

FILE

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the)
Ohio Edison Company, The Cleveland)
Electric Illuminating Company, and The)
Toledo Edison Company, for Authority to)
Establish a Standard Service Offer)
Pursuant to R.C. § 4928.143 in the Form)
of an Electric Security Plan)

Case No. 08-0935-EL-SSO

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**Direct Testimony of
Teresa L. Ringenbach**

**On Behalf of Intervener
Integritys Energy Services, Inc.**

Dated: September 29, 2008

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1 **I. INTRODUCTION**

2 A. Identification of Witness

3 **Q. PLEASE STATE YOUR NAME AND YOUR BUSINESS ADDRESS.**

4 A. My name is Teresa Ringenbach. I am the Regulatory Affairs Analyst for the
5 Midwest for Integrys Energy Services, Inc (“Integrys Energy” or “Integrys”). My
6 business address is 2000 Auburn Drive, Beachwood, OH 44122.

7
8 **Q. PLEASE DESCRIBE YOUR ENERGY BUSINESS BACKGROUND AND**
9 **PERSONAL QUALIFICATIONS**

10
11 A. I hold a Bachelor of Business Administration with a concentration in International
12 Business from the University of Toledo. I joined Integrys Energy Services, Inc.,
13 formerly WPS Energy Services, Inc. in September 2001 as a Customer Service
14 and Marketing Specialist. In 2002, I accepted the position of Account Manager-
15 Inside Sales. In 2005, I accepted the position of Regulatory Specialist. In this
16 position I was responsible for regulatory compliance and state registrations
17 throughout the United States. In 2006, I accepted the position of Regulatory
18 Affairs Analyst – East covering New England, New York, New Jersey, Ohio and
19 Pennsylvania. In the spring of 2008, I accepted the Regulatory Affairs Analyst
20 position for the Midwest region covering Ohio, Michigan, Illinois, Indiana,
21 Kentucky and all of Canada. In this position I direct the regulatory and legislative
22 efforts in the Midwest to ensure Integry Energy’s interests are protected.

23
24 **Q. PLEASE DESCRIBE YOUR EXPERIENCE WITH THE INTRODUCTION**
25 **OF ELECTRIC COMPETITION IN OHIO.**

1 **A.** During the market development period established under Senate Bill 3, I was the
2 Ohio Customer Service and Marketing Specialist. In that capacity, I was
3 responsible for the administration and sales of electric government aggregation
4 programs in Ohio. This role required an understanding of the electric government
5 aggregation rules, an understanding of residential and small commercial pricing,
6 coordination with FirstEnergy Supplier Support, PUCO staff, City governments,
7 customer service and consumer education. I implemented the internal policies of
8 Integrus Energy to ensure compliance with all rules and regulations. I also created
9 a newsletter and reviewed call center scripts to ensure customers were educated
10 and aware of the latest information affecting the programs. My role included
11 drafting Plan of Operation and Governance plans, participation in public
12 meetings, community events and charitable contributions in the communities we
13 served. In addition, I acted as the liaison between our communities, pricing and
14 legal for contract renewals and savings updates. My role grew to include
15 participation and support for any company regulatory proceedings affecting our
16 customers and providing the detailed information to support our regulatory efforts
17 in Ohio.

18
19 Since 2001, I have assisted in the direction and technical support of Integrus
20 Energy's regulatory efforts in Ohio. I have participated in the process by
21 directing outside counsel in both gas and electric rulemaking proceedings,
22 shopping credit cases, Rate Stabilization Plan ("RSP") cases, rate making and
23 settlement discussions. Today, as the Regulatory Affairs Analyst, I am the lead

1 regulatory official for Integrys Energy throughout the Midwest in both the
2 legislative and Commission forums. In this role, I promote and coordinate
3 regulatory events that affect Integrys Energy's business internally with employees
4 and externally with state legislatures and public utility commissions.

5
6 B. Purpose of Testimony

7
8 **Q. PLEASE DESCRIBE THE PURPOSE OF YOUR TESTIMONY.**

9
10 A. The purpose of my testimony is to explain from the perspective of a competitive
11 retail electric supplier ("CRES") how the improper imposition of non-bypassable
12 charges affects: 1) the ability of CRES providers to make offers to customers; 2)
13 the ability of customers to obtain savings on the cost of generation; and 3) the
14 viability of a competitive market.

15
16 **Q. DOES FIRSTENERGY PROPOSE TO IMPOSE NON-BYPASSABLE**
17 **GENERATION-RELATED CHARGES ON CUSTOMERS THAT SEEK**
18 **TO SELECT SERVICE FROM A CRES PROVIDER?**

19
20 A. Yes. All base rates and riders in the proposed tariffs are non-bypassable except
21 for Riders GEN, GPI, FTE, SBC, TAS, FCA, CCA, and DGC. My testimony will
22 address the six (6) non-bypassable generation-related charges which include
23 services customers receive from their CRES when they choose to shop.

24
25 **Q. DO YOU HAVE ANY RECOMMENDATIONS REGARDING**
26 **FIRSTENERGY'S PROPOSAL TO IMPOSE NON-BYPASSABLE**
27 **GENERATION-RELATED CHARGES ON CUSTOMERS THAT SEEK**
28 **TO SELECT SERVICE FROM A CRES PROVIDER?**
29

1 A. Yes. The Commission should reject FirstEnergy's attempts to impose generation
2 service related costs onto consumers that do not purchase generation supply from
3 FirstEnergy. If the Commission fails to significantly alter FirstEnergy's proposal
4 in this regard, retail competition and Government Aggregation will likely come to
5 an end in Ohio.

6 II. **THE IMPOSITION OF NON-BYPASSABLE GENERATION-RELATED**
7 **CHARGES WILL STYMIE COMPETITION ONCE AGAIN**
8
9

10 Q. PLEASE DESCRIBE WHAT YOU MEAN BY THE TERM "NON-
11 BYPASSABLE CHARGE".
12

13 A. A non-bypassable charge is a fee the customer is charged regardless of whether
14 they receive service from a CRES or the utility.
15

16 Q. SHOULD ALL CHARGES BE BYPASSABLE WHEN A CUSTOMER
17 TAKES SERVICE FROM A CRES PROVIDER?
18

19 A. No, only those costs associated with the service they receive from a CRES should
20 be bypassable. This allows customers to avoid paying the utility for services they
21 do not receive. Services which are distribution related or non-supply related
22 charges should continue to be paid by all customers regardless of shopping status.
23 Customers should only pay for the costs they cause from the services that they
24 purchase.
25

26 Q. HOW DO NON-BYPASSABLE CHARGES POTENTIALLY COST
27 CUSTOMERS MORE WHEN THEIR CRES SUPPLY OFFER IS LOWER
28 THAN THE UTILITY STANDARD SERVICE OFFER ("SSO") SUPPLY?
29

1 A. It is fairly simple. When a customer takes supply from a CRES they are receiving
2 all of their generation service from that company. They are no longer taking
3 generation service from the utility. If a shopping customer is forced to continue
4 to pay the utility for some portion of generation supply related charges plus pay
5 their CRES for the same service they are effectively paying more for generation
6 than had they not switched.

7
8 For Example: A customer who is paying 8 cents to the utility for generation
9 service may find a CRES offer for 7 cents and believe they are saving money.
10 The generation supply services offered are exactly the same; however, the
11 customer is only allowed to avoid 6 cents of the utility service. Not only is the
12 customer now paying 2 cents to the utility for a service they are receiving no
13 benefit from, but by switching they are paying 7 cents for generation supply to the
14 CRES. The customer is now paying 9 cents for supply -- a penny more than had
15 they not switched, even though they have bought lower cost generation.

16

17 **Q. WHAT IS THE EFFECT ON THE COMPETITIVE MARKET WHEN**
18 **SHOPPING CUSTOMERS HAVE TO PAY THE UTILITY FOR**
19 **GENERATION SERVICES THEY DO NOT RECEIVE?**

20

21 A. Making shopping customers pay the utility for generation service they do not
22 receive has the potential to destroy the competitive market, and in fact was a
23 major contributing feature in the collapse of governmental aggregation programs
24 at the end of 2005. These programs served roughly half the residential and small

1 commercial market during the market development period but collapsed when
2 FirstEnergy received authorization for its RSP.

3
4 **Q. DID INTEGRYS ENERGY SERVE OHIO GOVERNMENT**
5 **AGGREGATION PROGRAMS DURING THE MARKET**
6 **DEVELOPMENT PERIOD?**

7
8 **A.** Yes. From 2001 through 2005, Integrys Energy served three government electric
9 aggregation programs: The City of Cleveland's Program, The City of Euclid's
10 Program, and six communities in the Northwest Ohio Aggregation Coalition.

11
12 **Q. DID INTEGRYS ENERGY CONTINUE TO SERVE GOVERNMENT**
13 **AGGREGATION PROGRAMS AFTER DECEMBER 31, 2005 DURING**
14 **THE RSP PERIOD?**

15
16 **A.** No. One of the conditions of the RSPs that took effect after December 31, 2005
17 was that communities had to provide notice to FirstEnergy that they were going to
18 shop by a certain date. While Integrys Energy had agreements with three
19 communities to serve their programs during the RSP period, it was contingent on
20 necessary regulatory and market conditions. However, due to the regulatory
21 changes imposed by the Commission under the RSPs, we could no longer provide
22 savings and therefore notified the communities that the programs would end
23 effective December 31, 2005.

24
25 **Q. PLEASE DESCRIBE THE REGULATORY CHANGES WHICH CAUSED**
26 **INTEGRYS ENERGY TO TERMINATE ITS GOVERNMENT**
27 **AGGREGATION PROGRAMS IN OHIO.**
28

1 A. The improper imposition of non-bypassable generation-related charges put an end
2 to the government aggregation programs. Under the RSPs, the Commission
3 allowed FirstEnergy to cap the credit a customer receives when they shop. This
4 meant that no matter what a customer's true generation charge from the utility
5 was they would only avoid up to the cap. In addition, under FirstEnergy's Rate
6 Certainty Plan, the Commission authorized FirstEnergy to impose fuel deferral
7 charges upon all customers regardless of whether they used the fuel or took
8 generation service from FirstEnergy. These non-bypassable charges had the
9 effect of forcing customers who shopped to pay both the utility and their supplier
10 for the same supply related charges and ultimately paying more for their supply
11 through deferrals and carrying charges. Suppliers were forced to compete against
12 price to compares which were lower than what the customer was actually paying
13 the utility for their commodity service.

14
15 Q. **WHY IS THE HISTORY ASSOCIATED WITH THE RSP AND RATE**
16 **CERTAINTY PLAN RELEVANT TO THIS PROCEEDING?**

17
18 A. It is relevant as FirstEnergy has once again proposed to impose a number of non-
19 bypassable generation-related charges upon customers regardless of whether they
20 purchase the SSO from FirstEnergy.

21
22 **III. CUSTOMERS SHOULD ONLY PAY FOR THE SERVICES THEY USE**

23
24 Q. **WHICH NON-BYPASSABLE /NON-VOLUNTARY CHARGES IN THE**
25 **ESP WOULD FORCE A SHOPPING CUSTOMER TO PAY THE**
26 **UTILITY FOR A SERVICE THEY ARE TAKING FROM A CRES?**

1
2 A. FirstEnergy proposes to impose the following as non-bypassable generation-
3 related charges. These charges are for services the customer also receives from
4 their CRES and therefore should not be required to pay to the utility:

- 5 • The Minimum Default Service Charge (MDS);
- 6 • Deferred Generation Cost Recovery Rider (DGC);
- 7 • Non-distribution Service Uncollectible Rider;
- 8 • Regulatory Transition Charge (RTC);
- 9 • Deferred Fuel Charge (DFC); and
- 10 • Deferred Transmission Charge (DTC).

11
12 **Q. WILL YOUR TESTIMONY ADDRESS EACH OF THESE CHARGES?**

13 A. No. I will not be addressing the RTC, which FirstEnergy is waiving or the DTC
14 which was previously approved in a separate proceeding.

15
16 **Q. WHAT IS THE PURPOSE OF IMPOSING A MINIMUM DEFAULT**
17 **SERVICE CHARGE AND/OR THE STANDBY CHARGE?**

18
19 A. In some states, the provider of last resort service ("POLR") is allowed to charge a
20 modest POLR fee to cover the cost of obtaining generation to sell to customers
21 who have shopped and now wish to return to the default generation service. The
22 POLR fee does not include the cost of generation; it is just a fee to cover the cost
23 of accepting the customer back. FirstEnergy is claiming that it needs the MDS
24 rider to compensate it for the right to accept the customer back and the SBC in
25 order to guarantee the SSO rate when the customer returns.

1

2 **Q. HOW ARE THE PROPOSED SBC AND MDS RIDERS DESIGNED TO**
3 **OPERATE?**

4

5 **A.** Under the SBC, if a customer agrees to come back at market pricing rather than
6 the SSO rate they can avoid the SBC. FirstEnergy is made whole because they or
7 their affiliated supplier can sell the capacity and its associated energy in the
8 market. If the customer wishes to reserve the right to return at the SSO rate, the
9 SBC permits that but at a high price -- 1.5 cents per kWh in 2009, 2 cents per
10 kWh in 2010, and 2.5 cents per kWh in 2012. A customer that returns in
11 violation of its pledge is charged a penalty rate of 160% times the current market
12 prices.

13 The minimum default service is a misnomer, for it does not appear to be a discreet
14 service at all, just compensation for FirstEnergy to stand ready to sell generation
15 at 160% times the current market prices. FirstEnergy has provided no Direct
16 Prepared testimony or work papers which itemized the costs to justify the penny
17 per kWh fee.

18

19 **Q. IS IT FAIR AND REASONABLE TO CHARGE 1 CENT PER KILOWATT**
20 **HOUR FOR THE RIGHT TO RETURN TO SSO SERVICE AT 160% OF**
21 **MARKET RATES?**

22

23 **A.** No, there is no reason to believe that with the right to charge the SBC or if a
24 customer returns at 160% times the current market prices, FirstEnergy has any
25 commercial risk or lost opportunities. Further, it must be stressed that FirstEnergy
26 is asking for the right to charge a penny a kWh just for the contingent cost of
27 having to schedule generation. Further, even if FirstEnergy does have to schedule

1 generation, the SBC charge or the margin of 160% times current market prices
2 should make FirstEnergy more than whole for the administrative costs associated
3 with arranging for electric power and energy for these returning customers.
4

5 **Q. WHAT WOULD BE A REASONABLE POLR CHARGE?**

6 **A.** The customer should only pay for the services they take from FirstEnergy.
7 Customers who agree to return at market prices should not pay for electric
8 generation that they are not using. Any charges imposed for standby service
9 should be the true cost that FirstEnergy incurs for providing that service.
10

11 **Q. IS CHARGING A DEFERRED GENERATION COST RECOVERY**
12 **RIDER TO SHOPPING CUSTOMERS EQUITABLE?**
13

14 **A.** No. Customers who shop are no longer taking generation service from
15 FirstEnergy. By charging those shopping customers the Deferred Generation
16 Charges proposed in the Application, today's shopping customers will be paying
17 the generation costs for a service they did not use, plus carrying costs. Shopping
18 customers should have the option of not being charged the Deferred Generation
19 Charge, or getting a credit equal to the deferral and paying the Deferred
20 Generation Charge. Charging shopping customers for generation they did not
21 take is inequitable.
22

23 **Q. WHY SHOULD THE NON-DISTRIBUTION SERVICE**
24 **UNCOLLECTIBLE RIDER BE BYPASSABLE FOR CUSTOMERS THAT**
25 **SWITCH TO A CRES PROVIDER?**
26

1 A. It is a simple issue of fairness and proper ratemaking. CRES providers serving
2 customers within the FirstEnergy service territory take on the risk of non-payment
3 for generation service; not FirstEnergy. When a customer switches to a CRES
4 provider, they should not have to pay the utility for the risk of non-payment on
5 non-distribution charges if they are taking those services from a CRES. In
6 addition, FirstEnergy does not currently offer a purchase of receivables ("POR")
7 program to CRES providers so CRES customers subject to this non-bypassable
8 rider in effect pay for the bad debt of CRES service and then also have to pay the
9 bad debt for SSO service they do not receive.

10

11 **Q. DO YOU HAVE ANY RECOMMENDATIONS FOR A MORE**
12 **APPROPRIATE SOLUTION TO THE RISK OF NON-PAYMENT OF**
13 **NON-DISTRIBUTION CHARGES?**

14

15 A. Yes. If FirstEnergy insists on imposing this rider as a non-bypassable charge,
16 FirstEnergy should be required to provide a POR program for CRES providers
17 with a 0% discount rate similar to what is being done today in the Ohio natural
18 gas industry.

19

20 **Q. IF FIRSTENERGY IS UNWILLING TO OFFER A POR PROGRAM FOR**
21 **CRES PROVIDERS WITH A 0% DISCOUNT RATE, DO YOU HAVE**
22 **ANY OTHER RECOMMENDATION?**

23

24 A. Yes. The Commission should order FirstEnergy to make the non-distribution
25 uncollectible rider bypassable for customers that take service from a CRES
26 provider, as FirstEnergy will not incur any uncollectible costs associated with
27 non-distribution service.

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Q. PLEASE EXPLAIN WHY THE DEFERRED FUEL COST RECOVERY CHARGES SHOULD BE AVOIDABLE.

A. The monies for the Deferred Fuel Charge are not for expenses or costs due for ESP service. The monies to be collected are for generation fuel expenses for 2006 and 2007 that the Supreme Court in the *Elyria Foundry* case ruled could not be part of a distribution charge. All FirstEnergy has done in this ESP application is rename the collection rider a generation charge, but they seek to apply it to customers who do not take generation. The proposal violates the spirit if not the language of the *Elyria Foundry* decision. Furthermore, this very issue is a pending matter now in Case No. 08-124-EL-UNC. That is an active case and is the proper forum for this matter. The Commission should remove this issue from the ESP proceeding.

IV. CONCLUSION

Q. PLEASE SUMMARIZE WHY THE COMMISSION SHOULD CONSIDER THE EFFECTS ON ESP PRICING WHICH INCLUDES NON-BYPASSABLE GENERATION RELATED CHARGES ON SHOPPING CUSTOMERS.

A. When reviewing the benefits of the ESP, the Commission must include in their analysis the fact that S.B. 221 retained the right of customers to select someone other than the utility for their electricity. The Commission must consider the economic reality for customer choice and customer switching when evaluating FirstEnergy's ESP pricing.

1 Customers who shop with a CRES provider have a variety of products to choose
2 from including the ability to fix a rate at any point in the market. The imposition
3 of non-bypassable charges become a detriment to the ability of customers to shop
4 – especially when market prices are competitive with or below the utility SSO
5 price. At that point, the benefits of paying a lower price for generation outweigh
6 any benefit of deferrals which may artificially lower prices in the short term but
7 cost more in the long term. As I explained earlier, the imposition of a number of
8 inappropriate non-bypassable charges only benefits FirstEnergy, to the detriment
9 of customers.

10

11 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

12 **A.** Yes.

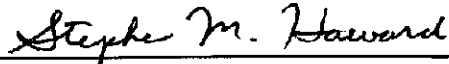
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served this 29th day of September, 2008 by regular U.S. mail, postage prepaid, or by electronic mail, upon the persons listed below.


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