

December 3, 2020

Members of the Public Utilities Commission of Ohio
PUCO 180 East Broad Street, 11th Floor
Columbus, Ohio 43215

Sent via email

Commissioners Trombold, Conway, Deters, and Friedeman:

The recent resignation of Sam Randazzo as PUCO chairman, and the circumstances surrounding it, threaten to undermine faith in the commission's important work. Only through extraordinary circumstances did the public learn the extent of Mr. Randazzo's ties to the industry he had been charged with regulating.

I hope you share my concerns about the commission's reputation and will work with Common Cause Ohio, its members, and allies to bring about long-overdue reforms. With input from experts and the general public, Common Cause Ohio is finalizing a package of reform proposals and plans to urge lawmakers to adopt them next year.

In the meantime, the PUCO's important mission continues. With the chairman's seat vacant and another to soon open, I am writing to respectfully ask each of you to voluntarily update your financial disclosure statements to include all work done with utilities, their consultants, and lobbyists over the past 10 years and include the nature of the work performed and the amount of compensation received.

In a recent filing with the Securities and Exchange Commission, FirstEnergy Corp. revealed a \$4 million payment in 2019 to terminate "a purported consulting agreement" that had been in place since 2013. Although the filing did not name the recipient of the money, Mr. Randazzo fits the description of someone who "subsequently was appointed to a full-time role as an Ohio government official directly involved in regulating" FirstEnergy. Mr. Randazzo was appointed chairman by Gov. Mike DeWine on Feb. 4, 2019. The filing came soon after the FBI raided Mr. Randazzo's condo as part of its on-going investigation into corruption at the Statehouse.

A check of his financial disclosure statements lists no \$4 million payment from anyone. It does, however, show that he was paid an unknown amount by the Sustainability Funding Alliance of Ohio, a company he incorporated in 2010. I am not suggesting that Mr. Randazzo failed to disclose required information. Ohio did not require him to identify the source of the firm's money or the amounts it was paid. I am suggesting that Ohio's disclosure requirements are inadequate and must be updated. The Sustainability Funding Alliance also turned up in a 2018 bankruptcy filing among the companies used by FirstEnergy's generation subsidiary, FirstEnergy Solutions.

As you know better than most, the PUCO has important responsibilities that affect nearly every Ohioan. As you also know, utility regulation is complex and often inaccessible to the public. To improve trust in the commission, the public needs a better understanding of the backgrounds of its members.

Thank you very much for considering this suggestion. If you have questions, please contact me at cturcer@commoncause.org or give me a call at 614-579-5509.

Sincerely,



Catherine Turcer
Executive Director
Common Cause Ohio
cturcer@commoncause.org

