

House Committees  
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Energy Committee  
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Joint Committee on Agency Rule Review  
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Ohio Retirement Study Council



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## **Representative Sean Patrick Brennan 14<sup>th</sup> House District**

RE: Case No. 24-1112-EL-ESS

Your Honors:

I appear before you not only as a citizen, but as a member of the Ohio General Assembly and as a representative of thousands of constituents who depend on reliable electric service every single day. I am here to respectfully urge you to reject the proposal from [FirstEnergy](#) to weaken electric reliability standards for [Cleveland Electric Illuminating Company](#), [Ohio Edison](#), and [Toledo Edison](#).

As legislators, we are entrusted with protecting the health, safety, and welfare of Ohioans. That responsibility includes ensuring that essential services — especially monopoly utilities — operate with accountability and in the public interest. The proposal before you raises serious concerns on all three fronts.

At its core, this request asks Ohioans to accept longer power outages and more frequent service interruptions because the company has failed to meet existing standards. That is not regulatory progress — it is regulatory retreat.

Reliable electricity is not a convenience. It powers oxygen machines and electric wheelchairs. It protects families during extreme weather. It allows people to work, children to learn, and seniors to remain safely in their homes. When service fails, the consequences are immediate and often dangerous.

Local governments have documented these impacts in stark terms. Communities have experienced prolonged outages that trapped residents in elevators, interrupted critical medical equipment, caused food spoilage for working families, and exposed vulnerable residents to extreme temperatures. Many of these outages, by the company's own admission, stem from equipment failures, aging infrastructure, or operational errors within its control.

From a policymaker's perspective, this raises a fundamental question:  
If declining performance leads to weakened standards, what incentive remains for improvement?

Ohio ratepayers have already invested heavily in reliability. Since 2017, customers have provided more than one billion dollars for grid modernization and system upgrades. After making that investment, Ohioans should reasonably expect measurable improvement — not requests to lower the bar.

Consumer protections are also at stake. The [Ohio Consumers' Counsel](#) has raised serious concerns that the proposed changes rely on system-wide averages that may conceal extended outages experienced by individual communities. Policymakers and regulators must ensure that statistical measures do not obscure real-world harm.

There are also equity concerns. Evidence suggests that reliability challenges disproportionately affect disadvantaged neighborhoods. Weakening standards risks deepening these disparities and undermining public confidence in the regulatory process.

Your Honors, the PUCO's role is to protect the public interest — especially where market forces cannot. Electric utilities operate as regulated monopolies. With that privilege comes an obligation to meet high standards of performance and reliability.

When a company struggles to meet those standards, the solution should be improvement, investment, and accountability — not permission to perform worse.

As a legislator, I take seriously my duty to represent the voices of my constituents. They expect reliable service. They expect accountability for the rates they pay. And they expect regulators to stand on the side of the public when essential services fall short.

Granting this request would send a clear message — that failure is acceptable, that accountability is optional, and that Ohio consumers must simply tolerate declining service.

That is not the message we should send.

Ohioans have paid for reliability. They depend on reliability. And they deserve reliability.

Lowering the standard does not solve the problem — it merely lowers expectations for the people you are charged to protect.

I respectfully urge you to reject this proposal, maintain strong reliability standards, and affirm that the public interest — not declining performance — sets the standard in Ohio.

Thank you for your time and your service.