

NRG Set 01  
Answer Prepared By: Santino Fanelli

**Case No. 23-0301-EL-SSO**

**In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. § 4928.143 in the Form of an Electric Security Plan**

**ANSWERS TO INTERROGATORIES**

**NRG Set 01–** What tariff services and schedules of the Applicants offer TOU, TOD or time-  
**INT-001** varying rates or charges?

**Response:** For residential customers, the Companies currently offer a three-part time of use rate as part of Rider GEN (“Time-of-Day Option (Residential)”). In the CEI Pilot area, there is also a separate critical peak pricing option available to residential customers (Rider RCP).

For commercial and industrial customers, the Companies offer a three-part time of use rate as part of Rider GEN (“Time-of-Day Option (Non-Residential)”) as well as an Experimental Critical Peak Pricing tariff (Rider CPP), an Experimental Real Time Pricing tariff (Rider RTP), and the Commercial High Load Factor Experimental Time-of-Use Rider (Rider HLF).

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**ANSWERS TO INTERROGATORIES**

**NRG Set 01– INT-002**      On a per-tariff or per-schedule basis, how many customers are currently taking services billed at TOU, TOD or time-varying rates or charges?

**Response:**      As of 7/31/2023, there were 144 customers taking service under the Rider GEN Time-of-Day Option (Residential) rate, and there were 4 customers taking service under Rider RCP. There are currently no customers taking service under the commercial and industrial time varying rate tariffs identified in the Companies' response to NRG Set 1-INT-001.

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**ANSWERS TO INTERROGATORIES**

**NRG Set 01– INT-003** Since the Applicants' established the current TOU, TOD or time-varying rates or charges, how many customers have been served under each tariff/schedule each year since they were established? Please separate by residential and non-residential customers.

**Response:** Objection. The request is overbroad and unduly burdensome. The request is also not relevant and not likely to lead the discovery of admissible evidence. Subject to and without waiving the foregoing objections, the number of residential customers participating in the Rider GEN Time-of-Day Option (Residential) rate is shown below:

Month	CE01	OE01	TE01	Total
<b>Mar-22</b>	6	16	9	<b>31</b>
<b>Apr-22</b>	27	41	20	<b>88</b>
<b>May-22</b>	31	48	23	<b>102</b>
<b>Jun-22</b>	31	49	17	<b>97</b>
<b>Jul-22</b>	30	48	16	<b>94</b>
<b>Aug-22</b>	40	49	19	<b>108</b>
<b>Sep-22</b>	53	67	30	<b>150</b>
<b>Oct-22</b>	61	78	34	<b>173</b>
<b>Nov-22</b>	62	78	34	<b>174</b>
<b>Dec-22</b>	115	106	41	<b>262</b>
<b>Jan-23</b>	195	126	43	<b>364</b>
<b>Feb-23</b>	208	132	43	<b>383</b>
<b>Mar-23</b>	210	130	42	<b>382</b>
<b>Apr-23</b>	208	125	41	<b>374</b>
<b>May-23</b>	206	123	40	<b>369</b>
<b>Jun-23</b>	139	103	31	<b>273</b>
<b>Jul-23</b>	53	64	27	<b>144</b>

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**ANSWERS TO INTERROGATORIES**

**NRG Set**      Did Staff approve the education and marketing plan for its time-varying rate  
**01– INT-05**      offering as approved and directed by the Commission in Case No. 20-50-EL-ATA?

**Response:**      Yes.

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**NRG Set**      Referencing the Applicants' time-varying rate offering for nonresidential  
**01– INT-06**      customers that was approved by the Commission in Case No. 20-50-EL-ATA,  
has it achieved the energy and capacity savings it was designed for? Please  
explain why or why not.

**Response:**      Objection. This Request seeks information that is not relevant and not  
reasonably calculated to lead to the discovery of admissible evidence. The  
Companies object to this Request that purports to require a detailed, narrative  
response. Penn Central Transp. Co. v. Armco Steel Corp., 27 Ohio Misc. 76,  
77 (C.P. 1971). The request also assumes facts not in evidence. Subject to and  
without waiving the foregoing objections, the Rider GEN Time-Of-Day Option  
(Non-Residential) was originally established pursuant to PUCO Orders in Case  
Nos. 08-935-EL-SSO and 09-541-EL-ATA, and did not specify a designed level  
of energy or capacity savings. The Companies modified the language in their  
Rider GEN tariff in Case No 20-50-EL-ATA to clarify that commercial and  
industrial customers with advanced meters are eligible to participate in the  
Time-of-Day Option (Non-Residential). No customers have signed up for the  
rate since the revised tariff language was implemented pursuant to Case 20-00-  
EL-ATA.

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**ANSWERS TO INTERROGATORIES**

**NRG Set**            What types of marketing and education have the Applicants done in the past to  
**01– INT-007**    inform customers regarding the SSO TOU tariffs/schedules?

**Response:**        Objection. This Request is vague and ambiguous in its use of the phrases “SSO TOU tariffs/schedules” and “in the past.” This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. The Companies interpret the question as asking about activities prior to those associated with Case No. 20-0050-EL-ATA. Subject to and without waiving the foregoing objections, in their CEI Pilot footprint the Companies have used a variety of methods to contact customers regarding TOU tariffs including direct mail, email marketing, and telemarketing.

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**ANSWERS TO INTERROGATORIES**

**NRG Set 01– INT-008**      What types of marketing and education do the Applicants currently do to inform customers regarding the current SSO TOU, TOD or time-varying rate tariffs/schedules?

**Response:**      Objection. This Request is vague and ambiguous in its use of the phrase “SSO TOU, TOD or time-varying rate tariffs/schedules.” This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Companies worked with the Grid Mod Collaborative to develop the marketing plan for the Rider GEN Time-of-Day Option (Residential) rate established pursuant to Case No. 20-0050-EL-ATA which is marketed to non-shopping customers using a direct mail and email campaign. Educational information regarding this rate is also available at:  
<https://www.firstenergycorp.com/help/smart-meters/oh-smartmeter/time-varying-rate-option.html>.

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**ANSWERS TO INTERROGATORIES**

**NRG Set**            What is the annual budget for marketing and education of the Applicants' current SSO TOU, TOD or time-varying rate tariffs/schedules in each year of the ESP 5?  
**01– INT-009**

**Response:**        Objection. The Request is vague and ambiguous in its use of the phrase “SSO TOU, TOD or time-varying rate tariffs/schedule.” This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Companies do not have an annual budget for marketing and education for each year of proposed ESP V. The Companies estimate the annual cost for Q3 2023 through Q1 2024 to be approximately \$50,000.



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**ANSWERS TO INTERROGATORIES**

**NRG Set 01– INT-010**      Apart from the basic requirements for a customer to obtain service from the Applicants, is there any condition or cost that an SSO customer must satisfy or incur in order to take service under the Applicants' current SSO TOU, TOD or time-varying rate tariffs/schedules? If yes, what are those conditions and costs?

**Response:**      Objection. The Request is vague and ambiguous in its use of the term "condition." This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, customers participating on a time-varying rate tariff must have an appropriate meter installed that is capable of measuring their usage under the terms of the tariff. For the terms and conditions of the Companies' time varying rate options, please refer to following tariff sheets: Rider GEN (sheet no. 114); Rider RCP (CEI only, sheet no. 89), Rider CPP (sheet no. 113), Rider RTP (sheet no.111), and Rider HLF (sheet no. 130).

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**ANSWERS TO INTERROGATORIES**

**NRG Set**            Describe the benefits to customers from the Applicants' current SSO TOU,  
**01– INT-011**    TOD or time-varying rate tariffs/schedules?

**Response:**        Objection. This Request improperly seeks or purports to require the Companies to provide documents and/or information that is publicly available or already in the possession, custody, or control of the requesting party, and thus equally available to the requesting party. This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Companies' current SSO time-varying rate options provide SSO customers opportunities for incentives to shift usage to offpeak periods and potentially reduce their energy costs and peak usage.

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**ANSWERS TO INTERROGATORIES**

**NRG Set 01– INT-017**      Identify all current activities and proposals from the Applicants that incentivize residential customers to use electricity during off-peak periods.

**Response:**      Objection. The Request is overbroad and unduly burdensome in requesting identification of all current activities and proposals from the Applicants that incentivize residential customers to use electricity during off-peak periods. The Request is vague and ambiguous in its use of the term “incentivize.” This Request seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. The Companies assume this question is asking about the Companies’ current time varying rates that are available to SSO residential customers. Subject to and without waiving the foregoing objections, please see the Companies’ response to NRG Set 1-INT-001.



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Summary: Exhibit NRG Exh 2 electronically filed by Mr. Ken Spencer on behalf of  
Armstrong & Okey, Inc..