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BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Public Utilities)	Case Nos. 98-593-GA-COI
Commission of Ohio Staff Second Report)	98-594-GA-COI
On Ohio's Natural Gas Choice® Programs.)	98-595-GA-COI

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ENRON ENERGY SERVICE, INC.

Now comes Enron Energy Services, Inc. (Enron) a natural gas marketer who is participating in both the Columbia Gas of Ohio and the Cincinnati Gas & Electric Choice programs. Enron has reviewed the Staff's report in the above styled docket, and finds that the data collected by the Staff and the discussion of that data a helpful addition towards reaching the State Policy goals of an open gas commodity market for all customers¹.

Within the text of the Report the Staff makes several recommendations for amending the three Choice Programs. Enron would support some of Staff's suggestions, and would oppose others. As a matter of process though because of nature of the Order calling for the Staff report, Enron believes that any changes to the existing Choice programs should come about from either: 1) a Commission ordered Roundtable or Investigation; or 2) a filing from the utility or its customers. Starting with a Commission Ordered proceeding or a filed complaint would assure proper public notice and public participation.

On page 2-3 of the Staff Report reference is made to the Staff's proposal to amend the complaint procedure in Choice programs first aired in the Commission Ordered Investigation in docket 99-661-GA-COI. Enron opposes this suggestion for the reasons articulated in the Joint

¹ See Revised Code Section 4928.02

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Marketers pleading². Enron requests that its comments in docket 99-661-GA-COI be incorporated as part of this response.

In conclusion, the Staff should be commended for a fine study. The Commission however ought to approach changes to the existing approved programs through the statutorily approved methods of complaint petitions by the utility / customers or a Commission ordered Roundtable or investigation.

Respectfully Submitted,



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² Reply Comments of the Marketers Group – filed July 9, 1999

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served on all parties listed on the attached service list this 2nd day of August, 1999.



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