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September 20, 2000

Via Express Mail

Ms. Daisy Crockron  
Chief of Docketing  
Public Utilities Commission of Ohio  
180 East Broad Street  
10th Floor  
Columbus, OH 43215-3793

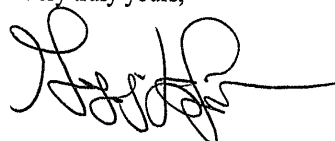
Re: FirstEnergy, Case Nos. 99-1212-EL-ETP, 99-1213-EL-ATA, and 99-1214-EL-AAM

Dear Ms. Crockron:

Enclosed please find an original and ten (10) copies of the Response of Shell Energy Services Co., L.L.C. In Support of the Motion to Clarify Submitted By the Marketers.

Please date-stamp the extra copy of the document enclosed and return them in the self-addressed, postage-prepaid envelope. Please contact me if you have any questions about this filing.

Very truly yours,



Gregory K. Lawrence

Attorney for  
Shell Energy Services Co., L.L.C.

Enclosure

WDC99 320423-1.058385.0015

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Technician B. McCauley Date Processed 9/25/2000

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of )  
FIRSTENERGY CORP. on Behalf of Ohio )  
Edison Company, The Cleveland Electric )  
Illuminating Company and The Toledo Edison )  
Company for Approval of their Transition Plans )  
And for Authorization to Collect Transition )  
Revenues )

Case No. 99-1212-EL-ETP

In the Matter of The Application of )  
FIRSTENERGY CORP. on Behalf of Ohio )  
Edison Company, The Cleveland Electric )  
Illuminating Company and The Toledo Edison )  
Company for Tariff Approval )

Case No. 99-1213-EL-ATA

In the Matter of The Application of )  
FIRSTENERGY CORP. on Behalf of Ohio )  
Edison Company, the Cleveland Electric )  
Illuminating Company and The Toledo Edison )  
Company for Certain Accounting Authority )

Case No. 99-1214-EL-AAM

**RESPONSE OF SHELL ENERGY SERVICES CO., L.L.C.  
IN SUPPORT  
OF THE MOTION TO CLARIFY SUBMITTED BY THE MARKETERS**

On September 1, 2000, the Marketer group filed a Motion with the Public Utilities Commission of Ohio ("Commission") to clarify the procedures that will be used in the review process for the tariffs filed by the FirstEnergy on August 28, 2000 in the above captioned proceedings and to request that the FirstEnergy identify which, if any, of the previous recommendations submitted by any party and the Staff, were addressed in the proposed tariffs filed on August 28, 2000 ("Compliance Filing"). The Commission has not yet ruled on the Motion or the propriety of the Compliance Filing. Shell Energy Services Co., L.L.C. ("Shell

Energy") files this response in support of the Marketers' Motion and requests that the Commission grant expeditiously the relief requested therein.

Shell Energy remains very concerned that no formal notice, comment and review process has been established for this critical Compliance Filing. The gains and efforts made during the past year to establish a competitive market for the FirstEnergy service territories could be lost if the FirstEnergy tariffs mistakenly or purposely fail to reflect the agreements and Commission orders in this case as well as any informal technical comments of the parties. As the Motion states "the FirstEnergy tariffs are to effect the Commission's Opinion and Order in these transition cases . . . The tariffs are integral to implementing the approved transition plans." Motion at 3. We agree. Indeed, FirstEnergy's Compliance Filing -- all two thousand plus pages of it -- represents a total restructuring of rates, and terms and conditions of existing and new services.

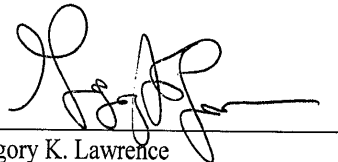
Such a critical Compliance Filing cannot be allowed to slip through the Commission process without comment and review. Indeed, the Commission Staff likely would find helpful formal review and comments of the parties regarding the proposed tariffs. Moreover, parties to the FirstEnergy transition case, including Shell Energy, are owed some level of process to ensure that hard fought agreements are reflected in the tariffs and, critically, technical aspects of the rates and services reflected in the filing are correct, workable and free from errors. There is a critical need, for example, to review FirstEnergy's tariffs regarding rate design (to ensure, for example, that shopping incentives are correctly reflected for all rate classes over the market

development period), terms and conditions (including billing and payment issues), and the Supplier Tariff to ensure compliance with the Commission's orders.

Shell Energy fully supports the relief requested in the Motion, including careful monitoring by the Staff and the parties to assure that FirstEnergy "appropriately implements" the settlements in this case and the suggestion of a "settlement type conference" followed by a formal notice, comment and review period, resulting in a Commission order. The review and comment period should be at least two weeks from the date of the Commission order granting the relief requested in the Motion.

WHEREFORE, the Commission should grant expeditiously the relief requested in the Motion.

Respectfully submitted,



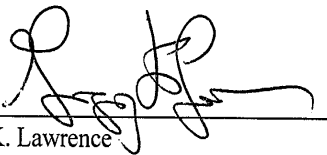
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*Attorney for  
Shell Energy Services Co., L.L.C.*

Dated: September 20, 2000

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Motion to Clarify was served upon the parties listed on the official Service List either by regular U.S. mail or via the e-mail service list for this proceeding, postage prepaid, this 20 day of September, 2000.

  
\_\_\_\_\_  
Gregory K. Lawrence