# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Investigation	)	
Into RPA Energy, Inc dba Green Choice	)	Case No. 22-0441-GE-COI
Energy's Compliance with the Ohio	)	
Administrative Code and Potential Remedial	)	
Actions for Non-Compliance	)	

## PREFILED TESTIMONY OF

SAMANTHA BOERSTLER
RELIABILITY AND SERVICE ANALYSIS DIVISION
SERVICE MONITORING AND ENFOREMENT DIVISION
PUBLIC UTILTIES COMMISSION OF OHIO

STAFF EXHIBIT \_\_\_

- 1 1. Q. Please state your name and business address.
- A. My name is Samantha Boerstler. My business address is 180 E. Broad
- 3 Street, Columbus, Ohio, 43215.

5 2. Q. By whom are you employed?

- A. I am employed by the Public Utilities Commission of Ohio (PUCO or
- 7 Commission).

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- 9 3. Q. What is your present position with the Commission and what are your duties?
- A. I am a Utility Specialist 1 in the Reliably and Service Analysis Division

  (RSAD) of the Service Monitoring and Enforcement Department (SMED).

  Under the direction of Nedra Ramsey, I am responsible for analyzing

  competitive providers' compliance with the Ohio Administrative Code

  (Ohio Adm.Code), monitoring the competitive retail electric and natural

  gas service industry, recommending enforcement actions, and monitoring
- 19 4. Q. Would you briefly state your educational background and work experience?

the Energy Choice website.

- A. I have a Bachelor of Arts degree in Social Science from Lake Erie College.
- I also have an Associate of Applied Science in Business Management and
- an Associate of Technical Studies in Information Technology from Eastern

1	Gateway Community College. I started working at the PUCO in September
2	2015 in the Commission's Consumer Services Division's (CSD) as a
3	Customer Service Representative. I was then promoted to a Customer
4	Service Investigator in October 2016. In that role I was responsible for
5	documenting customer inquiries and investigating customer complaints and
6	concerns to ensure compliance with Ohio Adm.Code rules and to help
7	resolve customer concerns/disputes. In December 2020 I was then
8	promoted to my current position as a Utility Specialist 1 in the RSAD of the
9	SMED.

11 5. Q. What is the purpose of your testimony in this case?

A. The purpose of my testimony is to support the "Staff's investigation and analysis" section of the Staff Report of the investigation filed in this proceed on June 10, 2022.

Q. What was your role in the investigation of RPA Energy, Inc dba GreenChoice Energy (RPA)?

A. I was tasked with analyzing the data from customer contacts taken by the CSD's call center to identify any trends or issues of possible non-compliance. I also reviewed all data provided by RPA from the data request (DR) sent by Staff to RPA as a result of issues identified. Finally, I

reviewed the Energy Choice Ohio website looking into rate trends for the time of the investigation.

- 4 7. Q. How many contacts, in total, were received regarding RPA?
- A. From January 1, 2021, to July 20, 2021, the PUCO Call Center received 25

  Customer contacts. Within the 25 customer contacts, 20 of them were

  investigated by the call center and found that the enrollments date from

  2019 to current.

- 10 8. Q. During your review of the customers contacts for RPA what did you discover?
- A. I discovered that there were patterns of unauthorized enrollments, and misleading and deceptive practices.

An example of an unauthorized enrollment is PUCO case number 00698115. The customer received a letter from Duke Energy stating that the account was being switched to Green Choice Energy. The customer stated she lives alone and did not authorize the enrollment with the company. I reviewed the call recording that was provided to Staff by RPA and the recording of the customer when she contacted the PUCO. From this review I noticed the voice of the person on the PUCO recording is not the same voice on the recording provided by RPA. In another case, case number 00696256, the customer disputed their enrollment with RPA

Energy. RPA provided Staff with a Third-Party Verification (TPV) and 1 signed contract. The information was reviewed with the customer at which 2 time he stated that he never signed the contract, nor did he complete the 3 TPV. Also, to note, the voice on the TPV was clearly not the customers. 4 An example of the misleading and deceptive practices I noticed after 5 reviewing many door-to-door solicitation complaints is that the 6 representatives posed as the utility or stated that they were working on 7 behalf of the utility. See case numbers 00679073, 00680143, 00693258, 8 9 00696256 and 00682929. After reviewing RPA's sales calls, I determined that customers were not 10 informed of the variable rate they would be billed, but that the rate would 11 be based on market conditions. In those cases, customers were charged 12 13 rates as high as \$0.13/kWh. (Case numbers 00660823, 00671118, 00672275, 00693258 and 00664386). At the time, the average variable rate 14 posted on the Energy Choice website was \$0.08514 per kWh, and the 15

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9. Q. Within your findings would you say any customers were harmed by RPA's acts and practices that did not comply with the Ohio Adm.Code, and if so, how?

variable rates RPA was charging were at least two times higher.

A. Yes, I found that customers were harmed by the practices of RPA. An example of this is case number 00672275. RPA informed Staff that the

customer's husband "James" agreed to the enrollment of the account and provided Staff with the completed TPV and signed contract. The customer stated she lives alone, her husband "Donald" is deceased, and she did not know the person on the TPV. Due to the customer's account being enrolled without correct authorization she was charged \$646.07 more than she would have paid if she were on utility's default the price to compare rate. For October 2021 RPA charged her a rate of \$0.129501558 per kWh in addition to a \$5.00 Energy Charge. The price to compare at that time was \$0.0526 per kWh Another example of a customer being harmed is case number 00660823. This customer was solicited via telephone and was never provided a rate, only that the enrollment would be a variable rate based on market conditions and a \$5.00 monthly service fee. During the TPV the customer was not informed of the \$5.00 monthly service fee, nor was he advised of the rate he would be billed by RPA. The only thing that was advised to him was that he would be billed a variable rate. The customer was with RPA for seven months and was refunded the difference of the rate charged by RPA from the utility price to compare, which totaled over \$1,500.00. 10. Q. What did you find in your review of RPA's responses to Staff's Data

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Request?

Per RPAs response 14,431 Ohio customers enrolled in the last 12 months from June 2020 to June 2021. During the week of June 6, 2021, RPA enrolled 699 customers' accounts. There were many issues I found after reviewing the information provided to Staff by RPA. When reviewing the telemarketing sales script, I found that the sales representatives did not follow the scripts, which led customers to be misled. The Door-to-door script is not in compliance with the requirement in the Ohio Adm.Code, nor is it a complete script. When reviewing the TPV script, I found that customers were not provided the correct unit of measurement for natural gas, nor were customers provided complete information regarding the terms and conditions of what RPA was offering.

11. Q. How did RPA representatives mislead customers to enroll with them?

A. Within the calls I reviewed, customers were informed that, "The reason for the call today is to explain the 100% clean, renewable energy that RPA can offer to customers in your state. What that means is that if you choose to enroll with RPA as your supplier your electricity will be upgraded to 100% renewable energy." I believe it is very misleading and can make a customer believe that they will receive 100% green energy to their home, which cannot happen. RPA purchases the electricity, which may be 100%

A.

DR 10a and 10e.

<sup>&</sup>lt;sup>2</sup> See Ohio Adm.Code 4901:1-21-05 and 4901:1-29-05.

D.R. call folder 06-04-2021 000132838\_5139321921.

1	green energy, that is then delivered to the electric distribution utility
2	(EDU). From there the EDU will distribute the electric to customer. The
3	EDU cannot control the type of electricity that gets delivered to each
4	customer.

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- 6 12. Q. What issues did you find with RPAs door-to-door script?
- A. In the door-to-door script, after the representative advises the customer that

  "Your utility will continue to read your meters," the script ends. Nowhere

  in the script does the representative advise the customer of a rate or ask if

  the customer wants to enroll with RPA.

- 12 13. Q. Can you explain the issues with RPAs TPV script?
- A. Within the TPV script provided, the representatives are advised to inform

  customers of the natural gas rate in Therms (Thermal British Units). No

  natural gas company in Ohio uses Therms as their unit of measurement for

  natural gas. CenterPoint Energy, Columbia Gas of Ohio and Duke Energy

  use Ccf (100 cubic feet), and Dominion Energy Ohio uses MCF (1000

  cubic feet). (Therms to Ccf: therms X 1.037=Ccf. Therms to Mcf: therms X

  10.37= Mcf). Within the TPV script the customer is advised they will be

Ohio Adm.Code 4901:1-29-05(8)(c) and (d) require that offers marketed by competitive retail natural gas suppliers be in a price per Ccf or Mcf, whichever is consistent with the incumbent natural gas company's billing format.

charged a \$5.00 monthly service fee on the variable rate. This is not
advised to the customer in the door-to-door script.

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14. Did you review any of the calls RPA provided to Staff in response to 4 Q. Staff's DRs? 5

During the investigation, Staff requested all sales calls placed by RPA for 6 A. the week of June 6, 2021. Of the calls provided by RPA, I listened to 30 7 random calls. Within the calls I found many issues. Most, if not all, of the 8 9 recorded calls that RPA provided do not go with the scripts. in many of the recordings the customers did not ask questions to the representative about 10 what they were enrolling into or what service RPA is providing. Based on 11 my experience, most customers ask those questions, and it is strange that 12 13 the customers in the RPA sales call recordings did not. In many of the sales call recordings, RPA's representatives promised

> customers a "lower rate" and "savings." In call 5138166994 of folder AGR 0531 to 0606, the representative advises the customer that RPA is "currently at a price that is lower than the price to compare." During the call the customer asks, "How much lower is this going to make my bill?" The representative responds, "\* \* \* Will lock in at \$0.1012. To give you an idea last year in Aug there was an EIA energy Information administration

See Exhibit SB1.

1	website article that came out and you guys were at \$0.1206." For June 2021
2	Duke price to compare for electric was \$0.0544 per kWh and for June 2020
3	it was \$0.0547 per kWh. I am unsure as to how someone could say RPA
4	has a lower rate than Duke Energy or that there would be savings.
5	Other issues I identified were several instances where the RPA
6	representative provided customers one rate during the sales call but then
7	advised customers of a different rate during the TPV. An example for this
8	would be 00013720_7404254358 of folder 06-04-2021. During the sales
9	call the customer is quoted a natural gas rate of \$0.383 per Therm. In the
10	TPV the customer is advised that the gas rate would be \$0.4625. Another
11	pattern I found is that the TPV did not disclose the \$5.00 monthly charge to
12	the customer. Other calls that provide one rate during the sales call but
13	another during the TPV are 003133048_5133208239,
14	009312588_5137516319, 009132614_5137616720,
15	00132847_6148798916, 00013720_7404254358.
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Q. Within your testimony you stated RPA promised customers lower rates. 15. 17 Based on your review of the market in Ohio would you find this statement 18 to be true? Why or why not? 19

This statement is not true. Using one of my examples earlier in my A. 20 testimony, call 5138166994, the customer was promised savings and 21 advised the rate they would be charged was \$0.1206 per kWh. When 22

		looking at the market in Ohio for electric renewable rates, the average rate
		from January 2021 to March 2022 \$0.060951 per kWh, with the lowest
		variable rate being \$0.0279 per kWh. In many of the CSD call center cases
		I reviewed, customers were promised savings but billed a rate over \$0.12
		per kWh, such as case numbers 00660823, 00664386, and 00672275.
		In case number 00660823, the customer was informed the variable rate
		would be based on market conditions. This customer was with RPA for
		seven months and the rate billed by RPA was as high as \$0.1395 per kWh.
		Based on the Energy Choice Ohio website looking at the Ohio market from
		January 2021 to March 2022, the average variable rate for renewable
		energy was \$0.0724 per kWh. <sup>6</sup>
16.	Q.	Does this conclude your testimony?
	A.	Yes, this concludes my testimony, but I reserve the right to add additional

testimony.

See Exhibit SB2.

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the **Prefiled Testimony of Samantha Boerstler** has been served upon the below-named counsel via electronic mail, this 30<sup>th</sup> day of September 2022.

/s/ Robert Eubanks

**Robert Eubanks** 

### **Parties of Record:**

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#### **Attorney Examiners:**

Jesse.Davis@puco.ohio.gov

#### Call name

000132192\_9372608058\_2.wav 000132380\_9374596069.wav 000132380\_9374596069\_2.wav 000132380\_9374596069\_3.wav 003132135\_9375651949.wav 003132135\_9375651949\_2.wav 006132887\_2165072422\_8.wav 006132887\_2165072422\_9 006132887\_2165072422\_10.wav 008132337\_3308136951.wav 008132373\_5134049427.wav 008132893\_6142183697.wav 009132533\_6142907099.wav 5132073086

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009312605\_5136257872

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### **Exhibit SB2**

TerritoryName	refRateCode	SupplierCompanyName	Price refRateType
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Ohio Edison	Residential	Hiko Energy LLC	0.139 Variable
The Illuminating Company	Residential	Hiko Energy LLC	0.139 Variable
Toledo Edison	Residential	Hiko Energy LLC	0.139 Variable
Ohio Edison	Residential	Hiko Energy LLC	0.139 Variable
The Illuminating Company	Residential	Hiko Energy LLC	0.139 Variable
Toledo Edison	Residential	Hiko Energy LLC	0.139 Variable
Ohio Edison	Residential	Hiko Energy LLC	0.139 Variable
The Illuminating Company	Residential	Hiko Energy LLC	0.139 Variable
Toledo Edison	Residential	Hiko Energy LLC	0.139 Variable
Ohio Edison	Residential	Hiko Energy LLC	0.139 Variable
The Illuminating Company	Residential	Hiko Energy LLC	0.139 Variable
Toledo Edison	Residential	Hiko Energy LLC	0.139 Variable
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The Illuminating Company	Residential	Hiko Energy LLC	0.139 Variable
Toledo Edison	Residential	Hiko Energy LLC	0.139 Variable
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The Illuminating Company	Residential	Hiko Energy LLC	0.139 Variable
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Ohio Edison	Residential	Hiko Energy LLC	0.139 Variable
The Illuminating Company	Residential	Hiko Energy LLC	0.139 Variable
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The Illuminating Company	Residential	Hiko Energy LLC	0.139 Variable
Toledo Edison	Residential	Hiko Energy LLC	0.139 Variable
Ohio Edison	Residential	Hiko Energy LLC	0.139 Variable
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The Illuminating Company		Hiko Energy LLC	
Toledo Edison	Residential	Hiko Energy LLC	0.139 Variable
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Duke Energy Ohio	Residential	IDT Energy, Inc	0.1198 Variable
Duke Energy Ohio	Residential	Residents Energy, LLC	0.1198 Variable
Duke Energy Ohio	Residential	IDT Energy, Inc	0.1198 Variable
Duke Energy Ohio	Residential	Residents Energy, LLC	0.1198 Variable
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Ohio Edison	Residential	Green Choice Energy	0.1195 Variable
Ohio Edison	Residential	Green Choice Energy	0.1195 Variable

The Illuminating Company	Residential	Green Choice Energy	0.1195 Variable
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American Electric Power	Residential	Green Choice Energy	0.0989 Variable
American Electric Power	Residential	Green Choice Energy	0.0989 Variable
Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Toledo Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Toledo Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
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Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Toledo Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Toledo Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Toledo Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Toledo Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
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The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
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Toledo Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Toledo Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Toledo Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Toledo Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Toledo Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Toledo Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Toledo Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Toledo Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0949 Variable
The Illuminating Company	Residential	XOOM Energy Ohio LLC	0.0949 Variable
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Ohio Edison	Residential	XOOM Energy Ohio LLC	0.0859 Variable
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Duke Energy Ohio	Residential	4 Choice Energy LLC	0.0599 Variable
Duke Energy Ohio	Residential	4 Choice Energy LLC	0.0599 Variable
Duke Energy Ohio	Residential	4 Choice Energy LLC	0.0599 Variable
Duke Energy Ohio	Residential	4 Choice Energy LLC	0.0599 Variable
Ohio Edison	Residential	Clearview Electric Inc	0.0599 Variable
The Illuminating Company	Residential	Clearview Electric Inc	0.0599 Variable
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Duke Energy Ohio		4 Choice Energy LLC	
Duke Energy Ohio	Residential	4 Choice Energy LLC	0.0599 Variable
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Ohio Edison	Residential	Clearview Electric Inc	0.0599 Variable
The Illuminating Company	Residential	Clearview Electric Inc	0.0599 Variable
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Ohio Edison	Residential	Clearview Electric Inc	0.0599 Variable
The Illuminating Company	Residential	Clearview Electric Inc	0.0599 Variable
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Ohio Edison	Residential	Clearview Electric Inc	0.0599 Variable
The Illuminating Company	Residential	Clearview Electric Inc	0.0599 Variable
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The Illuminating Company	Residential	Clearview Electric Inc	0.0599 Variable
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Ohio Edison	Residential	Clearview Electric Inc	0.0599 Variable
The Illuminating Company	Residential	Clearview Electric Inc	0.0599 Variable

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The Illuminating Company	Residential	Clearview Electric Inc	0.0599 Variable
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The Illuminating Company	Residential	Clearview Electric Inc	0.0599 Variable
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Ohio Edison	Residential	Clearview Electric Inc	0.0599 Variable
The Illuminating Company	Residential	Clearview Electric Inc	0.0599 Variable
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Ohio Edison	Residential	Clearview Electric Inc	0.0599 Variable
The Illuminating Company	Residential	Clearview Electric Inc	0.0599 Variable
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Duke Energy Ohio	Residential Residential	Clearview Electric Inc	0.0519 Variable
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Duke Energy Ohio	Residential	Clearview Electric Inc	0.0519 Variable
Duke Energy Ohio	Residential	Clearview Electric Inc	0.0519 Variable
Duke Energy Ohio	Residential	NRG Home	0.05 Variable

Duke Energy Ohio	Residential	NRG Home	0.05 Variable
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Duke Energy Ohio	Residential	NRG Home	0.05 Variable
Duke Energy Ohio	Residential	NRG Home	0.05 Variable
Duke Energy Ohio	Residential	NRG Home	0.05 Variable
Duke Energy Ohio	Residential	4 Choice Energy LLC	0.0499 Variable
Duke Energy Ohio	Residential	4 Choice Energy LLC	0.0499 Variable
Duke Energy Ohio	Residential	American Power & Gas of Ohio, LLC	0.0499 Variable
Duke Energy Ohio	Residential	4 Choice Energy LLC	0.0499 Variable
Duke Energy Ohio	Residential	4 Choice Energy LLC	0.0499 Variable
Duke Energy Ohio	Residential	American Power & Gas of Ohio, LLC	0.0499 Variable
Duke Energy Ohio	Residential	4 Choice Energy LLC	0.0499 Variable
Duke Energy Ohio	Residential	4 Choice Energy LLC	0.0499 Variable
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Duke Energy Ohio	Residential	4 Choice Energy LLC	0.0499 Variable
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Duke Energy Ohio	Residential	American Power & Gas of Ohio, LLC	0.0499 Variable
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Duke Energy Ohio	Residential	4 Choice Energy LLC	0.0499 Variable
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Duke Energy Ohio	Residential	American Power & Gas of Ohio, LLC	0.0499 Variable
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Duke Energy Ohio	Residential	4 Choice Energy LLC	0.0499 Variable
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Duke Energy Ohio	Residential	American Power & Gas of Ohio, LLC	0.0499 Variable
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Duke Energy Ohio	Residential	American Power & Gas of Ohio, LLC	0.0499 Variable
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American Electric Power	Residential	•	0.04934 Variable
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American Electric Power	Residential	Green Chaica France	0.04924 Variable
American Electric Power	Residential	Green Choice Energy	0.04924 Variable
American Electric Power	Residential	Green Choice Energy	0.04924 Variable
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American Electric Power	Residential	Green Choice Energy	0.04924 Variable
American Electric Power	Residential	NRG Home	0.049 Variable
Duke Energy Ohio	Residential	NRG Home	0.049 Variable
Ohio Edison	Residential	NRG Home	0.049 Variable
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Ohio Edison	Residential	NRG Home	0.049 Variable
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Ohio Edison	Residential	NRG Home	0.049 Variable

American E	lectric Power	Residential	NRG Home	0.049 Variable
Duke Energ	y Ohio	Residential	NRG Home	0.049 Variable
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American E	lectric Power	Residential	NRG Home	0.049 Variable
Duke Energ	y Ohio	Residential	NRG Home	0.049 Variable
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Duke Energ	y Ohio	Residential	NRG Home	0.049 Variable
American E	lectric Power	Residential	NRG Home	0.049 Variable
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American Electric Power	Residential	NRG Home	0.049 Variable
Duke Energy Ohio	Residential	NRG Home	0.049 Variable
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Toledo Edison	Residential	Green Choice Energy	0.04877 Variable
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Ohio Edison	Residential	Green Choice Energy	0.04805 Variable
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Ohio Edison	Residential	Green Choice Energy	0.04805 Variable
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AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
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Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
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Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
American Electric Power	Residential		
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Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable

Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
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Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0469 Variable
AES Ohio	Residential	Clearview Electric Inc	0.0469 Variable
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AES Ohio	Residential	NRG Home	0.046 Variable
Toledo Edison	Residential	NRG Home	0.046 Variable
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Toledo Edison	Residential	NRG Home	0.046 Variable
AES Ohio	Residential	NRG Home	0.046 Variable
Toledo Edison	Residential	NRG Home	0.046 Variable
AES Ohio	Residential	NRG Home	0.046 Variable
Toledo Edison	Residential	NRG Home	0.046 Variable 0.046 Variable
AES Ohio	Residential	NRG Home	U.U4U VAHADIE

Toledo Edison	Residential	NRG Home	0.046 Variable
AES Ohio	Residential	NRG Home	0.046 Variable
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Toledo Edison	Residential	NRG Home	0.046 Variable
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AES Ohio	Residential	NRG Home	U.U4U VAHADIE

Toledo Edison	Residential	NRG Home	0.046 Variable
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AES Ohio	Residential	NRG Home	0.046 Variable
Toledo Edison	Residential	NRG Home	0.046 Variable
Duke Energy Ohio	Residential	Clearview Electric Inc	0.0459 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
Duke Energy Ohio	Residential	Clearview Electric Inc	0.0459 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
Duke Energy Ohio	Residential	Clearview Electric Inc	0.0459 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
Duke Energy Ohio	Residential	Clearview Electric Inc	0.0459 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable

Duke Energy Ohio	Residential	Clearview Electric Inc	0.0459 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
Duke Energy Ohio	Residential	Clearview Electric Inc	0.0459 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
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The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
Duke Energy Ohio	Residential	Clearview Electric Inc	0.0459 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
Duke Energy Ohio	Residential	Clearview Electric Inc	0.0459 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
Duke Energy Ohio	Residential	Clearview Electric Inc	0.0459 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
Duke Energy Ohio	Residential	Clearview Electric Inc	0.0459 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
Duke Energy Ohio	Residential	Clearview Electric Inc	0.0459 Variable
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The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
Duke Energy Ohio	Residential	Clearview Electric Inc	0.0459 Variable
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The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
Duke Energy Ohio	Residential	Clearview Electric Inc	0.0459 Variable
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The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
Duke Energy Ohio	Residential	Clearview Electric Inc	0.0459 Variable
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The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
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The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0459 Variable
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The Illuminating Company	Residential	NRG Home	0.045 Variable
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The Illuminating Company	Residential	NRG Home	0.045 Variable
Ohio Edison	Residential	NRG Home	0.045 Variable
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Ohio Edison	Residential	NRG Home	0.045 Variable
The Illuminating Company	Residential	NRG Home	0.045 Variable
AES Ohio	Residential	American Power & Gas of Ohio, LLC	0.0449 Variable
AES Ohio	Residential	American Power & Gas of Ohio, LLC	0.0449 Variable
AES Ohio	Residential	American Power & Gas of Ohio, LLC	0.0449 Variable
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AES Ohio	Residential	American Power & Gas of Ohio, LLC	0.0449 Variable
AES Ohio	Residential	American Power & Gas of Ohio, LLC	0.0439 Variable
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American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
AES Ohio	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
AES Ohio	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
AES Ohio	Residential		0.0429 Variable
		American Power & Gas of Ohio, LLC	
American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
AES Ohio	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
American Electric Power	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
Ohio Edison	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
The Illuminating Company	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
Toledo Edison	Residential	American Power & Gas of Ohio, LLC	0.0429 Variable
Duke Energy Ohio	Residential	Great American Power, LLc	0.0329 Variable
Ohio Edison	Residential	Powervine Energy LLC	0.0329 Variable
The Illuminating Company	Residential	Powervine Energy LLC	0.0329 Variable
Toledo Edison	Residential	Powervine Energy LLC	0.0329 Variable
Duke Energy Ohio	Residential	Great American Power, LLc	0.0329 Variable
Ohio Edison	Residential	Powervine Energy LLC	0.0329 Variable
The Illuminating Company	Residential	Powervine Energy LLC	0.0329 Variable
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Toledo Edison	Residential	Powervine Energy LLC	0.0329 Variable
Duke Energy Ohio	Residential	Great American Power, LLc	0.0329 Variable
Ohio Edison	Residential	Powervine Energy LLC	0.0329 Variable
The Illuminating Company	Residential	Powervine Energy LLC	0.0329 Variable
Toledo Edison	Residential	Powervine Energy LLC	0.0329 Variable
Duke Energy Ohio	Residential	Great American Power, LLc	0.0329 Variable
Ohio Edison	Residential	Powervine Energy LLC	0.0329 Variable
The Illuminating Company	Residential	Powervine Energy LLC	0.0329 Variable
Toledo Edison	Residential	Powervine Energy LLC	0.0329 Variable
Duke Energy Ohio	Residential	Great American Power, LLc	0.0329 Variable
Ohio Edison	Residential	Powervine Energy LLC	0.0329 Variable
The Illuminating Company	Residential	Powervine Energy LLC	0.0329 Variable
Toledo Edison	Residential	Powervine Energy LLC	0.0329 Variable
American Electric Power	Residential	Powervine Energy LLC	0.0309 Variable
American Electric Power	Residential	Powervine Energy LLC	0.0309 Variable
American Electric Power	Residential	Powervine Energy LLC	0.0309 Variable
American Electric Power	Residential	Powervine Energy LLC	0.0309 Variable
American Electric Power	Residential	Powervine Energy LLC	0.0309 Variable
Duke Energy Ohio	Residential	Great American Power, LLc	0.0299 Variable
Duke Energy Ohio	Residential	Great American Power, LLc	0.0299 Variable
Duke Energy Ohio	Residential	Great American Power, LLc	0.0299 Variable
Duke Energy Ohio	Residential	Great American Power, LLc	0.0299 Variable
Duke Energy Ohio	Residential	Great American Power, LLc	0.0299 Variable
American Electric Power	Residential	Powervine Energy LLC	0.0279 Variable
Ohio Edison	Residential	Powervine Energy LLC	0.0279 Variable
The Illuminating Company	Residential	Powervine Energy LLC	0.0279 Variable
Toledo Edison	Residential	Powervine Energy LLC	0.0279 Variable
American Electric Power	Residential	Powervine Energy LLC	0.0279 Variable
Ohio Edison	Residential	Powervine Energy LLC	0.0279 Variable
The Illuminating Company	Residential	Powervine Energy LLC	0.0279 Variable
Toledo Edison	Residential	Powervine Energy LLC	0.0279 Variable
American Electric Power	Residential	Powervine Energy LLC	0.0279 Variable
Ohio Edison	Residential	Powervine Energy LLC	0.0279 Variable
The Illuminating Company	Residential	Powervine Energy LLC	0.0279 Variable
Toledo Edison	Residential	Powervine Energy LLC	0.0279 Variable
American Electric Power	Residential	Powervine Energy LLC	0.0279 Variable
Ohio Edison	Residential	Powervine Energy LLC	0.0279 Variable
The Illuminating Company	Residential	Powervine Energy LLC	0.0279 Variable
Toledo Edison	Residential	Powervine Energy LLC	0.0279 Variable
American Electric Power	Residential	Powervine Energy LLC	0.0279 Variable
Ohio Edison	Residential	Powervine Energy LLC	0.0279 Variable
The Illuminating Company	Residential	Powervine Energy LLC	0.0279 Variable
Toledo Edison	Residential	Powervine Energy LLC	0.0279 Variable
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## RenewableContent

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Case No(s). 22-0441-GE-COI

Summary: Testimony Prefiled Testimony of Samantha Boerstler, Reliability and Service Analysis Division, Service Monitoring and Enforcement Division, Public Utilities Commission of Ohio electronically filed by Mrs. Kimberly M. Naeder on behalf of PUCO