

Northwest Ohio **Aggregation Coalition**



Cities

Maumee

Northwood

Oregon

Perrysburg

Rossford

Sylvania

Toledo

Waterville

Villages

Delta

Holland

Ottawa Hills

Walbridge

Townships

Lake

Perrysburg

Counties

Lucas

Interested Party Testimony

Thomas R. Hays on behalf of the Northwest Ohio Aggregation Coalition (NOAC)

May 7, 2025

Chair Schaffer, Vice Chair Koehler, Ranking Member Hicks-Hudson and Members of the Agriculture and Natural Resources Committee the Northwest Ohio Aggregation Coalition (NOAC) thanks you for this opportunity and encourages you to pass the funding increase and budget proposed by the Office of the Ohio Consumer's Counsel (OCC).

Residential customers—not the general fund—pay for the OCC through a very small charge in our electric bills. This may be the only case where you ever hear anyone say, “We need to pay our lawyers *more*.” We do. OCC's existing budget is spread too thin in an often too one-sided struggle for reasonable utility rates.

NOAC's 125,000 residential and small business aggregation customers and all Ohioans will benefit. In a real-world sense, the OCC already has more than pre-paid for this increase through the reductions to our electric bills its advocacy obtained. One striking example is the OCC's advocacy at FERC that should save customers \$225 million in federal transmission charges. This alone would pay the OCC's *entire* proposed \$8.1 budget for more than 25 years. The OCC was the only Ohio agency that fought for Ohioans at FERC. And now Ohio industry, farms, homeowners and renters all benefit.

NOAC is among the larger aggregation coalitions, but we cannot afford to shoulder the burden or participate in each of the many actions at the PUCO that affect people. The OCC reaches out to help aggregations. The OCC's statewide expertise in the legal landscape and its practical understanding are something we ourselves cannot match and absolutely need.

You may not be aware, but customers pay the legal bills of the utility companies at these proceedings. We are not so happy with these legal bills. FirstEnergy is currently pursuing its base rate case at PUCO that will set the major portion of our electricity rates. The company estimates that its outside legal expense alone at \$1.5 million. The total legal costs are estimated at \$4.5 million *for one case*. This enormous FirstEnergy legal cost, paid by customers, doubled since its last case fifteen years ago.

We depend upon the OCC to ensure that utility rate increases are kept to those that are just and reasonable as provided in the Revised Code. The OCC must do so with a modest budget that has essentially not changed for these same fifteen years. We urge you to approve OCC's requested budget increase to ensure customers' interests are fairly considered as provided in the Revised Code.

Thank you for your consideration.