






From: [Roger Koeberle](#)
To: [PUCO-Docketing](#)
Subject: ELR comment letter
Date: Tuesday, December 5, 2023 3:48:14 PM
Attachments: [Viking Forge ELR Comment Letter.pdf](#)

Dear PUCO Docketing Department,

Please submit the attached “Public Comment” in the pending PUCO Case No. 23-301-EL-SSO.

Thank you,

	Roger Koeberle
	<i>President</i>
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From the Desk of Roger Koeberle

December 4, 2023

Public Utilities Commission of Ohio
180 E Broad Street
Columbus, OH 43215

To Whom It May Concern,

I am Roger Koeberle, President at Viking Forge, LLC located in Streetsboro, OH and I am writing this letter related to the application filed by the FirstEnergy electric utilities in Ohio for Authority to Establish a Standard Service Offer in the form of an Electric Security Plan, or ESP V.

Viking Forge is one of the premier closed die forging companies in the United States. We began our operations in 1988 as a greenfield, startup, captive operation initially supplying various hardware items for the truck industry. In 1991, we started selling commercially and grew to be a leading supplier of steel and stainless steel forgings to a wide variety of markets including transportation, recreational vehicles, energy, industrial, heavy equipment, and defense and ordnance. We are also an industry leader in the manufacturing of forged steel products. We started with one press line and now have eight, with the potential to process nearly 100 million pounds of steel a year. At our facility in Streetsboro, we employ approximately 175 full-time employees, making us one of the largest employers in Portage County, Ohio. Over the years, we have participated in several economic development programs offered through the city, county, and state. They committed to us, and we committed to them.

As a large forging company, we are a significant energy user located in FirstEnergy, specifically Ohio Edison's service territory. Due to our sizable forging operations, we also have the ability to provide meaningful interruptible load to FirstEnergy and PJM when local or regional grid conditions are threatened and grid emergencies arise. Our participation in FirstEnergy's current interruptible program, the Economic Load Response Rider (Rider ELR), dates back several additional years to FirstEnergy's Interruptible Rider. When the Interruptible Rider was discontinued, we signed up for the ELR program in June 2009.

For the last 14.5 years, Viking Forge has honored the commitment we made to FirstEnergy and its customers as a participant in FirstEnergy's ELR program. We have interrupted our load whenever we have been asked to do so, including on December 24, 2022 when PJM initiated a NERC Energy Emergency Level 2 Alert.

In return for the commitments Viking Forge has made to disrupt our operations for the good of FirstEnergy's system, other FirstEnergy customers, and the PJM regional grid as a whole, the credits we have received in return for that commitment have enabled Viking Forge to remain competitive in our industry and increase the positive economic impact we in turn have for the city of Streetsboro and the state of Ohio. We have successfully competed against companies overseas and have actually been able to reshore parts that had gone overseas. This is a 'Made In The USA' company with nearly 100% of the steel

that we process coming from the United States (the balance comes from Canada). Together, with the help of our local and state governments and FirstEnergy, we have been able to create a success story. The rest of the world doesn't play fair, that's where we need the help and support of our government to prosper and grow.

On behalf of Viking Forge, I urge the Public Utilities Commission of Ohio to approve the continuation of FirstEnergy's ELR Program, without reducing the program credits in a way that will result in a significant rate shock to our electric bills and our business operations. A significant and abrupt decrease in ELR program credits may have unwelcome downstream consequences for our operations, employees, and customers alike. When you look at the economic impact of companies like Viking Forge, LLC, it's not just 175 employees. It's 175 families, probably closer to 500 people that are affected. It's the employees and families of the United States steel companies that produce the 100 million pounds of steel that we consume. It's the employees and families of the local small businesses that support us in more ways than I can mention. The impact is huge and we need your help and support.

Respectfully,

A handwritten signature in black ink, appearing to read 'R. Koeberle', with a stylized, cursive script.

Roger M. Koeberle
President

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

12/5/2023 3:58:01 PM

in

Case No(s). 23-0301-EL-SSO

Summary: Public Comment of Roger Koeberle electronically filed by Docketing
Staff on behalf of Docketing.