

CITIZEN POWER

Public Policy Research Education and Advocacy

November 19, 2012

Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

Re: Case No. 12-2157-EL-ORD

Dear Docketing Division:

Enclosed please find for filing an original of the Comments of Citizen Power .

If you have any questions, please contact me at (412) 421-7029.

Sincerely,



Theodore S. Robinson, Esquire
Staff Attorney
Citizen Power
2121 Murray Avenue
Pittsburgh, PA 15217

Attachment

**BEFORE THE PUBLIC
UTILITIES COMMISSION OF OHIO**

In the Matter of the Adoption of Chapter)
4901:1-42, Ohio Administrative Code)
Regarding Green Pricing Programs, to)
Implement Am. Sub. S.B. 315) Case No. 12-2157-EL-ORD

COMMENTS OF CITIZEN POWER

Citizen Power submits these Comments in response to the October 17, 2012 Entry in Case No. 12-2157-EL-ORD which proposes creating Chapter 4901:1-42, O.A.C. in order to implement Am. Sub. S.B. 315, adopting Section 4928.70, Revised Code, regarding Green Pricing Programs. Citizen Power is in favor of specific guidelines addressing the review of Green Pricing Programs in Ohio. Not only do the proposed rules promote the development of green energy products by creating a level playing field for EDUs and CRES providers offering green pricing programs, but they also allow consumers to be confident that the green products they purchase have the environmental attributes represented in product and marketing materials. Citizen Power does, however, have a few suggested changes to the proposed rules based on our experience in marketing a wind based REC electricity product in Pennsylvania.

4901:1-42-03 (A) should apply to both marketing materials and program materials. In addition, Citizen Power supports the application of the Federal Trade Commission's (FTC) Guides for the Use of Environmental Marketing Claims (see 16 CFR 260.1-260.8 (relating to guides for the use of environmental marketing claims)) in assessing the environmental claims in marketing and product materials. Similarly, the Environmental Marketing Guidelines for Electricity published by the National Association of Attorneys General in 1999, *available at*

<http://www.atg.state.vt.us/assets/files/ENVIRONMENTAL%20MARKETING%20GUIDELINES.pdf>, is

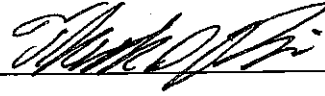
a valuable resource regarding environmental claims in the retail electricity market context.

Citizen Power recommends that the Public Utilities Commission of Ohio explicitly include one or both of these resources in the text of 4901:1-42-03 (A) as a guideline for accurate portrayal of marketing claims.

4901:1-42-03 (B) should have an exception to the 10 business day rule for modifications of previously accepted marketing materials that are de minimis and not related to green marketing claims. For example, if a CRES provider had a newspaper ad that had previously been provided to commission staff for review that stated "50% Ohio Wind Power for Franklin County", they should be able to also advertise "50% Ohio Wind Power for Cleveland" without having to get prior approval. This would allow green pricing programs to be more responsive to advertising opportunities.

4901:1-42-03 (F) requires that the resources used to support participation in the green pricing program be separate from the resources used for compliance with the state's AEPS. Citizen Power agrees with this requirement, but believes there should be one exception to this rule. Green pricing programs meeting 100% of a customer's electricity use with in-state renewable resources should not be required to go above 100% in order to additionally meet the AEPS for renewable resources. In essence, an EDU or CRES provider that provides a 100% in-state renewable product could use the same resources to meet both their green pricing program requirements and their AEPS renewable benchmarks. This methodology would be similar to the Green-e Energy National Standard Version 2.0 on page 9, http://www.green-e.org/docs/energy/Appendix%20D_Green-e%20Energy%20National%20Standard.pdf.


Respectfully submitted,



Theodore S. Robinson
Citizen Power, Inc.
2121 Murray Avenue
Pittsburgh, PA 15217
Tel: (412) 421-7029
Fax: (412) 421-6162
robinson@citizenpower.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Comments* was served electronically or by regular U.S. Mail upon the persons identified below in this case on this 19th day of November, 2012.


Theodore S. Robinson
Citizen Power
2121 Murray Avenue
Pittsburgh, PA 15217
Telephone: (412) 421-7029
FAX: (412) 421-6162

SERVICE LIST

Sandra Coffey
Public Utilities Commission of Ohio
180 E. Broad St.
Columbus, OH 43215
Sandra.Coffey@puc.state.oh.us

accounting@insourcepower.com
accounting@intelligenresources.com
adam.gusman@glacialenergy.com
admjgoch@powersupply.net
aemcdonnell@avalonenergy.us
aleach@ohiomfg.com
alicia_stanworth@esource.com
amitrey@borderenergyinc.com
andrew.biackstone@algonquinpower.com
angela.schorr@directenergy.com
anixon@americanenergyconsulting.com
arazi@bcmsmail.com
arnoahill@aol.com
arnyf@ueallc.com
awilliams@reliant.com
bbrunell@questenergysolutions.com
bcrockett@championenergyservices.com
belliff@symmestownship.org
bellish@buckeyeenergybrokers.com
belpremayor@wirefire.com
bgawboy@ecova.com
bharvey@bexley.org
bhastedt@henrycountyohio.com
bilidauber@mariettaoh.net
bjhawbaker@midamerican.com
boconnell@bgoohio.org

dzvosec@uaiservices.com
eagleenergy@fuse.net
eahrold@fellowmccord.com
edouthit@powermgmt.com
edwin.dearman@gexaenergy.com
ehewitt@globalmc2.com
ekortkamp@nationallenergy.com
EKovach@greenhillsohio.org
ep-finance@comcast.net
eric@clearenergysolutions.org
ericthamesIO@yahoo.com
ericz@reflectivees.com
eschmitt@ces-ltd.com
evew@consumerenergysolutions.com
fargob@fes.com
fcasteel@tesllc.us
fehrenergy@gmail.com
frank@hepconsultant.com
frank@psisoft.net
fritzk@communitygreenenergy.com
fwarner@msiutilities.com
gary.a.jeffries@dom.com
GBoeres@hamilton-township.org
gbroska@cityofstreetsboro.com
gcarter@americanpowernet.com
gelam@stepresources.com
ghyder@patriotenergygroup.com
giancoladenny@gmail.com
gkent@powerbrokersusa.com
gkrassen@bricker.com
gmaier@massillonohio.com
gpozza@mmenergy.com
gregory.campbell@dplinc.com
huckhayes@aes-nrg.com

brian.mcdermott@traditionenergy.com
brian@prospectresources.com
brianc@xencomgreenenergy.com
btrietsch@prioritypower.net
burns@energyconsultinggroupplc.com
cahadden@gmail.com
caleb.berger@capitalenergy.net
carolyn@clearchoice-energy.com
cbressonlaketwp@rrbiznet.com
ccieminski@fuse.net
cday@prebco.org
cdlecce@highvoltageco.com
cfrey@cityofeuclid.com
cgeorge@arcenergyinc.com
chorne@gearyenergy.com
chris.eilerman@cincinnati-oh.gov
chris.greulich@northshoreenergy.com
chris.hendrix@texasretailenergy.com
citymanager@gallianet.net
citymanager@greenfieldohio.net
claytonb@genesiseneryinternational.com
cnguyen@acclaimenergy.com
commissioners@co.trumbull.oh.us
corey@bidurenergy.com
cynthia.brady@constellation.com
daryl@niconsulting.com
davidk@lockland.com
dbell@energypluscompany.com
dberry@achieveenergysolutions.com
dbodine@libertypowercorp.com
dbragg@rd-energy.com
dchiarelli@emr-energy.com
deljevicg@dteenergy.com
derrickp03@gmail.com
dgriffith@texzon.net
dhowell@archbold.com
dhwilliams@msn.com
dicsman@ci.sandusky.oh.us
diradm@campbellohio.gov
dkiine@tailmadge-ohio.org
dlhota@nationwideenergypartners.com
dlock@lockgroup.com
dmcdaniel@dublin.oh.us
don.wathen@duke-energy.com
donsai@solarvisionllc.net
Dottie.franey@gahanna.gov
dparham@springdaie.org
dpearsall@peoplespower.com
drinebolt@aol.com
dwiers@satorienergy.com
jmass@sevenutility.com
jmcnally@mahoningcountyoh.gov
jmorris@ondemandenergy.com
jnottingham@verdigrisenergy.com
joe.martuccio@cantonohio.gov
john.finnigan@duke-energy.com

humlaw2@att.net
inquiry@blackhawkrisk.com
jacob@calvertonconsulting.com
jamail@power2switch.com
james.picardo@healthtrustpg.com
javier@goodenergy.com
jayoub@pegasusenergyusa.com
jbishop@unitedenergyservices.net
jboyko@westchesteroh.org
jdeeds@ecrmanagement.com
jeff@energy.me
jeffs@blueflameenergyservices.com
jfox@viridian.com
jgunderson@inciteenergy.com
jheinmiller@aspenenergy.com
jheintz@brouse.com
jim@avionenergy.com
jkist@tugmgmt.com
jkooper@hess.com
jkwinters@onesourceenergygroup.com
jloop@worldenergy.com
jlore@twp.boardman.oh.us
jmartorella@rpac.ne
regulatory@clearviewelectric.net
rick@cienergysolutions.com
rick@cityofnorton.org
rickm@mogadorevillage.org
ricks@ohanet.org
rmarchiori@demandresponsepartners.com
robert_haehn@live.com
robpropp@live.com
roger.obrist@trademarkenergy.com
ron.taglieri@summitenergy.com
roy@sustainablestar.com
rplutzer@resglobal.com
ruzhd@starionenergy.com
rvpalmese@palmcoenergy.com
rwiegner@wrenergy.biz
sam@mwncmh.com
samuel.harper@arcelormittai.com
sandy@eisenbachconsulting.com
sbarnes@sjindustries.com
sbuckley@sciotoenergy.com
scotts@seworksllc.com
scoven@starkenterprises.com
secretary@cityofsalemohio.org
segmond.t@energymarketexchange.com
selena.wong@mcenergyinc.com
sgarson@bettercostcontroi.com
sgunther@energyeas.com
shane.mathis@intifcstone.com
shaunpandit@earlybirdpower.com
slahmer@amberleyvillage.org
ssimins@hikoenergy.com
stedson@energy-utility.com
steve.egger@lpenergy.com

john@ma-llc.net
joyce@perrytwp.com
jrenneker@nos.com
jrowan@coleraintwp.org
jsmith@gseusa.com
jtitus@topco.com
julian.mithani@gdfsuezna.com
jwarino@ci.canfield.oh.us
jwarrick@energyprofessionals.com
kcasse@rapidpower.net
kcelarek@greentwp.org
keith.ctt@zoominternet.net
kmalcolm@e-grp.com
koleary@cityofgirard.com
kschisler@enernoc.com
ktomaine@taylorccc.com
ktweber@aep.com
kurt@d@connectlenergy.org
lagov@windstream.net
laura@enterpriseenergyconsulting.com
iboggs@rittman.com
ldalessandris@firstenergycorp.com
ldavis@keytexenergy.com
lhaire@ci.reynoldsburg.oh.us
linda@tesenergyservices.com
lisa.simpkins@constellation.com
lisa.wadsworth@srectrade.com
lrokey@glendaleohio.org
m_etterling@yahoo.com
mallyn@urcenergy.com
marionva@allianceoh.gov
mark.hegemann@fpp-llc.com
mark@hospitalenergy.com
markmcguire@mc2energyservices.com
markmcguire@mc2energyservices.com
marty@commercialutility.com
mayor@auroraoh.com
mayor@cityofbarberton.com
mayor@cityofcortland.org
mayor@cityofgreen.org
mayor@cityofstruthers.com
mayor@hartvilleoh.com
mayor@munroefalls.com
mayor@villageofsilverlake.com
mayorb@navarreohio.net
mbishop@energyalliances.com
mbixler@eriecounty.oh.gov
mburns@ci.indian-hill.oh.us
mburns@naturalgas-electric.com
mdangelo@napower.com
mdockry@austintowntwp.com
merideek@bmarkenergy.com
mfrank@5linx.com
mfrye@palmerenergy.com
mhaugh@justenergy.com
mhensley@auglaizecounty.org

steve.etsler@aksteel.com
steve@suncomenergy.com
tbraun@cheviot.org
teresa.ringenbach@directenergy.com
teresa.ringenbach@directenergy.com
tfitzgerald@verdeenergyusa.com
tmcdaniel@vectren.com
tony.richard@utilitymanagement.org
trterracina@integrysenergy.com
tsicafuse@valley-group.com
tslocum@ricos.com
tstaton@uaoh.net
tucker@rjtenergy.com
villageofnewmiddietown@comcast.net
vjollca.jusufi@ppandu.com
vparisi@igsenergy.com
whitney@unitil.com
wzuretti@hess.com
xpensesolution@aol.com

BpsTeam1@yahoo.com
jhood@Hess.com
IVISStonecaps@yahoo.com
acoberly@nordicenergy-us.com
adam.gusman@glacialenergy.com
adelong@gasmark.com
admin@nuenergysolutions.net
agitonga@patapawa.com
akeilson@keilsonlaw.com
alex.kania@baml.com
allenJoseph_w@solarturbines.com
amitrey@border-energy.com
andrea.lacroix@govdelivery.com
angela.e.gordon@lmco.com
anita.schafer@duke-energy.com
ann.zalocco@thompsonhine.com
apartmentenergy@gmail.com
aphillips@firstenergycorp.com
aschorr@gesc.com
asonderman@keglerbrown.com
astansky@firstenergycorp.com
atoss@verdeenergyusa.com
aundrea.williams@nrgenergy.com
awilliams@libertypowercorp.com
barbara.bossart@puc.state.oh.us
barthroyer@aol.com
bchansouk@noblesolutions.com
bcrockett@championenergyservices.com
bellish@buckeyeenergybrokers.com
bjhawbaker@midamerican.com
bieemel.a@choiceenergyservices.com
bmcdonald@lacapra.com
boduaha@yahoo.com
bonds.anita@yahoo.com
brenda.carnahan@duke-energy.com

mhinnenkamp@springfieldtp.org
mhobson@energyedgeconsulting.com
michael.harris@unifiedenergy.com
mike@netgainenergyadvisors.com
mmatioc@encoa.com
mmiller@stow.oh.us
mmilliron@crestlineoh.com
mnickoson@brakeyenergy.com
mnuzzo@energyenablement.com
monteleonef@e-grp.com
mort@dehoffs.com
mpayne@appienergy.com
mritz@savewaveenergy.com
mrunck@volunteereenergy.com
msmith@sperianenergy.com
mstumpo@legacyenergy.com
naveen.rabie@gdfsuezna.com
nick@nextgenohio.com
nmorse@ci.reynoldsburg.oh.us
nrosekrans@coiemanhines.com
nstika@cose.org
ohioenergyprogram@gmail.com
pat@clarityenergyconsulting.com
pat@mucinc.com
paul.rudewick@optimalfms.com
paul@liveenergy.com
paul@myerutiitybroker.com
pbatz@americaapproved.com
pdugandzic@nusconsulting.com
pete.wszalek@utilitech.com
pgolden@pro-starenergy.com
phillipwilson@myenergytrust.com
pnero@integenergy.com
polandadmin@zoominternet.net
pomam@muirfieldenergy.com
pschmelzer@ci.findlay.oh.us
rabaey@ses4energy.com

edmiller004@wowway.com
edwin.dearman@gexaenergy.com
eenergy@roadrunner.com
egallon@porterwright.com
elizabeth.watts@duke-energy.com
elmiller@firstenergycorp.com
eric.brown@dplinc.com
eric.hayes@trademarkenergy.com
eric.roth@linde.com
eric.weidele@puc.state.oh.us
eschmitt@ces-ltd.com
evew@consumerenergysolutions.com
fgeary@gearenergy.com
fjmez@local270.org
fmurray870@aol.com

brian@abaenergypartners.com
britton.ellis@scc.virginia.gov
bryant.steve@millercoors.com
bryce.mckenney@puc.state.oh.us
bud2587@sbcglobal.net
burkj@firstenergycorp.com
carlene.wright@snrdenton.com
catherine_kortlandt@praxair.com
cathy@theoec.org
cburns@brewer-garrett.com
cdunn@firstenergycorp.com
chadb@cneenergy.com
charies.f.eisenhardt@conocophillips.com
chris.greulich@northshoreenergy.com
chris.hendrix@texasretailenergy.com
chuck.moore@termna.com
chughey@championenergyservices.com
cldetty@scp.utilities.com
cmiller@szd.com
cmooney2@columbus.rr.com
corey@bidurenergy.com
cwilcox@fes.com
cynthia.brady@constellation.com
dane.stinson@baileycavalieri.com
darrinp@streamenergy.net
david.fein@constellation.com
dbrown@nusconsulting.com
dbweiss@aep.com
dcetola@hess.com
dchiarelii@emr-energy.com
ddemaree72@gmail.com
delilahn@streamenergy.net
depps@snl.com
deucesup22@msn.com
dhart@douglasshart.com
diane.antonelli@exeloncorp.com
dianne.kuhnell@duke-energy.com
dick.bulgrin@puc.state.oh.us
djmeszaros@firstenergycorp.com
dlcelona@gmail.com
dmatthews@settlemuter.com
dmroush@aep.com
docket@stratcomilc.com
docketing@puc.state.oh.us
dona.seger-lawson@dplinc.com
dpienergy@dplinc.com
dplrd@aol.com
drapp@firstenergycorp.com
drtwin@msn.com
dryan@mwncmh.com
dsoule@emr-energy.com
dsullivan@nrdc.org
eagleenergy@fuse.net
ed@twinoakshvac.com
mboyle@firstenergycorp.com
mcrestani@realwinwin.com

gail.giasgow@streamenergy.net
gchristman@border-energy.com
geoffrey_craig@platts.com
gfackier@deloitte.com
gfbechert@sciotoenergy.com
ghenderson@everpower.com
glandsberg@procurian.com
gms.utiloperationsl@accenture.com
gpouios@enernoc.com
gpozza@mmenergy.com
greenikat62@yahoo.com
greg.price@puc.state.oh.us
gregory.hering@gmail.com
gswanson@emsenergy.com
harsh.acharya@bmo.com
heyrunnr@woh.rr.com
huckhayes@aes-nrg.com
igoodman@commerceenergy.com
info@goodenergy.com
infoclassl01@yahoo.com
ioriod@firstenergycorp.com
jack.keegan@puc.state.oh.us
james.picardo@healthtrustpg.com
jasherwood@aep.com
jay7236@gmail.com
jcablel4@hotmail.com
jcasadont@bluestarenergy.com
jchen@apgelic.com
jclark@mwncmh.com
jehlinger@omnisource.com
jeinstein@vounteerenergy.com
jennifer.lause@directenergy.com
jim.riley@ormet.com
jim.ziolkowski@duke-energy.com
jjones@iadder.com
jjrennie@aep.com
jkist@tugmgmt.com
jlang@calfee.com
jloop@worldenergy.com
jmcdermott@firstenergycorp.com
joel.glassman@glacialenergy.com
john.funk@yahoo.com
john.higgins@navigant.com
john.horstmann@dplinc.com
johntoth@firstenergycorp.com
joseph.clark@directenergy.com
josh.elsea@huntington.com
jrmorris@ondemandenergy.com
jroberts@enernoc.com
jseymour@ttcorp.com
jstott@tvii.biz
judi.sobecki@dplinc.com
juliehayes@aes-nrg.com
justfrj@yahoo.com
jvandonkelaar@yahoo.com
jwooster@patriotenergygroup.com

mdhartzler@embarqmail.com
melanie.elatieh@ugicorp.com
melissa.stanford@development.ohio.gov
mhaugh@justenergy.com
mhobson@energyedgeconsulting.com
mhpetricoff@vorys.com
michael.arberg@lpbenergy.com
michele.bolden@pncmortgage.com
mike.bjorkman@govdelivery.com
mjsatterwhite@aep.com
mkuchera@bluestarenergy.com
mljeunelot@aep.com
mloeb@bidurenergy.com
mmccarthy@ambientcorp.com
moffice@ovec.com
morganm@et-elect.com
morrisey.sean@gmail.com
mstarck@independenceenergyco.com
mswary@borderenergyinc.com
mvfiscalofficer@yahoo.com
mwarnock@bricker.com
mzavislan@buckeyepower.com
mzemke@bricker.com
nathan.parke@dplinc.com
naveen.rabie@gdfsuezna.com
neads@lallycpa.com
nsevaraj@aep.com
nstika@cose.org
nu.energy.ns@gmail.com
ohiosc@gmail.com
olavokark@yahoo.com
operations@energywindow.com
ottoelectric@gmail.com
parts@bobgillinghamford.com
patj@oaima.org
pattersonk@tipcity.net
pauia84mail@yahoo.com
pawilliams@reliant.com
peggy.laub@duke-energy.com
peter.cavan+puco@puiseenergy.com
pgiannamore@heraldstaronline.com
pomam@muirfieldenergy.com
pshorr@speccap.com
rajeev.lalwani@ms.com
rajkovic@umich.edu
randall.griffin@dplinc.com
ravidevara@rocketmail.com
razimmer@gannett.com
rcdruss@yahoo.com
rchristian@vectren.com
rgannon@mwncmh.com
rgerdeman@midwestrec.com
rjohnson@clevelandthermal.com
rmbulgrin@gmail.com
robert.wolfe@puc.state.oh.us
robyn.livesay@dplinc.com

jzornes@ohioenergycoop.org
kammstarl@aol.com
karen.sealy@snrdenton.com
kate.stanley@constellation.com
kawall@pplweb.com
kbojko@enlightenedenergyadvisors.com
kcarrier@embarqmail.com
kcouper@bellsouth.net
kderickson@stepresources.com
kirsty.norvell@unifiedenergy.com
kjefferY@rhainc.com
kjkolich@firstenergycorp.com
kkavali@firstenergycorp.com
korkosza@firstenergycorp.com
krogers@emsenergy.com
kstump@woh.rr.com
ktieken@vectren.com
kurt.helfrich@thompsonhine.com
lamedas@fes.com
lbhacker@aep.com
ldavis@keytexenergy.com
leddenr@firstenergycorp.com
leighann.berger@linde.com
leslie.kovacik@toledo.oh.gov
leslie.kroeger@hkiaw.com
leslie@bluewaterwind.com
linda.cavanaugh@dplinc.com
lindaj@americanpowernet.com
ljsark@sbcglobal.net
lkecker@aep.com
imcalister@bricker.com
lorentzka@aol.com
magrawal@globaldata.com
magundeifinger@aep.com
mammasu@gmail.com
mardi.ditze@communityenergyinc.com
mark.bellamy@puc.state.oh.us
marketresearch@pplweb.com
massiem@firstenergycorp.com
mbeirne@amppartners.org
mbowen@franklinenergy.com
william.adams@baileycavalieri.com
wynnm@firstenergycorp.com
wzigli@cpp.org
yang.Y.song@credit-suisse.com
ychouemail@yahoo.com

rosemary.troxle@gexaenergy.com
rrgal3@yahoo.com
ryan_coleman@ham.honda.com
rzdunkewicz@acclaimenergy.com
sallyjok@yahoo.com
S3weaver@aep.com
sbuckleY@sciotoenergy.com
scott.langleY@dplinc.com
sdoover@standenergy.com
sdsaliba@gmail.com
searslawrence@yahoo.com
seiselstein@porterwright.com
selisar@mwncmh.com
sharon.lam@duke-energy.com
sharonhillman@mc2energyYservices.com
sherry.bannister@dplinc.com
shopson@napower.com
shornyak@aep.com
singleton@firstenergycorp.com
sjdias@aep.com
skmeyers@aep.com
slhill@aep.com
slosh@clevelandthermal.com
smaye@nappartners.com
smiller@gongwer-oh.com
sritchard@dovetailsoiar.com
squade@firstenergycorp.com
sschweitzer@strategygroupmedia.com
starkw@firstenergycorp.com
stephen.bennett@exeloncorp.com
stevechc5626@yahoo.com
stnourse@aep.com
sue2811@roadrunner.com
swilliamstudor@Yahoo.com
tatavega2007@att.net
tbarnhart@worldenergy.com
tdavies@ecova.com
teresa.ringenbach@directenergy.com
tfarinacci@emr-energyY.com
throcmorton.dean@gmail.com
tina.watkins@puc.state.oh.us
tito.cavallo@uc.edu
tieach@amp-ohio.org
tmcunningham@aep.com
tnedwick@nhtinc.org
tony.brigano@hickspartners.com
torahood@bricker.com
tquaii@crestlineoh.com
twechter@firstenergycorp.com
vic.gallina@puc.state.oh.us
vleach-payne@mwncmh.com
vturner@championenergyYservices.com
wchen@ecsgird.com
will.kenworthY@tipenergy.com

HUDSON ENERGY SERVICES LLC
Vanessa Anesetti-Parra Regulatory
Compliance
6345 Dixie Rd Suite 200
Mississauga ON L5T2E6

BEST ENERGY LLC
Ty Ball COO
233 S Wacker Dr 84th Floor
Chicago IL 60606

**INTERNATIONAL MARKETING
BUSINESS GROUP LTD**
Edward Abdoney
5600 Monroe St Suite 203A
Sylvania OH 43560

DEFINITIVE ENERGY GROUP INC
David Bruce Owner
990 Pinecrest Dr
Sugar Grove IL 60554

Village of Catawba
Arlie Addis Sr Mayor
115 S Persimmon St
PO Box 25
Catawba OH 43010

Atlas Scinergy, Inc.
Andrew Davis President & CEO
829 Sherman Avenue
Evanston IL 60201

CHICAGO POWER COMPANY LLC
James Wahl Owner
6955 W Calla Dr
Tucson AZ 85743

AEP Energy Inc
Madelon Kuchera VP Regulatory
363 W Erie St Suite 700
Chicago IL 60654

Noble Americas Energy Solutions LLC
Bryan White Regulatory Compliance
Analyst
401 West A Street Suite 500
San Diego CA 92101-3017

VAN WERT COUNTY
Larry Clouse
114 E Main St Suite 200
Van Wert OH 45891

**WORTHINGTON ENERGY
CONSULTANTS LLC**
Fred Graft
445 Hutchinson Ave Suite 800
Columbus OH 43235

City of Washington Court House
Joe Denen City Manager
105 North Main Street
Washington CH OH 43160

City of Fairborn
Randy Groves Finance Director
44 West Hebble Avenue
Fairborn OH 45324

Columbus Southern Power Company
Selwyn Dias Director, Regulatory Services
850 Tech Center Dr
Gahanna OH 43230

WILLIAMS COUNTY
Lewis D Hilkert Commiss
100 S MAIN STREET 1 COURTHOUSE
BRYAN OH 43506

Village of Tremont
Paula Johnson Mayor
24 Bloese St
PO Box 184
Tremont City OH 45372

VILLAGE OF NEW PARIS
Sharon Schroder Owner
301 W Cherry St
New Paris OH 45347

Village of Fredericktown
Alan Kintner Mayor
2 E Sandusky Street
Fredericktown OH 43019

TELCO PROS INC
Kari Shaw COO
2806 Payne Ave
Cleveland OH 44114

BKE MECHANICAL INC
John Lyons President
11524 W 183rd St Suite 200
Orlando Park IL 60467

NOBLE AMERICAS GAS & POWER
CORP
Anna Chacko Emerald Energy Retail
4 Stamford Plaza 107 Elm Street
Stamford CT 6902

TMGES INC
Merrill Mangalasseril
1602 S Indiana Ave Suite 304
Chicago IL 60616

US ENERGY MANAGEMENT LLC
James Applegate President
7905 9th Ave S Street
St Petersburg FL 33707

AMERICAN UTILITY MANAGEMENT INC
Jeff Peterson Secretary
333 E Butterfield Rd 3rd Fl
Lombard IL 60148

THE COUNCIL ON NORTHEAST
ENERGY
Joan Brown Treasurer
6105 Park Blvd
Pinellas Park FL 33781

SOURCEONEINC
Brant Davis Sourceone Inc
132 Canal St
Boston MA 2114

OPTIMUM GROUP LLC
Darren Reed VP
34 Ellis Ct
Morganville NJ 7751

Ohio Power Company
Selwyn Dias VP Regulatory & Finance
850 Tech Center Drive
Gahanna OH 43230

Linde Energy Services, Inc.
Karen Weeks Energy Market Analyst
1 Greenwich Street Suite 200
Stewartville NJ 8886

COLUMBIA TOWNSHIP
C. Michael Lemon
5686 Kenwood Rd
Cincinnati OH 45227

YELLOW CREEK TOWNSHIP
Arland Smith
42793 Oak Ridge Rd
Wellsville OH 43968

RIVERSIDE ENERGY INC
Sherri Loscko President
545 Metro Place South Suite 100
Dublin OH 43017

ALLEN COUNTY
Greg Sneary
301 N Main St
Lima OH 45802

LYKINS OIL COMPANY
Robert Manning CFO
5163 Wolfpen Pleasant Hill Road
Milford OH 45150

City of Bucyrus
Thomas Teynor Service-Safety Director
500 S. Sandusky Ave
Bucyrus OH 44820

CITY OF KENTON
Randy Manns City of Kenton
111 W Franklin St
PO Box 220
Kenton OH 43326

Cleveland Electric Illuminating Company
Harvey Wagner VP and Controller
76 South Main Street
Akron OH 44308

City of Mount Vernon
Richard Mavis Mayor
40 Public Square
Mount Vernon OH 43050

HOCKING COUNTY
John Walker
1 E Main St
Logan OH 43138

City of Cleveland Heights
Robert Downey City Mgr
40 Severance Circle
Cleveland Heights OH 44118

NEWGENERGY LLC
Jeffry Parker CEO/CFO
2675 Windmill Pkwy #3823
Henderson NV 89074

HARDIN COUNTY
Edward Elliot Commiss
1 Courthouse Square Suite 100
Kenton OH 43326

TREBEL LLC
Scott Belcastro Owner
4067 Treeline Ct
Westerville OH 43082

City of Ravenna
Kelly Englehart Service Director
210 Park Way
Ravenna OH 44266

Ohio Valley Electric Corporation
John Brodt Secretary & Treasurer
3932 US Route 23
Piketon OH 45661

City of East Liverpool
Brenda Fargo Govt. Aggregator
126 W. 6th Street
East Liverpool OH 43920

ADVEN RESOURCES LLC
Steven Mittelmeier Adven Recources
13518 TradewindsDr
Strongsville OH 44136

Miami Valley Communications Council
John Weithofer Executive Director
1195 East Alex-Bell Road
Centerville OH 45459

Amerex Brokers LLC
Amalia Berrios Counsel
1 Sugar Creek Center Blvd Suite 700
Sugar Land TX 77478

AP GAS & ELECTRIC (OH) LLC
Jeff Chen VP
6161 Savoy Dr Suite 500
Houston TX 77036

BRANDED RETAIL ENERGY CO LLC
Justin Helms CFO
200 Crescent Court Suite 1070
Dallas TX 75201

IRON ENERGY LLC
David Luppino President
1114 Lost Creek Blvd Ste 410
Austin TX 78746

ENERGY AUCTION EXCHANGE LLC
Kelly Curtis Director
3557 W 9800 South Suite 250
South Jordan UT 84095

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