



OEC [Action Fund]

**Testimony before Columbus City Council
Regarding Ordinance 0586-2025
From the Ohio Environmental Council Action Fund
March 10, 2025**

Council President Hardin, President Pro Tem Dorans, and all of Columbus City Council, thank you for giving me the opportunity to speak tonight regarding Columbus's Aggregation program. My name is Chris Tavenor, I use they/them pronouns, and I am the general counsel for the Ohio Environmental Council Action Fund.

Tonight, Columbus City Council is considering modifications to its contract with AEP Energy and Trebel Energy to govern the aggregation program. It is considering modifications for the second time in four years since the program launched in 2021. The OEC Action Fund understands the regulatory realities facing the program—state policy has made it difficult to procure in-state renewable energy generation. We know AEP Energy and Trebel have worked hard to acquire in-state resources, but right now, there simply aren't enough solar and wind resources in Ohio available to meet the goals of the program.

Thus, the OEC Action Fund isn't here today to dispute the changes already proposed to the agreement—we understand the regulatory situation that makes those changes necessary. However, we believe now is the time to think more holistically about Columbus's aggregation program and how it sits within the context of the city's Climate Action Plan. While the program is generally achieving its goals of saving customers money—a laudable achievement—it's missing the mark on its original in-state renewable generation goals.

The team at Sustainable Columbus is doing incredible work to develop creative solutions to meet the goals of the Columbus Climate Action Plan, as are other parts of the city government. Whether it's the creative programs integrated throughout the LinkUs initiative with COTA, the changes to density to promote walkable communities in the Zone-In initiative, or the myriad other programs being implemented across the city, Columbus is thinking creatively.

To that end—if the contract must be opened now to address regulatory circumstances for in-state renewable generation—we encourage Columbus City Council to consider a few other minor amendments to the contract, too, to start a creative process for the Aggregation program.

We have three recommendations.

1. Enhance the language in the agreement in Section 17.2 around the Community Grant programs to target specific types of work—and explore what it would look like to enhance funding for the program in years that experience significant savings for customers.
2. Add language to the contract in Section 2.3 requiring AEP Energy, Trebel Energy, and Sustainable Columbus to collaborate on a plan identifying concrete steps the companies and the City can take to reach its in-state renewable energy generation goals, including methods beyond purchasing electricity from utility-scale Clean Energy Assets and Renewable Energy Credits. Such a plan would be presented to Columbus City Council and could include regular recurring updates on its progress.
3. In Article 10, add language requiring a regular third-party audit or review of the aggregation program to assess performance based on deliverables outlined in the contract. Audits are useful tools to provide decision makers with consistent, reliable information regarding the performance of a program even when the program is generally successful.

We believe these changes open the door for creative discussions moving forward about how the Aggregation program can meet both its goals and the greater goals of the Columbus Climate Action Plan.

Thank you for your time today, and I am happy to answer any questions you might have.

Respectfully submitted,

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