

Office of the Ohio Consumers' Counsel

ANNUAL REPORT



2025

Advocating for Affordable and Reliable
Utility Services for Ohio Families

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“The information shared by OCC’s Outreach and Education Specialist equips our organization’s staff with the knowledge and resources needed to better help families who are struggling to make ends meet, helping us guide them toward more informed decisions about their utility costs and financial stability.”

~ Clayton Genth, Executive Director, Home is the Foundation

“I appreciate that our regional Outreach & Education Specialist keeps our county providers up to date on what types of assistance are available, changes, and consumer alerts so we are well informed.”

~ Kristi Hannan, PhD, Associate Director, Lucas County Family Council

About the Office of the Ohio Consumers' Counsel



The Office of the Ohio Consumers' Counsel (OCC) is the statewide legal representative for Ohio's residential consumers in matters related to investor-owned electric, natural gas, telephone and water services. Led by the Ohio Consumers' Counsel, the

Agency advocates for consumers in proceedings before the Public Utilities Commission of Ohio (PUCO), the Supreme Court of Ohio, federal regulatory agencies, appellate courts and the Ohio General Assembly.

The Agency also monitors public utilities' compliance with regulatory standards for consumer protection. OCC educates consumers about utility issues that affect their bills and quality of service.

The Consumers' Counsel is selected by a nine-member, bipartisan governing board representing family farmers, organized labor, and residential consumers. Each governing board member is appointed by the Ohio Attorney General. OCC has 36 employees and a fiscal year 2025 operating budget of \$6.3 million.

Since the Agency's inception in 1976, OCC has helped to save Ohio utility consumers billions of dollars in avoided utility charges, advocated to create payment assistance programs for low-income consumers and worked to safeguard consumer protections. The Agency's staff has educated thousands of utility consumers about energy choices and ways to save money on their bills.

Mission

The Ohio Consumers' Counsel advocates and educates to secure for Ohioans affordable, reliable and equitable residential utility services that are essential to their well-being.

Vision

To be an independent voice of Ohio residential consumers, including at-risk communities, for achieving justice, equity and regulatory reform regarding their utility services.

Core Values

Justice

We will advocate for what is fair and equitable for Ohio's residential utility consumers.

Respect

We will treat each other, our partners and the public with consideration and appreciation.

Excellence

We will produce work that is high quality and we will strive to continuously improve our services.

Integrity

We will conduct ourselves in a manner consistent with the highest ethical standards.

Communication

We will share information and ideas to contribute to the making of optimal decisions by our colleagues and ourselves.

Fiscal Report

This report is for Fiscal Year 2025 that ended June 30, 2025. The Agency is not funded through the General Revenue Fund of the State (tax dollars). Instead, OCC is funded through an assessment on the intrastate gross receipts of entities regulated by the PUCO based on Section 4911.18 of the Ohio Revised Code. The Agency assessed 1,310 regulated entities for operating funds for Fiscal Year 2025.

Operating Budget Expenditures

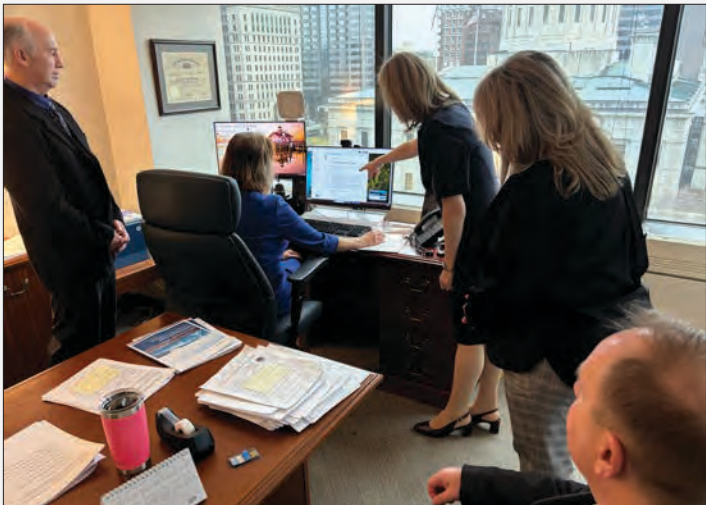
Payroll and Benefits	\$ 4,643,237
Purchased Personal Services	\$ 982,197
Supplies and Maintenance	\$ 514,904
Equipment	\$ 10,679
Total	\$ 6,151,017

Budget

OCC’s Funding Costs Consumers Less Than 3 Cents for Every \$100 Consumers Pay for Utility Services

OCC delivers significant value to consumers. In fact, our research shows that over the past five years, every \$1 spent on funding OCC resulted in approximately \$29 in direct residential consumer savings, producing an excellent return on investment for consumers in the state.

Over the past 15 years OCC’s purchasing power has been drastically eroded as the Agency budget did not keep pace with inflation. We will continue to strive to restore OCC’s budget so that the Consumers’ Counsel can continue to adequately and effectively advocate for Ohio’s residential utility consumers.



The Consumers’ Counsel reviews costs affecting Ohioans’ utility bills with the Deputy Consumers’ Counsel and other senior management.

Highlights

- **\$400+ Million in Consumer Savings Secured**

OCC achieved a major victory for Ohio consumers when the U.S. Supreme Court denied utilities' petitions for review of OCC's victory at the Sixth Circuit Court of Appeals. The decision eliminates an unnecessary profits adder for Ohio electric utilities, securing more than \$400 million in savings through 2031. Additional savings are expected in future years.

- **\$276 Million in Restitution from FirstEnergy**

After six years of advocacy by OCC, the PUCO approved a settlement requiring FirstEnergy to pay \$276 million to consumers for its misconduct in the House Bill 6 scandal. The settlement delivers \$25 million more for consumers than the amount originally ordered by the PUCO.

- **Coal Subsidies Ended and Electric Security Plans Eliminated**

OCC's leadership and policy advocacy helped secure enactment of House Bill 15, landmark legislation that eliminated pro-utility electric security plans (ESPs) and ended costly coal subsidies provided to Ohio utilities.

- **Greater Transparency and Accountability at the PUCO**

OCC's advocacy led the PUCO to change its long-standing practice of giving utilities early access to draft "independent" audit reports before they are filed in the public docket – strengthening transparency and reducing the potential for undue utility influence.

- **Consumers Protected from Data Center Infrastructure Costs**

OCC helped secure a PUCO-approved settlement among AEP, OCC, and others that protects consumers from bearing the infrastructure costs of data centers.

- **Up to \$82 Million in Potential Refunds for AES Ohio Consumers**

OCC successfully appealed a PUCO order that allowed AES Ohio to retain excessive profits charged to consumers. The decision paved the way for consumer refunds of up to \$82 million.

- **Expanded Consumer Outreach and Education**

OCC expanded its digital outreach in 2025, posting across five social media platforms and launching its Facebook page. OCC also launched its electronic consumer newsletter, increasing access to consumer alerts, case updates, and assistance information.

- **National Leadership in Consumer Advocacy**

OCC hosted the National Association of State Utility Consumer Advocates (NASUCA) 2025 Mid-Year Meeting, and participated in several panels, including NASUCA – The Original Story, presented by the Consumers' Counsel and three of her predecessors.

Governing Board Chair Message

Message from Michael Watkins

As Chair of the Ohio Consumers' Counsel Governing Board in 2025, it is my privilege to present, on behalf of the Board, this Annual Report to the Ohio General Assembly describing OCC's expenditures, participation in proceedings and other activities for the year.

The Board extends its sincere thanks to Ohio Consumers' Counsel Willis, Deputy Consumers' Counsel O'Brien and the OCC staff for their outstanding work in meeting many challenges while advocating for Ohio's residential consumers.

Over the past year, our priorities focused on fighting unjustified utility rate increases and protecting affordable energy access as financial pressures continue to grow for Ohio households.

I am particularly proud that, after six years of sustained effort calling for accountability, the PUCO ordered \$251 million in penalties tied to the FirstEnergy misconduct investigations. Through continued engagement and negotiation, OCC helped increase the total to \$276 million, ensuring that every dollar would directly benefit consumers. Importantly, the agreement dedicates \$10 million to bill-payment assistance for vulnerable residential customers and another \$10 million to home weatherization programs that help low-income homeowners and renters reduce long-term energy costs.

As Ohio addresses the influx of data centers and the financial and reliability impacts of connecting them to existing infrastructure, OCC has worked to ensure residential consumers are not left bearing unfair costs. The Agency challenged excessive natural gas, electric, and water rate increases; opposed cost shifts to households; and advocated for stronger reliability standards and expanded consumer assistance funding. OCC also worked to prevent service disconnections for vulnerable families, increase transparency in utility spending, educate consumers about their rights, and secure stronger protections for consumers in submetered housing.

I want to express my gratitude to Vice-Chair Cheryl Grossman and the other members of OCC's Governing Board for their dedication to Ohio consumers. I also thank Governor DeWine, Attorney General Yost, and members of the Ohio General Assembly for their ongoing support on issues affecting millions of residential utility consumers.

The Governing Board members, the Vice-Chair, and I have been honored to continue the Agency's long tradition of public service to Ohio consumers.



Michael Watkins
Ohio Consumers' Counsel Governing Board Chair

Ohio Consumers' Counsel Message



Message from Ohio Consumers' Counsel Maureen Willis

As the Office of the Ohio Consumers' Counsel approaches its 50th year of service, 2025 stands out as a defining year for utility accountability in Ohio.

After six years of persistent advocacy that began with OCC's September 2020 accountability request, the Public Utilities Commission of Ohio ordered \$251 million in penalties arising from the FirstEnergy misconduct investigation. OCC then played a critical role in negotiations that increased those penalties to \$276 million – with every dollar directed to benefit consumers. The settlement includes \$20 million for energy assistance programs to help low-income consumers.

Accountability at FirstEnergy was only part of this year's progress. OCC also pressed for and secured improvements to Ohio's electric rate case process and reforms strengthening the independence of utility audits at the PUCO. These structural changes will improve transparency, oversight, and fairness for years to come.

Affordability remains the core of OCC's mission. Ohio consumers should pay only for prudent and necessary utility costs – not inflated spending, avoidable mistakes or corporate misconduct. OCC's focus has been unwavering: protect consumers first.

I am grateful to the OCC Governing Board, led by Chair Watkins, whose steady and thoughtful leadership strengthened this Agency. We welcome Cheryl Grossman as she assumes the role of Chair.

Thank you to the lawmakers who engaged with us in serious, substantive dialogue. House Bill 15 may be the most consumer-focused utility law enacted in two decades – proof that thoughtful reform is possible when consumer interests are prioritized.

I am also thankful for collaboration with Governor DeWine's office, Attorney General Yost's team, and local leaders who joined us in challenging excessive utility spending.

Finally, I want to recognize the OCC team. We are small compared to the armies of lawyers and consultants employed by utilities. But our Legal, Analytical, Public Affairs, and Operations teams deliver results that matter. Our team proves that disciplined, focused advocacy can make a real difference.

In 2025, OCC did more than participate in proceedings – we changed outcomes. And as we enter our 50th year, we remain committed to strengthening accountability, advancing transparency, and ensuring that Ohio consumers receive reliable, affordable utility service.

A handwritten signature in blue ink that reads "Maureen R. Willis".

Maureen R. Willis
Ohio Consumers' Counsel

Governing Board

The Ohio Attorney General appoints nine members to the Consumers' Counsel Governing Board by law. The Board consists of three members each for residential consumers, organized labor and family farmers. No more than five members of the Board may be from the same political party. Board members are subject to confirmation by the Ohio Senate and serve three-year terms. The Board is responsible for appointing the Consumers' Counsel (Agency Director) and the Deputy Consumers' Counsel.



Michael A. Watkins

Chair, 2017 – 2025
Vice-Chair, 2015 – 2017
Term(s): 2010 – 2026
Representing: Organized Labor
Hometown: Elida

Michael Watkins has served as a member of the Fraternal Order of Police (FOP), Lima Lodge No. 21 since 1976 when he began his career as a police officer in Lima. He retired as an active law enforcement officer in 1999. He served six terms as president of FOP Lima Lodge No. 21 and currently serves as the recording secretary. Mr. Watkins was employed by The Fraternal Order of Police, Ohio Labor Council, Inc., as an administrative assistant from 2003 until 2020. He was trustee of the FOP's 6th district from 1993 to 1995 and has served in that position again since 2007.



Cheryl Grossman

Chair, 2026 – present
Vice-Chair, 2022 – 2025
Term(s): 2019 – 2026
Representing:
Residential Consumers
Hometown: Grove City

Cheryl Grossman is a former State Representative (23rd House District) and Mayor of Grove City. She was a member of the General Assembly from 2009 to 2017, where she served as Assistant Minority Whip, Assistant Majority Whip and Majority Whip. She has received more than 30 legislator awards, including the 2016 National Autism Speaks Legislator of the Year. Ms. Grossman chaired the Transportation Subcommittee, Gas Tax Task Force and the Ohio Housing Study Committee, as well as served on several additional committees. She is a founding member of the Grove City Rotary Club and serves on the BIA Foundation Board, Ohio Access to Justice Board, and the Stynchula Family Foundation. She is a lifelong resident of Grove City.



Governing Board



Randy Brown

Term(s): 2022 – 2025

Representing: Family Farmers

Hometown: Nevada

Randy Brown is a fifth-generation farmer in Wyandot County. Mr. Brown and his son grow corn and soybeans and are also contract pig growers. Mr. Brown presently serves on the Wyandot County Community Foundation Board and the Wyandot Popcorn Museum Board. In the past, he served on the United States Pork Center of Excellence Board, Ohio Pork Council Board, Wyandot County Farm Bureau Board, Ridgedale School Board, and the National Pork Board.



David Fleetwood

Term(s): 2022 – 2025

Representing: Organized Labor

Hometown: Toledo

David Fleetwood, a 35-year Member of Laborers International Union of North America (LIUNA) Local 500, was elected as Business Manager in 2013 and has served as Business Manager/Secretary-Treasurer since May 2017. Mr. Fleetwood has served his industry as Union Steward, Foreman, General Foreman, Recording Secretary, Executive Board Vice President, Business Agent, International Convention Committee on Apprenticeship, Ohio Laborers' District Council Delegate, Ohio Laborers' District Council Auditor, Ohio Laborers' District Council Sergeant At Arms, Greater Northwest Ohio AFL-CIO Executive Board Member & Current President, Northwest Ohio Building and Construction Trades Council President Executive Board Member and Current President. He served or is serving his community as Lucas County Workforce Development Board Member; Co-Chair of the Toledo Community-Police Relations and Reform Committee; Toledo-Lucas County Port Authority Board of Directors as Member, Vice-Chairman, and past Chairman.



Dorsey Hager, Jr.

Term(s): 2020 – 2027

Representing: Organized Labor

Hometown: Marysville

Dorsey Hager comes from a family with an extensive organized labor background. His mother retired from Navistar International where she was a member of the International Association of Machinists and Aerospace Workers. His father's career spanned over 30 years as a member of the United Association of Plumbers and Pipefitters Local 189. Dorsey became an apprentice member of the International Association of Heat and Frost Insulators Local 50 on Sept. 11, 1994. In May of 1998, he completed his apprenticeship and became a journeyman insulator. He served his local union in elected office as Financial Secretary and as Business Manager. In March of 2014, he was elected to his current position as Executive Secretary-Treasurer of the Columbus/Central Ohio Building & Construction Trades Council. He and his wife of 26 years, Michelle, live in Marysville.



Bruce L. Lackey

Term(s): 2024 – 2027

Representing:

Residential Consumers

Hometown: Hilliard

Bruce Lackey has been a second generation owner-operator of Happy Chicken Farms and Merry Milk Maid, since joining full time out of college in 1975. These family businesses distribute fresh eggs, dairy and ice cream products to restaurants, retail grocery, convenience stores, schools, bakery and institutional customers across central Ohio. Mr. Lackey also served in the leadership positions for Midwest Foods Association, Midwest Farms and Midwest Egg Marketing for decades. Mr. Lackey's commitment to helping others is evident in his various volunteer positions with local charitable groups including Boy Scouts of America, The Salvation Army and Children's Hunger Alliance. Mr. Lackey and his wife of 45 years have three children, three grandchildren and are active members of Saint Timothy parish in northwest Columbus.

Governing Board



Jan Shannon

Term(s): 2019 – 2025
Representing:
Residential Consumers
Hometown: Orient

Jan Shannon is retired after serving as the Executive Director of the Pickaway County Community Foundation. Ms. Shannon began that career after completing a 30-year career with the state of Ohio. She is a farm owner and advocate for agriculture. Ms. Shannon currently contracts with non-profits in Pickaway County to assist them in moving their missions forward to better serve their community. In addition, Ms. Shannon also serves on the Pickaway Ross Career and Technology School Board and the Muhlenberg Board of Zoning Appeals. She is a graduate of the AgriPower VIII program with the Ohio Farm Bureau, officer in Circleville Sunrise Rotary, Assistant District Governor with Rotary District 6690, and enjoys volunteering and serving her community.



Josh Yoder

Term(s): 2022 – 2027
Representing: Family Farmers
Hometown: Plain City

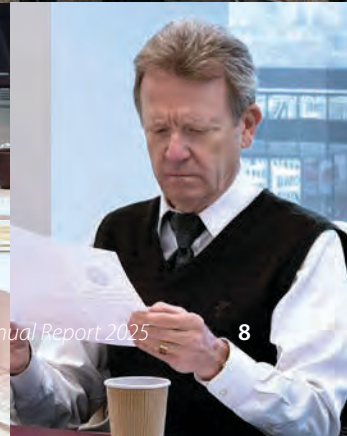
Josh Yoder is a fifth-generation farmer and operates his own retail business selling seed and crop inputs to local farmers. Mr. Yoder previously served with the Ohio Corn & Wheat Growers Association on the Ohio Corn Marketing Program Board of Directors. He is a member of his township's zoning commission and is an adjunct professor for Rosedale Bible College teaching microeconomics. Mr. Yoder has a Bachelor of Science in Agribusiness and Applied Economics from The Ohio State University, a Masters of Science in Agricultural Economics, and a Masters of Business Administration from The Ohio State University.



Connie Skinner

Term(s): 2020 – 2026
Vice-Chair, 2026 – Present
Representing: Family Farmers
Hometown: Delaware

Connie Skinner and her family are sixth-generation crop farmers, operating Hardscrabble Farms in Delaware County, Ohio, which began in 1912. She also serves her community as a Brown Township Trustee, is an active member of her church and her local rotary club. Ms. Skinner currently serves on the Delaware County District Library Board and is treasurer for the Delaware County Township Association. New adventures for her this year include volunteering with HelpLine and serving on the Ohio Township Association Service Corp. Board. She previously served on the Delaware County Farm Bureau Board. Ms. Skinner enjoys serving the people of her community and state.



Leadership



Maureen Willis **Consumers' Counsel** **and Agency Director**

Maureen Willis became Ohio's fifth Consumers' Counsel on Oct. 1, 2023, following her appointment by the Agency's Governing Board on June 30, 2023. She previously served as Acting Legal Director starting in April of 2023. Before that Maureen spent eight years as the Office of Consumers' Counsel (OCC) Senior Counsel.

In total, Ms. Willis has devoted more than 27 years of her career to representing residential utility consumers.

Maureen began her public service at the OCC in 1982 as a legal intern and was hired as a Staff Attorney in 1983 after earning her Juris Doctor from Capital University.

She holds a bachelor's degree in criminal justice from the University of Dayton. She left Columbus to work for the Office of the People's Counsel in Washington, D.C., a consumer advocacy agency focused on utility matters, and subsequently returned to Ohio to serve as an Assistant Consumers' Counsel.

During a period away from the Agency to raise her three children, Ms. Willis continued to build her expertise in public utility law and public service. Her work during the time included service with Hahn, Loeser & Parks; the Ohio Attorney General's Office as Special Counsel; and the Montgomery County Prosecutor's Office. She returned to the OCC in 2004, bringing with her a broad perspective on utility regulation, litigation and consumer protection.

As Consumers' Counsel, Ms. Willis leads the Agency's mission to advocate for fair, just, and reasonable utility rates and practices on behalf of Ohio's residential consumers.



Angela O'Brien **Deputy Consumers' Counsel** **and Legal Director**

Angela O'Brien was appointed Deputy Consumers' Counsel in June 2023, by the Consumers' Counsel Governing Board. Angela is also the Legal Director for the Agency. She is one of the Board's two appointees for leading the Agency, the other being the Consumers' Counsel (Agency Director). Her leadership initiatives include achieving justice, equity and regulatory reform for residential utility consumers, as stated in OCC's Vision.

Angela also served Ohioans for four years as an Assistant Consumers' Counsel. She was named OCC Employee of the Quarter two times for excellence in case work. Previously, Angela was in private practice. She practiced for a decade in the Regulated Industries group at Mayer Brown in Chicago. Earlier, she practiced in the Energy and Utilities group at Barnes & Thornburg in Indianapolis. Her work at both firms included representing regulated utilities and competitive energy suppliers and appearing before state public utility commissions in Indiana and Illinois. In 2015, Angela and her family moved from Chicago to the Columbus, Ohio area. Angela earned her B.A. from the University of Houston and her J.D. from the Indiana University School of Law.

Leadership



David Basich
Analytical Services Director

David Basich is the Director of the Analytical Services Department with OCC. David joined the Agency in 2024 and oversees a team of analysts advocating on behalf of Ohio's 4.5 million residential utility consumers. Prior to joining

OCC, David served as Director of Energy Operations at Washington Prime Group, where he was responsible for a \$35M utility budget in over 100 retail facilities. David has more than 25 years in the energy field including prior experience serving as the Energy Office Administrator for the City of Denver, Colorado and the Energy Manager for the University of North Carolina, Greensboro. David obtained both his MBA (Finance) and BET degree in Electronic Engineering Technology from the University of Toledo.



Matt Corlett
Operations Director

Matt is the Operations Director and has more than 27 years of experience in state government administration. He began his career with the Department of Public Safety and served in a variety of roles including procurement, payroll, internal

audit, and budget for more than 17 years before going to the Board of Pharmacy as Director of Administration. He served in that role for 7 years and led the Board's HR, fiscal, and IT operations. Most recently, he was CFO for the PUCO for over 2 years. Matt has a bachelor's degree in business administration from Mount Vernon Nazarene University.



Merrilee Embs
Public Affairs Director

Merrilee Embs is the Director of OCC's Public Affairs Department. Merrilee joined the OCC in March 2019 and was named Director in January 2024. She oversees the Public Affairs Department to support OCC's efforts in communications,

outreach and education and legislative services. She is currently working toward a Ph.D. at Tiffin University. She earned a Master of Science Degree in Mass Communications/Public Relations from Murray State University in 2022 and a Bachelor of Arts in Mass Communications/Journalism from Wright State University in 1995. In addition, she has more than 25 years' experience in editorial publishing, business operations with multiple daily and weekly newspapers, as well as health care public relations.



Left to Right: David Basich, Merrilee Embs, Maureen Willis, Angela O'Brien, Matt Corlett

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Partnerships

OCC frequently partners with other consumer advocacy groups to advance consumer protection goals. The Agency joined with these groups to help get the best rates for consumers and gain additional consumer protections at the PUCO and the legislature. OCC is grateful for the opportunity to work with other agencies and their staff, who courageously serve the public interest. Additionally at FERC, OCC partnered with other state consumer advocates in Illinois, Maryland, New Jersey and the District of Columbia.

Northwest Ohio Aggregation Coalition



OHIO'S ELECTRIC COOPERATIVES

Your Touchstone Energy® Cooperatives 

LOW INCOME DIALOG GROUP

OCC Legislative Impact 2025


19 Legislative
Testimonies


9 Bills
Addressed

Major Win

HB 15



- Ended Electric Security Plans and Coal Subsidies

Consumer Priorities Ahead



- Submetering



- Utility Billing Transparency



- Nominating Council Reform



- Data Centers

— 2025 Legislative Timeline —

Jan-Feb



OCC Testified
on Key Bills

Mar



House Bill 15
OVEC Subsidies
Repealed

May



House Bill 15 Enacted
OVEC Subsidies Repealed

June



Push for Consumer
Protections

Year-Round



Ongoing Advocacy
for Ohio Consumers

Legislative Activities

OCC represented Ohio utility consumers before the General Assembly, advocating for policies that strengthen affordability, transparency, and accountability in utility regulation. During the year, the Consumers' Counsel and OCC staff testified 19 times on nine separate bills addressing coal subsidies and electric security plans, community energy, submetering protections, natural gas regulation, demand response programs and billing transparency.

Through sustained engagement in the legislative process, OCC helped advance important consumer protections and regulatory reforms. To review OCC testimony on these measures, visit www.occ.ohio.gov/testimony.

Legislative Activities

House Bill 15 Ends Costly Coal Subsidies and Electric Security Plans

After nearly a decade of litigation and legislative advocacy by the OCC, House Bill 15 marked a major step forward for residential utility consumers. Signed into law by Governor DeWine in May 2025, the legislation repealed electric security plans and eliminated consumer-funded subsidies for the Ohio Valley Electric Corporation (OVEC) coal plants.

For years, ESPs allowed utilities to impose add-on charges with limited regulatory scrutiny. Their repeal restores a more transparent and competitive framework for electric service in Ohio.

House Bill 15 also ended subsidies for OVEC's Kyger Creek plant in Ohio and the Clifty Creek plant in Indiana. Built in the 1950s to supply electricity to a federal uranium-enrichment facility in Piketon, the plants later became uneconomic in competitive markets. Nevertheless, Ohio consumers were required to cover their losses through the "Legacy Generation Resource Rider."

Since the passage of HB 6, Ohio consumers paid more than \$500 million to support the plants. Although cost recovery began earlier through PUCO-approved riders, HB 6 codified and extended the subsidies into state law.

Consumers' Counsel Maureen Willis told the Ohio House Energy Committee:

"These coal plant subsidies cost Ohioans \$440,000 a day. The subsidies need to end now and not linger on collecting millions more from Ohioans over the next several years."

To help build public awareness, OCC developed a Coal Subsidy Calculator that tracked in real time the growing costs charged to consumers and the emissions produced by the plants.

Although the subsidies have ended, OCC continues to challenge the prudence and legality of past charges to ensure consumers are fully protected.



OCC's Coal Subsidy Calculator, just days before the subsidies ended.

"Affordability must be at the forefront of energy reform in Ohio. House Bill 15 is a positive step toward keeping utility service affordable for Ohio families and businesses."

– Ohio Consumers' Counsel Maureen Willis

Senate Bill 103 – Natural Gas Regulatory Reform

Senate Bill 103, now law, reforms aspects of natural gas utility ratemaking. The legislation allows alternative rate plans for certain large customers while limiting the impact of major industrial investments on residential utility bills.

Consumer concerns raised during the legislative process helped shape revisions that improved the balance between regulatory flexibility and consumer protection. The final legislation passed unanimously.

House Bill 158 – Consumer Utility Billing Transparency Act

OCC strongly supports House Bill 158, which would require utilities to clearly itemize riders, taxes, and other charges on residential bills for electric, natural gas, and water service.

Legislative Activities

Improved transparency will help consumers better understand their utility costs, identify potential billing errors, and make informed decisions about energy use. This legislation would provide important new tools for consumer awareness and accountability from utilities.

House Bill 303 – Community Energy

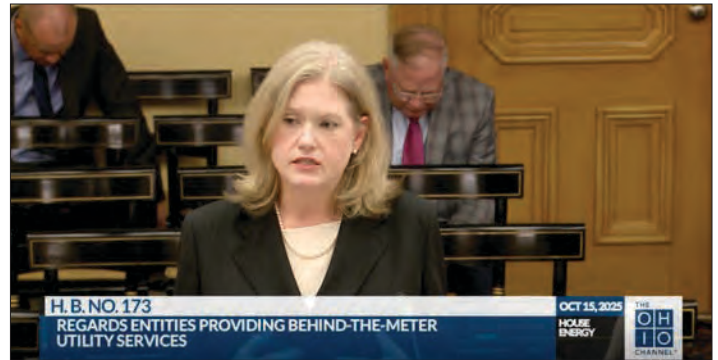
House Bill 303 would establish a community energy pilot program allowing consumers to subscribe to a shared local project and receive bill credits for the electricity produced. Community energy expands access to renewable energy for renters, homeowners without suitable rooftops, and small businesses.

OCC worked with sponsors to address concerns about potential cost-shifting to non-participants and to strengthen consumer protections.

House Bill 173 – Submetering Protections

House Bill 173 addresses behind-the-meter utility services such as submetering, where landlords use third parties to bill tenants for electricity, water, or natural gas.

Without appropriate safeguards, submetered consumers can face higher costs and fewer protections than direct utility consumers. OCC worked with legislators to strengthen consumer protections and improve transparency in billing practices. Improved transparency and rate oversight can reduce costs for tenants and protect their access to energy assistance programs and flexible payment options that enhance affordability and service reliability.



Deputy Consumers' Counsel Angela O'Brien testifies before the Ohio House of Representatives on HB 173.

“Why should apartment or condo residents have fewer legal rights, less protection and more limited assistance when it comes to utility service just because of where they live?”

– Ohio Consumers' Counsel Maureen Willis

House Bill 427 – Authorize Voluntary Demand Response Program for Certain Customers

House Bill 427 would authorize voluntary demand response programs that allow utilities to make small adjustments to participating consumers' thermostats or appliances during periods of peak demand.

These programs can help reduce electricity costs and improve grid reliability. OCC continues working with legislators to ensure the programs include strong consumer protections and avoid shifting costs to non-participating consumers.

House Bill 6 Scandal Continues

After Six Years, Consumers' Counsel Advocacy Secures Major Accountability in House Bill 6 Scandal

After six years of persistent advocacy by OCC and allied parties, the PUCO issued a landmark decision on Nov. 19, 2025, delivering long-overdue accountability for FirstEnergy's Ohio consumers.

In two separate orders addressing the fallout from the HB 6 scandal, the PUCO ruled that FirstEnergy's Ohio utilities – The Illuminating Company, Ohio Edison, and Toledo Edison – violated Ohio law, PUCO regulations, and prior Commission orders. The PUCO ordered FirstEnergy to pay a combined \$250 million in consumer restitution and civil forfeitures.

This marked a significant victory for residential and business consumers who unknowingly bore costs tied to the HB 6 scandal.

OCC opposed HB 6 long before its passage in July 2019 and began calling for accountability as the scandal unfolded. In September 2020, OCC formally urged the PUCO to open an investigation into FirstEnergy's conduct following the federal indictment of former House Speaker Larry Householder. Two months later, in November 2020, then PUCO Chair Sam Randazzo resigned.

Even during an 18-month stay of the PUCO proceedings pending the completion of Householder's federal trial, OCC continued pressing forward – filing motions, reviewing thousands of pages of discovery, deposing witnesses, and compelling testimony from former FirstEnergy employees. That persistence ensured consumers ultimately received answers, financial relief, and structural accountability.

“For six years, the Office of the Consumers' Counsel and others pressed for accountability and relief on behalf of consumers.”

– Ohio Consumers' Counsel Maureen Willis

The PUCO Orders Provided Significant Relief Restitution Payments

Nearly \$187 million was ordered to be returned directly to FirstEnergy consumers including:

- Approximately \$180 million in penalties for improper use of Distribution Modernization Rider (DMR) funds; and
- \$6.6 million, plus interest, refunded for misallocated or undocumented transactions.

Civil Forfeitures

FirstEnergy was ordered to pay at least \$64 million in civil penalties to Ohio's General Revenue Fund, including:

- \$21 million for violations of corporate separation laws;
- \$18 million for failing to disclose a side agreement in a 2015 PUCO proceeding; and
- \$23 million for seven violations identified in a 2021 corporate separation audit, along with a required follow-up audit within three years.

Settlement Secures Even Greater Consumer Recovery

While the PUCO's orders represented meaningful accountability, OCC continued to advocate for additional relief. As a result of negotiations led by OCC and other stakeholders, FirstEnergy agreed to a settlement approved by the PUCO in January 2026.

Under that settlement, approximately \$280 million will be directly returned to consumers – substantially more than the amount ordered in the original PUCO decisions. Importantly, approximately \$20 million of those funds will be directed to assist low-income Ohioans.

Six years after the scandal first came to light, Ohio consumers are seeing real financial restitution and enforceable reforms. This outcome reflects OCC's unwavering commitment to accountability, transparency, and protecting utility consumers.

The Rise and Fall of House Bill 6: Corruption, Consequences, and Restitution

2019–2024: The Corruption and Investigations



HB 6 Signed Amidst Federal Bribery Scheme

The 2019 bill sparked what federal authorities called the largest bribery scheme in Ohio history.

2019

2020

2021

2023

2024

**\$230
MILLION FINE**

FirstEnergy Admits to Wire Fraud

The corporation entered a deferred prosecution agreement and paid a \$230 million fine.



OCC asks PUCO to Investigate

OCC files request for investigation and audit of HB 6 matters.



Federal Racketeering Convictions

The former House Speaker and GOP Chair were found guilty of federal racketeering in 2023.

2025–2026: Repeal and Consumer Restitution



HB 15 ends \$500 million in Coal Subsidies and Electric Security Plans

New legislation passed in 2025 eliminated costly coal plant subsidies and electric security plans.



2025

2025

2026

\$276M IN RESTITUTION AND REFUNDS



PUCO ORDER \$250 MILLION

Fines, restitution, and consumer refunds



OCC SETTLEMENT \$276 MILLION

Direct customer refunds and energy assistance



State Criminal Trial Commences

2026 marks the start of state trials for executives facing charges, including bribery.



Electric Consumer Protection

2025 Impact for Ohio Consumers

- \$80 million saved for Duke Energy consumers through OCC advocacy
- \$67.3 million saved for AES Ohio consumers through settlement negotiations
- Strong protections adopted to ensure data centers—not residential consumers—pay for new electricity demand

OCC advocated for more than four million Ohio residential electric consumers, working to keep electricity affordable while ensuring reliable service and strong consumer protections.

Since electric generation was deregulated in Ohio in 1999, residential consumers have paid more than \$15 billion in subsidies to electric distribution utilities. House Bill 15, supported by OCC and other stakeholders, ended many of those subsidies and strengthened oversight of electric utilities.

Throughout 2025, OCC pressed for lower rates, fair allocation of new infrastructure costs, stronger oversight of utilities, improved reliability, and expanded bill assistance for struggling households.

Electric Consumer Protection

Protecting Consumers from Data Center Electricity Costs

The rapid growth of large data centers in central Ohio is creating unprecedented electricity demand and requiring significant new generation and grid investments. Without proper safeguards, those costs could be shifted onto residential consumers.

OCC worked side-by-side with AEP Ohio, the PUCO Staff, and other stakeholders to develop a special electric tariff governing service to data centers. The tariff approved by the PUCO establishes important protections to ensure that data centers—not residential consumers—bear the financial risks associated with their massive electricity demand.

Under the OCC-supported settlement, data centers must:

- Pay for at least 85 percent of their projected electric load
- Provide meaningful financial guarantees
- Face penalties if projects are canceled or fail to materialize

These provisions help ensure that data centers have “skin in the game” and help protect consumers from paying for stranded or speculative infrastructure.

The path to PUCO approval of the OCC-supported settlement was challenging.

The tech giants proposed a watered-down version of the tariff that lacked the accountability and consumer protections found in the settlement supported by OCC, AEP, and others. The PUCO ultimately approved the stronger settlement.

The tariff has received national attention as states across the country grapple with the rapid growth of energy-intensive data centers.

PUCO Case No. 24-508-EL-ATA

“The PUCO should ensure that the true cost of serving data centers aren’t shifted onto everyday households.”

– Ohio Consumers’ Counsel Maureen Willis



OCC's Consumer Alerts notify consumers of upcoming public hearings where consumers can be heard.

OCC Challenges Utility Rate Increases

Ohio consumers faced multiple major electric distribution rate cases in 2025.

OCC actively participated in proceedings involving AEP Ohio, AES Ohio, and FirstEnergy, filing testimony, participating in hearings, negotiating settlements where appropriate, and opposing excessive profits and pro-utility provisions.

These efforts focused on limiting rate increases, protecting affordability, and strengthening protections for low-income households.

OCC Saves Consumers \$80 Million in Duke Electric Case

OCC joined Duke Energy, Ohio Partners for Affordable Energy, the Ohio Manufacturers' Association Energy Group, the City of Cincinnati, PUCO Staff, and others on a settlement in Duke Energy's fifth electric security plan case.

The PUCO approved the agreement in 2025.

Electric Consumer Protection

The settlement reallocates transmission costs saving residential consumers approximately \$80 million over three years compared to Duke's original proposal. Additional consumer benefits included:

- \$7.2 million in energy efficiency programs for eligible low-income households
- \$575,000 in shareholder-funded support for payment assistance and consumer education

PUCO Case Nos. 24-278-EL-SSO, et al.

OCC Reduces AES Ohio Rate Increase

In late 2024, AES Ohio requested a 14% rate increase for consumers. Through negotiations, OCC secured improvements that reduced the impact of the increase, saving consumers approximately \$67.3 million compared to AES Ohio's initial proposal.

The settlement also:

- Eliminated a proposed increase in the \$9.75 monthly fixed customer charge
- Expanded low-income assistance funding, increasing AES Ohio's annual contribution from \$50,000 to \$1 million

PUCO Case Nos. 24-1009-EL-AIR, et al.

AEP Ohio Rate Case

AEP filed a request in April 2025 to increase its distribution rates, raising the typical residential consumer's bill by about \$4 per month.

OCC opposed a settlement signed by AEP, the PUCO Staff, and others because it proposed an unreasonably high 9.84% return on equity and provisions that failed to adequately protect consumers from skyrocketing transmission costs.



OCC's J.P. Blackwood (far right) and Ryan King (seated second from right) attend a public hearing.

"We fought for affordability and fairness. This agreement delivers both."

– Ohio Consumers' Counsel Maureen Willis

Consumers voiced strong concerns during public hearings in December. OCC filed final briefs in February 2026.

The case remains pending before the PUCO.

PUCO Case Nos. 25-392-EL-AIR, et al.

FirstEnergy Rate Case

FirstEnergy requested a \$190 million rate increase.

OCC and the Northwest Ohio Aggregation Coalition (NOAC) urged the PUCO to reduce FirstEnergy's rates by more than \$132 million.

In November 2025, the PUCO approved a net increase of \$34 million annually.

The impact varied by service territory:

- The Illuminating Company: about \$5 per month increase
- Ohio Edison: about \$1.80 per month decrease
- Toledo Edison: about \$0.50 per month decrease

PUCO Case Nos. 24-468-EL-AIR, et al.

Electric Consumer Protection

AES Ohio Rate Increase for 2027-2029

AES Ohio, in October, filed the first multi-year rate case under the new procedures established in House Bill 15. AES Ohio is seeking approval for rate increases from 2027 through 2029. If approved, base distribution charges will increase by a cumulative 22.79% in 2029.

PUCO Case Nos. 25-958-EL-AIR, et al.

OCC Advocates for Strong Electric Reliability

OCC advocated for consumers in a case where FirstEnergy sought to weaken its reliability standards.

Pointing to frequent outages in communities such as Lakewood and Barberton, OCC argued that after consumers have paid hundreds of millions of dollars for grid improvements, they deserve better reliability—not lower standards.

The case remains pending before the PUCO.

PUCO Case No. 24-1112-EL-ESS

OCC Improves Transparency in Utility Audits

For years, OCC pushed for greater transparency in the PUCO's independent audits of utilities.

Previously, utilities were allowed to review draft audit reports before they were finalized and filed publicly. OCC



Senior Counsel William Michael cross-examines a witness during a PUCO hearing.

*“An audit isn’t
independent if utilities
can steer the outcome.
Consumers deserve
audits that are free from
influence.”*

*– Ohio Consumers’
Counsel Maureen Willis*

objected to this practice because it allowed utilities to influence supposedly independent audits.

In 2025, the PUCO adopted reforms requested by OCC. Utilities will no longer receive draft audit reports before they are publicly released, ending a practice that allowed utilities undue influence over the audit process.

The change resulted from OCC’s Application for Rehearing in a FirstEnergy case and strengthens oversight of nearly \$164 million in utility charges examined in that proceeding.

PUCO Case No. 23-1071-EL-RDR

“OCC’s outreach has been especially helpful for patrons who may find the energy marketplace confusing, and we appreciate their commitment to educating Ohio consumers.”

~ Travis McAfee, Assistant Director, Way Public Library

“Learning how to navigate energy choice was incredibly valuable to our community at a time when utility rate increases are confusing. OCC community outreach programs, especially to older adults, are priceless.”

~ Erin Lally, Director, Donna Smallwood Activities Center



Natural Gas Consumer Protection

Key Consumer Impacts in 2025

- \$26 million rate decrease approved for Enbridge natural gas consumers
- \$8 million reduction in Centerpoint's requested revenue increase
- \$2.3 million in unbilled gas charges written off for Duke's consumers
- \$950,000 in shareholder funds secured to reduce Duke customer back bills
- \$250,000 in shareholder contribution to energy assistance programs
- More than 350,000 Ohio households represented in major natural gas rate cases

OCC advocated for affordability for Ohio natural gas consumers throughout 2025 by seeking lower utility returns on equity (ROE), limiting increases to fixed monthly charges, and expanding consumer protections. With many Ohio households facing rising living costs, OCC remains focused on ensuring fair, affordable, and reliable natural gas service. A full list of OCC's case activities appears at the end of this Annual Report.

Natural Gas Consumer Protection

OCC Advocacy Reduces CenterPoint's Return on Equity

OCC represented approximately 330,000 CenterPoint Energy residential consumers when the utility sought to increase its natural gas distribution rates, including a proposal that would have raised the typical residential bill by about \$23 per month.

OCC advocated for a lower return on equity (ROE), reduced fixed charges, expanded payment assistance, and a smaller rate increase. Although OCC opposed the settlement reached by CenterPoint, PUCO Staff and other parties, the PUCO adopted OCC's recommendation to reduce the utility's ROE which lowers CenterPoint's revenue increase by about \$8 million.

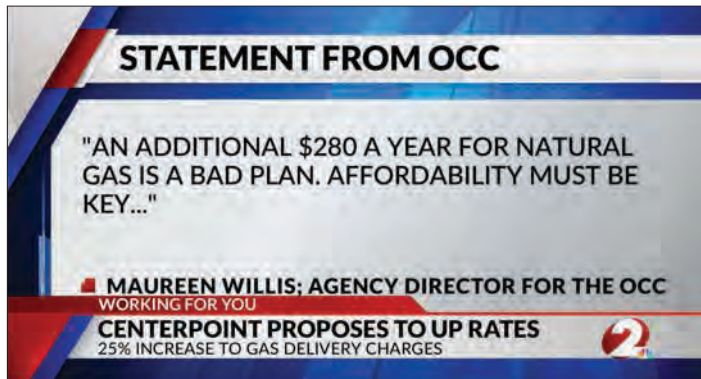
OCC also supported consumer engagement through public hearings and community outreach, leading five communities to pass resolutions opposing the increase.



Ohio Consumers' Counsel Maureen Willis speaks during the Clark County Board of Commissioners meeting on CenterPoint's rate increase.

Enbridge filed another rate increase application on Dec. 31, 2025, seeking to raise the residential monthly service charge by nearly 25%. OCC is reviewing the proposal and will continue advocating for affordable rates.

PUCO Case Nos. 23-894-GA-AIR, et al., 25-1097-GA-AIR, et al.



PUCO Case Nos. 24-832-GA-AIR, et al.

OCC Advocacy Leads to \$26 Million Rate Decrease for Enbridge Consumers

OCC continued its advocacy for residential consumers in an Enbridge distribution rate case that was filed in 2023. Enbridge initially requested a \$212 million increase, later reduced to \$60 million.

OCC and other consumer advocates argued that rates should decrease and urged lower fixed charges and stronger protections for low-income consumers. In June 2025, the PUCO approved a \$26 million rate decrease for Enbridge consumers.

OCC Opposes Fixed Charge Increase for Cumberland Consumers

Cumberland Gas Company sought more than double the fixed monthly fee for its residential consumers. OCC represented 2,500 Cumberland consumers and advocated for affordable rates.

Although OCC participated in settlement discussions, it opposed the agreement signed by Cumberland and the PUCO Staff because it did not adequately address affordability concerns. The PUCO approved the settlement, increasing the monthly fixed charge from \$10 to \$14.

PUCO Case No. 24-862-GA-AIR

OCC Advocates for Lower Rates and Fair Charges in Suburban Gas Case

OCC intervened in Suburban Natural Gas Company's 2025 rate case to represent over 19,000 residential consumers. Suburban proposed increasing residential bills by about \$84 per year and requested an 11.7% ROE, which would have been the highest among Ohio gas utilities.

Natural Gas Consumer Protection



Consumer Alert: Suburban Natural Gas Seeks Rate Increase

If Approved Typical Consumers Will
Pay \$84 More per Year

[Learn More](#)



Consumer Alert: Cumberland Proposes Doubling the Monthly Fixed Charge for Natural Gas

The fixed monthly charge would
increase from **\$10 per month to
\$21 per month** representing a **110
percent increase**. That's an
additional **\$132 per year**.

[Learn More](#)

Consumer Alerts are available at www.occ.ohio.gov/consumer-alerts

OCC advocated for a lower return on equity, a volumetric customer charge instead of higher fixed fees, and no increase in the reconnection fee. OCC participated in settlement negotiations but did not sign or oppose the resulting agreement. A final PUCO decision is pending.

PUCO Case Nos. 25-553-GA-AIR, et al.

Natural Gas/Electric

OCC Secures Consumer Protections in Duke Back Billing Case

OCC worked with ProSeniors and Legal Aid of Southwest Ohio to improve a settlement addressing billing errors affecting some Duke Energy natural gas consumers. After Duke and the PUCO Staff entered a settlement before the case was opened publicly, OCC successfully urged the PUCO to reopen the case so residential consumers could be represented.

OCC's advocacy strengthened the settlement by securing:

- \$950,000 in shareholder funds to reduce back bill balances
- \$2.2 million in unbilled gas charges written off
- Up to 24-month payment plans for affected consumers

- \$250,000 in shareholder donations to Duke's Share the Light assistance program

PUCO Case No. 24-297-GE-UNC

OCC Advocates for Stronger Winter Utility Protections

OCC urged the PUCO to strengthen protections for vulnerable consumers during the 2025-2026 Winter Reconnect Order, working with Ohio Partners for Affordable Energy (OPAE) and State Representative Sean Brennan.

More than 3 million Ohioans live in poverty. Utilities disconnected over 2 million Ohioans between 2018 and 2025. OCC and its partners urged the PUCO to adopt stronger safeguards, including winter shutoff bans, weather emergency protections, and improved transparency in disconnection data.

The PUCO declined to address these recommendations. OCC will continue pursuing stronger consumer protections in future proceedings.

PUCO Case No. 25-494-GE-UNC



Special Reconnect Order (SRO)

Assistance for utility customers (regardless of income) to reconnect or avoid service disconnection.

Available mid-Oct. to mid-April

[Learn More](#)

www.occ.ohio.gov/factsheet/special-reconnect-order

Natural Gas Consumer Protection

OCC Secures Consumer Protections in Energy Marketer Cases

OCC helped secure important consumer protections through settlement agreements with competitive suppliers Major Energy and Eligo Energy following investigations by the PUCO Staff into deceptive marketing and enrollment practices.

Both matters arose from Notices of Probable Non-Compliance issued by the PUCO Staff concerning the companies' solicitation and enrollment of consumers in electric and natural gas supply service. OCC participated in settlement negotiations to ensure consumers were protected and compensated.

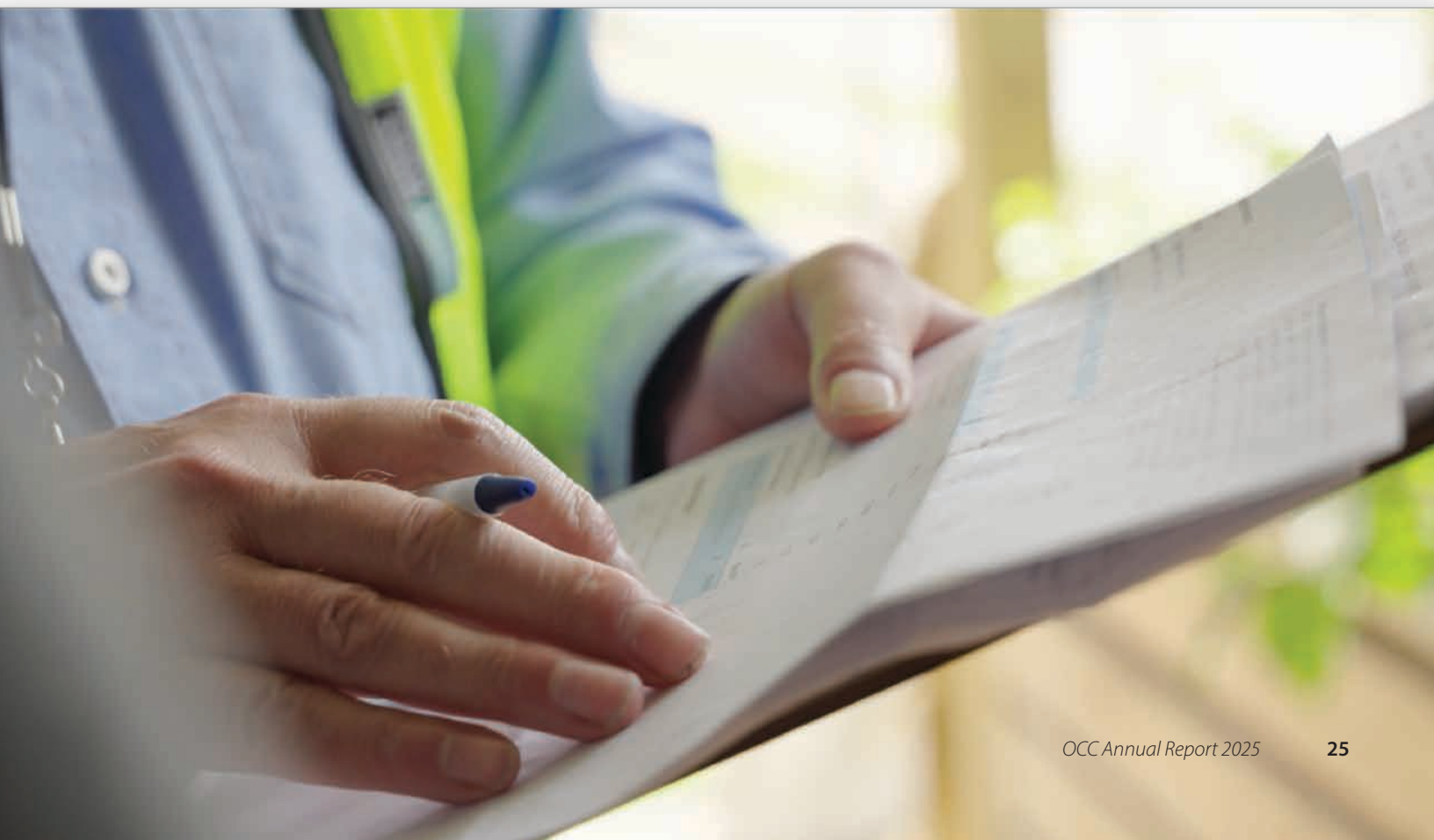
In the Major Energy case, consumer complaints and the PUCO Staff investigation raised concerns about possible misrepresentations by sales representatives, inadequate disclosure of contract terms, and potential alteration of enrollment verification recordings. Through the settlement, Major Energy agreed to suspend telemarketing and door-to-door marketing in Ohio for 18 months, provide more

than \$250,000 in restitution to affected consumers, and implement stronger safeguards to prevent deceptive sales practices. The company also agreed to donate \$400,000 to support bill payment assistance programs.

In the Eligo Energy case, the PUCO Staff identified discrepancies between company records and recorded sales calls, and alleged altered enrollment recordings and misleading identification statements. The settlement negotiated with OCC's participation requires Eligo to suspend residential telemarketing enrollments in Ohio for 30 months, allows affected consumers to cancel service without termination penalties and provides credits to consumers who previously paid early termination fees. Eligo also agreed to pay \$14,600 to the State of Ohio and donate \$300,000 to support bill payment assistance programs.

Through its advocacy in these cases, OCC helped end problematic marketing practices, secure financial relief for consumers, and strengthen protections for Ohio households.

PUCO Case Nos. 25-841-GE-UNC, 25-989-GE-UNC





Water Consumer Protection

OCC advocates for Ohio consumers who depend on reliable and affordable water and wastewater services from utilities regulated by the PUCO. Through participation in rate cases and regulatory proceedings, OCC works to ensure that water and sewer rates remain just, reasonable, and affordable for residential consumers.

Protecting Consumers in Aqua Ohio Rate Cases

OCC intervened in Aqua Ohio's water and sewer rate cases after the company requested a \$13.4 million increase in water rates, along with additional sewer rate increases affecting consumers in several service areas.

OCC advocated on behalf of nearly 47,000 residential consumers, raising affordability concerns, challenging proposed costs that could unnecessarily increase customer bills. OCC recommended adjustments designed to ensure that any rates approved by the PUCO are fair and reasonable for consumers.

To expand opportunities for consumer participation, OCC requested that the PUCO hold a virtual public hearing in addition to in-person hearings so more consumers could testify about the impact of Aqua's proposed rate increases. The PUCO granted OCC's request. Virtual and in-person public hearings were held in January 2026. The cases remain pending before the PUCO as OCC continues advocating for reasonable water and sewer rates.

PUCO Case Nos. 25-594-WW-AIR, et al., 25-593-ST-AIR

Advocating for Christi Water Consumers

OCC also represented consumers in Christi Water's request to increase water rates. OCC opposed a proposed settlement between Christi Water and the PUCO Staff that requires consumers to pay for significant system water losses in the utility's system.

Evidence presented in the case showed two system leaks, including one estimated to be losing approximately 7,500 gallons per day. OCC argued that consumers should not be required to pay for water lost due to leaks in the utility's system.



During the case, OCC filed objections to the Staff report, presented testimony opposing the settlement, conducted discovery, issued subpoenas to obtain additional information, and successfully moved to reopen the record so additional evidence regarding the system leaks could be considered.

The PUCO ultimately issued an order adopting a modified settlement. OCC filed an application for rehearing, arguing that requiring consumers to pay for the utility's lost water results in unlawful and unreasonable rates. The PUCO denied OCC's rehearing request. The approved increase is expected to raise a typical Christi Water consumers' bill by nearly \$220 per year.

OCC advocated to prevent consumers from paying for water lost due to utility system leaks and to ensure that rates reflect responsible utility management.

PUCO Case No. 24-798-WW-AIR



OCC Advocacy at the Ohio Supreme Court

OCC represented Ohio consumers in several matters before the Ohio Supreme Court this year. Under state law, the Court has jurisdiction to hear direct appeals of decisions issued by the PUCO. OCC carefully evaluates whether to pursue an appeal, considering both the potential impact on consumers and the responsible use of limited Agency resources.

OCC Advocacy at the Ohio Supreme Court

Appeal of Duke Investment Not Used and Useful to Consumers

OCC appealed a PUCO decision that allows Duke Energy to charge natural gas consumers for propane storage caverns that were not used or useful.

OCC argued that the PUCO acted unlawfully and unreasonably by permitting Duke to collect approximately \$29 million from consumers for caverns that were not used and useful at “date certain.” Consumers were also effectively double-charged because Duke simultaneously recovered costs for the Central Corridor Pipeline, which replaced the caverns. OCC further argued that the PUCO abused its discretion by refusing to make the charges subject to refund.

Assistant Consumers’ Counsel John Finnigan presented oral argument before the Ohio Supreme Court in October 2025. A decision is expected in 2026.

OSC Case No. 2024-1505

Big Win for Consumers in AES Excessive Profits Case

Persistence paid off for AES consumers in 2025. Following oral argument by Deputy Consumers’ Counsel Angela O’Brien, the Court unanimously ruled that the PUCO violated Ohio law when it allowed AES Ohio to retain \$61 million in “significantly excessive” earnings from 2018 and 2019.

The Court agreed with OCC that Ohio law requires excessive earnings to be refunded to consumers and rejected the PUCO’s attempt to offset those profits against future capital spending. The Court remanded the case for a lawful recalculation.

On remand, AES and PUCO Staff proposed minimal refunds. OCC filed testimony seeking the full \$61 million plus interest. OCC also sought relief from the Ohio Supreme Court through a writ to prevent the PUCO from considering parent company contributions when calculating refunds. Although the writ was denied in 2026, OCC continues to press for full refunds for AES consumers.

OSC Case No. 2021-1473

“Every dollar, with interest, must be returned to the Ohioans who paid it.”

– Ohio Consumers’ Counsel Maureen Willis



Deputy Consumers’ Counsel Angela O’Brien presents oral arguments to the Ohio Supreme Court.

OCC Appeal Seeks \$152 Million in Additional Consumer Refunds

In related consolidated appeals, OCC is seeking approximately \$152 million in additional refunds tied to AES “stability charges” collected from 2020 and 2023.

OCC argues that when AES withdrew from its electric security plan, Ohio law required it to return to its most recent standard service offer. Instead, the PUCO permitted AES to revert to an earlier electric security plan and continue collecting a \$76 million annual stability charge without evidence supporting the cost, risk, or service justification for the charge.

During oral argument before the Court, Consumers’ Counsel Maureen Willis emphasized that the PUCO has a legal duty to set just and reasonable rates based on record evidence. OCC argued that allowing consumers to be charged for a speculative long-term provider-of-last-resort risk—even though AES was no longer supplying that service—was an abuse of discretion.

A decision in those appeals is expected early in 2026.

OSC Case Nos. 2023-111, 2023-130

OCC Advocacy at the Ohio Supreme Court



Consumers' Counsel Maureen Willis responds to questions from the court.

OCC Challenges Duke Charge for Its \$14 Million Rate Case Error

OCC appealed a PUCO decision allowing Duke Energy to charge consumers \$14 million to correct its own mathematical error from a prior rate case.

After the PUCO approved a fifteen-party settlement—which OCC opposed—Duke implemented a \$23 million rate increase. Duke later sought to recover an additional \$14 million through a separate proceeding involving its Distribution Capital Investment Rider (Rider DCI). None of the fifteen settling parties from the rate case were participants in that rider case except Duke and PUCO Staff.

An independent auditor recommended against allowing Duke to collect the additional amount, but the PUCO rejected the recommendation. As a result, the original \$23 million rate increase effectively became a \$37 million increase.

OCC's appeal argues that Ohio law prohibits retroactive ratemaking and limits utilities to collecting only those charges authorized in their filed tariffs. Riders, OCC contends, cannot be used to reopen closed cases or shift the consequences of utility errors onto consumers.

OCC presented oral argument before the Ohio Supreme Court in February 2026. A decision is expected in 2026.

OSC Case No. 2025-620

OCC Challenges Coal Subsidy Charges

OCC asked the Ohio Supreme Court to order the return of \$74.5 million in coal plant subsidy charges to AEP Ohio consumers under the OVEC rider.

In Supreme Court Case No. 2024-1735, OCC challenged coal charges imposed on AEP Ohio consumers during 2018 and 2019 under the OVEC rider. The PUCO labeled the charges “prudent” and “in the best interests of ratepayers.” OCC argued that those findings lacked support.

A central issue in the appeal involves the integrity of a PUCO-ordered audit. In an early draft report, the independent auditor concluded that continued operation of the subsidized coal plants did not appear to be in consumers' best interest. After a private email request from PUCO Staff, that conclusion was removed and did not appear in the final docketed audit report. The PUCO later denied OCC the opportunity to question the Staff member involved.

OCC has asked the Court to reverse the PUCO's order and require refunds to consumers. A decision is pending.

OSC Case No. 2024-1735

“Ohio families are struggling with costs, and they need a Commission that puts affordability front and center.”

– Ohio Consumers' Counsel Maureen Willis



Assistant Consumers' Counsel John Finnigan presented oral argument on the Duke appeal.



OCC Advocacy at the U.S. Supreme Court

OCC successfully defended a major court victory in 2025, protecting Ohio utility consumers from excessive electric transmission charges at the United States Supreme Court. The win came after several years of advocacy that moved through the lower tribunals and will provide an estimated \$445 million in savings to Ohio utility consumers. This outcome reflects OCC's continued advocacy in federal courts to ensure utility consumers are protected from unjustified costs.

\$445 Million in Savings for Ohio Consumers

OCC Court Victory Ends Unnecessary Electric Transmission Charges

OCC secured a major legal victory protecting Ohio utility consumers from unnecessary electric transmission charges.

The United States Supreme Court declined to review a ruling by the U.S. Court of Appeals for the Sixth Circuit that struck down the “RTO adder” for Ohio utilities, an incentive that increased profits for transmission-owning utilities participating in regional transmission organizations (RTOs).

OCC argued that the incentive was no longer justified once utilities had already joined an RTO. The Sixth Circuit agreed, ruling that the Federal Energy Regulatory Commission’s approval of the incentive was unlawful.

Because the Supreme Court declined review, the Sixth Circuit’s decision remains in effect – securing hundreds of millions of dollars in savings for Ohio consumers.

Consumer Savings from the Decision

- \$220 million – AEP Ohio customers
- \$126 million – FirstEnergy Ohio customers
- \$99 million – Duke Energy Ohio customers

Total estimated consumer savings through 2031: \$445 million.

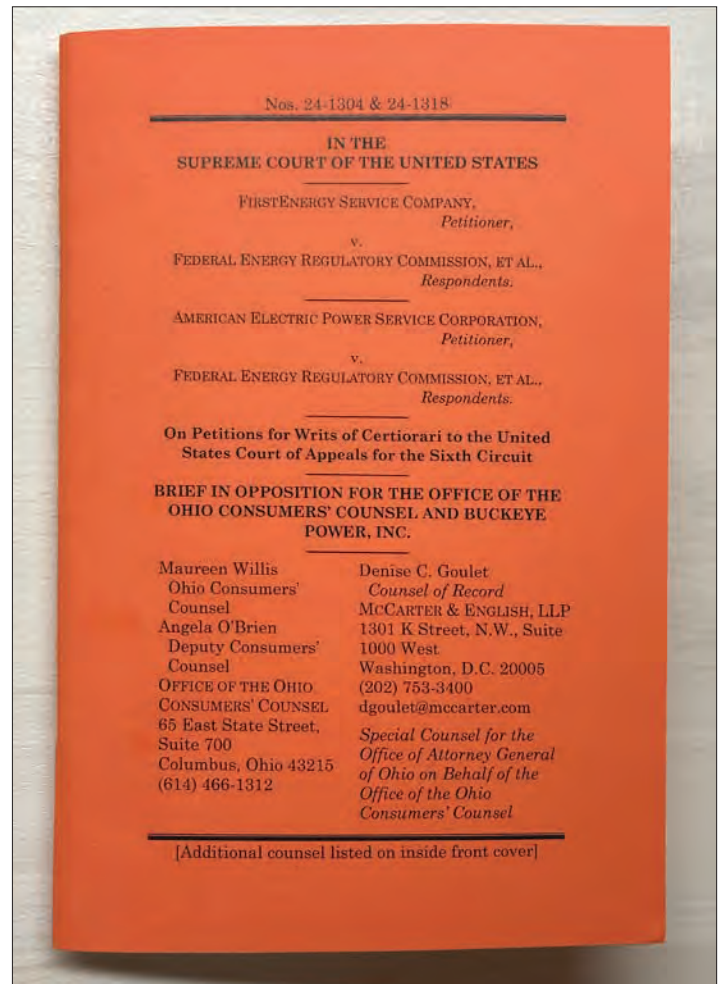
Why the Case Matters

The RTO adder increased utilities’ allowed return on equity by 50 basis points, raising electric transmission costs paid by consumers.

Former FERC Chair Mark Christie criticized the incentive as:

“FERC candy taken directly from consumers and redistributed to transmission owners.”

The Sixth Circuit agreed with OCC that the incentive was no longer justified and ordered it removed.

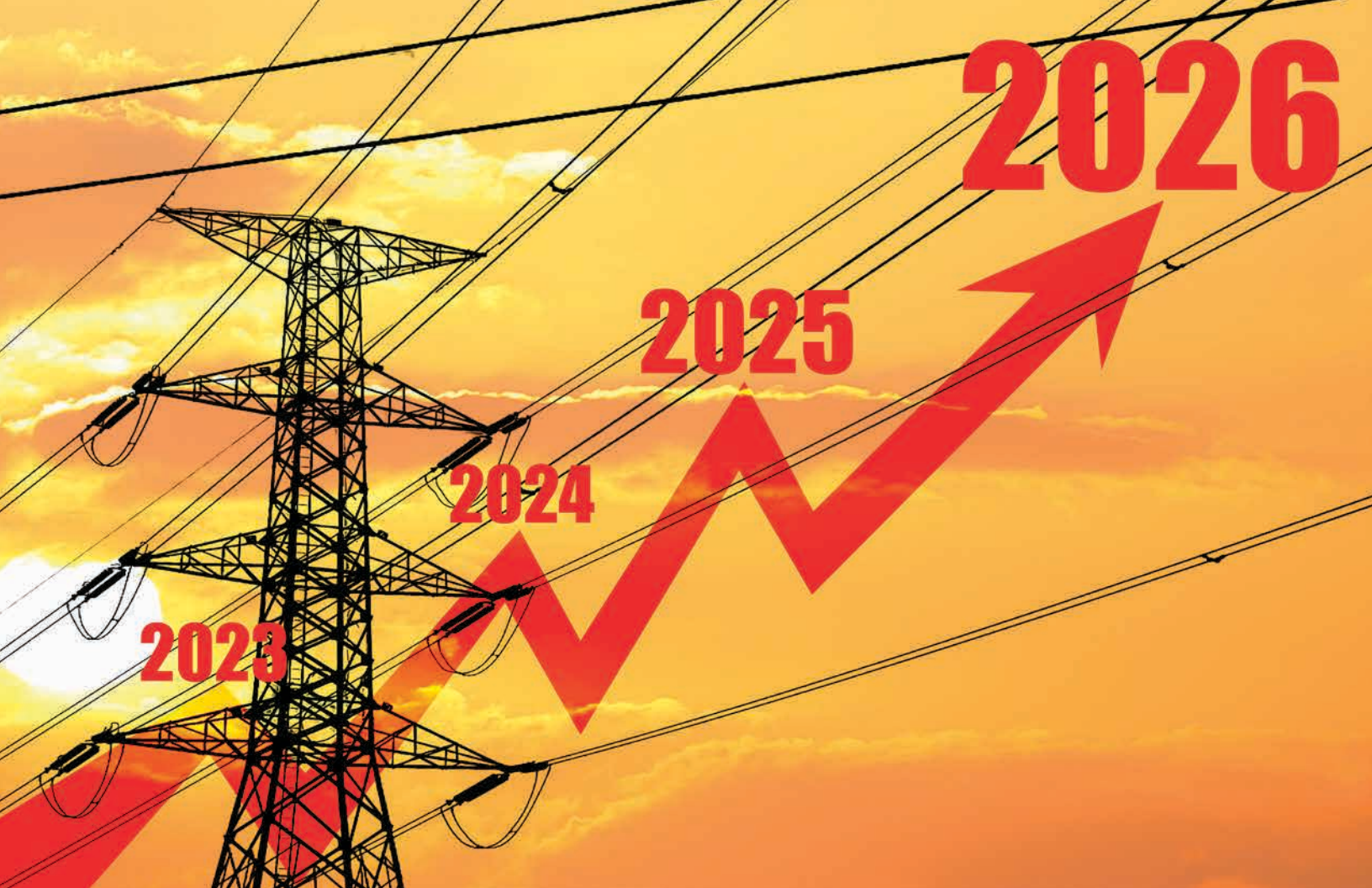


OCC's Role

OCC challenged the Federal Energy Regulatory Commission’s approval of the RTO adder and defended the victory when utilities asked the United States Supreme Court to review the case.

By declining review, the Supreme Court left the Sixth Circuit decision in place—securing these savings for Ohio consumers.

USSC Case Nos. 24-1304, 24-1318; USCA 6th Cir. Case Nos. 21-4072, 22-3351, 23-3196, 23-3324, 23-3366, 23-3417; Originating FERC Case Nos. ER20-1068-000, ER20-1068-003



Federal Advocacy Protecting Ohio Utility Consumers

2025 Impact: OCC's federal advocacy protected hundreds of millions of dollars in savings for Ohio consumers, challenged rules that could increase transmission costs, and pushed for reforms to address rising electricity capacity prices in the PJM region.

OCC represented Ohio utility consumers before the Federal Energy Regulatory Commission (FERC), the U.S. Courts of Appeals, and the United States Supreme Court. Federal decisions can significantly affect the rates Ohioans pay for electric and natural gas service.

OCC also collaborated with consumer advocates from other states to address major regional transmission issues at FERC, including long-term transmission planning and reforms to PJM's capacity market, advocating for policies that keep energy costs affordable for consumers.

Federal Advocacy Protecting Ohio Utility Consumers

Challenging Transmission Planning Rules That Could Raise Consumer Costs

OCC joined industrial consumer groups and rural electric cooperatives in filing a brief in consolidated appeals challenging FERC Order 1920.

Order 1920 and related orders (Orders 1920-A and 1920-B) established new requirements for long-term regional transmission planning, requiring transmission providers to plan for grid needs over a 20-year horizon.

Because transmission costs are included in consumers' electric bills, OCC and other consumer advocates argue that the rule:

- Allows transmission costs to increase without adequate safeguards for consumers
- Shifts the costs of transmission upgrades to utility customers
- Weakens protections that prevent consumers from paying for policy-driven projects promoted by other states

USCA 4th Cir., Case No. 24-1650, et al.; Originating FERC Case No. RM21-17-000

Advocating for Capacity Market Reform to Address Rising Electricity Prices

Ohioans experienced significant electricity cost increases after PJM's 2025/2026 Base Residual Auction (BRA) produced more than an 800% increase in wholesale capacity prices.

Throughout 2025, OCC worked with consumer advocate offices across the PJM region to advocate for reforms at FERC aimed at protecting consumers from excessive capacity market costs.

In January, OCC joined consumer advocate offices in Maryland, New Jersey, Illinois, and Washington, D.C. in filing a protest challenging aspects of PJM's proposed capacity market rule changes.

OCC also intervened in a complaint filed by Pennsylvania Governor Josh Shapiro challenging the excessive prices produced by the 2025/2026 auction.

Pennsylvania and PJM later reached a settlement establishing a "collar" for the next two auctions (2026/2027 and 2027/2028), including:

- A price cap of approximately \$325 per MW-day
- A price floor of approximately \$175 per MW-day

OCC and other consumer advocates supported the price cap but raised concerns that the price floor could increase costs for consumers. Advocates also criticized the lack of transparency in developing the settlement.

FERC Case Nos. ER25-785-000, EL25-46-000, ER25-1357-000

Protecting Consumers From Improper Natural Gas Pipeline Charges

OCC intervened in a complaint at FERC filed by natural gas producer and shipper Jay-Bee Production against Texas Gas Transmission.

The complaint alleges that Texas Gas improperly imposes a demand surcharge on shippers for back haul transportation service to delivery points in Ohio. It also alleges that Texas Gas restricts segmentation of pipeline capacity in violation of FERC's open-access policies.

OCC filed comments supporting the complaint. Ohio consumers rely on Texas Gas pipeline capacity to deliver natural gas supplies and ultimately pay pipeline transmission costs through their utility rates.

FERC Case No. RP25-966-000

Consumer Education

OCC not only advocates in utility cases but also works to educate Ohioans about their utility rights. OCC expanded its consumer education efforts by producing additional educational videos, launching a quarterly newsletter, adding new social media platforms, and developing new tools to inform consumers about rate increase requests and other utility issues affecting them.



OCC provides consumer education through its website (www.occ.ohio.gov), fact sheets, consumer alerts, social media, videos, consumer presentations, broadcast interviews, and by responding directly to questions from consumers and organizations.

OCC's Outreach and Education (O&E) Specialists regularly work with consumers and community organizations across Ohio to explain utility issues and consumer rights. In 2025, the team participated in 834 in-person and virtual events and site visits, interacting with nearly 26,000 consumers. These efforts help Ohioans manage utility bills, understand energy choice and aggregation, access assistance programs, and participate in proceedings before the Public Utilities Commission of Ohio (PUCO).

OCC staff also participated in resource fairs and community events throughout the state, including the Ohio State Fair, where the Agency spoke with more than 1,100 consumers and distributed more than 500 educational fact sheets.

The Public Affairs Department responds to consumer and media inquiries and develops educational resources for Ohioans. OCC received more than 500 media mentions as interest in utility issues increased.

Consumers can access a wide range of resources through OCC's website, including downloadable fact sheets, consumer alerts, and information about rate cases and public hearings. The website also provides information on bill payment assistance programs and disconnection protections for consumers struggling to maintain service. OCC expanded resources for Spanish-speaking consumers and added additional translated materials.

Consumer Education

OCC also uses social media to share updates on utility issues and promote consumer participation. OCC expanded its presence to additional platforms including Reddit, Facebook, LinkedIn, Threads, and Bluesky, significantly increasing audience engagement. One post regarding an AEP Ohio rate increase received more than 33,000 views on Reddit.

Through presentations to local governments and community groups, OCC encouraged greater consumer participation in utility proceedings. As a result, 22 local governments passed resolutions opposing proposed rate increases, and many communities submitted testimony or public comments in PUCO hearings.

OCC also works closely with organizations serving low-income and vulnerable consumers. For more than 20 years, the Consumers' Counsel Low-Income Dialogue Group (LIDG) has brought together partner organizations to discuss utility affordability issues and coordinate advocacy on behalf of vulnerable consumers.

Through these outreach and education efforts, OCC remains committed to providing Ohioans with reliable, objective information about their utility rights, service options, and opportunities to make their voices heard.

At OCC, we put consumers first.

Below: OCC's Ryan King and O&E Senior Program Specialist Amy Carles are ready to answer consumers' questions.



Office of the Ohio Consumers'

Employee Recognition

Exceptional employees are recognized as Employee of the Quarter by the Consumers' Counsel, the Deputy Consumers' Counsel, and the Agency's Directors. Employees are acknowledged for their outstanding work on behalf of Ohio's residential utility consumers and for exemplifying OCC's mission, vision and values.



Alana Noward
Senior Case Team Coordinator

Alana Noward was named OCC Employee of the Quarter for the first quarter of 2025. Alana joined OCC in December of 2021. Prior to joining OCC, Alana had been serving as a paralegal at Huntington Bank, working with a team of attorneys

for about three years. At Huntington, she managed various legal case tracking systems and outside counsel billing. Before that, she was an administrative assistant for several Attorney Examiners in the Hearing Unit at the State Medical Board of Ohio for approximately six years. At the Medical Board, many of her duties were similar to her responsibilities now as a Case Team Coordinator, including drafting and filing various documents, managing the hearing calendar, and providing administrative support on a multitude of cases. Alana has a Bachelors' Degree from The Ohio State University, where she majored in Sociology and minored in English.



John Schroeder
Network and Systems Administrator

John Schroeder was named OCC Employee of the Quarter for the second quarter of 2025. John joined the OCC in May 2012 and later expanded his role to Network and Systems Administrator

in 2016. He performs a variety of job duties including assisting staff with software, databases, and telecommunications systems. John also works to design, implement, and maintain security of OCC's networks. He assists the Network Engineer with technology-related issues. Prior to joining OCC, John Schroeder excelled as a freelance consultant, delivering tailored network solutions for small businesses and residential clients, and providing expert home consultation and technical repairs. John Schroeder also served as lead technical consultant for a central Ohio mayoral campaign and success-

fully developed and managed an e-commerce sales platform. Additionally, John has worked for Central Ohio Primary Care Physicians, City of Gahanna, and Whitehall City Schools. John has completed coursework toward an information technology degree from The Ohio State University.



Donald Kral
Litigation Attorney

Donald Kral was named OCC Employee of the Quarter for the third quarter of 2025. Don joined the OCC in July of 2023 as a Litigation Attorney. He has several decades of litigation experience, most recently at Babin Law and before

that at Kisling, Nestico & Redick, and Elk & Elk, among others. Not long after OCC was created, Don served as the Legislative Director for Ohioans for Utility Reform and as Director of Energy Pricing Research for the Ohio Energy Credits Advisory Committee, a special committee of the Ohio General Assembly. Don earned his B.A. in Political Science and Philosophy from Miami University, and his law degree from Harvard Law School.



John Finnigan
Assistant Consumers' Counsel

John Finnigan was named OCC Employee of the Quarter for the fourth quarter of 2025. John joined the OCC in November of 2020 as an Assistant Consumers' Counsel. John brings to OCC his significant utility regulatory

experience. He represented Cinergy and later Duke Energy Ohio in cases before the PUCO for 13 years (1999 – 2012). He next represented the Environmental Defense Fund in Ohio and other jurisdictions for 8 years (2012 – 2020). John earned his B.A. from the University of Cincinnati. He earned an M.B.A. from Indiana University and a J.D. from the University of Cincinnati College of Law.

Ohio Utility Consumer Case Ledger: A Regulatory Snapshot

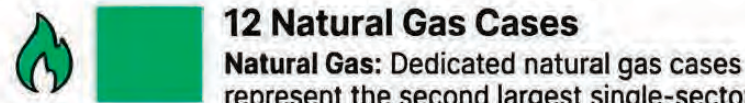
Case Activity Overview

Utilities by Service Type



72 Electric Cases

Electric Sector: The vast majority of consumer utility case activity.



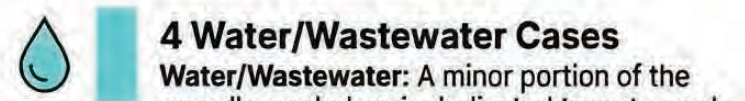
12 Natural Gas Cases

Natural Gas: Dedicated natural gas cases represent the second largest single-sector category.



8 Dual-Service Cases

Dual-Service: Providers managing both Natural Gas and Electric services.



4 Water/Wastewater Cases

Water/Wastewater: A minor portion of the overall case ledger is dedicated to water and wastewater utility issues.



Nearly 40% of active cases have progressed to the formal testimony phase.



A small fraction of total active cases have successfully reached a negotiated settlement.



Only a very small percentage of cases are currently being challenged through the appeals process.

Major Case Classifications



9 Rate Cases

These cases specifically address the prices charged to consumers for utility services.



3 Electric Security Plan (ESP) Cases

Focused on the long-term plans for electric utility supply and pricing structures.

Case Activity by Utility Company

FirstEnergy Utilities
21 Active Cases

AEP Ohio
17 Active Cases

Duke Energy
15 Active Cases

AES OHIO
13 Active Cases

Columbia Gas | 2 Active Cases
Other Utilities | 7 Active Cases

FirstEnergy Leads in Case Volume

With 21 cases, FirstEnergy Utilities has the highest number of active proceedings among the major providers.

High Activity Among Major Electric Providers

AEP Ohio (17 cases), Duke Energy (15 cases), and AES Ohio (13 cases) all maintain significant legal footprints.

Columbia Gas and Others

Columbia Gas accounts for 2 cases, while 7 cases involve various other smaller utilities.



Representing Ohio Consumers in Utility Cases

The Office of the Ohio Consumers' Counsel (OCC) participated in cases before the Public Utilities Commission of Ohio (PUCO) and appellate courts to ensure that residential utility consumers pay just and reasonable rates for essential services.

Case Activity at a Glance

Total Active Cases:	118
Testimonies Filed:	48
Settlements Reached:	7
Appeals Filed:	2

Utilities Involved

Electric:	72 cases
Natural Gas:	12 cases
Natural Gas and Electric:	.8 cases
Water/Wastewater:	.4 cases

Major Consumer Cases

Rate Cases:	9
Electric Security Plan Cases:	3

Case Activity by Utility

AEP Ohio:	17
AES Ohio:	13
Duke Energy Ohio:	15
FirstEnergy Utilities:	21
Columbia Gas:	2
Other Utilities:	7

Case Number	Entity	Issue	OCC is Advocating to:
Public Utilities Commission of Ohio – Electric			
25-1501-EL-FOR	AEP Ohio Transmission Company	2024 Long-Term Forecast Report	Protect consumers from overpaying for transmission costs
25-1039-EL-ATR	AEP	Transfer OVEC Interests	Protect consumers from abuse of market power and cross-subsidization
25-0997-EL-ESS	FirstEnergy	Service, Safety & Reliability Standards	Protect consumers by advocating for strong reliability standards
25-0980-EL-AIS	American Transmission Systems	FirstEnergy Money Pool	Protect consumers from bearing costs associated with data centers
25-0971-EL-UNC	AEP	Bill Format	Protect consumers advocating for clear and transparent utility bills
25-0958-EL-AIR; 25-0959-EL-AAM; 25-0960-EL-ATA; 25-0961-EL-RDR	AES	Rate Case	Protect consumers from unjust and unreasonable rates requested by utility
25-0862-EL-RDR	FirstEnergy	Delivery Capital Recovery Rider	Protect consumers from bearing unjust and unreasonable costs of FE's 2025 delivery capital rider charges
25-0826-EL-UNC	PUCO Proposed Process	Statewide Reliability Report	Review and recommend consumer protections to strengthen the Statewide Reliability Report
25-0814-EL-UNC	PUCO Study	Potential Use and Deployment of Advanced Transmission Technology	Review Report on Potential Use and Deployment of Advanced Transmission Technology
25-0778-EL-RDR	Legacy Generation Resource	Rider Charges	Protect consumers from paying for imprudently incurred coal subsidies
25-0732-EL-RDR	FirstEnergy	Non-Market-Based Services	Protect consumers from paying too much for non-market based transmission service

2025 Case Activity



Case Number	Entity	Issue	OCC is Advocating to:
25-0632-EL-RDR	Duke	Distribution Capital Investment Rider	Protect consumers from being charged increased rates for capital investment
25-0607-EL-USF	Ohio Department of Development	Universal Service Fund Rider	Provide input on universal service funding
25-0501-EL-FOR	AES	2024 Long-Term Forecast Report	Review forecast to ensure fair allocation of costs between and among customer classes
25-0496-EL-RDR	AES	Infrastructure Investment Rider	Protect consumers from unjust charges associated with AES Ohio's SmartGrid charges
25-0392-EL-AIR; 25-0393-EL-ATA; 25-0395-EL-AAM	AEP	Rate Case	Protect AEP Ohio consumers from being charged too high rates
25-0349-EL-ORD	PUCO Rules Review	Net Metering	Include consumer protection recommendations to minimize risk of costs shifting
25-0240-EL-UNC	FirstEnergy	Quadrennial Review of Electric Security Plan	Protect consumers from paying excessive electric security plan rates
25-0154-EL-RDR	Duke	Power Future Initiatives Rider	Protect consumers from being charged unjust and unreasonable rates
25-0134-EL-AEC	AEP	Fuel Cell Economic Development Agreement with Cologix Johnstown	Protect consumers from paying for behind the meter generation including the capital costs or potential stranded investment
25-0133-EL-AEC	AEP	Fuel Cell Economic Development Agreement with Amazon Data Services	Protect consumers from paying for behind the meter generation including the capital costs or potential stranded investment
25-0110-EL-RDR	AEP	Distribution Investment Rider	Review of capital investment charges to AEP Ohio consumers
25-0109-EL-RDR	AES	Annual True-up for Transmission Cost Recovery Rider	Protect consumers against an unreasonable increases in transmission charges by AES Ohio
25-0092-EL-SSO	FirstEnergy	Electric Security Plan VI	This case was withdrawn on 10/2/25
25-0062-EL-RDR	Duke	Distribution Decoupling Rider	Protect consumers from a \$12 annual increase on the DDR rider charge
25-0016-EL-RDR	Duke	Supplier Cost Reconciliation Rider	Review of costs for SSO auction
24-1135-EL-RDR	AES	Distribution Investment Rider	Review of capital investment charges to AES consumers
24-1129-EL-RDR	AEP	Distribution Investment Rider	Review of utility's capital investment
24-1112-EL-ESS	FirstEnergy	Reliability Standards	Protect consumers by recommending strong reliability standards
24-1039-EL-ORD	PUCO Rules Review	Interconnection Standards	Protect consumers by strengthening the interconnection standards
24-1009-EL-AIR; 24-1010-EL-AAM; 24-1011-EL-ATA	AES	Rate Case	Protect consumers from being charged unjust and unreasonable rates
24-0960-EL-MER	AES	Limited Change in Control (Astrid Holdings)	Protect consumers from being adversely impacted by change of ownership
24-0920-EL-RDR	FirstEnergy	Delivery Capital Recovery Rider	Protect consumers by reviewing capital expenditures of utility
24-0787-EL-RDR	AEP	GridSMART Phase 3 Distributed Automation Circuit Reconfiguration	Protect consumers by reviewing capital expenditures of utility

2025 Case Activity



Case Number	Entity	Issue	OCC is Advocating to:
24-0734-EL-AEC	AEP	Reasonable Arrangement with Intel	Protect consumers by reviewing economical development arrangement
24-0637-EL-RDR	Duke	Distribution Capital Investment Rider	Protect consumers from being charged unjust and unreasonable rates
24-0508-EL-ATA	AEP	Data Center Tariffs	Protect consumers from unnecessary charges due to data centers
24-0493-EL-RDR	AEP	Basic Transmission Cost Recovery	Protect consumers from paying unreasonable transmission charges
24-0468-EL-AIR; 24-0469-EL-ATA; 24-0470-EL-AAM; 24-0471-EL-UNC	FirstEnergy	Rate Case	Protect consumers from unjust and unreasonable rates for electric service
24-0389-EL-RDR	AES	Infrastructure Investment Rider	Protect consumers who could be adversely affected by utility's proposal
24-0278-EL-SSO; 24-0279-EL-ATA; 24-0280-EL-AAM	Duke	Electric Security Plan	Protect consumers from being charged unjust and unreasonable rates
24-0153-EL-RDR	Duke, AES, AEP	Legacy Generation Resource Audits	Protect consumers from abuse of market power and cross-subsidization
24-0132-EL-UNC	AES	Uncollectible Expense Recovery	Protect consumers from being adversely impacted by the utility's proposal
24-0068-EL-ESS	Duke	Reliability Standards	Protect consumers from being adversely impacted from reduced reliability standards
24-0039-EL-RDR	Duke	Power Future Initiatives Rider	Protect consumers who could be adversely affected by unreasonable rates
23-1017-EL-RDR	AEP	GridSMART Phase III	Review and consumer advocacy of the annual audit of AEP Ohio GridSmart Rider
23-0893-EL-RDR	FirstEnergy	2023 Delivery Capital Recovery Rider	Protect consumers from being charged unjust and unreasonable rates for utility's capital investment
23-0549-EL-RDR	Duke	Distribution Capital Investment Rider	Protect consumers from being charged unjust and unreasonable rates
23-0477-EL-RDR	AES	Infrastructure Investment Rider	Protect consumers from an unreasonable rate increase
22-1042-EL-RDR	FirstEnergy	Advanced Metering Infrastructure / Modern Grid Rider	Review rates and charges for reasonableness
22-1037-EL-RDR	FirstEnergy	Alternative Energy Resource Rider	Protect consumers from being charged unjust and unreasonable rates
22-0892-EL-RDR	FirstEnergy	2022 Delivery Capital Recovery Rider	Review and consumer advocacy on the annual audit of FirstEnergy's DCR Rider
22-0704-EL-UNC	FirstEnergy	Grid Modernization Phase II	Protect consumers from being charged unjust and unreasonable rates
22-0693-EL-ABN	AEP	Abandonment of Electric Service Lines	Protect consumers from being adversely impacted by the utility's abandonment proposal
22-0279-EL-CSS	Duke v. Nationwide Energy Partners	Submetering	Protect consumers from losing protections as a result of unregulated submetering services
21-1234-EL-WVR	DP&L	Remote Disconnect	Protect consumers from being adversely impacted by remote disconnection policies
21-1130-EL-WVR	FirstEnergy	Grid Modernization Phase I	Protect consumers by providing recommendations on FirstEnergy's grid mod phase I
21-0560-EL-RDR	AES	Energy Efficiency	Protect consumers from being charged unjust and unreasonable rates

2025 Case Activity



Case Number	Entity	Issue	OCC is Advocating to:
20-1502-EL-UNC	FirstEnergy	Political and Charitable Spending	Protect consumers ensuring that costs they are charged are necessary to provide utility service
20-1118-EL-RDR	AEP	Legacy Generation Resource Audits	Protect consumers from abuse of market power and cross-subsidization
18-1875-EL-GRD; 18-1876-EL-WVR; 18-1877-EL-AAM; 19-1121-EL-UNC; 20-1041-EL-UNC	DP&L	Significantly Excessive Earnings Test	Protect consumers by reviewing excessive earnings by DP&L
18-1646-EL-RDR; 19-1904-EL-RDR; 20-1673-EL-RDR; 21-1131-EL-RDR; 22-1044-EL-RDR	FirstEnergy	Energy Efficiency and Demand Side Management	Protect consumers from paying too much for utility economic development programs and an audit process that lacks transparency
17-2474-EL-RDR	FirstEnergy	Application for Tariff Riders	Protect consumers ensuring that costs they are charged are necessary to provide utility service
17-0974-EL-UNC	FirstEnergy	Corporate Separation	Protect consumers from abuse of market power and cross-subsidization
14-1297-EL-SSO	FirstEnergy	Electric Security Plan IV	Protect consumers from unjust and unreasonable rates

Public Utilities Commission of Ohio – Natural Gas			
25-0820-GA-RDR	CenterPoint	Energy Efficiency Fund Rider	Protect consumers from paying for energy efficiency programs that are readily available in the competitive market
25-0720-GA-RDR	CenterPoint	Distribution Replacement Rider	Protect consumers against rider rate increases that increase overall bills
25-0621-GA-RDR	Columbia Gas	Capital Expenditure Program	Protect consumers from being charged unjust and unreasonable rates
25-0598-GA-ORD	PUCO Rules Review	Infrastructure Development Costs	Protect consumers by recommendations on infrastructure development cost recovery rules
25-0553-GA-AIR; 25-0554-GA-ATA; 25-0555-GA-AAM; 25-0556-GA-ALT; 25-0557-GA-IRR	Suburban Natural Gas	Rate Case	Protect consumers from an unjust and unreasonable rate increase
25-0177-GA-ORD	PUCO Rules Review	Minimum Gas Service Standards	Protect consumers by providing recommendations on the natural gas rules
24-0862-GA-AIR	Ohio Cumberland Gas	Rate Case	Protect consumers from being charged unjust and unreasonable rates
24-0832-GA-AIR; 24-0833-GA-ALT; 24-0834-GA-AAM; 24-0835-GA-ATA	CenterPoint	Rate Case	Protect consumers from being charged unjust and unreasonable rates
23-0894-GA-AIR; 23-0895-GA-ALT; 23-0896-GA-AAM; 23-0897-GA-ATA	Dominion Energy	Rate Increase	Protect consumers from being charged unjust and unreasonable rates
14-1615-GA-AAM	Columbia Gas	Change Accounting Methods	Protect consumers from being adversely impacted by the utility's proposal

2025 Case Activity



Case Number	Entity	Issue	OCC is Advocating to:
Public Utilities Commission of Ohio – Electric and Natural Gas			
25-0989-GE-UNC	Eligo Energy Ohio	Settlement	Protect consumers from marketer misconduct
25-0841-GE-UNC	Major Energy Services	Settlement	Protect consumers from marketer misconduct
25-0729-GE-ORD	PUCO Rules Review	Competitive Retail Service Supplier	Protect consumers from unlawful solicitation for electric and natural gas services
25-0710-GE-ORD	PUCO Rules Review	Competitive Retail Electric Service/ Competitive Retail Natural Gas Service Notice of Rate Change	Protect consumers from unlawful marketer practices
25-0494-GE-UNC	PUCO 2025-2026 Winter Heading Season	Disconnection of Gas and Electric Services	Protect consumers against disconnections from utilities, both gas and electric
24-0297-GE-UNC	Duke	Probable Non-compliance	Protect consumers from harm from utilities seeking exemptions from PUCO regulations
23-0720-GE-UNC	Inspire Energy Holdings, LLC.	Marketing Issues	Protect consumers from misleading and deceptive marketing practices
22-0332-GE-WVR	Vista	Waiver Third Party Verification	Protect consumers against marketer's proposal on digital third party verification
Public Utilities Commission of Ohio – Water			
25-0594-WW-AIR; 25-0595-WW-ATA	Aqua	Rate Case	Protect consumers from being charged unjust and unreasonable rates
25-0593-ST-AIR	Aqua Wastewater	Rate Case	Protect consumers from being charged unjust and unreasonable rates
24-0910-WW-SIC	Aqua	System Improvement Charge	Protect consumers from being charged unjust and unreasonable rates
24-0798-WW-AIR	Christi	Rate Case	Protect consumers from being charged unjust and unreasonable rates
Public Utilities Commission of Ohio – All Utilities			
25-0815-AU-ORD	PUCO Rules Review	Rate Case Filing Requirements	Protect consumers by advocating to increase utility transparency, protect and enhance consumer due process rights post-HB 15 legislation
25-0695-AU-ORD	PUCO Rules Review	Rules of Practice	Protect consumers' due process rights and the right to a fair hearing
25-0599-AU-ORD	PUCO Rules Review	Establishment of Credit and Termination of Service	Protect consumers by advocating to strengthen credit and termination of service rules
Ohio Supreme Court			
2025-1622	Enbridge	Rate Case	Protect consumers from unjust and unreasonable rates
2025-1580	OCC Writ of Prohibition	Objection to admission of testimony in violation of R.C. 4928.143(F)	Protect consumers by asking the Court to prohibit the PUCO from considering evidence of parent contributions in profits test
2025-1458	AEP	Data Center	Support PUCO decision approving AEP data center tariff
2025-0620	Duke	Distribution Capital Investment Rider	Protect consumers from retroactive ratemaking

2025 Case Activity



Case Number	Entity	Issue	OCC is Advocating to:
2025-0490	FirstEnergy	Electric Security Plan	Protect consumers from being adversely impacted by the utility's proposal
2024-1735	AEP	OVEC	Protect consumers from abuse of market power and cross-subsidization
2024-1505	Duke	Gas Rate Case	Protect consumers from being charged unjust and unreasonable rates
2024-0236	RPA Energy	Potential Remedial Actions for Noncompliance	Protect consumers from misleading and deceptive marketing and enrollment practices
2023-0130	DP&L	Electric Security Plan	Protect consumers from being charged unjust and unreasonable rates
2023-0111	DP&L	Electric Security Plan	Protect consumers from being charged unjust and unreasonable rates
2021-1473	DP&L	Significantly Excessive Earnings Test	Protect consumers from being charged unjust and unreasonable rates

Federal Energy Regulatory Commission			
ER26-0455	PJM Interconnection	Variable Resource Requirement	Protect consumers by advocating against unjust and unreasonable electricity charges
ER26-0004	Rulemaking	Ensuring the Timely and Orderly Interconnection of Large Loads	Protect consumers by advocating against unjust and unreasonable electricity charges
ER25-1811	PJM Interconnection	Regional Transmission Expansion Plan	Protect consumers by advocating against unjust and unreasonable transmission charges
ER25-1357	PJM Interconnection	Revised Price Cap and Price Floor for 2026/2027 and 2027/2028	Protect consumers by advocating for price caps
ER25-0785	PJM Interconnection	Capacity Must-offer Requirement	Protect consumers by advocating for rule changes
ER25-0778	PJM Interconnection	Surplus Interconnection Service	Protect consumers by advocating for tariff changes on transmission interconnections
ER25-0712	PJM Interconnection	Reliability Resource Initiative	Protect consumers by advocating for increased transparency in interconnection rules
ER25-0682	PJM Interconnection	Reliability Pricing Model	Protect consumers by advocating for reform of capacity auction
EL25-0049	PJM Interconnection	Show Cause regarding Co-Location Rules	Protect consumers by advocating for reasonable co-location rules
EL25-0046	Commonwealth of Pennsylvania v. PJM	Complaint	Protect consumers by advocating for reform of PJM capacity auction
EL25-0018	Joint Consumer Advocates v. PJM Interconnection	Base Residential Auction Capacity Prices	Protect consumers from paying too high prices for electric capacity by advocating for rule reform
EL23-0105	OCC v. PJM Interconnection, American Electric Power Service Corp., AES Ohio and Duke Energy Ohio, LLC	Monopoly Electric Transmission Charges for Supplemental Projects	Protect consumers from being charged unjust and unreasonable rates
RM21-0017	PJM Interconnection	Transmission Pricing Reform	Protect consumers from being charged unjust and unreasonable rates

2025 Case Activity



Case Number	Entity	Issue	OCC is Advocating to:
United States Court of Appeals for the District of Columbia Circuit			
25-1064	PJM Transmission v FERC	Complaint	Protect consumers by advocating against transmission owners' unreasonable control over the transmission planning process
United States Court of Appeals for the Fourth Circuit			
24-2163	OCC v. FERC	Electric Regional Transmission Planning and Cost Allocation	Protect consumers from being charged unjust and unreasonable rates
24-1650	OCC v. FERC	Transmission Pricing Reform	Protect consumers from being charged unjust and unreasonable rates
Supreme Court of the United States			
24-1304 & 24-1318	FirstEnergy & AEP Service Companies v. FERC, et al.	Transmission Profits	Protect consumers from being charged added profits for transmission investment



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Office of the Ohio Consumers' Counsel
65 East State Street, Suite 700, Columbus, Ohio 43215
www.occ.ohio.gov • @OCC4Consumers

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