



Office of the Ohio Consumers' Counsel

"Your Residential Utility Consumer Advocate"



2014 Annual Report

The Office of the Ohio Consumers' Counsel

► **Mission**

OCC advocates for Ohio's residential utility consumers through representation and education in a variety of forums.

► **Vision**

Informed consumers able to choose among a variety of affordable, quality utility services with options to control and customize their utility usage.

► **Core Values**

Justice

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

Integrity

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

Excellence

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

Communications

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

Respect

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

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A message from Bruce Weston

Ohio Consumers' Counsel



In 2014, we again dedicated ourselves, at the Office of the Ohio Consumers' Counsel, to representing and educating Ohioans regarding their electric, natural gas, telephone, and water services. We worked to fulfill our vision of informed consumers who are able to choose among a variety of affordable, quality utility services with options to control and customize their utility usage.

This vision matters for consumers in 4.5 million Ohio households. The outcomes of legislation and cases, the choices consumers make among alternative energy suppliers, and opportunities to conserve have the potential to account for hundreds of dollars on Ohioans' utility bills. With regard to consumers' energy choices, we produced our first online educational videos to help Ohioans.

Utility services can change with new practices and technologies. These changes can present new opportunities and challenges for consumers, as was seen in 2014.

An example is the increase in consumer concerns about high utility bills resulting from the reselling of utility services—such as electricity—in apartments, condominiums and other locations. We developed a list of principles for protecting consumers of resold utility services, which became part of our recommendations to lawmakers.

Another example is protecting the affordability and availability of basic telephone service (landlines) for Ohioans, as the telephone industry seeks further deregulation and transitions to new technologies. The need for consumer protection includes rural Ohio where telephone alternatives are fewer. In the legislative process at the close of 2014, we provided recommendations for this consumer protection. And, during that legislative process, Governor Kasich participated to protect Ohio consumers.

Also, we participated in regulatory cases and in the legislative process on issues involving energy efficiency. In both forums, we provided recommendations for balancing the costs and benefits of energy efficiency programs for consumers.

A continuing focus has been to try to transfer the relatively low energy prices in the marketplace to actual reductions on Ohioans' energy bills. In this regard, we recommended protecting consumers from paying subsidies to electric utilities. And we recommended limiting the proliferation of utility "riders" and other charges that increase Ohioans' electric bills.

Governing Board Chair Gene Krebs is to be commended for tirelessly sharing his time and advice for our consumer services in 2014. And thanks to Chair Krebs, Vice-Chair Susheela Suguness and all the Board members, as appointees of the Ohio Attorney General, for their guidance, encouragement and commitment to our agency's services to Ohioans. Thanks also to the Consumers' Counsel's staff, Deputy Consumers' Counsel Larry Sauer and former Deputy Consumers' Counsel Melissa Yost for their dedicated service in protecting consumers.

The Administration, legislators, and other policymakers are appreciated for their open door to hear consumer perspectives on these issues of importance to Ohioans. And thanks to those with whom we have partnered in our work for the public.

We look forward to serving Ohioans in 2015.

A message from Gene Krebs Governing Board Chairman



My colleagues and I on the Consumers' Counsel Governing Board are pleased to present this Annual Report to the Ohio General Assembly. The Annual Report outlines the agency's activities to help Ohioans, through representation and education, regarding their residential utility services in 2014. I commend Consumers' Counsel Weston and the agency's staff for their service to fellow Ohioans through legal representation and education.

Consumer protection continued to be a critical need last year in light of utility proposals to increase charges to customers. We serve Ohioans at a time of change for utility services they depend upon in their daily lives. Changes are especially apparent with regard to electric service. Ohio consumers have seen electric prices that are too high with the potential, some say, to spiral even higher.

Given the significance of electric service issues for Ohio families and our state economy, the Governing Board is reviewing, in 2015, how Ohioans have fared under the restructuring of the electric industry (to a competitive market for generation) that began with a 1999 law. It concerns me that, in 2014, Ohio consumers were paying more for electric service, on average, than consumers in 32 other states. (That statistic is based on data from the U.S. Energy Information Administration.) Questions for the Board's focus include why the restructuring of the industry has not resulted in electric prices that are lower than current levels for residential consumers, especially considering that the competitive market has had relatively low prices for energy.

The Board was pleased to see the agency participate in the state fair and in county fairs last year, as the Board encouraged. Ohio's tradition of state and county fairs provides an additional opportunity for outreach and education with Ohioans.

Board member Roland Taylor arranged for presentations to the Governing Board on Ohio's natural gas production industry, during our November meeting. I thank him, the Plumbers and Pipefitters Local Union 189 that assisted, and those making presentations for an informative session.

I thank Attorney General Mike DeWine for his reappointments last year of Board members Sally Hughes, Michael Watkins, and Fred Yoder. I appreciate the public service, to the Board and consumers, of former Deputy Consumers' Counsel Melissa Yost. And the Board was pleased to appoint Larry Sauer, a dedicated consumer advocate, as Deputy Consumers' Counsel.

I thank Consumers' Counsel Bruce Weston for his leadership and commitment to excellence in the agency's services to Ohioans. I acknowledge and thank policymakers and stakeholders who worked in the interest of Ohio consumers in 2014. I extend gratitude to the Ohio General Assembly and the Governor's Office in providing for the agency to serve Ohioans.

I look forward to our opportunities in 2015 to assist Ohioans with their utility services, including helping them save money on their utility bills.

Governing Board

About the Governing Board

By statute, the Ohio Attorney General appoints members to the Office of the Ohio Consumers' Counsel Governing Board. The Board consists of nine members, with three members appointed for each of the three organized groups: residential consumers; labor; and family farmers. No more than five members of the Board may be from the same political party. Board members are confirmed by the Ohio Senate and serve three-year terms. The Board is responsible for appointing the Consumers' Counsel and Deputy Consumers' Counsel.



Jason D. Clark

Board member, 2012 – 2015
Representing organized labor

Jason Clark serves as the business representative for the members of Millwright Local 1090, a statewide organization that is a division of the United Brotherhood of Carpenters. He previously served in various positions with both the Cincinnati and Dayton AFL-CIOs.



Fred Cooke

Board member, 2013 – 2016
Representing family farmers

Fred Cooke is a 30-year member of the Richland County Farm Bureau and runs a 1200-acre farm in Shelby, Ohio with his son. He also had a 30-year career as an educator teaching agriculture at Greene County Vocational School, Willard High School and Shelby High School in addition to teaching various courses at Southern State College in Wilmington. He is a member of the Hazel Grove Farm Bureau Community Council and the Malabar Farm Foundation.



Sally A. Hughes

Board member, 2011 – 2017
Representing residential consumers

Sally Hughes serves as president and chief executive officer of Caster Connection, Inc., a manufacturer of ergonomic casters and wheels. Ms. Hughes currently serves on the Board of the Ohio Chamber of Commerce and is a member of the Entrepreneurs Organization, Women's Presidents Organization, and Women's Business Enterprise National Council. She is on the Board of The Wellington School and the Women's Leadership Network Advisory Council for Otterbein University.



Gene Krebs

Chair, 2012 – 2016
Vice Chair, 2011 – 2012
Board member, 2005 – 2016
Representing residential consumers

Gene Krebs was appointed to the OCC Governing Board in 2005 and has been appointed to the Board by both Republican and Democrat Attorneys General. Mr. Krebs spent three years on the Eaton City School Board, eight years in the Ohio House of Representatives, four years as Preble County Commissioner, and five years on the Preble County Planning Commission. He has served on the Joint Committee on High Technology Start-up Business, Sales Tax Holiday Study Committee (Chair), and the Eminent Domain Task Force, all by legislative appointment. Mr. Krebs was appointed by Governor Ted Strickland to serve on Ohio's 21st Century Transportation Task Force and most recently by Governor John Kasich to the Local Government Innovation Council. Currently he is a Senior Fellow with The Center for Community Solutions and is working on their behalf on a series of video interviews of thought leaders, human service advocates and youthful entrepreneurs.

Governing Board



Susheela D. Suguness
Vice Chair, 2013 – 2015
Board member, 2012 – 2015
Representing residential consumers

Susheela Suguness cofounded and served as CEO of Prime Engineering & Architecture, Inc. and was responsible for day-to-day management of all aspects of business operations. She has served on the Board of Women Transportation Seminar (WTS) Columbus, which is dedicated to the professional advancement of women in transportation and has been a Transportation Advisory Board Member with the City of Columbus. She also served as the President of Asian Indian American Business Group (AIABG) of Columbus, Ohio.

Ms. Suguness is a Civil Engineering Graduate from one of the prestigious colleges in India, the Indian Institute of Technology (IIT), Chennai (Madras), India and a proud Graduate from the University of Florida with a Masters Degree in Civil Engineering.



Roland "Butch" Taylor
Board member, 2013 – 2016
Representing organized labor

Roland "Butch" Taylor has served as a member of Plumbers & Pipefitters Local 396 since 1980 where he has been the Business Manager since 2010. During his membership with Local 396, Mr. Taylor has also held other positions, including Union President (1995-2000), Executive Board Member (1992-1995) and Business Agent. Mr. Taylor also serves on the Boards of Leadership of the Mahoning Valley, Youngstown/Warren Regional Chamber and Chamber of Commerce. He was honored as the Regional Chamber's Labor Leader of the Year in 2012.



Michael A. Watkins
Board member, 2010 – 2017
Representing organized labor

Michael Watkins has served as a member of the Fraternal Order of Police (FOP), Lima Lodge No. 21 since 1976. He currently is serving his third term as president of FOP Lodge No. 21 after working for 12 years as its secretary. He is currently employed by the Fraternal Order of Police, Ohio Labor Council, Inc. in Columbus as the Administrative Assistant. Mr. Watkins was trustee of the FOP's 6th district from 1993 – 1995 and re-elected to the position, which he has held since 2007.



Fred Yoder
Board member, 2011 – 2017
Representing family farmers

Fred Yoder is the owner and operator of Fred Yoder Farms. He also is a partner and executive vice president with Yoder Ag Services LLC. Mr. Yoder currently serves as an Ohio delegate to the USA Poultry and Egg Export and U.S. Grains Councils; on the Ohio Corn and Wheat Political Action Committee, Wheat Growers Association; Ohio Corn Marketing Board of Directors; Madison County Farm Bureau Board of Trustees; and as chairman of the Ohio chapter of the 25 by '25 Alliance.



Stuart Young
Board member, 2012 – 2015
Representing family farmers

Stuart Young is a third generation dairy farmer. He is an owner and manager of Young's Jersey Dairy Inc. in Yellow Springs, Ohio. He previously served as Clark County Farm Bureau President and served on the Board of Directors for eight years. He has also served on the Husted Volunteer Fire Dept. for 32 years.

Senior Management



Bruce Weston

The OCC Governing Board appointed Bruce Weston to lead the agency as Consumers' Counsel, in March 2012.

Previously, Mr. Weston served as the Deputy Consumers' Counsel, by Governing Board appointment. As Deputy, he also directed the services of OCC's Legal Department.

Mr. Weston brings 35 years of experience in public utilities law to OCC. He is committed to protecting the interests of Ohio's residential utility consumers. His priorities for OCC include advocating for reasonable rates, competitive choices, and reliable service for Ohioans.

Prior to joining OCC for a second time in October 2004, Mr. Weston was in private law practice. He served as legal counsel for clients in cases involving utility rates, service quality, industry restructuring and competition.

Mr. Weston received his bachelor's degree in business administration from the University of Cincinnati. He began his career at OCC in 1978, as a legal intern. After earning his law degree from The Ohio State University College of Law, he began a 12-year tenure as an attorney for the agency. Mr. Weston served as the chairman of the Public Utilities Law Committee of the Ohio State Bar Association for two years ending in June 2012.



Larry Sauer

Larry Sauer was appointed as the Deputy Consumers' Counsel by the OCC Governing Board in September 2014. The Deputy is to perform the duties of the Ohio Consumers' Counsel during any times of unavailability. Mr. Sauer also serves as the Director of the

Legal Department. In that position, he manages the Legal Department's staff and is part of OCC's senior management team. Mr. Sauer joined OCC in March 2003 as an Assistant Consumers' Counsel. He has served as counsel in complex electric and natural gas cases. And he has advised the agency on consumer issues involving the transition to competitive markets for utility services.



Dan Shields

Dan Shields joined OCC as Director of the Analytical Department in March 2014. The department provides advice and recommendations for OCC's consumer positions on technical and policy issues related to public utility services. Mr. Shields is responsible for administering the accounting, economic and financial analyses associated with intrastate and interstate utility rate filings and other regulatory proceedings that affect Ohio's residential utility consumers.



Monica Hunyadi

Monica Hunyadi joined OCC in September 2013. As the Chief of Staff – Non-Case Services, she provides assistance to the agency director (the Consumers' Counsel) on special projects affecting Ohio consumers and the agency. She leads the OCC Operations and Public Affairs Departments toward meeting objectives for services within the agency and for the public. She previously served as the OCC Director of Operations from 1996 to 2005. She then accepted a position as the Director of Human Resources at the Supreme Court of Ohio. She also taught various human resource courses for the Ohio Judicial College and the Ohio Association of Court Administrators.



Melissa Yost

Melissa Yost served as the Deputy Consumer's Counsel from January 2013 to August 2014, by Governing Board appointment. She also served as the Director of the Legal Department during part of her time as Deputy. Prior to joining OCC, Ms. Yost served as an assistant attorney general for five years with the Office of the Attorney General.



Charles Repuzynsky

Charles Repuzynsky served as the Director of the Operations Department until September 2014. His responsibilities included budgeting, finance, human resources, and information and technology for supporting OCC's consumer advocacy.

Electric

Overview

In 2014, the Office of the Ohio Consumers' Counsel (OCC) continued to advocate for affordable electric rates for Ohioans. Ohioans were paying electric prices that were higher, on average, than residential electricity prices in 32 other states in 2014, according to information from the U.S. Energy Information Administration.

One OCC objective is for Ohioans to save money from the historically low energy prices in the marketplace. Obtaining the benefits of competition is consistent with the Ohio General Assembly's enactment of Senate Bill 3, a 1999 law. That law transformed the state from regulated rates to market-based electric generation pricing.

Regulation in Ohio has continued to diverge from traditional rate cases to single-issue ratemaking cases. Traditional rate cases protect customers by review of all aspects of utility operations affecting customers, including utility profits. Single-issue cases typically focus on a single charge or cost that the utility is seeking to increase on customers' bills.

Additionally, several electric utilities asked the Public Utilities Commission of Ohio (PUCO) to require customers to guarantee profits for certain deregulated power plants. The Consumers' Counsel recommended protecting customers from paying these subsidies that were proposed at a time when electricity generation should be provided in competitive markets.

With billions of dollars at stake for consumers in utility proposals for higher rates, OCC participated in many electric cases in 2014. In one case alone, Duke Energy's customers were protected from paying \$729 million in rate increases.

These electric cases were at the PUCO, the Ohio Supreme Court and the Federal Energy Regulatory Commission. Also, in testimony before the Ohio General Assembly, the Consumers' Counsel made recommendations that would protect the monthly bills of utility customers.

AEP, Duke and FirstEnergy seek guaranteed profits for deregulated power plants

In 2014, American Electric Power (AEP), Duke Energy, and FirstEnergy asked the PUCO to approve long-term agreements that would guarantee profits for deregulated power plants at the consumer's expense.

Under Ohio law, what utilities charge for power plants is to be determined by the competitive electricity market, not guaranteed by the government regulator.

OCC and others recommended that the PUCO deny the proposed "Power Purchase Agreements." The electric utilities' proposals were the latest in a succession of in-

dustry proposals seeking government protection from competitive markets, at the expense of consumers.

In recent years, the markets would have provided consumers with historically low energy prices. Instead, electric customers have paid billions during the shift from regulated power plants to deregulated generation, since 1999. The new proposals sought by the utilities could have customers paying billions more.

OCC filed the testimony of experts that FirstEnergy's proposal alone could cost customers more than \$3 billion over the 15-year period of the agreement. The PUCO will hold a hearing in 2015.

The PUCO decided AEP's proposal on February 25, 2015, denying the proposed "Power Purchase Agreement." However, the PUCO gave guidance for future proposals.

AEP, Case Nos. 14-1693-EL-RDR, 13-2385-EL-SSO; Duke, Case No. 14-841-EL-SSO; FirstEnergy, Case No. 14-1297-EL-SSO

Duke customers protected from \$729 million in rate increases

Duke Energy's 690,000 electric customers were spared an overall increase of \$729 million. That occurred in February 2014, when the PUCO denied the utility's request for additional money. If approved, the request would have added \$150 to \$200 per year to customers' bills for three years.

OCC and others asked the PUCO to dismiss Duke's request because it violated a settlement agreement that OCC, the PUCO Staff, Duke and others signed in 2011. The settlement allowed Duke to collect \$330 million in "electric service stability charges" that Duke claimed it needed to be protected against losses due to competition for generation service.

In exchange for that charge, OCC and others obtained as part of the settlement that a series of auctions would be held to set generation prices according to the competitive market. That agreement allowed customers to take advantage of historically low market prices for electricity. The first auction resulted in a 17.5 percent rate decrease for customers.

However, after the PUCO approved a significant capacity cost increase for AEP Ohio, Duke filed a similar proposal to collect capacity costs from its customers. Capacity costs generally relate to the fixed cost of power plants that can produce electricity.

Duke asked for an additional \$729 million in charges, even though the 2011 agreement had barely taken effect. OCC and others, including businesses, industrial customers, and the City of Cincinnati, asked the PUCO to reject Duke's request.

The PUCO rejected Duke's request to impose this rate increase on customers.

Duke, Case No. 12-2400-EL-UNC

FirstEnergy's overcharges for renewable energy appealed to Ohio Supreme Court

In December 2013, FirstEnergy appealed, to the Ohio Supreme Court, a PUCO decision that it had overcharged its customers for renewable energy. In February 2014, the Consumers' Counsel also appealed the PUCO's decision.

Under a 2008 Ohio law, electric utilities are required to purchase a portion of their generation supply from renewable energy sources. The law also allows utilities to recover the costs of these purchases from customers if the purchases are determined to be reasonable.

There was activity in the appeals in 2014. OCC requested that FirstEnergy be required to credit its customers more than the \$43.4 million in overcharges, plus interest, that the PUCO had ordered for crediting back to customers. OCC is not permitted to say precisely how much more in overcharges it recommended that FirstEnergy return to customers. FirstEnergy claims the information is a confidential trade secret and must be kept from the public domain.

In February 2014, the Supreme Court granted FirstEnergy's request to stop (stay) the return of the \$43.4 million that the PUCO had ordered. The stay is in effect until the Supreme Court decides the appeal.

FirstEnergy, Case No. 11-5201-EL-RDR; Sup. Ct. Case 2013-2026

AEP and DP&L consumers charged for storm repair costs

In December 2012, AEP asked the PUCO for permission to charge its 1.5 million customers \$61.8 million to cover its repair costs for several large storms. It is believed to be the most expensive storm repair request in Ohio's history. One year later, AEP signed a settlement with the PUCO Staff and a number of non-residential parties that would allow AEP to charge customers \$54.8 million plus carrying charges. OCC recommended that the PUCO limit charges to consumers to \$23.6 million.

OCC asserted that the \$54.8 million proposed for charging customers did not reflect reasonable costs associated with storm restoration. OCC's experts testi-

fied that AEP did not consider other reasonable, less expensive options for storm restoration.

DP&L also proposed a Storm Cost Recovery Rider in December of 2012. DP&L sought to charge customers for major storm costs incurred in 2011 and 2012, as well as the costs from Hurricane Ike in 2008. The initial request was \$64 million and was later reduced to \$37 million.

On May 1, 2014, DP&L filed a settlement with the PUCO Staff and Kroger Co. to propose charging customers the amount of \$22.3 million. OCC did not sign the settlement, out of concern that customers would be charged much more than appropriate. OCC recommended that the charges for residential utility consumers be reduced to \$1 million and asserted that DP&L's historic profits were sufficient to cover the storm restoration costs.

The PUCO found both the AEP and DP&L settlements to be reasonable. The settlements were then adopted and approved, allowing the charges to customers.

AEP, Case No. 12-3255-EL-RDR; DP&L, Case No. 12-3062-EL-RDR

Consumer protections sought in review of 2008 energy law

Consumer groups, businesses, environmental groups, and other stakeholders testified on legislation in the Ohio General Assembly in 2014 that would revisit parts of Ohio's 2008 energy law. Ohio's electric utilities did not present public testimony.

Senate Bill 310, which was adopted by the legislature on May 28, 2014, freezes for two years the state's targets for energy efficiency and renewable energy. The 2008 law provided for increasing energy efficiency and renewable energy in Ohio each year until 2025.

Senate Bill 310 also requires a panel of lawmakers to study the issues and provide a report to the General Assembly by the end of September 2015.

OCC testified before both the Ohio House and Senate Public Utilities Committees. OCC recommended that, instead of the two-year freeze, other parts of the 2008 energy law should be changed to provide consumer protections.

Those recommendations included ending the allowance in the law for electric utilities to charge consumers for excessive profits. The 2008 law merely disallows utilities from charging for "significantly" excessive profits. And OCC proposed an end to the practice of allowing electric utilities to bill consumers for charges above the market price of electricity.

OCC also recommended a law to require refunds to consumers when the Ohio Supreme Court determines that the PUCO allowed utilities to collect inappropriate charges. In February 2014, the Supreme Court held that even though AEP had collected \$368 million, plus carrying charges, from consumers in unjustified charges, the law did not allow for "retroactive ratemaking" to refund the money.

A complicating factor for consumers is that OCC has been unable to use a stay to stop the utility's collection of charges during an appeal. OCC cannot, as a practical matter, afford to post a bond with the Supreme Court to cover millions of dollars that the utility would not be collecting while an appeal is pending.

Protections needed for customers of resold public utility service

Residents of some apartments, manufactured homes and other housing communities do not receive a bill from the local public utility for their utility services.

Instead, a landlord, park operator, condominium owners association, or other third party sometimes "resells" the public utility service to tenants and residents.

The resale of public utility service can result in higher bills than what customers would pay if they were billed directly by the local utility.

A series of newspaper stories highlighted this problem in October 2013. The stories reported that the practice of reselling public utility services has inflated some residential utility bills by as much as 40 percent, compared to those customers directly billed by a public utility.

In 2014, legislation was introduced in a number of bills (House Bills 422, 483, 545, 568 and 662) to address the higher charges for resold services that many customers were paying.

The Consumers' Counsel testified three times in 2014 on this issue. One testimony was before the House Finance and Appropriations Committee (HB 483, April 2014). The other two testimonies were before the House Public Utilities Committee (HB 422, 545, 568 and 662, December 2014). OCC recommended a number of consumer protections.

In testimony on December 2, 2014, OCC outlined seven principles for consumer protection on the reselling issue. Those consumer principles include price protections, disclosures about the resale of public utility service and remedies for any violations of the law.

On December 17, 2014, the House Public Utilities Committee approved Substitute House Bill 662. OCC hopes the passing of the bill in Committee will serve as momentum for a new bill in 2015 and a law that is much needed by many Ohioans.

Natural Gas

Overview

Major concerns for the Office of the Ohio Consumers' Counsel (OCC) in 2014 included protecting approximately 420,000 natural gas customers of Duke Energy (Duke) and preserving a century-old law that balances consumer and utility interests.

In March 2014, OCC and others appealed, to the Ohio Supreme Court, the decision of the Public Utilities Commission of Ohio (PUCO) to approve a rate increase requested by Duke. The request was to charge customers for the costs to clean up pollution at two long-closed manufactured gas plant sites.

Ohio law limits utilities to charging for the costs of providing utility service to current customers. In the appeals, residential and business customer groups are asking the Supreme Court to protect utility customers from paying Duke's charges. The charges relate to clean up of pollution that dates back more than 100 years (to the 19th century) at plants that have been long closed.

In the Ohio House of Representatives, utilities sought legislation to weaken the longstanding Ohio law that should prevent charging customers for this clean-up. In response, OCC recommended protections for Ohioans' utility bills.

Separately, OCC participated in House interested-party meetings on legislation supported by natural gas utilities to charge consumers to fund economic development. OCC appreciated the opportunity to participate in the process. A compromise was reached to reduce the amount of funding to be collected from customers while providing for economic development.

Additionally, Ohio customers of natural gas utilities continued to benefit in 2014 from lower gas prices resulting from market-based auctions. OCC was a participant in earlier cases where decisions were made to use the auctions for establishing these prices that have been favorable to consumers.

Appeals to the Ohio Supreme Court, regarding Duke's charges to customers to clean up 19th-century gas plant sites

In March 2014, OCC (and others) appealed a 3-2 decision of the PUCO. The decision permitted Duke to charge its 420,000 natural gas customers \$55 million for the costs (spent to date) to clean up two of its long-defunct manufactured gas plant sites in Cincinnati.

At the heart of the issue is whether these charges violate an Ohio law that has protected consumers in utility rate cases for a century. Ohio law limits utilities to charging for the costs of providing utility service to current customers. The position of residential and business customer groups is that utilities cannot legally charge customers for the costs of cleaning up long-defunct

manufactured gas plant sites (where pollution dates back to the mid-1800s).

The two PUCO Commissioners who dissented from the majority's decision would have disallowed Duke's charges to customers. Both of those Commissioners cited the ratemaking law as the reason why they could not support granting Duke's request.

On March 3, 2014, Duke began collecting \$1.62 a month from its residential customers who will each pay, on average, about \$100 for the clean-up costs over the course of five years.

As part of the appeal, OCC and others asked the Ohio Supreme Court to stay (stop) Duke from charging cus-

tomers while the Court considers the appeal. The Court granted this request on May 14, 2014, without requiring OCC and others to post a bond.

However, after natural gas utilities filed to oppose the Court's action to stop the charges during the appeal, the Court reversed its ruling. On November 5, 2014, the Court ruled that Duke would be allowed to resume its collections from customers unless OCC and others posted a \$2.5 million bond. As a state agency, OCC cannot afford to post such a bond with the Supreme Court. On January 14, 2015, Duke resumed its charges to customers. Duke's charges for the clean-up of manufactured gas plants remained on appeal in 2014. Duke's consumers are continuing to pay for those charges during the appeal process.

In another appeal where there was not a stay, consumers lost money in an otherwise successful appeal of AEP's electric security plan (Case Nos. 08-0917-EL-SSO, 08-0918-EL-SSO, Sup. Ct. 2012-187). The Court found that \$368 million in unjustified charges by the utility could not be returned to customers because the utility had already collected the money. The Court suggested that the resolution of this problem could be a matter for the Ohio General Assembly.

It should be noted that FirstEnergy, in its latest proposal for an electric security plan (Case No. 14-1297-EL-SSO), is seeking authorization that could lead to charging customers for the clean up of manufactured gas plants.

Duke, Case No. 12-1685-GA-AIR, Sup. Ct. 2014-0328

Preserving consumer protections when natural gas utilities sought a law to allow charges for clean up of pollution

Natural gas utilities sought an amendment that was added to House Bill 483, part of the mid-biennium budget review in 2014. The amendment would have weakened the current law that should prevent charging consumers for the clean-up of 19th-century manufactured gas plants. In this regard, OCC presented recommendations for consumer protection to the Ohio House Finance and Appropriations Committee, in April 2014.

Ohio law restricts utilities to charging for the costs of providing utility service to current customers and for only those costs that are used and useful to customers. Ultimately, the amendment was removed from HB 483, to the benefit of consumers.

This issue may sound familiar. Natural gas utilities sought a similar amendment in Amended Substitute House Bill 59 (the biennium budget bill) in 2013. That amendment was eventually vetoed by the Governor. (See OCC 2013 Annual Report, p. 16.)

Protecting consumers in legislation that allows natural gas utilities to charge customers for economic development

OCC appreciated the opportunity to participate in interested-party meetings, in the Ohio House of Representatives, related to funding of economic development. House Bill 319 was proposed to allow the collection of funds from consumers to support natural gas utilities' economic development projects. Through the interested-party process, the funding to be collected from customers was reduced.

Substitute House Bill 319 was enacted at year-end. It limits the costs that could be charged to any single customer to no more than \$3 per calendar year, or about \$10 million annually for all customers.

Natural gas utilities initially sought legislation to charge customers \$33 million annually for infrastructure development projects.

As of June 2014, there were 3 million residential natural gas customers in Ohio and over 253,000 commercial and industrial natural gas customers, according to statistics from the PUCO.

Telecommunications

Overview

The Office of the Ohio Consumers' Counsel (OCC) advocated for the continued provision of basic local (landline) telephone service for consumers, in 2014. Basic service is offered to consumers without any requirement that consumers buy a bundle of services.

Under a provision in House Bill 490, telephone companies would have been permitted to discontinue basic landline service.

Protecting the affordability and availability of basic landline service for Ohio consumers

OCC sought to protect Ohioans' basic telephone service in November by recommending that the legislation be significantly improved, or not enacted, in House Bill 490. The bill would have allowed telephone companies to discontinue Ohioans' basic landline service. Basic service includes a dial tone for a flat monthly rate, access to 9-1-1, operator services, telephone relay services for the hearing impaired, caller ID blocking on a per-call basis, directory assistance and long distance service, among other things.

Consumers' Counsel Bruce Weston testified on two occasions with concerns for Ohio consumers. Those concerns included that the amendment could allow telephone companies to leave consumers with less reliable service, no service, or higher-priced alternatives (i.e., service bundles, such as cable TV and Internet) that they may not want or need.

In parts of rural Ohio, for example, it is not uncommon to find a lack of cellphone signal. For rural Ohioans in those areas cellphone service, even if affordably priced,

would not be a viable alternative in the event telephone companies were to withdraw basic service.

Also, the bill would have allowed telephone companies to give a mere 90-day notice in advance of the changes to their service offerings. This amount of time was insufficient for customers to try to find another affordable option for telephone service for themselves and their families.

The Federal Communications Commission (FCC) is in the midst of transitioning from a public switched telephone network to an Internet-based network. Although HB 490 was based on this upcoming policy change, OCC noted that it could potentially take years for the FCC to implement it. Thus, there is not a pressing need for the legislation now.

Governor Kasich informed the Senate Agriculture Committee that he would veto HB 490 if it included the telephone legislation. Ultimately, the Senate Committee halted its consideration of HB 490, and the legislation did not become law. (Note: In 2015, telephone legislation has been included in the biennium budget bill, House Bill 64.)

Water

Overview

The Office of the Ohio Consumers' Counsel (OCC) participated in a Public Utilities Commission of Ohio (PUCO) case where the state's largest water utility filed for a rate increase.

The case was the first rate increase sought by Aqua Ohio since it acquired Ohio American Water Company. The Utility described the rate increase as needed to fund water plant investments, as well as to create more uniform rates between customers in different areas of its service territory.

Participating on behalf of consumers

Aqua Ohio initially sought to increase rates to customers by \$6.65 million or approximately 11.75 percent. Residential customers were asked to pay \$4.34 million of the total rate increase. The utility described the increase as needed to pay for water plant investments it made during the past several years. The increase affected 86,000 residential customers in portions of Ashtabula, Franklin, Lake, Lawrence, Mahoning, Marion, Pike, Portage, Preble, Richland, Seneca, Stark, Summit, Trumbull, and Williams counties.

Aqua proposed this rate increase as the first step in merging its Lake Erie, Masury, and Aqua Ohio Water divisions, by establishing more uniformity in rates among these areas. OCC analyzed the application and sought ways to reduce the rate impact on residential customers.

Aqua, the PUCO Staff, and other intervening parties filed a settlement agreement that decreased the proposed revenue increase from \$6,659,718 (11.76 percent increase) to \$3,820,000 (6.74 percent increase), in July 2014. OCC initially opposed the settlement. However, OCC later chose to not oppose the settlement given, among other things, the opportunity to moderate litigation costs. (Utilities typically are allowed to charge customers for litigation costs in rate cases, and those charges can be more of a consideration for customer protection when the utility is relatively small, such as Aqua.) Furthermore, at the local public hearings there were fewer customer complaints about water quality and the proposed rate increase compared to customer concerns in recent years. The PUCO approved the settlement in September.

Aqua, Case No. 13-2124-WW-AIR

Consumer Education

Overview

In this time of competitive utility markets, it is critical for utility customers to have reliable sources for objective information about their choices. The Office of the Ohio Consumers' Counsel (OCC) remains committed to providing Ohioans with resources that will help them make informed decisions for saving money.

OCC continues its focus on educating consumers about energy choices

OCC's Outreach and Education staff met with thousands of Ohioans in 2014. Staff members attended over 500 outreach events. The most requested presentation in 2014 was OCC's "Energy Choice" speech, which helps consumers make informed decisions about their energy suppliers.

Also, we were pleased to be a part of Ohio's tradition of county and regional fairs, as well as the Ohio State Fair. OCC staffed booths and met with fairgoers at the fairs in Allen County, Coshocton County, and Montgomery County. OCC also visited with consumers at the Ohio State Fair and the Farm Science Review.

In this regard, OCC appreciated that two experienced Outreach and Education professionals rejoined the agency. Andy Tinkham and Amy Carles are again speaking with and educating consumer groups in Ohio as part of the OCC Speakers Bureau.

In 2014, OCC began using social media to correspond with consumers. Now you can follow us on Twitter @OhioUtilityUser. OCC also launched a YouTube channel to help consumers better understand their energy choices. The videos can be found on OCC's website at www.occ.ohio.gov/education/videos.shtml.

OCC upgraded some of its communications systems last year. Those upgrades included a new state website domain. Our new web domain is www.occ.ohio.gov. Visitors who use an earlier link to our website will be automatically forwarded to our new location on the web.



Current Ohio Consumers' Counsel Bruce Weston invited first Consumers' Counsel Bill Spratley to send OCC's first tweet.

Low-Income Dialogue Group

The Office of the Ohio Consumers' Counsel (OCC) has worked with stakeholders in a variety of forums to identify and address issues that impact low-income utility customers. One of those forums is the Low-Income Dialogue Group (LIDG). The LIDG has a monthly conference call among low-income advocates involved in utility consumer issues. OCC has facilitated the LIDG for over ten years, including in 2014.

According to the most recent Ohio Poverty Report, poverty in Ohio has increased 58% over the last decade. An estimated 1,797,000 of Ohioans were poor, representing 16% of the population living in poverty. An estimated 340,000 families, or 11.6 percent of Ohio families, were living in poverty. Some of the highest poverty rates in the state were in Youngstown at 36.4%, Cleveland at 35.4% and Dayton at 34.7%.

LIDG members, including the Consumers' Counsel, testified in favor of legislation to protect consumers from the submetering and reselling of utility services.

Another issue of concern was the legislation affecting Ohioans' basic telephone service, in House Bill 490.

LIDG members also participated in workshops and working groups at the Public Utilities Commission of Ohio ("PUCO") that addressed different aspects of Ohio's energy choice programs. The consumer groups sought more emphasis on consumer issues, such as customer education, in those discussions.

The Consumers' Counsel and LIDG members offered comments on the PUCO's Credit and Disconnect rules.

Employee Recognition

Exceptional employees are recognized by the Office of the Ohio Consumers' Counsel (OCC) directors throughout the year. Employees are acknowledged for their outstanding work on behalf of Ohio's residential utility consumers and for exemplifying OCC's mission, vision and values. From among these recognized employees, OCC's staff annually selects an employee of the year.

2014 Employee of the Year



Laurie Knight

OCC's 2014 Employee of the Year is Laurie Knight, administrative assistant in the Operations Department. Ms. Knight was selected for this honor by her peers after being chosen as employee

of the quarter for October – December 2014.

Ms. Knight assists with human resource functions, employee benefits, payroll processing, fleet management and travel arrangements for the agency. She also serves as secretary to the Governing Board.

With her associate degree in secretarial science from Columbus State Community College, Ms. Knight served the OCC as the executive secretary for Consumers' Counsel Migden-Ostrander. Previously, she was a word processing specialist. Ms. Knight's career at OCC spans the years 1984 to 1994 and 2004 to the present.

On the credit issues, the consumer advocates asked the PUCO to adopt multiple options for customers to demonstrate creditworthiness. And they proposed ways to protect consumers' privacy, such as having utilities and others use alternatives to social security numbers to establish service. In the disconnection rules, LIDG members advocated for additional types of payment arrangements to be offered to utility consumers. And they proposed more uniformity between gas and electric rules for the Percentage of Income Payment Plans where such uniformity could be implemented without harming consumers.

Daniel Duann

Selected as Employee of the Quarter for January - March 2014, Daniel Duann is a senior specialist on capital markets and structures who analyzes, reviews and prepares testimony on water, electric and natural gas cases and other regulatory proceedings. Dr. Duann joined OCC in January 2008.

Deb Bingham

Selected as Employee of the Quarter for April - June 2014, Deb Bingham is a case team coordinator for the electric and water teams. She organizes case work, schedules meetings for the teams, formats legal documents including briefs, discovery, pleadings and testimony. Ms. Bingham joined OCC in September 2005.

Steve Hines

Selected as Employee of the Quarter for July - September 2014, Steve Hines was a principal regulatory analyst for OCC. Mr. Hines joined the OCC in April 1984. He recently retired in November after serving utility consumers with OCC for 30 years. Steve served as the agency's water team leader since March 2006 and was OCC's representative on the water team for the National Association of State Utility Consumer Advocates.

2014 Fiscal Report

The Office of the Ohio Consumers' Counsel (OCC) is funded through an assessment on the intrastate gross receipts of entities regulated by the Public Utilities Commission of Ohio (PUCO), based on Section 4911.18 of the Ohio Revised Code.

OCC assessed more than 1,000 entities for operating funds for fiscal year 2014. If all regulated entities charged their customers for the cost of OCC's budget, this would cost customers less than three cents for every \$100 in utility bills. This cost is equivalent to less than a dollar a year for a typical utility customer.

Operating budget

Fiscal year 2014 expenditures

Personnel services	\$ 3,569,551.00
Purchased personal services	\$ 506,205.35
Supplies and maintenance.....	\$ 430,226.67
Equipment.....	\$ 61,669.10
Other refunds.....	\$ 22.42
Total	\$ 4,567,674.54

2014 Case Activity

Cases with All Utilities at the Public Utilities Commission of Ohio

Case Number	Company/Case Type	Issue
13-0274-AU-ORD	PUCO Rules Review	Credit and Disconnect

Electricity Cases at the Public Utilities Commission of Ohio

Case Number	Company/Case Type	Issue
14-1693-EL-RDR; 14-1694-EL-AAM	Ohio Power	Expansion of Power Purchase Agreements
14-1580-EL-RDR	Duke Energy	Energy Efficiency Recovery Mechanism
14-1411-EL-ORD	PUCO Rules Review	SB 310 Rulemaking; Renewable Energy Resource, Energy Efficiency Savings and Peak Demand Reduction Requirements
14-1297-EL-SSO	Ohio Edison; Toledo Edison; Cleveland Electric Illuminating	Electric Security Plan IV
14-1186-EL-RDR	Ohio Power	Deferred Capacity Charges
14-1160-EL-UNC; 14-1161-EL-AAM	Duke Energy	Advanced Meter Opt-Out and Cost Recovery
14-1158-EL-ATA	Ohio Power	Advanced Meter Opt-Out Tariff
14-1084-EL-UNC	Dayton Power & Light	Sale of East Bend Unit 2
14-1080-EL-RDR	Dayton Power & Light	Energy Efficiency Rider Update
14-0873-EL-RDR	Ohio Power	2009-2013 Energy Efficiency Peak Demand Reduction Update/True-Up

14-0853-EL-EEC	Ohio Power	2013 Status Report of the Energy Efficiency and Peak Demand Response Programs Portfolio
14-0862-EL-EEC; 14-0863-EL-EEC; 14-0864-EL-EEC	Ohio Edison; Toledo Edison; Cleveland Electric Illuminating	Transmission and Distribution Projects
14-0859-EL-EEC; 14-0860-EL-EEC; 14-0861-EL-EEC	Ohio Edison; Toledo Edison; Cleveland Electric Illuminating	2013 Status Report of the Energy Efficiency and Peak Demand Response Programs Portfolio
14-0841-EL-SSO; 14-0842-EL-ATA	Duke Energy	Electric Security Plan III
14-0828-EL-UNC	Ohio Edison; Toledo Edison; Cleveland Electric Illuminating	2013 Significantly Excessive Earnings Test
14-0738-EL-POR	Dayton Power & Light	2013 Status Report of the Energy Efficiency and Peak Demand Response Programs Portfolio
14-0568-EL-COI	Commission Ordered Investigation	Competitive Retail Electric Service Markets
14-0485-EL-ORD	PUCO Rules Review	Retail Service Market Rules
14-0457-EL-RDR	Duke Energy	Recovery of Program Costs, Lost Distribution Revenue and Performance Incentives Related to Energy Efficiency and Peak Demand Response Program
14-0456-EL-EEC	Duke Energy	2013 Status Report of the Energy Efficiency and Peak Demand Response Programs Portfolio

2014 Case Activity

14-0255-EL-RDR	Ohio Power	Distribution Investment Rider
14-0193-EL-RDR	Ohio Power	Economic Development Rider
14-0192-EL-RDR	Ohio Power	SmartGrid Rider Update
14-0117-EL-FAC	Dayton Power & Light	2013 and 2014 Fuel Audits
14-0075-EL-POR	Duke Energy	Energy Efficiency Pilot Program
13-2442-EL-UNC	Dayton Power & Light	Corporate Separation
13-2420-EL-UNC	Dayton Power & Light	Generation Assets
13-2394-EL-UNC	Ohio Power	2014 Distribution Investment Rider Workplan
13-2385-EL-SSO; 13-2386-EL-AAM	Ohio Power	Electric Security Plan III
13-2349-EL-AAM	Dayton Power & Light	2013 Storm Costs
13-2249-EL-UNC; 13-2250-EL-UNC	Ohio Power and Columbus Southern Power	2011 Significantly Excessive Earnings Test
13-2206-EL-CSS	Ormet v. Ohio Power	Billing Dispute
13-2100-EL-ORD	Ohio Edison; Toledo Edison; Cleveland Electric Illuminating	Delivery Capital Recovery Rider
13-2029-EL-ORD	PUCO Rules Review	Market-Based Standard Service Offer
13-1938-EL-WVR	Ohio Power	gridSMART limited waiver
13-1892-EL-FAC	Ohio Power	Fuel Adjustment Clauses for 4th Quarter 2013
13-1539-EL-UNC	Duke Energy	Reliability Targets
13-1530-EL-RDR	Ohio Power	Transition to Market-Based Rates
13-1286-EL-FAC	Ohio Power	Fuel Adjustment Clauses for 3rd Quarter of 2013
13-1201-EL-RDR	Ohio Power	2009-2012 Energy Efficiency and Peak Demand
13-0955-EL-ORD	PUCO Rules Review	Corporate Separation
13-0954-EL-ORD	PUCO Rules Review	Transmission Cost Recovery Rider
13-0953-EL-ORD	PUCO Rules Review	Reasonable Arrangements
13-0652-EL-ORD	PUCO Rules Review	Alternative Energy Portfolio Standards
13-0651-EL-ORD	PUCO Rules Review	Energy Efficiency Rules
13-0572-EL-FAC	Columbus Southern Power and Ohio Power	Fuel Adjustment Clauses for 2nd Quarter 2013
13-0549-EL-RDR	FirstEnergy	2012 Annual Review SmartGrid
12-3255-EL-ATA	Ohio Power	2012 Major Storm Costs
12-3151-EL-COI	Commission Ordered Investigation	Electric Market Design and Corporate Separation
12-3133-EL-FAC	Ohio Power	Fuel Adjustment Clauses for 1st Quarter 2013
12-3062-EL-RDR; 12-3266-EL-AAM	Dayton Power & Light	Deferral Accounting for 2008, 2011 and 2012 Major Storm Costs
12-2881-EL-FAC	Dayton Power & Light	Fuel Audit

12-2190-EL-POR; 12-2191-EL-POR; 12-2192-EL-POR	Ohio Edison; Toledo Edison; Cleveland Electric Illuminating	Energy Efficiency/Peak Demand Reduction Application for 2013-2015
12-2050-EL-ORD	PUCO Rules Review	Electric Services Rules
12-1945-EL-ESS	Ohio Power	Reliability
12-1924-EL-ORD	PUCO Rules Review	Competitive Retail Electric Service
12-1557-EL-RDR	Ohio Power	2009-2011 Energy Efficiency and Peak Demand Reduction Update/True-Up
12-0426-EL-SSO; 12-0427-EL-ATA; 12-0428-EL-AAM; 12-0429-EL-WVR; 12-0672-EL-RDR	Dayton Power & Light	Electric Security Plan II
12-0406-EL-RDR	Ohio Edison; Toledo Edison; Cleveland Electric Illuminating	Smart Grid Tariff
11-5201-EL-RDR	Ohio Edison; Toledo Edison; Cleveland Electric Illuminating	Advanced Energy Rider
11-0346-EL-SSO; 11-0348-EL-SSO; 11-0349-EL-AAM; 11-0350-EL-AAM	Columbus Southern Power and Ohio Power	Electric Security Plan II
11-0281-EL-FAC	Columbus Southern Power and Ohio Power	Fuel Adjustment Clause

Electricity Cases at the Supreme Court of Ohio

Case Number	Company/Case Type	Issue
2014-1505	IEU v. Dayton Power & Light (OCC Appellant/Cross-Appellee)	Industrial Energy Users (Appellant/Cross-Appellee) Appeal of PUCO Decision on Electric Security Plan II (PUCO Case No. 12-426-EL-SSO et al.)
2013-2026	FirstEnergy v. PUCO (OCC Intervening Appellee)	FirstEnergy Appeal of PUCO Decision on FE Alternative Energy Rider (PUCO Case No. 11-5201-EL-RDR)

Electricity Cases at the Federal Energy Regulatory Commission

Case Number	Company/Case Type	Issue
EL15-31	PJM	Revision to Amended/Restated Operating Agreement and Open Access Transportation Tariff
EL14-94	PJM	Capacity Caps
ER14-2940	PJM	VRR Curve Adjustments under PJM Triennial Review
EL14-55	FirstEnergy	Complaint
EL14-36	FirstEnergy Solutions	Capacity Market Charges

2014 Case Activity

AD13-07	PJM	Capacity Market
ER13-1164	AEP Ohio	Wholesale Capacity Price
ER12-1901	GenOn	Reliability Must Run
ER11-3279	Midwest Independent System Operator and FirstEnergy	Switch to PJM from MISO
ER11-2814	PJM/ATSI	Switch to PJM from MISO

Natural Gas Cases at the Public Utilities Commission of Ohio

Case Number	Company/Case Type	Issue
14-1709-GA-COI	Commission Ordered Investigation	Cobra Pipeline
14-1654-GA-CSS	Orwell Natural Gas Company	Complaint Against Orwell Trumbull Pipeline
14-1615-GA-AAM	Columbia Gas	Modification of Accounting Procedures
14-0948-GA-AEC	Brainard Gas Corporation	Special Arrangement
14-0375-GA-RDR; 14-0376-GA-ATA	Duke Energy	Annual Adjustment to Rider Manufactured Gas Plant
14-0212-GA-GCR	Orwell Natural Gas Company	Gas Cost Recovery Audit Period From 7/1/12 thru 6/30/14
14-0209-GA-GCR	Northeast Natural Gas	Gas Cost Recovery Audit Period from 3/1/12 thru 6/30/14
14-0206-GA-GCR	Brainard Gas Corporation	Gas Cost Recovery
14-0205-GA-COI	Brainard Gas; Northeast Ohio; Orwell Natural Gas	Investigative Audit
13-2231-GA-RDR; 13-2232-GA-ATA	Duke Energy	Accelerated Main Replacement Program Rider
13-2225-GA-RDR	PUCO Rules Review	Minimum Gas Service Standards
13-2146-GA-RDR	Columbia Gas	Infrastructure Replacement Plan and Rider Demand Side Management
13-1571-GA-ALT	Vectren	Alternative Rate Plan
12-1685-GA-AIR; 12-1686-GA-ATA; 12-1687-GA-ALT; 12-1688-GA-AAM	Duke Energy	Distribution Rate Case
12-0925-GA-ORD	PUCO Rules Review	Competitive Retail Natural Gas Service

Natural Gas Cases at the Supreme Court of Ohio

Case Number	Company/Case Type	Issue
2014-0328	OPAE v. Duke Energy (OCCOhio Partners for Affordable Energy Appellant)	Appeal of PUCO Decision on Manufactured Gas Plants (PUCO Case No. 12-1685-GA-AIR et al.)

Combined Natural Gas/Electric Cases at the Public Utilities Commission of Ohio

Case Number	Company/Case Type	Issue
14-1740-EL-WVR; 14-1741-GA-WVR	Interstate Gas Supply Inc.	Waiver of Third Party Verifications
14-1051-GE-RDR	Duke Energy	SmartGrid Rider
13-1141-GE-RDR	Duke Energy	SmartGrid Rider

Telecommunications Cases at the Public Utilities Commission of Ohio

Case Number	Company/Case Type	Issue
14-0191-TP-UNC	Middle Point Telephone Company	Basic Local Exchange Service

Water Cases at the Public Utilities Commission of Ohio

Case Number	Company/Case Type	Issue
13-2124-WW-AIR	Aqua Ohio	Rate Case



Ohio's residential utility consumer advocate



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