

BEFORE

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THE PUBLIC UTILITIES COMMISSION OF OHIO

PUCO

In the Matter of the Application of )  
 Cincinnati Gas & Electric Company to )  
 Modify its Non-Residential Generation )  
 Rates to Provide for Market-Based ) Case No. 03-93-EL-ATA  
 Standard Service Offer Pricing and to )  
 Establish a Pilot Alternative )  
 Competitively-Bid Service Rate Option )  
 Subsequent to Market Development )  
 Period )

In the Matter of the Application of The )  
 Cincinnati Gas & Electric Company for )  
 Authority to Modify Current Accounting )  
 Procedures for Certain Costs ) Case No. 03-2079-EL-AAM  
 Associated With The Midwest )  
 Independent Transmission System )  
 Operator )

In the Matter of the Application of The )  
 Cincinnati Gas & Electric Company for )  
 Authority to Modify Current Accounting ) Case No. 03-2081-EL-AAM  
 Procedures for Capital Investment in its ) Case No. 03-2080-EL-ATA  
 Electric Transmission And Distribution )  
 System And to Establish a Capital )  
 Investment Reliability Rider to be )  
 Effective After the Market Development )  
 Period )

**OBJECTIONS OF COMMUNITIES UNITED FOR ACTION (CUFA)  
 TO CG&E'S PROPOSED RATE STABLIZATION PLAN**

Filed simultaneous herewith is CUFA's motion for leave to intervene.

1. CUFA adopts the objections raised by Ohio Consumers' Counsel.
2. The proposals fail to address the unique needs of low income residential customers, who will be especially vulnerable to "rate shock." The only provision in the proposal that even acknowledges the burden on low income

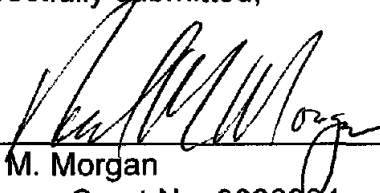
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customers is at par. 12 of the ERRSP, promising to continue energy efficiency programs.

3. The proposals fail to address how CG&E will handle the accounts of customers and former customers who are or have been participants in the Percentage of Income Payment Plan (PIPP). The company continues to bill these residential customers tens of millions of dollars for "PIPP arrearages." Although the ownership of PIPP arrearages has shifted to the Ohio Department of Development (ODOD), CG&E's third-party billing & collection practices in regard to that money have not changed. CG&E bills PIPP arrearages to individual customers as if they were owed to the company and not ODOD, and CG&E has not informed the customers that it is acting as a third party collector on behalf of ODOD. In addition to misleading the customers as to the identity of the creditor, PIPP arrearages billed by the company become an obstacle to receiving or regaining service when the person is no longer eligible for PIPP. This occurs, e.g., when a former PIPP customer moves into rental property where the heat is master-metered and service is conditioned on payment of the accumulated arrearage.
4. CUFA objects to the Commission's having placed this critical matter on an accelerated schedule that assures minimal opportunity to understand and explore the ramifications of the company's proposals. A review of the docket in this case indicates no "residential" issues until the company's January 26 filing, converting the case from one addressing only commercial and industrial consumers to a global case restructuring rates for all customers. Parties have

had a scant five weeks to recognize the expanded scope and object to the proposals, with only another six weeks to prepare for the Commission hearing.

Respectfully submitted,

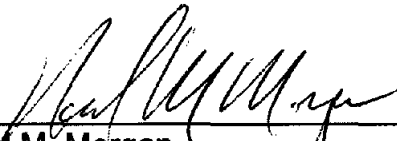


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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing pleading was served on the following either facsimile or by first class U.S. mail, postage prepaid, upon the following this 9<sup>th</sup> day of March, 2004.



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