BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Approval of Phase Two of Their Distribution Grid Modernization Plan	Case No. 22-0704-EL-UNC
In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Review of Rider AMI (2019)	Case No. 18-1647-EL-RDR
In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Review of Rider AMI (2020)	Case No. 19-1903-EL-RDR
In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Review of Rider AMI (2021)	Case No. 20-1672-EL-RDR

INITIAL POST-HEARING BRIEF OF OHIO ENERGY LEADERSHIP COUNCIL

Ohio Energy Leadership Council ("OELC") respectfully submits this initial post-hearing brief to the Public Utilities Commission of Ohio (the "Commission") in support of the joint Stipulation and Recommendation ("Joint Stipulation") filed on April 12, 2024, by the Ohio Edison Company ("OE"), The Cleveland Electric Illuminating Company ("CEI"), and The Toledo Edison Company ("TE," together with OE and CEI "FirstEnergy"), in these matters related to FirstEnergy's Application for approval of Phase Two of the Grid Modernization Plan ("Grid Mod II").

OELC specifically aims to address the Joint Stipulation's proposed unified rate design for commercial and industrial customers.[1] As proposed, the unified rate provides a more balanced rate-design for commercial and industrial customers that better aligns advanced and interval ("AMI") meter replacements with Rider AMI costs allocated to Primary and Subtransmission customers. To be clear, the proposed Rider AMI charges still disproportionately fall upon FirstEnergy's commercial and industrial customers. And the unified rate design should not reflect a position binding upon OELC or its constituents in future matters.

However, to promote settlement and greater modernization of FirstEnergy's service territory, OELC membership—which comprises commercial and industrial customers across FirstEnergy's service territory being served by each of FirstEnergy's constituent companies—has agreed to the unified rate design. The Joint Stipulation passes each of the three criteria deployed to evaluate and approve stipulations. The Commission should approve the Joint Stipulation—and with it, the proposed unified rate design.

I. STANDARD OF REVIEW.

The Commission has developed a long-standing rubric to evaluate settlements such as the Joint Stipulation:[2]

(1) whether the settlement is a product of serious bargaining among capable, knowledgeable parties;

(2) whether the settlement, as a package, benefits ratepayers and the public interest; and

(3) whether the settlement package violates any important regulatory principle or practice.

Each criterion counsels adopting the Joint Stipulation.

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[1] *See* Joint Stip. at 26 (proposing that "[i]n determining Rider AMI rates for Grid Mod II costs using this allocation methodology, the GS, GP and GSU rate schedules will be combined into a single rate").

[2] Office of Consumers' Counsel v. Pub. Utils. Com., 64 Ohio St. 3d 123, 126 (1992).

II. LAW & ARGUMENT

A. THE STIPULATION IS A PRODUCT OF SERIOUS BARGAINING AMONG CAPABLE, KNOWLEDGEABLE PARTIES.

First, the Joint Stipulation reflects exhaustive settlement deliberations among capable parties. FirstEnergy filed the Grid Mod II application on July 15, 2022.[3] In November of 2023, FirstEnergy circulated its first draft term sheet, and hosted the first settlement discussion on November 22, 2023. Discussions and term sheet revisions continued into December of 2023—totaling fourteen (14) term sheet drafts and seven (7) settlement discussions.[4] No intervenor party was excluded from these discussions—including Staff and the Ohio Consumers' Counsel ("OCC"). In each settlement context, the parties voiced interests and reached compromises. An initial draft stipulation was first distributed on April 8, 2024.

After receiving feedback and incorporating revisions, the Joint Stipulation was submitted to the Commission on April 12, 2024.[5] This Joint Stipulation "represents a reasonable compromise involving a balancing of competing positions and, as such, does not necessarily reflect the position that one or more of the Signatory Parties would have taken if these issues had been fully litigation without the Stipulation."[6]

Also—as the Commission is aware—the record shows that the parties and counsel are experienced litigators who regularly practice in Commission matters. As Witness Quirk highlights, "the Signatory Parties have an extensive history of participation and experience in matters before the Commission."[7] The fourteen (14) signatory parties are "frequent flyers" that include

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[3] *See* Tr. at 56:17-18.
[4] *See* Quirk Test. 3:13-20. This sum reflects only those settlement discussions open to all parties. The exact number of sessions might be higher based on discrete deliberations with individual parties.
[5] *See generally* Stip. (filed Apr. 12, 2024).
[6] Quirk Test. 7:16-21.
[7] Quirk Test. 7:6-7.

FirstEnergy, Citizens Utility Board of Ohio, Environmental Law & Policy Center, Interstate Gas Supply, LLC, The Kroger Co., Northeast Ohio Public Energy Council, Ohio Energy Group, Ohio Environmental Council, The Ohio Manufacturers' Association Energy Group, Retail Energy Supply Association, Walmart Inc., and OELC. And the non-signatories—Commission Staff and the OCC—also practice often before the Commission. In fact, all but one of these parties (the Citizens Utility Board of Ohio) participated in this matter's prior case—the FirstEnergy Grid Mod I proceeding.[8]

Neither Commission Staff nor OCC—nor any other party—has submitted any credible evidence challenging this first criterion of the Commission's three-part test. The record evidence only supports finding that the Joint Stipulation arose from serious bargaining among capable and knowledgeable parties. The first criterion is satisfied.

B. THE JOINT STIPULATION PACKAGE BENEFITS RATEPAYERS AND THE PUBLIC INTEREST.

1. The Joint Stipulation, as a package, benefits ratepayers and the public interest.

Overall, the Joint Stipulation package benefits ratepayers and the public interest. The Joint Stipulation itself provides a detailed breakdown of the proposed changes—such as reducing capital cost by $205 million (33%), installing 1.4 million AMI meters, applying a credit through Rider AMI in the first quarter that FirstEnergy recovers Grid Mod II costs, applying a unified rate design for commercial and industrial customers for purposes of Rider AMI cost recovery, and more.[9] As highlighted by FirstEnergy Witness Quirk, the Joint Stipulation "is estimated to result in $762 million of net benefits to customers in excess of the associated costs over 20 years."[10] Moreover,

[8] *See generally* Case No. 16-0481-EL-UNC.
[9] *See generally* Joint Stip. at 4-28.
[10] *See* Quirk Test. at 19:16-18; Joint Stip. Ex. A (FirstEnergy Grid Mod II Joint Stipulation Cost-Benefit Analysis).

this figure does not capture the "non-quantifiable benefits," which further benefit ratepayers and the public interest.[11] And multiple customer protections—such as capex caps, periodic program assessments, ongoing financial audits of Rider AMI, and continued Grid Mod Collaborative feedback—will safeguard against any unexpected headwinds that impact FirstEnergy's grid modernization plans.[12] Combined, the Joint Stipulation's proposals synergize with Ohio's broader grid modernization goals to benefit FirstEnergy ratepayers and the public interest.

2. The Joint Stipulation proposes a unified rate design for Rider AMI cost allocation.

The Joint Stipulation proposes replacing 1.4 million FirstEnergy customer accounts' legacy meters with AMI meters.[13] Approximately 90% of those meter replacements are for residential customers; commercial and industrial customers, on the other hand, comprise only 9% of the total AMI meter replacements:[14]

Rate	AMI Meters	AMI Meter Replacement %
GP Total	28	0.002%
GS Total	129,742	9.267%
GSU Total	34	0.002%
RS Total	1,268,583	90.613%
STL Total	270	0.019%
TRF Total	1,347	0.096%
Total	1,400,004	100%

The Joint Stipulation proposes recovering these meter installation costs using the allocation methodology currently approved for Rider AMI until the Commission issues a decision in the 2024 FirstEnergy Base Rate Case.[15] Thereafter, the Joint Stipulation proposes allocating costs to match base distribution revenue as approved by the Commission's decision–excluding GT customers and

[11] *See id.* at 19:19-22.
[12] *See id.* at 20:1-16.
[13] *See* Joint Stip. at 7.
[14] *See* OELC Ex. 1 at 6.
[15] *See* Joint Stip. at 26; McMillen Test. at 4:5-9.

operational savings.[16] And the Joint stipulation further proposes unifying "the GS, GP and GSU rate schedules[, which] will be combined into a single rate" for Grid Mod II costs recovered through Rider AMI.[17]

3. The Joint Stipulation's proposed unified rate design for Rider AMI commercial and industrial customers benefits all FirstEnergy ratepayers and the public interest.

Under the Joint Stipulation, Secondary (GS), Primary (GP), and Subtransmission (GSU) customers would each pay the same rate under a unified rate design. This proposal benefits ratepayers and the public interest in two respects: (a) it better aligns commercial and industrial customers' Rider AMI revenue share with AMI meter replacements; and (b) it reduces discrepancy between commercial and industrial customers' Rider AMI rates.

a. The unified rate design standardizes Rider AMI rates for commercial and industrial customers.

First, the Joint Stipulation's unified rate design results in more reasonable rates for Primary and Subtransmission customers. Rider AMI rates under the Application charged Primary (GP) and Subtransmission (GSU) customers a significantly higher rate than Secondary (GS) customers. The Application proposed Rider AMI rates as follows:[18]

Figure 1A: Application Rider AMI Rates During Grid Mod II Year 2

	RS	GS	GP	GSU	STL	TRF	POL
CEI	$ 2.32	$ 18.31	$ 166.35	$ 223.31	$ 0.32	$ 2.23	$ 6.81
OE	$ 2.53	$ 9.59	$ 180.70	$ 316.25	$ 0.25	$ 1.78	$ 2.93
TE	$ 1.96	$ 9.22	$ 89.12	$ 133.50	$ 0.60	$ 1.17	$ 1.54

[16] *See* Joint Stip. at 26; McMillen Test. at 4:9-11.
[17] Joint Stip. at 26.
[18] *See generally* OELC Ex. 1B (Application Typical Bills – Comparison for CEI, OE, and TE).

As Figure 1A shows—in Grid Mod Year 2[19] under the terms of the Application—General Secondary customers are charged only a fraction of the Rider AMI rates charged to Primary and Subtransmission customers. For example, in the CEI service territory, Secondary customers pay 11.0% of the rates charged to Primary customers and 8.2% of the rates charged to Subtransmission customers.[20]

This uneven distribution, however, is addressed under the Joint Stipulation where commercial and industrial customers' Rider AMI rates are unified within each FirstEnergy company. The proposed monthly Rider AMI rates in Grid Mod Year 2 in the Joint Stipulation are as follows:[21]

Figure 1B: Joint Stipulation Rider AMI Rates During Grid Mod II Year 2

	RS	GS	GP	GSU	STL	TRF	POL
CEI	$ 0.98	$ 8.86	$ 8.86	$ 8.86	$ 0.53	$ 0.89	$ 3.00
OE	$ 1.54	$ 7.18	$ 7.18	$ 7.18	$ 0.25	$ 1.03	$ 1.81
TE	$ 1.29	$ 6.76	$ 6.76	$ 6.76	$ 0.40	$ 0.83	$ 1.04

Under the Joint Stipulation, the Grid Mod Year 2 Rider AMI rates between commercial and industrial customers are uniform—standardized—to account for the gulf between Secondary customers' rates, and the rates paid by Primary and Subtransmission customers in the Application.[22] This results in a more reasonable and level Rider AMI rate distribution among

[19] OELC focuses on Grid Mod Year 2 because the Joint Stipulation only applies unified rates beginning in Grid Mod Year 2—pursuant to Joint Stipulation section V.D, under which FirstEnergy will include a credit for prior revenue requirements associated with the CEI Pilot area during Grid Mod Year 1. *See* Joint Stip. at 6.
[20] *See* OELC Ex. 1B at 2-4 (Application Typical Bills – Comparison for CEI, OE, and TE).
[21] *See generally* OELC Ex. 1A (Joint Stipulation Typical Bill Impacts – Comparison for CEI, OE, and TE).
[22] *See* OELC Ex. 1A at

commercial and industrial customers. As FirstEnergy Witness McMillen put it, this unified rate design "provide[s] consistency among the commercial and industrial rate schedules."[23]

b. The Joint Stipulation's unified rate design aligns Rider AMI revenue with AMI meter replacements.

The proposed unified rate design also better aligns Rider AMI revenue with the primary benefit that each customer receives: AMI meter replacement. The Application's Rider AMI proposal burdened Primary and Subtransmission rate classes with a disproportionate slice of Rider AMI revenue. For example, under the Application's Grid Mod II year two proposal,[24] the Application promoted collecting revenue according to the following schedule:[25]

Figure 2A: Application Rider AMI Revenues During Grid Mod II Year 2

	RS	GS	GP	GSU	STL	TRF	POL	Total
CEI	$ 1,572,823.12	$ 1,396,686.80	$ 19,296.60	$ 116,567.82	$ 69.44	$ 1,077.09	$ 59,199.33	$ 3,165,720.20
OE	$ 2,427,737.40	$ 1,062,399.38	$ 196,240.20	$ 31,941.25	$ 241.00	$ 2,511.58	$ 29,927.02	$ 3,750,997.83
TE	$ 546,814.52	$ 317,352.40	$ 47,055.36	$ 1,068.00	$ 229.20	$ 4,992.39	$ 1,210.44	$ 918,722.31
Total	$ 4,547,375.04	$ 2,776,438.58	$ 262,592.16	$ 149,577.07	$ 539.64	$ 8,581.06	$ 90,336.79	**$ 7,835,440.34**
Revenue %	58.04%	35.43%	3.35%	1.91%	0.01%	0.11%	1.15%	

As earlier discussed, Commercial and industrial customers would only receive approximately 9% of AMI meter replacements.[26] And the Application allocated commercial and industrial customers a disproportionately higher percentage of revenue—40.69%. More specifically, Primary and Subtransmission customers would shoulder a disproportionately large

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[23] McMillen Test. at 4:13-14.

[24] Again, OELC focuses on Grid Mod Year 2 because the Joint Stipulation only applies unified rates beginning in Grid Mod Year 2—pursuant to Joint Stipulation section V.D, under which FirstEnergy will include a credit for prior revenue requirements associated with the CEI Pilot area during Grid Mod Year 1. *See* Joint Stip. at 6.

[25] *See generally* OELC Ex. 1-B. This table is based on the data digested from FirstEnergy Witness McMillen's Application testimony, which FirstEnergy provided in response to OELC Set 2-INT-003. *See* OELC Ex. 1 (FirstEnergy's responses to OELC's second set of interrogatories).

[26] *See generally* OELC Ex. 1-B; OELC Ex. 1 at 6.

slice of Rider AMI revenue—5.26%[27]—considering these customers would only receive 0.004% of AMI meter installations.[28] In other words, Primary and Subtransmission customers paid nearly 1,315% times the benefit received.

The Joint Stipulation's unified rate design tempers this discrepancy. Under the Joint Stipulation, Rider AMI commercial and industrial customers still shoulder roughly 40% of Rider AMI revenue consistent with the Grid Mod I base distribution revenue.[29] However, by unifying the commercial and industrial customers' rate classes, Primary and Subtransmission customers' Rider AMI revenue shares are reduced to better mirror AMI meter replacements—while customers in the Secondary rate class receive only a marginal increase to account for those reductions. For example, under the Joint Stipulation's Grid Mod II Year 2 proposal, FirstEnergy anticipates the unified rate class would apply as follows:[30]

Figure 2B: Joint Stipulation Rider AMI Revenues During Grid Mod II Year 2

	RS	GS	GP	GSU	STL	TRF	POL	Total
CEI	$ 664,382.18	$ 675,840.80	$ 1,027.76	$ 4,624.92	$ 115.01	$ 429.87	$ 26,079.00	$ 1,372,499.54
OE	$ 1,477,753.20	$ 795,414.76	$ 7,797.48	$ 725.18	$ 241.00	$ 1,453.33	$ 18,487.34	$ 2,301,872.29
TE	$ 359,893.23	$ 232,679.20	$ 3,569.28	$ 54.08	$ 152.80	$ 3,541.61	$ 817.44	$ 600,707.64
Total	$ 2,502,028.61	$ 1,703,934.76	$ 12,394.52	$ 5,404.18	$ 508.81	$ 5,424.81	$ 45,383.78	**$ 4,275,079.47**
Revenue %	58.53%	39.86%	0.29%	0.13%	0.01%	0.13%	1.06%	

The Joint Stipulation's unified rate design slashes Rider AMI charges for Primary and Subtransmission customers who previously shouldered a disproportionate slice of Rider AMI revenue under the Application.[31] Primary rate customers' share of Rider AMI's revenue is reduced

[27] That is, 3.6% for Rate Class GP and 1.9% for Rate Class GSU.
[28] *See* OELC Ex. 1 at 6.
[29] *See* Joint Stip. at 26.
[30] *See generally* OELC Ex. 1-A. This table is based on the data digested from FirstEnergy Witness McMillen's Joint Stipulation testimony, which FirstEnergy provided in response to OELC Set 2-INT-004. *See* OELC Ex. 1 (FirstEnergy's responses to OELC's second set of interrogatories).
[31] *See generally* OELC Ex. 1-A.

from 3.35% to only 0.29%. And in a similar manner, Subtransmission rate customers' Rider AMI revenue share falls from 1.91% to only 0.13%. And to offset these reductions, Secondary rate class customers receive only a marginal revenue share increase from 35.43% to 39.86%.

Also, the Joint Stipulation's unified rate design imposes negligible revenue share impacts on other customer classes. As shown in Figures 2A and 2B, residential customers' revenue under the Joint Stipulation increases by only 0.49%. Street Lighting Service remains at 0.01%. And Traffic and Pole classes only jump marginally—by 0.02% and 0.09% respectively. Therefore, the Joint Stipulation's unified rate design benefits ratepayers by ensuring that FirstEnergy upholds its revenue requirement while better apportioning revenue between commercial and industrial customers to align with AMI meter replacements. And the unified rate design benefits the public interest by continuing to support AMI meter replacement despite Rider AMI revenue incongruencies. Because the unified rate design benefits ratepayers and the public interest, the second criterion is also satisfied.

4. OCC Witness Alvarez did not sufficiently explain how, if at all, the unified rate design will not benefit ratepayers or the public interest.

OCC is the only party who presented any evidence opposing the Joint Stipulation—here, in the form of OCC witness Alvarez. But OCC witness Alvarez has not provided any credible testimony to justify modifying or rejecting the proposed unified rate class. Mr. Alvarez states generally that "the Settlement is not in the best interest of consumers or the public interest[.]"[32] But Mr. Alvarez's true critiques are directed elsewhere—not the unified rate design.[33] Mr. Alvarez states in passing that "the economic benefits of AMI-related reliability improvements accrue disproportionately to commercial and industrial consumers, who will bear a minority of the

[32] Alvarez Test. at 2:12-13.
[33] *See generally* Tr. Vol. II at 178:4-267:2.

deployment's costs."[34] However, his testimony does not address the disproportionate revenue share and costs shouldered by commercial and industrial customers.

Indeed, as highlighted above, commercial and industrial customers comprise a minority of the AMI meter replacements for Grid Mod II—barely 9% as compared to 90% for residential customers.[35] Even so, commercial and industrial customers will pay roughly 40% of Rider AMI revenue under the Joint Stipulation.[36] Therefore, even if commercial and industrial customers pay a minority of Rider AMI revenue, they still pay four times more than the AMI meters they will receive under Grid Mod II. Mr. Alvarez' testimony, therefore, is unconvincing.

His testimony—written and verbal—also do not once mention the unified/combined rate design, or assail its benefits to ratepayers or the public interest. In fact, Mr. Alvarez admits that if Rider AMI followed cost-to-service principles, then FirstEnergy residents would actually shoulder a greater percentage of Rider AMI costs as opposed to what is currently proposed under the Joint Stipulation.[37] And Mr. Alvarez further admits that he has not proposed any alternative cost allocation methodology.[38] Lacking any credible countervailing testimony, the Commission should recognize that the unified rate design benefits ratepayers—especially residential customers—and is in the public interest.

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[34] *Id.* at 13:19-21.
[35] *See* OELC Ex. 1 at 6.
[36] *See generally* OELC Ex. 1-A.
[37] *See* Tr. Vol. II at 227:9-228:3.
[38] *See id.* at 228:21-23.

C. THE JOINT STIPULATION DOES NOT VIOLATE ANY IMPORTANT REGULATORY PRINCIPLE OR PRACTICE.

Lastly, the Joint Stipulation does not violate a single regulatory principle or practice.[39] Rather, as showcased through the unified rate class for commercial and industrial customers, the Joint Stipulation supports at least two of these regulatory principles and practices.

First, the Joint Stipulation "[e]nsure[s] the availability to consumers of adequate, reliable, safe, efficient, nondiscriminatory, and reasonably priced retail electric service[.]"[40] The Joint Stipulation's unified rate for commercial and industrial customers better aligns the benefits of Grid Mod II—that is, continued AMI meter replacements—with the costs each rate class must bear. It better aligns the Rider AMI rates between Secondary, Primary, and Subtransmission customers with negligible impacts on all other customers' Rider AMI charges. Therefore, the unified rate class promotes reasonably priced electric service.[41]

Similarly, the Joint Stipulation—particularly through the unified rate for commercial and industrial customers—"[e]ncourage[s] innovation and market access for cost-effective supply- and demand-side retail electric service including, but not limited to, demand-side management, time-differentiated pricing, waste energy recovery systems, smart grid programs, and implementation of advanced metering infrastructure[.]"[42] Through the unified rate class, commercial and industrial customers shoulder a disproportionate share of Rider AMI costs. However, in so doing, the Joint Stipulation enables the realization of AMI smart meter benefits for a greater number of FirstEnergy customers across its service territory. The unified rate design therefore helps implement advanced

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[39] *See generally* R.C. § 4928.02(A); Quirk Test. 7:24-8:3.
[40] R.C. § 4928.02(A).
[41] *See* Quirk Test. at 7:24-8:2.
[42] R.C. § 4928.02(A).

metering infrastructure and the accompanying innovation while avoiding unreasonable charges on Primary and Subtransmission class customers.

All told, the Joint Stipulation does not violate any Ohio regulatory principle or practice., and the unified rate design actually furthers at least two important Ohio regulatory principles and practices. The third criterion, therefore, is satisfied.

III. CONCLUSION

In summary, the Joint Stipulation should be adopted. It satisfies each criterion in the three-part test. The proposed Rider AMI unified rate design standardizes commercial and industrial customers' Rider AMI rates to better align AMI meter replacement benefits with Rider AMI revenue. Accordingly, the Commission should accept the Joint Stipulation's proposal, including the unified rate design for commercial and industrial customers.

Date: July 31, 2024

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CERTIFICATE OF SERVICE

I certify on this 31st day of July, 2024, that the foregoing document was filed using the Commission's Docketing Information System and was served by electronic mail on the following:

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