed amendments to the proposed rules in Chapters 4906-1 through 4906-7 to help promote these goals, and to help prevent transmission system failures and deficiencies.<sup>3</sup>

## II. REPLY COMMENTS

### A. The definitions of “associated facility” and “associated facilities” should exclude customer-owned and private substations.

One of the most drastic changes suggested by the Board’s proposed rules is the expansion of the Board’s jurisdiction over customer-owned and private substations. The modification to the definition of “associated facility” proposed by the Board will increase costs for industrial customers seeking to construct their own ‘step-down’ substations, which contain transmission voltages above 100kV and distribution voltages below 100kV.

A diverse group of stakeholders expressed concern with this proposal in their initial comments. For example, Industrial Energy Users-Ohio,<sup>4</sup> the Ohio Energy Group,<sup>5</sup> One Energy

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<sup>2</sup> *Id.* at 2 (“It is important to note that over the past three years, the Board has authorized \$1.4 billion in transmission system spending through an accelerated review process that does not require documented reliability benefits to Ohio customers. \$1.1 billion of this transmission spending was not part of PJM’s Regional Transmission Expansion Planning (RTEP), and thus also was not required to demonstrate reliability benefits to PJM or the Federal Energy Regulatory Commission (FERC).”).

<sup>3</sup> *Id.*, Attachment A.

<sup>4</sup> Comments of Industrial Energy Users-Ohio at 2-5 (Aug. 5, 2022) (IEU Comments).

<sup>5</sup> Comments of the Ohio Energy Group at 2 (Aug. 5, 2022) (OEG Comments).

Enterprises, Inc.,<sup>6</sup> American Transmission Systems Incorporated,<sup>7</sup> Buckeye Power,<sup>8</sup> Ohio Power Company,<sup>9</sup> and the Ohio Chamber of Commerce<sup>10</sup> all filed comments concerned with an expansion of the Board’s jurisdiction.

As OMAEG noted in its initial comments,<sup>11</sup> placing public utility-owned substations that contain transmission and distribution voltages under Board certification will help curtail unfettered and unregulated spending by electric distribution utilities, which is eventually passed through to customers. However, the Board should avoid creating undue burden for business customers seeking to construct their own substations at their own cost.<sup>12</sup> Staff’s proposed amendments to existing Ohio Adm.Code 4906-1-01(F)(2)(b) would require a manufacturing customer constructing, on its own property for its own use, an electric substation that includes both transmission and distribution voltages to receive Board certification.

The costs associated with customer-owned substations are borne by the customer itself. As such, these projects do not present the same risk of runaway spending by electric distribution utilities and Board certification is unnecessary. Adding an additional regulatory hurdle to these projects will *increase* the costs to build these projects, rather than curtailing utility spending, thereby lowering the benefit to customers who seek to construct their own substations.<sup>13</sup> As noted by the Ohio Chamber of Commerce, “the ability to construct substations free of burdensome or

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<sup>6</sup> Initial Comments of One Energy Enterprises Inc. at 2-3 (Aug. 5, 2022) (One Energy Comments).

<sup>7</sup> Initial Comments of American Transmission Systems Incorporated at 2 (Aug. 5, 2022) (ATSI Comments).

<sup>8</sup> Initial Comments of Buckeye Power, Inc. at 3-8 (Aug. 5, 2022) (Buckeye Power Comments).

<sup>9</sup> Initial Comments of Ohio Power Company and AEP Ohio Transmission Company, Inc. at 7-8 (Aug. 5, 2022) (AEP Comments).

<sup>10</sup> Comments of the Ohio Chamber of Commerce at 1-2 (Aug. 5, 2022) (Ohio Chamber of Commerce Comments).

<sup>11</sup> See OMAEG Comments at 15-16.

<sup>12</sup> *Id.*

<sup>13</sup> See Buckeye Power Comments at 6 (“This change would have increased the project cost by tens of thousands of dollars—all of which would have been placed on the cooperative and its member-owners.”).

new regulatory approvals is critical for large users of energy who take transmission level service from electric utilities.”<sup>14</sup> Moreover, expanding Board jurisdiction to these customer-owned projects would drastically increase the Board’s workload, leading to significant administrative backlog.<sup>15</sup> This will lead to further increased costs and delays in constructing projects that benefit Ohio’s customers and are paid directly by customers themselves.

Therefore, OMAEG recommends adding the phrase “public utility-owned” before the word “substations” as it is used in the first two instances of proposed Rule 4906-1-01(F)(2)(b). The following are OMAEG’s proposed amendments to the language proposed by Staff for proposed Rule 4906-1-01(F)(2)(b):

~~Transmission voltage switching~~ Both public utility-owned substations that change electricity line voltage from one transmission voltage to another transmission voltage and public utility-owned substations that change line voltage between transmission voltage and distribution voltage ~~shall be classified~~ are considered as transmission substations and are considered associated facilities of transmission lines. ~~Pole-mounted transmission switching substations are excluded. Those stations that change electricity from transmission voltage to distribution voltage shall be classified as distribution substations, and are not considered associated facilities of transmission lines.~~

OMAEG respectfully requests that the Board adopt amendments to proposed Rule 4906-6-05 as set forth above and as provided in the initial comments of the OMAEG.

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<sup>14</sup> Ohio Chamber of Commerce Comments at 2.

<sup>15</sup> See IEU Comments at 5 (“Finally, it is not clear how the OPSB could reasonably position itself to process all of the distribution projects and customer substation projects that would be covered by the OPSB’s Staff proposed expansion of jurisdictional scope. That unworkable result, however, can be avoided by recognizing that the OPSB’s jurisdiction does not include customer-substations.”); AEP Comments at 7 (“The Companies estimate that this proposed rule would increase the number of applications filed approximately 30-45% or more, based on the types of projects that are currently being developed or have been identified by the Companies. This would include substations that step down voltages to a distribution level, which are often facilities that directly feed industrial and large business customers.”); OEG Comments at 2 (“This provision would bring step-down transmission substations under the OPSB’s jurisdiction for the first time.”).

**B. The Board should expand the definitions of “associated facility” and “associated facilities” to include 69 kV voltage lines for transmission owners.**

In contrast to customer-owned, customer-funded projects, where increased oversight will lead to increased costs for consumers, heightened Board regulation of utility-owned, ratepayer-funded projects will put a check on unrestricted runaway spending by distribution utilities. If a customer invests in a project that ultimately proves unnecessary or not cost efficient, that customer will bear the costs of that project. However, if a utility invests in a similar project that ultimately proves unnecessary or not cost efficient, it will pass those costs on to ratepayers who had no input in the decision-making process. Therefore, OMAEG supports the recommendation, proposed by the Ohio Farm Bureau Federation, which advocate for “the expansion of jurisdiction to include 69kV lines, as these have become much more common today.”<sup>16</sup>

In particular, OMAEG recommends that the Board amend the definition of transmission line and associated facilities in such a way as to include the 69kV voltage level. Further clarity is needed to distinguish between 69kV lines and facilities that perform a transmission function and 69kV lines and facilities that perform a distribution function.

Currently, these projects exist in a sort of “legal limbo.”<sup>17</sup> These projects lack oversight from PJM, who considers them “supplemental projects.” PJM considers these supplemental projects to be “transmission system improvements identified by Transmission Owners to meet local needs not required for compliance with PJM criteria for reliability, operational performance or economic efficiency, [which] are not state public policy projects.”<sup>18</sup> As noted by the Office of the Ohio Consumers’ Counsel (OCC), “[t]he unfortunate reality for consumers is that neither

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<sup>16</sup> Initial Comments of the Ohio Farm Bureau Federation at 8 (Aug. 4, 2022).

<sup>17</sup> *Id.* at 9.

<sup>18</sup> PJM, Members Review Planning Under M-3 Process (Oct. 22, 2019), available at <https://insidelines.pjm.com/pjm-members-review-planning-under-m-3-process/> (last accessed Sept. 9, 2022).

FERC nor PJM review supplemental projects for need or cost-effectiveness.”<sup>19</sup> However, while PJM and FERC consider these projects to be localized, the Board currently does not monitor them either. Expanding the definition of transmission line and associated facilities to include the 69kV voltage level will help mitigate this “regulatory ‘Catch-22.’”<sup>20</sup>

Transmission projects falling under the existing 100 kV requirement are financially significant. According to PJM’s 2020 Regional Transmission Expansion Plan (RTEP) Report, approved baseline projects with a design capacity less than 100 kV cost more than the total of approved 345 kV projects as well as the total of approved 500 kV projects over the past four years.<sup>21</sup> Additionally, the 2020 RTEP Report states that “2020 continues to reflect the shifting dynamics driving transmission expansion...[specifically] new large-scale transmission projects (345 kV and above) have become more uncommon as RTO load growth as fallen below one percent.”<sup>22</sup>

In Ohio, approximately 31% of total transmission system upgrades (this includes both required upgrades through the RTEP process as well as supplemental upgrades) involve projects that are less than 100 kV.<sup>23</sup> These projects, on average, cost \$29.9 million, only \$2.3 million less on average than projects with a design capacity above 100 kV.<sup>24</sup> Furthermore, 100% of these projects were deemed “supplemental,” meaning that they were not required through PJM’s

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<sup>19</sup> Comments of the Office of the Ohio Consumers’ Counsel at 2 (Aug. 5, 2022) (OCC Comments).

<sup>20</sup> *Id.*

<sup>21</sup> PJM Key 2020 RTEP Report Graphics & Information, available at <https://www.pjm.com/library/reports-notices/rtep-documents/2020-rtep> (last accessed Sept. 2, 2022).

<sup>22</sup> PJM 2020 Regional Transmission Expansion Plan at Section 1, Page 5 (Feb. 28, 2021), available at <https://www.pjm.com/-/media/library/reports-notices/2020-rtep/2020-rtep-book-1.ashx> (last accessed Sept. 2, 2022).

<sup>23</sup> *See* PJM 2020 Ohio State Infrastructure Report (Apr. 2021), available at <https://www.pjm.com/-/media/library/reports-notices/state-specific-reports/2020/2020-ohio-state-infrastructure-report.ashx> (last accessed Sept. 2, 2022).

<sup>24</sup> *Id.*



Regional Transmission Expansion Plan process, and thus are not reviewed at all for reliability benefits. PJM has been clear they view “supplemental” projects as driven by “local” needs, not system reliability. As such, PJM has delegated responsibility to the local regulatory authorities, such as the Board, to review these local, supplemental projects to determine whether the project is needed, if the project improves reliability, and if the benefits outweigh the costs.

In conclusion, a significant percentage of both transmission projects and total investment dollars are invested in transmission projects at the 69 kV design capacity rating. Providing the Board jurisdiction over these projects by expanding the definition of “associated facility” and “associated facilities” will allow for greater transparency of transmission investment within Ohio and will ensure that the projects are necessary, providing local reliability benefits to the system and customers in a cost-effective manner.

**C. The Board should modify its rules to expand its authority for review of supplemental transmission projects, especially with regard to applicants under the accelerated review process, for need and cost effectiveness.**

Ohio’s Federal Energy Advocate has recognized the more than \$1 billion in annual supplemental transmission investment.<sup>25</sup> This incredible price tag is unreasonably burdensome, especially if it cannot be demonstrated that the transmission projects are needed, if it cannot be demonstrated quantitatively that they create system reliability benefits, or if it cannot be demonstrated quantitatively that the benefits outweigh the costs. Meanwhile, publicly regulated utilities and transmission owners argue that little to no review of utility-owned projects is more than sufficient for a \$1 billion portfolio of transmission spending, which is ultimately recovered

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<sup>25</sup> *Electric Transmission Incentives Policy Under Section 219 of the Federal Power Act*, FERC Docket No. RM20-10-000, Comments of the Pub. Util. Comm’n of Ohio at 3 (June 25, 2021).

from Ohio commercial, industrial, and residential ratepayers.<sup>26</sup> Contrary to the utilities' view, it is reasonable to expect that transmission owners be required to outline a sufficiently detailed justification for their expenses.

In fact, in a survey of accelerated certificate applications submitted since May 2019, nineteen applicants proposed supplemental projects to rebuild electric power transmission lines at a total cost of \$718 million.<sup>27</sup> In these applications, there was little to no quantitative demonstration of how the projects would improve the performance and reliability of the transmission system.<sup>28</sup> The lack of information and demonstration of need is astonishing. At a minimum, the applicants should be required to reference Institute of Electrical and Electronic Engineers (IEEE) industry standard definitions for reliability, such as System Average Interruption Frequency Index (SAIFI), System Average Interruption Duration Index (SAIDI), and Customer Average Interruption Duration Index (CAIDI), which would highlight possible need for a project.<sup>29</sup> They should also be required to detail intended improvements and benefits to Ohio ratepayers, such as improvements to weight bearing and thermal limitations, as well as the justification for these improvements.

Competitive, non-monopoly businesses would not invest \$1 billion with such little analysis of the costs and benefits. But this is common place for applications submitted pursuant to the accelerated review process for supplemental projects. These applications arrive without detail,

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<sup>26</sup> See, e.g., AEP Comments at 3 (“The rules currently in place are already too cumbersome and restrictive, to the detriment of customers and economic development in Ohio”).

<sup>27</sup> OMAEG’s initial comments we inadvertently state that twenty-two applicants proposed supplemental projects to rebuild transmission lines at a cost of \$718 million. There were instead nineteen applicants at the same cost of \$718 million.

<sup>28</sup> See various Letters of Notification recorded in the Board’s Docketing Information System. See cases with Industry Code “EL” (electric), Purpose Code “BLN” (letter of notification), and Status “OPEN.”

<sup>29</sup> IEEE Draft Guide for Electric Power Distribution Reliability Indices, IEEE P1366/D6, at 1-43 (May 2022).

without context, without clarity, and without regard for industry precedent. Essentially, the accelerated review process as currently maintained offers a path for transmission owners to self-regulate.

As stated by the OCC, “there needs to be regulatory oversight to protect consumers from unfair and unreasonable charges.”<sup>30</sup> OCC noted that:

PJM defines supplemental transmission projects as a transmission expansion or enhancement that is not needed for system reliability, operational performance, or economic criteria. The costs of these projects are charged to consumers through PJM but are not reviewed for prudence or cost. These projects are basically rubber stamped by PJM then charged to customers.<sup>31</sup>

OMAEG agrees. The burden of proof should be on transmission owners to show that investment in transmission benefits Ohio’s manufacturers and all customers. The current landscape of unregulated and unfettered investment increases costs and is disadvantageous to Ohio manufacturing.

All improvements to the transmission system should be reviewed pursuant to the Board’s responsibilities under R.C. 4906.10 to “serve the interests of electric system economy and reliability,”<sup>32</sup> including improvements proposed under the accelerated review process. The current accelerated review process does not adequately ensure that the Board is authorized to fully review projects for economy and reliability. Instead, the absence of a discussion of the expansion of operational capabilities and operational limits in accelerated certificate applications provides a path for unchecked spending on unnecessary upgrades. As such, OMAEG recommends that the Board adopt the revisions to proposed Rule 4906-6-05 as detailed in OMAEG’s initial comments.<sup>33</sup>

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<sup>30</sup> OCC Comments at 2.

<sup>31</sup> *Id.* at 3

<sup>32</sup> R.C. 4906.10(A)(4) (emphasis added).

<sup>33</sup> *See* OMAEG Comments, Attachment A.

### III. CONCLUSION

OMAEG requests that the Board adopt amendments to Ohio Adm.Code Chapters 4906-1 through 4906-7 and Staff's proposed amendments thereto as proposed herein and in OMAEG's initial comments.<sup>34</sup>

The Board's accelerated review process facilitates billions of dollars in transmission system investment with no clear reliability benefit. MAEG recommends amendments to the requirements of the accelerated certificate applications for utility-owned facilities to require documentation and demonstration of increased reliability benefits. The additional data proposed will provide transparency and will ensure that customers pay for only cost-effective and sensible investments in the transmission system.

Adopting the recommendations delineated herein and in the initial comments of the OMAEG will provide the Board with the data and tools to ensure that the billions of customer dollars spent on transmission projects have documented reliability improvements, including the proposals that are submitted pursuant to the accelerated application process.

Respectfully submitted,

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<sup>34</sup> See generally OMAEG Comments.



## CERTIFICATE OF SERVICE

The Ohio Power Siting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document also is being served via electronic mail on September 2, 2022 upon the parties listed below.

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