



November 12, 2025
Before the House Energy Committee
Opponent Testimony on Substitute House Bill 303

Chairman Holmes, Vice Chair Mathews, Ranking Member Rader and House Energy committee members, my name is Frank Strigari. I serve as Vice President, External Affairs for AEP Ohio. Thank you for allowing me to testify today in opposition to Substitute House Bill 303 (Sub. HB 303).

While we appreciate the ongoing work of the bill sponsors and this committee on Sub. HB 303, AEP Ohio remains opposed to the bill for the same reason we have opposed the bill from the outset: specifically, the bill would force non-subscribers (i.e., those who do not participate in a proposed “community energy” project) to subsidize these projects.

How is that? First, in lines 357-367 of Sub. HB 303, the bill requires that a “subscriber” receive a bill credit equal to the “retail rate...minus only” distribution charges specified in the bill.

What is the “retail rate”? In lines 353-356 of Sub. HB 303, the bill defines “retail rate” as including **all costs** of providing generation service, **transmission service**, and distribution service.

Thus, a “subscriber” must receive a bill credit from a utility that includes the costs of transmission.

Under current law, all customers, including “subscribers”, must pay for the costs of transmission services and receive the benefits of those services. If certain customers would now be paid for the very transmission services that they would continue to use, then other customers are left to pick up those customers’ tabs. Thus, non-subscribers would be subsidizing “subscribers” who receive a bill credit for a “community energy” project under Sub. HB 303.

In fact, the plain language of the most recent version of Sub. HB 303 now expressly acknowledges that these credits will come at a cost to non-subscribers. In lines 348-352, the substitute bill now only protects large industrial customers and mercantile customers from the costs of “community energy” projects. This leaves all other customer classes, including residential customers, on the hook for the subsidies.

To emphasize, only large industrial and mercantile customers are protected from these subsidies, while residential customers would pay the costs of this “pilot program”. AEP Ohio has been clear from the outset that if this bill expressly protects **all** non-subscribers from paying for any direct or indirect costs associated with “community energy” projects, then AEP Ohio would no longer oppose this bill. Therefore, so long as the community energy projects contemplated under the bill are paid for entirely by the project developers and subscribers, and not by AEP Ohio or non-subscribers, then AEP Ohio would no longer oppose the bill.

Thank you very much for the opportunity to testify in opposition to Sub. HB 303 and I am happy to answer any questions.