11:00 a.m. (EST) 1-866-362-9768 940-609-8246#

OMA Government Affairs CommitteeApril 5, 2017

The Ohio Manufacturers'

AGENDA

Welcome & Introductions Chris Hess, Director, Public Affairs, Eaton Corporation; Committee Chair

Protecting Energy Markets: A Priority for ManufacturersBrad Belden, The Belden Brick Company
OMA Energy Committee

Panel Presentation: Dr. Edward Ned Hill, The Ohio State University Reasons to fight re-monopolizing the electricity generating industry

Dr. Edward Ned Hill, The Ohio State University Andrew Thomas, Cleveland State University

A Better Way Forward: Ryan Augsburger, OMA Staff
Legislative Reforms Needed to Protect Kim Bojko, CLL LLP, OMA Energy Counsel
Manufacturers

A Campaign Plan To Support Curt Steiner & Jen Detwiler, Steiner Communications

Q&A & Discussion (Time Permitting) **Committee Members**

Next Steps

2017 Government Affairs Committee Calendar Meetings will begin at 9:30 a.m.

Wednesday, June 07 Tuesday, August 29, Cleveland Wednesday, November 29 Our thanks to today's meeting sponsor:





COMPETITIVE MARKETS FOR ELECTRICITY DELIVER \$3 BILLION A YEAR IN SAVINGS TO OHIO ELECTRICITY CONSUMERS

"The great danger to the consumer is the monopoly ... His most effective protection is free competition ... The consumer is protected from being exploited by one seller by the existence of another seller from whom he can buy and who is eager to sell to him. Alternative sources of supply protect the consumer far more effectively than all the Ralph Naders of the world."

~ Milton Friedman

Competitive electricity markets in Ohio are working and delivering cost savings and other benefits to customers across Ohio.

Over the past 17 years, since the enactment of Ohio Amended Substitute Senate Bill 3 (SB 3) in 1999, the restructuring of Ohio's retail electricity marketplace has been implemented and refined.

The major premise of SB 3 was that competitive markets, rather than government regulation, would provide the choices, savings and other benefits that customers seek and value. This premise has been proven correct.

COMPETITIVE MARKETS ARE WORKING WELL FOR OHIO ELECTRICITY CUSTOMERS

Ohio's electric industry restructuring sought to secure safe, reliable, lowest-cost electricity for customers.

Electricity customers in Ohio today enjoy unprecedented options for shopping for generation service. The competitive market is working. It's delivering customer choice, new energy technologies, innovative energy services, and direct energy savings to customers – all while assuring energy reliability.

THE BENEFITS OF COMPETITION ARE NUMEROUS AND WELL-DOCUMENTED

Customers across the state are benefitting from competitive electricity markets in numerous ways:

LOWER COSTS. A recently completed analysis¹ of electricity prices in Ohio since 2011 found that deregulation has saved, and will continue to save, Ohio electricity customers an average of three billion dollars annually.

Deregulation has dramatically lowered the generation rates offered to customers as cost-based ratemaking has been replaced by competitive market-based auctions. Under SB 3, for their customers who do not shop for electric generation on the retail market, electric distribution utilities are required to purchase electricity via competitive auctions. From 2011 through 2015, these auctions have saved non-shopping consumers \$12.9 billion.

For those customers who shopped for generation from competitive suppliers in the retail market, there have been even greater savings. From 2011 through 2015, customers who are purchasing electricity from a competitive supplier conservatively realized an additional \$3.1 billion in cost savings compared to what was paid by customers who purchased generation from their incumbent utility.

Combined, then, shoppers and non-shoppers have saved more than \$16 billion since 2011 due to Ohio's move away from electric generation monopolies and to competitive markets.

The transition to a competitive retail electric marketplace has allowed customers access to historically low energy prices driven by the natural gas shale boom and flattening demand for electricity. And in a free market, customers get the benefit, not the monopoly to which they have been captive.

¹ ELECTRICITY CUSTOMER CHOICE IN OHIO: How competition has outperformed traditional monopoly regulation, November 2016, Northeast Ohio Public Energy Council



COMPETITIVE MARKETS FOR ELECTRICITY DELIVER \$3 BILLION A YEAR IN SAVINGS TO OHIO ELECTRICITY CONSUMERS

INVESTMENT & ECONOMIC GROWTH. Free markets encourage entrepreneurship. Entrepreneurs drive investment. It is occurring in Ohio's electricity marketplace in a big way.

Eight new natural gas-powered plants are in various stages of construction throughout Ohio. Four more are in various planning stages.

The estimated collective capacity of the eight new plants is 8,242 MW, and they collectively represent a \$7.74 billion investment. This new capacity is enough to power 7,000,000 homes which is more than 1.5 times the entire population of Ohio.

The eight new plants also will generate an incredible demand for Ohio natural gas. It is estimated, conservatively, that for every 5,000 MW of new capacity, approximately \$20 billion of natural gas will be purchased over a 30-year period.²

PJM Interconnection is the Regional Transmission Organization that governs the grid that supplies Ohio and 13 other states and the District of Columbia. Its energy and capacity markets are sending clear price signals that are attracting substantial investment in new generation. And, by driving prices down, Ohio becomes more competitive.

IMPROVED TECHNOLOGY AND ITS EFFICIENCY IN MAKING ELECTRICITY. The markets drive technology investment and innovation. The markets are attracting to Ohio new technologies that improve energy generating efficiency, as measured by "heat rate," or the amount of BTUs needed to make a kWh of electricity. The favored base load power plant configuration in Ohio today is a water-cooled, 2-on-1 combined cycle, gas-fueled power plant, which is nearly twice as efficient as legacy coal-fired plants. This is important because enhanced efficiency conserves fuel and lowers wholesale energy prices for all consumers.

Markets also drive efficiency gains in already operating generation units. A study of 950 fossil-fuel power plants in the U.S. found that those in restructured, competitive markets increased their heat rate by 13 percent. This market-driven gain in power plant efficiency resulted in a reduction of up to 81 million tons of carbon dioxide nationally, equivalent to the amount of CO² produced by up to 14 million cars. The fuel efficiency gains were found to be from technical changes to the power plant, and organizational changes with the operating staff.³ Yet another study found that nuclear plants in competitive territory gained 3 to 5 percent in efficiency compared to their regulated peers.⁴

And, consider the surging role of batteries in regulating the frequency of the electric grid. PJM has created markets to provide frequency regulation to keep local grids stable. As a result, in 2015, grid-scale batteries had already grown to provide 22 percent of the frequency regulation needed for the electric grid, from 16 percent in 2014. By the first half of 2016, the number of battery units rapidly expanded, and batteries now make up 42 percent of frequency regulation.⁵

² JobsOhio

³ Craig, J. Dean, Savage, Scott., "Market Restructuring, Competition and the Efficiency of Electricity Generation: Plant-level Evidence from the United States 1996 to 2006.", http://www.colorado.edu/Economics/papers/Wps-09/wp09-06/09-06CraigSavage.pdf

⁴ Fabrizio, K, Rose, N., and Wolfram, C., "Do Markets Reduce Costs? Assessing the Impact of Regulatory Restructuring on US Electric Generation Efficiency", http://economics.mit.edu/files/9915

http://www.monitoringanalytics.com/reports/PJM_State_of_the_Market/2016/2016q2-som-pjm-sec10.pdf

IMPROVED RELIABILITY. Competitive markets deliver reliable electricity supply. Ohio's electric generators participate in a wholesale competitive market operated by the PJM Regional Transmission Organization. To ensure that reliable electricity supply is maintained, PJM conducts a forward-looking competitive auction for generation capacity. Generation capacity is the promise of an electric generator to be available to operate when the grid requires it. PJM goes so far as to literally equate capacity to reliability. PJM plays it safe, forecasting the peak capacity requirements of the grid in future years and aiming to procure a reserve margin of about 15 percent more than it actually needs. The results show that competitive auctions work. For the past five years, PJM has procured even more reserve margin than it has targeted, on average about 20 percent annually.6

The amount of PJM's recent reserve margins exceeds the entire generating capabilities for all of Ohio.7 That is to say, PJM's auction has procured so much capacity, that even on the hottest of days, it has more than enough standby resources to meet all of Ohio's capacity needs.

YEAR	RESERVE MARGIN
2019/20	22.40%
2018/19	19.80%
2017/18	19.70%
2016/17	21.10%
2015/16	20.20%

PJM projected capacity reserve margin over five years

CONCLUSION

The promise of electricity markets has become reality in Ohio. Electricity markets are delivering the anticipated benefits:

- Driving electricity costs down an estimated \$16 billion in savings from 2011 to 2015 for Ohio businesses and families
- Attracting substantial investment in new generation in Ohio - 8,242 MW of new generation and more in the planning pipeline
- · Improving energy efficiency and reliability reserve margins steadily in the 20 percent range with 13 percent gain in power plant efficiency

The policy has even greater promise for Ohio's future, if state and federal policymakers will pursue public policy that protects competitive markets in Ohio and federally.

Source: PJM Base Residual Auction reports, for example, see: http://www.pjm.com/~/media/markets-ops/rpm/rpm-auction-info/2019-2020-base-residual-auction-report.ashx

https://www.eia.gov/electricity/state/ohio/index.cfm



COMPETITIVE MARKETS FOR ELECTRICITY DELIVER \$3 BILLION A YEAR IN SAVINGS TO OHIO ELECTRICITY CONSUMERS

WHAT IS CAPACITY AND HOW DOES IT IMPACT ELECTRIC COSTS?

Capacity is part of a customer's electric generation rate, along with the cost of the energy itself, and is associated with the costs a generation supplier incurs to have enough power to meet demand in a particular area during peak times. Today, it accounts for around 12 percent of the total bill.

The cost of capacity is determined through a series of forward capacity auctions conducted by a Regional Transmission Organization (RTO), which coordinates power generation and transmission and transmission within a region and is responsible for grid operations and electric reliability. In Ohio, the RTO is PJM Interconnection (PJM). Customers pay for this via their generation supplier.

In general, constrained generation supplies drive auction prices up, which in turn signals the need to build new generation assets (or reduce demand). On the other hand, an excess of generation typically drives auction prices down, discouraging the construction of new power plants.



OHIO'S ELECTRIC UTILITIES' ABOVE-MARKET CHARGES ARE ANTI-COMPETITIVE FOR OHIO'S CONSUMERS

Ohio's 17-year transition from a regulated to a competitive market for electric generation is providing electric customers unprecedented options for shopping for - and saving on - generation service. The competitive market is working.

Market-based pricing is delivering customer choice, investment in new energy technologies, and innovative energy services. Competition is driving electricity costs down for families and businesses. Substantial investment in new generation is underway in our state, improving energy efficiency and reliability, and reducing environmental impacts.

A recent study conducted jointly by Cleveland State University and The Ohio State University found that since 2011, electricity shoppers and non-shoppers in Ohio have saved more than \$16 billion as a result of market-priced electricity -- more than \$3 billion a year.

> Competitive markets dispatch the least cost power producer first and highest cost producer last in order to meet the instantaneous demand for energy. The hourly energy prices are set at the cost of the last plant dispatched to satisfy demand. With the demand for energy flat due to successful energy efficiency measures, uneconomic plants are not getting dispatched and, therefore, prices remain low. Independent generators and their lower-cost natural gas-fired power plants are further driving costs down (one benefit of Ohio's extensive shale gas deposits). Within this economic dispatch model traditional electric utilities heavily reliant on aging, uneconomic plants are finding it difficult to compete.

Deregulated pricing requires utilities to develop default rates (the rate paid by customers who choose not to shop) based on wholesale market prices for energy, rather than on the cost of goods, as was the case for decades. Electric generators with high costs due to aging, uneconomic power plants cannot recover enough revenues from market-based rates to recover their costs.



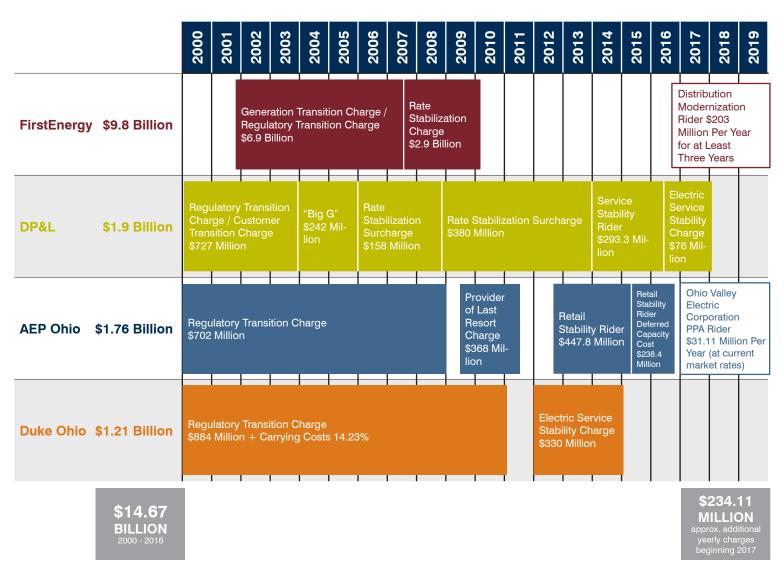
OHIO'S ELECTRIC UTILITIES' ABOVE-MARKET CHARGES ARE ANTI-COMPETITIVE FOR OHIO'S CONSUMERS

In response, Ohio utilities are proposing to protect their futures in two major ways: (a) seeking legislation to return to a form of monopolistic electricity pricing, and, in the interim, (b) continuing to force customers to pay billions of dollars in above-market charges.

According to the Office of the Ohio Consumers' Counsel, from 2000 to 2016, Ohio's electric utilities collected \$14.67 billion in above-market charges from all customers regardless whether the customers were purchasing generation supply from a competitive supplier. Most of these charges were approved to help the utilities manage through the transition from regulated pricing to market-based pricing.

SUBSIDY SCORECARD - ELECTRIC UTILITY CHARGES TO OHIOANS

PUCO-APPROVED ABOVE-MARKET ELECTRIC UTILITY CHARGES SINCE 2000



SOURCE: OFFICE OF OHIO CONSUMERS' COUNSEL

Utilities continue to prevail in Public Utilities Commission of Ohio (PUCO) cases, resulting in new non-bypassable riders on customers to generate revenue needed to ameliorate the utilities' (or their parent companies') cash-flow problems and/or improve their profitability. In late 2016, the PUCO issued two rulings authorizing the collection of more than \$1 billion of ratepayer money to prop up the corporate earnings of FirstEnergy and allowing an "unknown" amount for subsidies for unregulated AEP Ohio generation. In addition, Dayton Power & Light has a pending PUCO case to collect from customers another \$105 million per year for three years with an option to request a two-year extension.

This most recent round of non-bypassable riders comes at a time when the market is delivering robust benefits. These cases were all filed to keep inefficient and uneconomic utility power plants operating, essentially to prop up the value of the corporations, with no associated consumer benefits. For example, the PUCO has acknowledged that FirstEnergy's PUCO-approved Distribution Modernization Rider will not fund any specific modernization projects, but, instead, is an incentive that will prop up FirstEnergy's credit rating.

Approximate Estimated Costs to Manufacturers for FirstEnergy's Distribution Modernization Rider

	Consumntion	FirstEnergy				
Manufacturer Size	Consumption (kWh/year)	Annual Cost Estimate*	Total for 5-year DMR*	Total for 5-year DMR w/o tax gross up		
Small (~\$100k/yr in electricity costs)	1,000,000	\$3,747	\$18,735	\$12,178		
Medium (~\$600k/yr in electricity costs)	` I /500,000		\$140,510	\$91,332		
Large (~\$6 million/yr in electricity costs)	100,000,000	\$374,694	\$1,873,468	\$1,217,754		
Extra large	1,000,000,000	\$3,746,936	\$18,734,681	\$12,177,543		
Territory total		~\$203 Million	~\$1.019 Billion	~\$662.5 Million		

^{*}Assumes 35% Corporate Tax Gross Up

Distribution Modernization Rider approved by PUCO in October 2016

Approximate Estimated Costs to Manufacturers for DP&L's Debt-Relief Settlement

Manufacturer Size Consumption (kWh/year)		Estimated Annual DMR Cost (\$)	Estimated 5-year DMR Cost (\$)	
Small	1,000,000	\$7,724	\$38,622	
Medium	7,500,000	\$52,665	\$263,326	
Large	100,000,000	\$399,246	\$1,996,232	
Extra large	1,000,000,000	\$3,992,465	\$19,962,323	

Dayton Power & Light (DP&L) Distribution Modernization Rider (DMR) to provide \$105 million per year for three years, with option to request two-year extension. Pending approval by PUCO in 2017.



OHIO'S ELECTRIC UTILITIES' ABOVE-MARKET CHARGES ARE ANTI-COMPETITIVE FOR OHIO'S CONSUMERS

ABOVE-MARKET CHARGES ARE OFFSETTING LOWER GENERATION COSTS

A logical conclusion of seeing historically low wholesale and retail electricity generation prices might be that Ohioans have overall lower electric bills. But, in fact, due to the imposition of these non-generation-related utility charges, the overall cost of electricity is not going down. The utilities' non-bypassable above-market charges are dampening the benefits of lower deregulated generation costs.

THERE IS NO SHORTAGE OF GENERATION

In recent cases before the PUCO, utilities have argued that if Ohio does not approve their proposed above-market cost riders, the utilities' affiliated generation facilities will shut down, threatening the availability and affordability of electricity for Ohioans. The utilities claim that rejection of proposed new riders would send a clear message to the marketplace discouraging investment in new generation assets in Ohio.

They claim this would further compromise our future energy security – and that adequate supplies of generation can be assured only if customers subsidize continued operation of obsolete, inefficient and unprofitable power plants. The utilities continue to try to convince policymakers, regulators and customers that without guaranteed cost-recovery through some form of customer subsidization, investors will not be willing to take on the financial risk of building new generation plants in Ohio.

This is wrong. Markets are working. The energy and capacity markets operated by PJM Interconnection (the Regional Transmission Operator that manages the electricity grid for Ohio and the region) are sending clear price signals that are attracting substantial investment in new generation. Eight new natural gas-powered plants are in various stages of construction throughout Ohio (and more are on the drawing board). And for the past five years, PJM has procured even more reserve margin than it has targeted. New generation is being built -- just not by Ohio's regulated electric utilities.

Additionally, subsidies for generators to ensure reliability already exist through the PJM construct. PJM provides additional compensation to a generation owner when a unit proposed for retirement must continue operating for reliability purposes. This mechanism is precise in its award of above-market rates to only those assets proven necessary for grid stability.

PROTECT THE DEREGULATED GENERATION MARKET BENEFITS

As consumers' generation charges are dropping, their non-generation charges, which in some cases include dozens of non-bypassable riders, are on the rise – eating away at customers' overall savings with no corresponding benefits. These riders function as a new tax on families and businesses and are a drag on the state's economy.

Moving forward, Ohio needs to maintain the healthy operation of a robust competitive electric generation marketplace that is delivering price benefits to consumers and job-creating energy innovation for the state's economy. The PUCO and the Ohio General Assembly must protect the open, competitive markets created by electric industry restructuring.



ELECTRICITY RATEMAKING REFORMS THAT PROTECT CONSUMERS

The successes of Ohio's transition to a competitive retail market for electricity generation are now documented – billions of dollars in savings for shopping and non-shopping consumers alike, robust new natural gas-fired generation projects planned and coming online, and more than adequate standby capacity as measured by the Regional Transition Organization, PJM Interconnection.

However, there are some statutory rate-making provisions in the law that are clearly anti-competitive for consumers, bad for the Ohio economy, and deserve review and correction.

Most of the issues identified in this document are provisions in current law dating back to the implementation of Senate Bill 221 (SB 221), which took effect in August 2008. SB 221 altered the regulatory structure under which utilities operate, created new ratemaking provisions and established policies to promote advanced and renewable energy.

PROBLEM #1: ELECTRIC SECURITY PLANS

The Electric Security Plans (ESPs) permitted under current Ohio law allow utilities to charge customers for costs higher than market prices for generation at a time when Ohioans should be benefitting more from historically low wholesale prices. There is no justification for unnecessarily high ESP rates. The market-based option should be the prevailing rate structure. ESPs are simply no longer a useful rate-making construct.

 CORRECTION: Eliminate language in current Ohio law that permits utilities to file ESPs. Elimination of ESPs would also solve problems #2, #3, #4 and #5.

PROBLEM #2: UTILITIES' EXCESSIVE PROFITS

Under current law, utilities' profits are analyzed by the Public Utilities Commission of Ohio (PUCO). When the PUCO determines that a utility has earned profits deemed "excessive," the utility is not required to return the excess earnings to customers. Only if the utility's earnings are deemed "significantly excessive" is the utility required to refund the amount of excessive earnings to its customers.

CORRECTION: Require any utility that earns
"excessive" profits to refund to customers the
full amount of any excess profits – not just those
profits deemed "significantly" excessive. Delete the
word "significantly" from current law.

PROBLEM #3: UTILITIES' ASSESSMENT OF NON-GENERATION CHARGES IN AN ELECTRIC SECURITY PLAN (ESP)

Utilities have the ability to propose ESPs to the PUCO in order to set generation services rates. However, current law also permits a utility to propose distribution-related charges in an ESP. Utilities have been using this ability to successfully implement distribution charges, collected via non-bypassable riders on customers' bills (that is, customers cannot "shop around" the charges). Some of these riders have actually had nothing to do with distribution or distribution modernization. For example, FirstEnergy was granted a 'distribution modernization rider' to provide credit support to the corporation.

 CORRECTION: Expressly prohibit utilities from collecting distribution-related charges in an ESP and any financial integrity charges to support the parent company. Utilities would retain the traditional option to file a distribution rate case separately to request recovery of distributionrelated costs that they may incur. The utility retains the right to file an emergency rate case if the regulated utility's financial situation is dire and in need of customer assistance to support it.



ELECTRICITY RATEMAKING REFORMS THAT PROTECT CONSUMERS

PROBLEM #4: "MORE FAVORABLE IN THE AGGREGATE" STANDARD

Current Ohio law prescribes as a standard for PUCO approval of an ESP that its pricing (and other terms and conditions) be "more favorable in the aggregate" when compared to the expected results from the market rate option. When ruling on ESPs, the PUCO has considered both quantitative and qualitative factors. This typically has made it easier for utilities to obtain approval of their ESPs, which are more costly for consumers as opposed to the market rate option. Consumers should be able to rely on the PUCO to approve only the most favorable quantitatively-measured rate proposal.

 CORRECTION: Modify current law to explicitly limit the "more favorable in the aggregate" test solely to quantitative factors.

PROBLEM #5: UTILITIES' VETO POWER IN ESP CASES

Under current law, if a utility does not like a PUCO ruling in an ESP case, the utility can unilaterally withdraw its application – in effect, granting the utility veto power in the case. This is a decidedly unfair and an anti-consumer policy.

 CORRECTION: Eliminate the provision in Ohio law that grants a utility the privilege to withdraw its application for an ESP case if the PUCO modifies the proposed plan in any way.

PROBLEM #6: CUSTOMER PROTECTION DURING THE APPEALS PROCESS

Current law allows a utility to retain monies that it collected from customers even if the Supreme Court of Ohio deems such charges unlawful and reverses a PUCO order.

 CORRECTION: Modify current law to allow customers to obtain a refund of utility charges that have been collected from customers when the Supreme Court of Ohio reverses a PUCO order and finds such charges to be unlawful. The proposed actions itemized in this document will collectively undo anticonsumer ratemaking provisions contained in SB 221 by eliminating processes and policies that work against consumer and market interests. Enactment of the provisions would benefit Ohio by putting money into the productive economy and stimulating jobcreation.





Reasons to fight re-monopolizing the electricity generating industry

Edward [Ned] Hill
Andrew Thomas
Ohio Manufacturers Association
April 2017

The findings, conclusions, and recommendations expressed in this presentation are the product of research conducted by the authors and do not represent the views of either The Ohio State University, the John Glenn College of Public Page 12 of 47 Affairs, Cleveland State University, or of the Levin College of Urban Affairs.



Is competition in the electric generation market working? A four-part test

- Are consumers saving money compared to what they would be paying in a monopolized generating market?
- Has system reliability improve?
- □ Are new entrants investing money in generating plant and equipment?
- □ Are uncompetitive power plants leaving the market?





Analyzing the Effects of Competition on Electricity Pricing

Limitations

- "All-in" EIA prices are confounded by rising distribution and transportation costs.
- EIA prices do not measure savings due to shopping.

Strategies for Study

- Estimate savings
 compared to the
 Standard Service Offer
 (SSO) (also called
 Price-to-Compare) due
 to shopping.
- Estimate savings
 available for all
 ratepayers due to SSO.



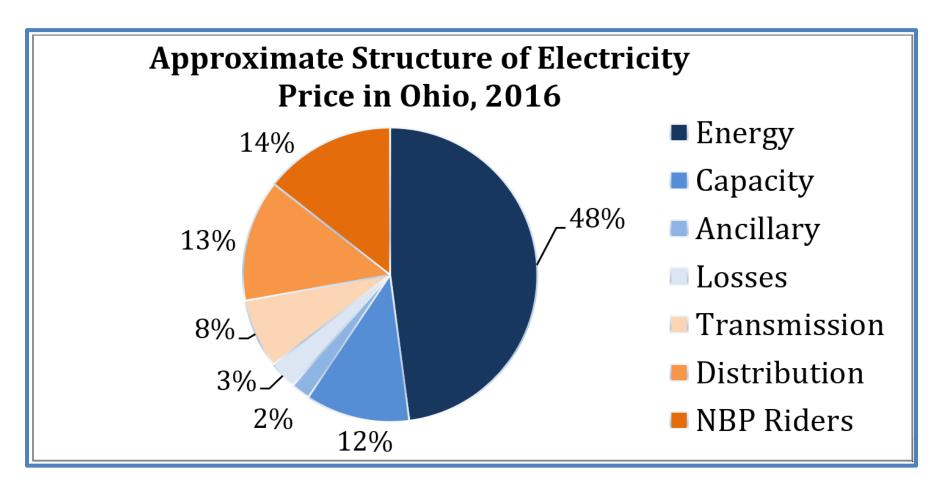
Portion of Ohio Electricity Sold to Shoppers 2008 to 2016







Mercantile Shopping Customers



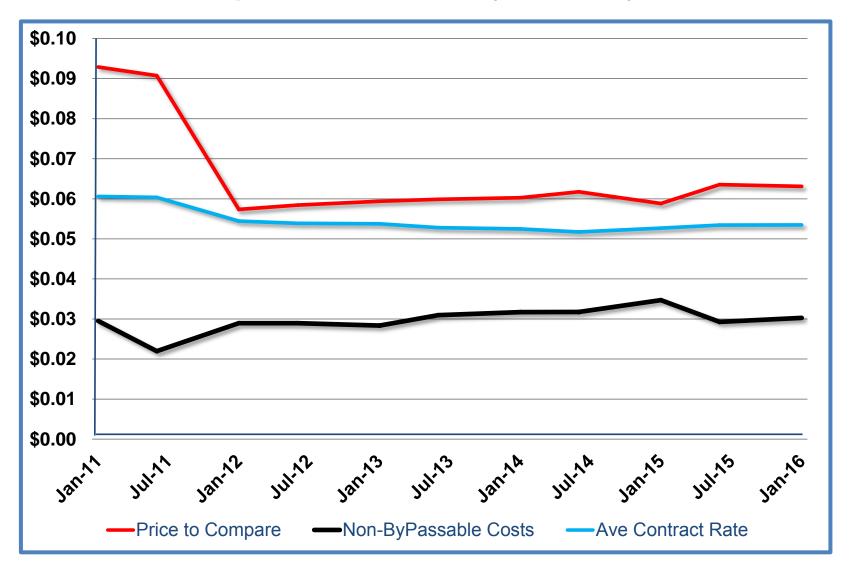
Assumes: 47% load factor for Secondary, 67% load factor for Primary





Duke Energy Commercial Mercantile

Note the 2011 drop in PTC and stability in Non-ByPassable Costs



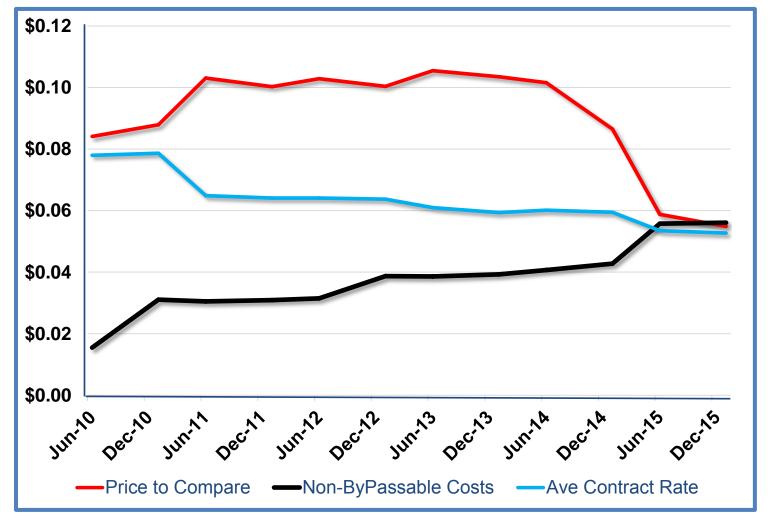




AEP Ohio Commercial Mercantile

Note 2014 drop in the PTC and increase in Non-ByPassable Costs.

Non-ByPassable Costs now makeup half of the bill.







Average Avoided Costs within Investor Owned Utility [IOU] Regions Secondary Mercantile Market

	2011	2012	2013	2014	2015	2016
AEP ⁷⁹	20%	24%	29%	30%	18%	4%
Duke	34%	7%	14%	17%	13%	13%
DPL	19%	15%	16%	20%	19%	7%
FirstEnergy ⁸⁰	16%	15%	13%	24%	21%	7%
Average	22%	15%	18%	23%	18%	8%

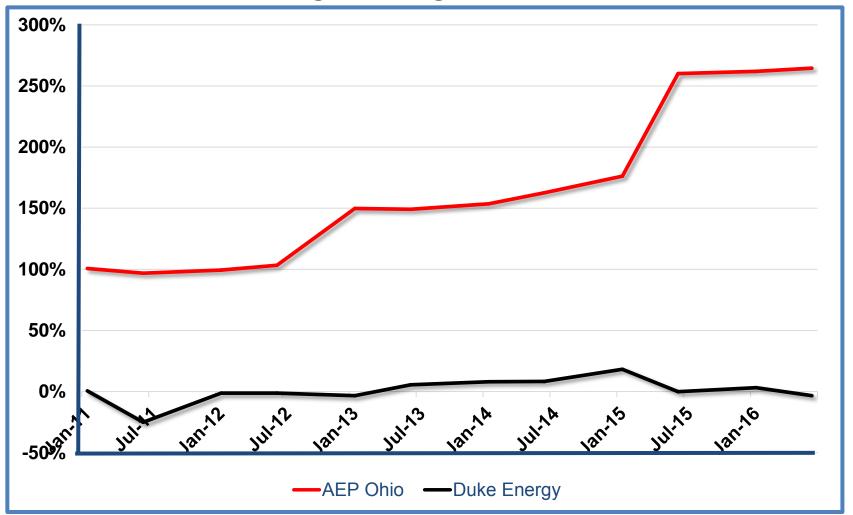
- Through June of 2016.
- Average of GS2 Secondary and GS3 Primary for both Columbus Southern Power and Ohio Power.
- Includes secondary rate classes for Ohio Edison, Toledo Edison and Cleveland Electric Illuminating Company.





Change in Utility Non-ByPassable Costs

One with a generating fleet and one without

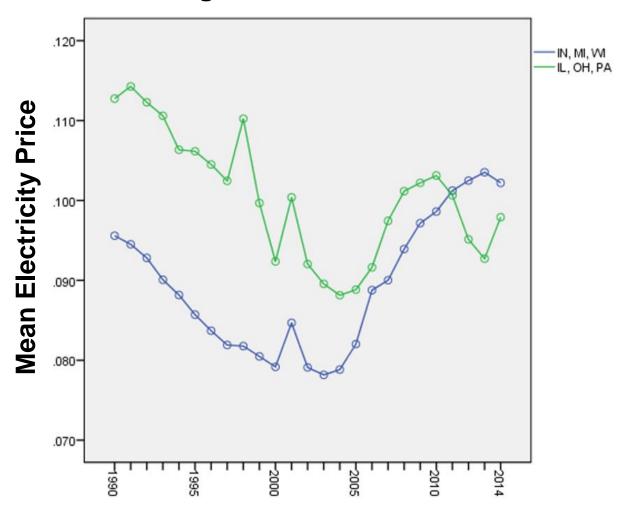






Changes in Electricity Prices

Means of the Combined Residential, Commercial and Industrial Sectors for Regulated and Deregulated Midwestern States: 1990 to 2015







Total Savings Due to Deregulation in Ohio

2011-2015 (millions of dollars)

Year	Shopping	SSO	Total	
2011	\$496.70	\$2,395.00	\$2,891.70	
2012	\$443.29	\$2,366.00	\$2,809.29 \$3,086.11 \$3,204.21	
2013	\$744.11	\$2,342.00		
2014	\$824.21	\$2,380.00		
2015	\$645.19	\$2,339.00	\$2,984.19	
Five Year Total	\$3,153.30	\$11,822.00	\$14,975.30	





Can the SSO Savings Be Correct?

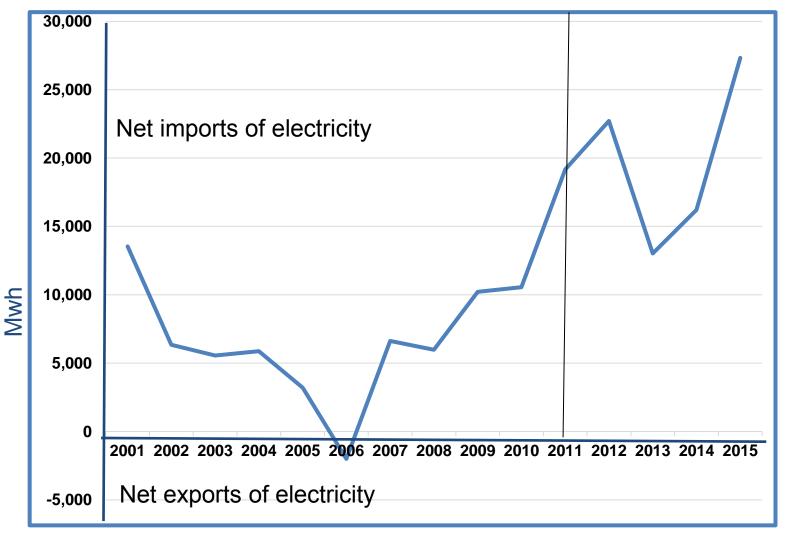
How can 1.76 cents per kWh result in \$2.3 Billion a year savings? Answer: Ranges from 16% to 15% of the potential electricity payments Lower percentage is partially due to increasing share of riders in bills

				Estimate	Estimate	
		Retail		Savings	Retail	Estimate of
	MWh Retail	Sales	Price per	per MWh	Savings	Percent
Year	Sales	\$2016M	MWh	\$2016	\$2016M	Saved
2011	154,746,310	14,852	90.3	18.71	2,896	16.4%
2012	152,456,864	14,512	91.2	18.36	2,800	16.2%
2013	150,307,087	14,242	92.0	18.12	2,724	16.1%
2014	150,679,713	14,873	97.3	17.85	2,690	15.3%
2015	149,213,224	15,049	99.8	17.79	2,655	15.0%
2016*	134,882,000	13,121	111.3	17.60	2,374	15.3%
* Year-to-d	late through Novembe	er 2016				
Sources:	ources: EIA, Power Annual, 2011- 2015, Tat					
	EIA, Power Monthly, Table 5.6.B, Novemebr 2016					



Ohio has Always Imported Electricity

Thousands of Megawatt Hours per Year

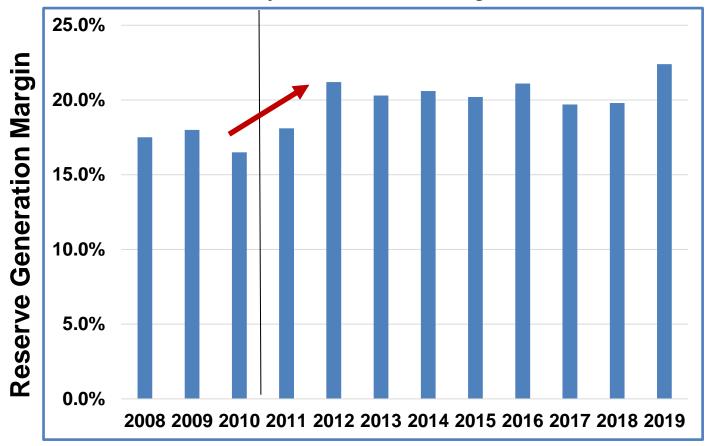






Competitive Electricity Generating Market improved system reliability

PJM Reserve Electricity Generation Margin Auction Years 2008 to 2020



Note: A vertical line has been drawn at 2011 to indicate the start of an effective competitive electric generating market. Source: http://www.pjm.com/markets-and-operations/rpm.aspx





11 Natural Gas Power Plants

10,900 Megawatts and \$9 billion in construction cost Under Construction, Approved, or Announced

	Location City & County	Project Name	Status	Megawatts	Owner	Investment Amount \$million	Announced Construction Start Date	Expected Completion Date
1	Cadiz, Harrison*	Harrison Power Project	Announced	1,000	EmberClear Corp	no data	2018(4)	
2	Carrollton, Carroll	Carroll County Energy Generation Facility	Construction	742	Advanced Power	900		2017 4th quarter
3	Lordstown, Trumbull	Lordstown Energy Center	Construction	800	Clean Energy Future	850		2018 2nd Quarter
4	Lordstown, Trumbull	Trumbull Energy Center	OPSB Application filed 02/28/17	940	Clean Energy Future	850	2020 2nd quarter	
5	Middletown, Butler	Middeltown Energy Center	Construction	525	NTE Energy	600		2018 2nd quarter
6	Oregon, Lucas	Oregon Clean Energy Center	Construciton	860	Clean Energy Future	860		2017 2nd quarter
7	Oregon, Lucas	Clean Energy Future- Oregon	OPSB Application filed	860	Clean Energy Future	860		
8	Pickaway	Pickaway Energy Center	Announced	1,000	NTE Energy	1,100	2017 or 2018	
9	Valley Township, Guernsey	Guernsey Power Station	Pre-application OPSB	1,650	Apex Power	1,100	Early 2018	
10	Wilkesville, Vinton**	Rolling Hills Generating Station	Filings completed Waiting***	1,414	Eastern Energy LLC	700	2018	
11	Yellow Creek, Columbiana	South Field Electric Generation Facility	Approved	1,100	Advanced Powery	1,100		2019 3rd quarter
	Under construction	4		2,927		3,210		
	Approved, no construciton date	2		2,514		1,800		
	Applications filed OPSB	2		1,800		1,710		
	Pre-aplication OPSB	1		1,650		1,100		
	Announced	2		2,000		1,100		
	Total	9		10,891		8,920		

OPSB: Ohio Power Siting Board

Sources: Tom Knox, January 9, 2017, "Here are the 10 natural gas plants in development in Ohio." Columbus Business First; Brad Belden, "Why is all of this relevant?" Voyrs Energy Summit, February 5, 2017

Interviews with consultants



^{*}Information on the Harrison Power Project in Cadiz is from news articles in September 2016

^{**} The Rolling Hill plant in Wilkesville, Vinton county is an existing peaking plant that has applied to convert to a combined cycle plant.

^{***} From the project web site: The earliest data the conversion project would be operating is 2018. This depends on demonstrated base load demand

Four-part test

Is competition in the electric generation market working?

Are consumers saving money compared to what they would be paying in a monopolized generating market?

\$2.8 Billion per year going forward

\$15 Billion from 2011 to 2015

Is system reliability improving?

Electricity Generating Margin at 22.4%

Are new entrants investing money in generating plant and equipment?

11 new generating plants; 3 open or under construction \$8.9 Billion investment; \$11.2 MW of potential new power

Are uncompetitive power plants leaving the market 56 coal fired boilers closed with 10,000 MW of capacity Sales of coal generation by IOUs to specialized operators



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The findings, conclusions, and recommendations expressed in this presentation are the product of research conducted by the authors and do not represent the views of either The Ohio State University, the John Glenn College of Public Page 29 of 47 Affairs, Cleveland State University, or of the Levin College of the Urban Affairs.

February 24, 2017 Revised April 3, 2017

From: Ned Hill

SUBJECT: Knowing when competitive electric markets are working

Four outcomes show if a market is successfully transitioning from being anti-competitive to competitive:

- 1. Prices are lower: Prices are lower than they would have been under previous conditions.
- 2. New Investment is taking place: Firms either invest to take advantage of business opportunities or existing plant are recapitalized under new ownership.
- 3. *Uncompetitive plants close; balance sheets restructure*: Existing facilities, with higher cost operations leave the market or the balance sheets of existing firms are restructured to allow new investment.
- 4. Generating system reliability Improves.

Competitive markets for electric generation have worked well:

- Savings of \$3 billion a year compared to what prices would have been if electric generation remained a monopoly: \$645 million from shopping and \$2.3 billion from lower SSO auctions.
- The \$2.3 billion in savings from purchasing electricity for SSOs in competitive auctions represents a 15% savings for customers. 1
- System reliability has improved; PJM Interconnect has a 22.4% generation reserve margin.²
- Investment in electric generation capacity is taking place in Ohio.
- Inefficient power plants are either closing or being sold to better capitalized or more efficient operators. These are primarily coal fired.

Challenges exist that will hurt both electricity users and the state's economic development:

- Increases in non-bypassable riders imposed by the PUCO are partially offsetting savings from competition in generating markets.
- At least two of the state's IOUs have large debts associated with financial investments that have not worked out. Electricity customers paid \$14.7 Billion in transition costs and other mandated above-market payments. These payments were intended to write down the value of uncompetitive generating assets.
 - o FirstEnergy used the payments to purchase out-of-state power plants and to pay stockholders.
 - o Arlington Virginia-based AES Corp purchased DP&L in June 2011 for \$3.5 Billion, which included DP&L's existing debt. AES is looking to the PUCO for a return on its takeover of an Ohio utility.
- Owners of Ohio-located non-competitive electric generating facilities are attempting to use political
 power to re-monopolize the generation markets, including natural gas and non-carbon based
 generation, and raise prices. All to offset the consequences of bad business decisions and investments
 and to preserve the value of stockholders' shares.

Welcome to Ohio: Where lemon socialism creates crony capitalism.

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¹ Separate estimates by William Bowen and Ned Hill

² PJM Interconnect at: http://www.pjm.com/markets-and-operations/rpm.aspx

February 28, 2017

From: Ned Hill

SUBJECT: 14 conclusions on preserving a competitive electricity generation market

- 1. The utilities are attempting to re-monopolize the electricity generating industry in Ohio.
 - Ohio's Investor Owned Utilities [IOUs] are attempting to balkanize and re-monopolize the electric generation industry.
 - The geography of the generating market consists of 12 states
 - The generating industry is regulated by the FERC.
- 2. Re-monopolization of the electric generation assets in Ohio will result in the state's consumers purchasing the most expensive power first and the least expensive power last.
 - Re-monopolizing the electricity generating market will result in regulatory-protected, highest priced, generation being purchased first, with the rest of the demand being satisfied from power from lower cost, competitive, suppliers at market rates. This is backwards.
 - The algebra of blended rates means that Ohio's consumers will be paying above-market rates for electricity if the generation market is re-monopolized.
- 3. **Competitive markets work** by having the lowest-cost supply purchased first and highest cost last. The last units purchased will earn the lowest profit from the sale. The last price offered sets the market price.
 - Markets work by having higher cost producers exit the market because of a lack of demand for their product while inducing lower cost producers to enter the market. Under remonopolization this fundamental market mechanism will be thwarted. The result? Higher-cost, more inefficient generating assets remaining in the market at the expense of lower cost, more efficient, generating assets.
 - The risk of investment in new, more cost-effective capacity, will increase resulting in investments not being made because protected capacity will not exit the market.
 - Regulatory barriers to entry protect existing investors, harm consumers, and discriminate against potential investors.
 - Stockholders, bondholders, and senior management of the utilities with uncompetitive generating assets will be protected against losses while the wallets of electricity users will be forced open.
- 4. The **electricity generation system's reliability has improved** as PJM has gained experience with running competitive auction markets, and as investments in new, more efficient, generation has taken place to take advantage of new marketing opportunities.
 - After competitive markets became effective in 2011 the reserve margin in the PJM transmission grid has been near 20 percent. The latest reserve margin was 22.4%.
 - Preserving uncompetitive generating assets and having a *defacto* policy of purchase worst-first, or most expensive-first, generating capacity because it is owned and located in Ohio will result in diminished system reliability for two reasons:

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- A balkanized generating market will lose the benefits of pooling across a large geographic region to offset localized spikes in demand or the unexpected shutdown of generating capacity.
- Retaining less efficient generation capacity at the expense of new investment in more efficient generating capacity will result in diminished reliability.

5. FERC is the body that is, and should be, regulating the multi-state electricity generating market.

- The logic of deregulation that Ohio adopted rests on having a competitive market for electric generation across the multi-state PJM transmission grid.
- Federal regulation of the generating market, coupled with a strong watchdog role played by the PUCO, protects Ohio's consumers from the political capture of the legislature or regulatory capture of the PUCO by the state's investor owner utilities.

6. The benefits from deregulation that will be endangered by re-monopolization include:

- **\$3 billion in Lost savings** compared to what prices would have been under monopolized generating markets: \$645 million from shopping and \$2.3 billion from SSO auctions.
- The \$2.3 billion in SSO savings is 15% of what electricity prices would have been without competitive electric generating markets.
- **Decreased** system reliability
- Lost construction employment and associated positive economic spill-overs
- **Decreased** employment among employers who use electricity and diminished competitive position for business locations due to increases in the relative cost of electricity.
- Lost opportunity to lower carbon emissions

7. Ohioans have paid twice for stranded assets. Why should they pay a third time?

- From 2000 to 2016 Ohio's electricity users paid the state's IOUs \$14.7 billion in stranded
 asset payments, regulatory transition charges, rate stabilization charges, and other above
 market payments.
- The PUCO recently approved riders for FirstEnergy worth an estimated \$204 million a year and \$31 million a year for AEP for the years 2017 to 2019. DP&L has a rate case before the PUCO looking for its payout.
- The legislative expectation was that these payments would be used to write down the value of "stranded," that is economically uncompetitive, generating assets.
- FirstEnergy used the stranded assets payments to purchase out-of-state coal-fired generating plants. Both FirstEnergy and DP&L are highly leveraged and the recent funds are being used to offset the consequences of bad business bets, too much debt, and a need to pay dividends.
- DP&L was purchased by Arlington, Virginia based AES Corp in June 2011 for \$3.5 billion and on March 4, 201 was reported by the RTO Insider to have "buyer's remorse."
- Lessons from the steel, auto, and aluminum industries show that subsidizing companies with balance sheet problems and over-valued assets does not work. Assets must be written down and the company needs to be restructured financially before it can become competitive.

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¹ Rich Heidorn and Ted Caddell. "AES: Buyer's Remorse on DPL Acquisition: May sell utility's generation." *RTO Insider*, March 4, 2014. https://www.rtoinsider.com/aes-dpl-remorse-1403/



- Public policy can learn much from reading three of Laura Numeroff's children's books *If You Give a Mouse a Cookie, If You Give a Moose a Muffin*, and *If You Give a Pig a Pancake*. It may take all three to drive the lesson home.
- 8. Placing the generating fleets of IOUs into clearly identified subsidiaries and assigning the debt associated with generating fleet to that subsidiary is a crucial step in creating a viable operating entity and unlocking the value of assets that are in their transmission and distribution businesses. The IOUs and their customers have to be freed from the dead weight of overvalued generating assets or debt issued to pay for over-valued assets that were acquired. [Or, in the case of DP&L the value of debt issued by its purchaser when AES Corp. purchased DP&L.]. These assets need to be marked down to their market value.
- 9. Ohio's electricity supply has not become more vulnerable, or less reliable, due to deregulation and the closure of some existing power plants. Arguments have been made that Ohio will in some way become economically vulnerable by a potential loss of current generating assets. This is just wrong:
 - Since the early 1990s Ohio has, with one exception, been a net importer of electricity. The exceptional year was in 2006.
 - It is true that as competition in the market for electricity generation has taken root imports from outside Ohio in the PJM transmission grid have increased. However, that has occurred with a decrease in retail prices and an increase in system reliability. Lower prices and improved reliability are the two outcomes that the legislature expected when it passed the deregulation bill in 1999. Whether a power plant is located on the north or south bank of the Ohio does not matter to Ohio electricity users. Electrons do not come dressed in OSU scarlet and grey, OU green and white, Pitt black and gold, WVU blue and gold, or UK blue and white.
 - Investments in new generating capacity are being made in Ohio to take advantage of the ability
 to compete to sell electricity into the PLM's multistate generating market and to take
 advantage of the regional natural gas market. At present, 11,000 megawatts, or 11 gigawatts,
 of new natural gas fired generating capacity is either operating, under construction, permitted,
 or publicly announced but not yet in the regulatory approval process.
- 10. **Ohio's fuel diversity is improving.** Throughout the ongoing campaign being conducted by the IOUs to re-monopolize the electric generating industry it has been asserted that fuel diversity will be impaired with the loss of uncompetitive coal-fired electric generating capacity.
 - Before deregulation occurred, the fuel mix used in generating electricity in Ohio was undiversified. In 2010 [the year before deregulated markets took hold] 82 percent of power generated was from coal, 11 percent nuclear, and 5 percent natural gas. This was 98 percent of production.
 - In 2015 the portfolio is more balanced and diversified than it was five years earlier: 59 percent coal, 14 percent nuclear, 23 percent natural gas for a total of 96 percent of production. Gains have been made in wind and utility solar.
 - Because the production of electricity using nuclear fuel is now the most expensive form of generation that source of generation is in danger.

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- 11. Nuclear power is the most expensive power produced today and it does not deserve a subsidy from Ohio's electric customers. Nuclear power plants have had difficulty clearing capacity auctions and are providing the most expensive power in the regional market. FirstEnergy is lobbying for Ohio to follow in the footsteps of New York and Illinois to provide subsidies in the form of Zero Emission Credits to underwrite the generating costs. The benefit that is being sold to electricity users is electricity produced without carbon emissions. The reality it is yet another lifeline to FirstEnergy to prevent the financial effects of owing a high cost power plant. The IOUs are attempting to associate these plants with carbon reduction to justify subsidies. Doing so is bad state public policy because the problem of what to do with economically obsolete nuclear is a national problem.
 - The benefits from carbon-free electricity generation from a nuclear plant do not stop at the Ohio border. The benefits from carbon reduction are enjoyed across the entire airshed. There is no reason why the cost of subsidy should be borne just by Ohio ratepayers but by all who enjoy the benefits from carbon reduction.
 - Nuclear power plants, as is true for any power plant, are part of the regional electricity power market. In the case of Ohio, this is the multistate PJM transmission territory. Having states protect significant power sources will disrupt the operation of a competitive market for power.
 - The federal government never delivered on its promise to find a solution for the lifetime disposition of spent fuel rods and it has allowed nuclear power plants to operate without liability insurance protection, making surrounding property owners and state and local government de facto insurers of last resort in case of a disaster.
 - The ability of financially strapped IOUs to maintain and safely operate nuclear power
 plants is a genuine concern and subsidies designed to shore up their balance sheets are
 not a sustainable answer.
- 12. The IOUs are latching onto carbon reduction as a way to avoid writing down the costs of their dying nuclear assets. Their goal is to find a subsidy for the plants. They are offering carbon reduction as the rationale. This leads to the question: Is this the most cost efficient and effective way to achieve carbon reductions? The answer is no. A market should be established for carbon reduction so that goals are met in the least costly way to electricity users.
 - PJM could establish a market for reducing carbon emissions. A market adjusted tax or permit will give price advantages and investment incentives to low-carbon and nocarbon generating technologies.
 - If that solution be nuclear, so be it, as long as the full costs of nuclear power production are covered.
 - If the solution is a combination of energy efficiency investments and wind, solar and natural gas production that is fine as well.
- 13. IOUs are offering to support carbon free electric generating technologies under three conditions. (1) Carbon-free generation that they invest in be subject to a regulatory guaranteed rate of return.

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- (2) Carbon-free generation that is not owned by the IOUs be placed under a regulatory regime. And, (3) natural gas generation in the state of Ohio that is not owned by the IOUs be placed under a regulatory regime.
- Such actions will deter investment in carbon-reducing generation capacity because these actions will prevent existing high carbon output plants from leaving the market.
- Placing carbon-free and reduced carbon generating plants under regulatory control will not allow markets work to reduce their costs, thereby lowering demand for green energy.
- Regulation will effectively pull Ohio out of the competitive portion of the PJM auction markets resulting in (1) higher electricity prices for consumers, (2) reduce economic activity in the state, and (3) and reduced demand for carbon-free electricity generation and conservation.
- 14. Ohio's regulatory framework needs to allow for industry-scale proof of concept experiments in electricity generation, transmission, and distribution.
 - These experiments should have a research and evaluation component associated with them and the technical results made public with both technical results and public benefits and costs enumerated.
 - If the public is paying for the proof of concept experiment and no, or a limited amount of, private capital is invested then all data should be publicly available.
 - Regulation should not be used to pre-monopolize new sources of generation.
 - Experiments with technologies that could disrupt existing transmission and distribution technologies should be encouraged, especially if they disrupt the natural monopoly characteristics of those markets.





Ensuring reliable, affordable energy through competitive markets

April 5, 2017

Campaign Goals

- Tell the story: A deregulated, competitive energy market works best for residential and business customers
- Stop adverse legislation that disrupts competitive markets
- Potentially pass legislation that improves market competition
- Shift the conversation so that the body politic predominantly agrees that a competitive energy market is in the state's best interest, and that serves as a foundation for public policy and administrative decision-making

Coalition: Structure

- Formalize a Coalition
 - Garner support from like-minded supporters of deregulation
 - Pool resources from partner organizations
 - Execute superior communication with winning arguments based on informed data









Coalition: Organize around Guiding Principles

- 1. Providing Affordable Rates through Competitive Markets
 - Protecting customers from above-market rates

- 2. Fostering Innovation and Job Creation through Competition
 - Market forces allow old technology to exit
- 3. Ensuring *Reliable Energy*

What would a campaign look like?

Phase 1

Research and preparation to ready the coalition for communication and engagement with legislators and the public.

Phase 2:

Implementation of campaign plan to impact public discourse, defeat opponent legislation, and/or advance coalition legislation.

Phase 1: Research & Development (April – June)

- Information collection primary & secondary research to develop poll
- Public opinion polling
- Initial branding of the campaign (name, logo, website)
- Develop strategic lobbying plan
- Refine target audiences
- Message development
- Development of initial advocacy materials
- Development of initial supporter groups

Phase 2: Engagement (July – December)

- Media and editorial board outreach
- Legislator/lobbyist meetings
- Education of stakeholders & coalition memberships
- Activate digital media awareness / education campaign
- Activate online petition (budgeting for 60,000+ signatures)
- "Patch-through" phone program to connect constituents with legislators (budgeting 14,000+ connects)

Assets

Ohio Manufacturers' Association

Issue expertise & research, active membership base

Ohio Consumers' Counsel

Strong reputation for consumer protection, issue expertise & research

<u>AARP</u>

Active membership base, expertise on consumer issues

Northeast Ohio Public Energy Council

Ohio's largest energy aggregator

Dr. Ned Hill

Economic expert providing influential research and data

Estimated Budget

	PHASE 1: April - June		PHASE 2: July – December
\$60,000	Consultant fees (\$20,000/month)	\$150,000	Consultant fees (\$25,000/month)
\$15,000	Lobbying fees (\$5,000/month)	\$45,000	Lobbying fees (\$7,500/month)
\$60,000	Statewide benchmark poll (one-time)	\$93,750	Digital awareness campaign
\$15,000	Website development (one-time)	\$250,800	Online petition
\$2,500	Printed advocacy materials (one-time)	\$204,120	Patch-through phone connects
		\$19,320	Data matching and management
\$152,500	TOTAL PHASE 1		
		\$762,990	TOTAL PHASE 2

About Us



Curt Steiner

As CEO of Steiner Public Relations, veteran communicator Curt Steiner is well known in business, government, media and higher education circles. Steiner leads his high-performance communications and public affairs firm with vast experience in media strategy, press relations, communications, politics, reputation management, lobbying, campaign management, corporate consulting and government policy-making.

Steiner has served Chief of Staff to a Governor, Chief of Staff to an Ohio House Speaker and was a longtime Senior Vice President at The Ohio State University. His many political clients over the years have included George Voinovich, Rob Portman, Mike DeWine and Patrick Tiberi. Steiner has managed or directed the communications of numerous statewide political and ballot issue campaigns. Most recently, In 2015, Steiner led the significantly outspent but highly successful campaign to defeat State Issue 3, the proposed constitutional amendment to legalize recreational marijuana and establish a monopoly.



Jen Detwiler

Jen is Vice President of Steiner Public Relations. She brings more than 20 years of experience in government, public policy and corporate communications. In addition to serving as advisor and spokesperson for executive-level leaders, Jen has worked effectively with teams in developing and executing communications strategies and tactics in high-pressure situations, crisis media management and analytic problem-solving.



Jonathan Varner

Jonathan Varner has built winning political and public affairs campaigns for candidates, committees, unions, nonprofits, and Fortune 500 businesses for nearly 20 years.

In 2007 he founded the company that would become JVA Campaigns, which has worked from California to Maine, and many places in between. In 2014 alone, JVA Campaigns worked in 17 states on campaigns ranging from governor to city council. Other past clients include AFSCME, America Votes, AT&T, the International Association of Firefighters, Planned Parenthood, the United Steelworkers, and hundreds of candidates for state and local office.

Under Varner's leadership as the firm's creative director, JVA Campaigns has won more than 40 Pollie awards from the American Association of Political Consultants for advertising work in mail, digital, print, and radio. In 2013, Campaigns & Elections Magazine named Varner one of their national "Influencers 500" as well as one of Ohio's five most influential Democratic consultants.

As the founder and creative director of JVA, Jonathan is intimately involved in all of the work we do, but he enjoys specializing in ballot initiatives, public affairs, vote-by-mail programs, and conducting mail tests and experiments.



Meredith Tucker

Prior to joining JVA Campaigns, Meredith Tucker earned her chops as a communications specialist by serving as Communications Director of the Ohio Democratic Party and as spokesperson and media consultant for dozens of Democratic candidates and political campaigns. Her media savviness has earned her the respect of reporters in Ohio, Washington DC, and all across the country.

On the JVA team, Meredith takes the lead on strategic communications and messaging for political and public affairs clients. She uses her seasoned communications skills to help clients cultivate their message, strategize on media relations, and develop direct mail and digital campaigns.

Recent clients include: The Ohio Environmental Council, Hillel International, American Roots, The Ohio Senate Democratic Caucus, and countless local and legislative candidates.

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Our Experience



Steiner Public Relations is a high-performance communications and public affairs firm uniquely qualified to deliver powerful results for select clients. Steiner PR specialized in creating effective communications strategies for statewide initiatives. Team members have played major roles in Ohio statewide ballot issue campaigns for more than three decades.

Recent successes include, in 2015, overcoming a 10 to 1 campaign spending disadvantage to secure a landslide defeat of State Issue 3, an effort to create a marijuana monopoly in Ohio. The firm has also achieved successes for clients in the energy, higher education, healthcare, and business industries.



WE'VE BEEN THERE.

JVA Campaigns has served as public affairs counsel for major corporations, labor unions, and non-profit associations. We win big battles and navigate difficult situations by bringing together some of the best minds in the industry, and by using an integrated approach to communications. Our clients know we'll tackle their biggest problems with a deft touch and a smart strategy that was designed specifically for them—not recycled from some other campaign.

Some of our successful work includes projects with the AFL-CIO, AFSCME, AT&T, Hillel International, International Association of Firefighters, Israel on Campus Coalition, PhRMA, Planned Parenthood, and the State Innovation Exchange (SiX).





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