



9450 SW Gemini Drive
PMB 44671
Beaverton, OR 97008

January 17, 2022

BY EMAIL

Jenifer French, Chair
Public Utilities Commission of Ohio
jenifer.french@puc.state.oh.us

Re: The LED Fraud

Dear Jenifer French,

We read about the PUC audit that discovered that \$460 million was unable to be accounted for how it was spent.¹ We also understand that this audit was conducted because of First Energy's recent bribery scheme.

We wish to alert the PUC to First Energy's fraudulent claim that Light Emitting Diodes save energy. We have already sent a letter to First Energy, and we also notified Bridgett Brennan, US Attorney Northern District of Ohio, about this fraud. However, the response from Ms. Brennan's office was "*This Office is not an investigative agency*" and they declined to investigate. Given the amount of fraudulent activity surrounding First Energy, we find it astounding that Ms. Brennan would not investigate, or at least notify the FBI or PUC of this issue.

Figure 1 is a quote from First Energy's website.² The statement that an LED has greater energy efficiency is a fraudulent claim, as energy use by an HPS and an LED cannot be compared because they don't provide the same service. HPS provides uniform illumination, while LEDs are a light beam incapable of providing uniform illumination.

¹ <https://apnews.com/article/business-ohio-akron-utilities-65c9399b304c913476e083e846672b21>

² <https://www.firstenergycorp.com/content/dam/customer/get-help/files/savingenergy/pa-streetlights/led-factsheet-posttop-pn.pdf>

To help lower municipal energy usage and maintenance costs, Penelec now offers LED street lighting.

LED streetlights provide many advantages over traditional lighting, including:

- Longer life span – projected 50,000+ hours
- Greater energy efficiency
- Reduced maintenance costs
- Faster turn on and turn off

Figure 1 - First Energy Fraudulent Claim

Figure 2 exposes the fraudulent claims. A uniform illumination device that is compatible with the human nervous system is shown on the left side of the diagram.

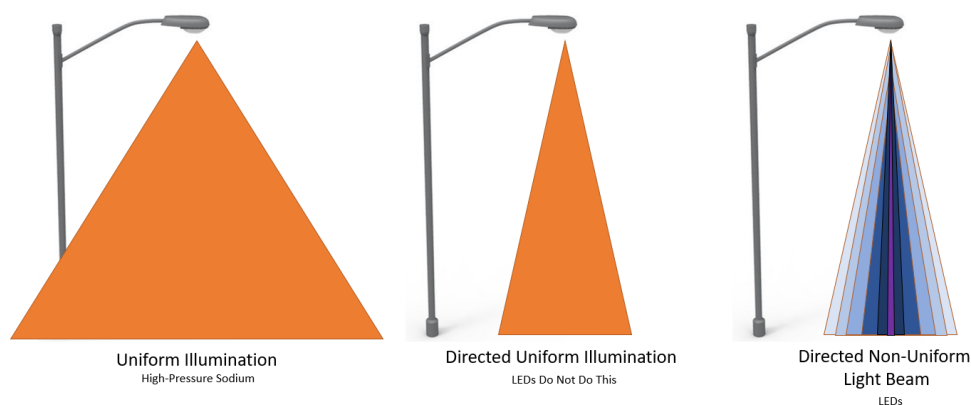


Figure 2 - Streetlight Comparison

The middle portion of Figure 2 is what First Energy fraudulently claims is the shape of the LED light beam. First Energy claims that the beam is directed, but uniform, therefore saving energy. The reason this claim is fraudulent is because First Energy knows that this middle diagram is not a truthful representation of the actual shape of the LED light beam. The real pattern of an LED light beam is shown on the right side of the figure which demonstrates the non-uniformity of the light and shows that the middle of the light beam is exceedingly intense, far beyond human tolerance levels and that there is extreme variability between the peak luminance in the middle, and the luminance at the edges.

We are sending to you our letters to First Energy, the city of Toledo Ohio, the US Attorney Northern District of Ohio and additional documentation showing that First Energy is part of the LED Cartel, the group of businesses that have colluded to promote the fraudulent myth that LEDs save energy. We request a thorough investigation, and we stand ready to support the Public Utilities Commission of Ohio in this effort.

Sincerely,

Mark Baker

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