

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Edison :  
Company, The Cleveland Electric Illuminating : Case No. 08-935-EL-SSO  
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. :

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**PREFILED TESTIMONY  
OF  
DUANE A. ROBERTS  
SERVICE MONITORING & ENFORCEMENT DEPARTMENT  
RELIABILITY & SERVICE ANALYSIS DIVISION  
PUBLIC UTILITIES COMMISSION OF OHIO**

Staff Exhibit \_\_\_\_\_

October 6, 2008

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Technician T.M. Date Processed 10/6/2008

1 1. Q. Please state your name and business address.

2 A. My name is Duane A. Roberts. My business address is 180 E. Broad  
3 Street, Columbus, Ohio 43266-0573.  
4

5 2. Q. By who are you employed?

6 A. I am employed by the Public Utilities Commission of Ohio (PUCO).  
7

8 3. Q. What is your current position with the Public Utilities Commission of Ohio  
9 and what are your duties?

10 A. I am a Utility Special 3 in the Non-Competitive Electric Section within the  
11 Reliability and Service Analysis Division of the Service Monitoring and  
12 Enforcement Department. My duties are to develop, implement, and  
13 enforce service quality and consumer protection policies and rules for non-  
14 competitive electric service. My role in rate cases, commission-ordered  
15 investigations, and tariff reviews is to analyze their impact on customers  
16 and recommend policies and practices that ensure quality, safe, and reliable  
17 service, fair treatment of customers, and consumer protection.  
18

19 4. Q. Would you please state your background?

20 A. I am a 1984 graduate from DeVry Institute of Technology in Columbus  
21 with an Associate of Science Degree in Computer Programming and a  
22 Bachelor of Science Degree in Computer Science for Business. After

1 graduation, I was employed by the Ohio Exposition Commission as the  
2 Commission's Fiscal Officer. I began my employment with the Public  
3 Utilities Commission of Ohio in October 1984 as a Utility Examiner I in  
4 the Accounts and Valuation Division of the Utilities Department. In June  
5 1989, I transferred to the Information Systems Division of the Administra-  
6 tion Department as a Programmer/Analyst 3. In September 1990, I trans-  
7 ferred to the Accounts and Audits Division of the Utilities Department in  
8 the same capacity. In December 1998, I transferred to the Electric Section  
9 in the Compliance Division of the Consumer Services Department as a  
10 Management Analyst Supervisor 2. In March 2000, I transferred to the  
11 Reliability and Service Analysis Division of the Service Monitoring and  
12 Enforcement Department at my present position. In addition and concu-  
13 rent with my employment with the Commission, I served as a Computer  
14 Programming Instructor during the evening sessions at the Circleville  
15 Branch of Bliss College from January 1986 until September 1986.

16  
17 5. Q. What is the purpose of your testimony in this proceeding?

18 A. The purpose of my testimony is to address the following components  
19 included within the Company's electric security plan (ESP) proposal:

- 20 • Delivery Service Improvement (DSI) rider
- 21 • Commitment to make at least a \$1 billion capital investment in the
- 22 operating companies' distribution systems [in the aggregate]

- System Average Interruption Duration Index (SAIDI) Reliability Target
- Rear Lot Reduction Factor
- Performance Bands

6. Q. FE as part of its ESP plan proposes a Delivery Service Improvement Rider (DSI rider). Does the Staff recommend that the Commission authorize the Company to implement its proposed DSI rider? Please explain.

A. No. The Company's proposal did not contain defined programs with associated costs and benefits nor did it quantify how much of its cost is incremental to current spending. The Company attempts to justify the need for this rider by claiming that it needs additional funding to train new employees to replace retirees and to replace components of an aging distribution system. Staff believes that these items are a part of the day-to-day operations of any utility company and therefore should not require special funding beyond that which is approved by the Commission to be used for normal day-to-day operations.

7. Q. As part of its electric security plan, the distribution companies have included provisions regarding distribution infrastructure modernization and a plan providing for cost recovery. Describe the type of a distribution infra-

1 structure modernization plan that an electric distribution utility could sub-  
2 mit that Staff would support.

3 A. In order for the Staff to entertain such a cost-recovery mechanism, the  
4 Company would have to present a plan that goes beyond day-to-day opera-  
5 tions that is directed towards specifically targeted programs. The plan  
6 should measurably quantify the benefits that customers are expected to  
7 receive in improved service reliability upon completion of each program  
8 included in the plan. The plan should also include the cost associated with  
9 the implementation and completion of each program along with docu-  
10 mentation that shows that these costs are incremental to the Company's  
11 current cost of day-to-day operations.

12  
13 8. Q. Does the Staff support the Company's commitment to make at least a \$1  
14 billion capital investment in the operating companies' distribution systems  
15 [in the aggregate]? Please explain.

16 A. Staff fully supports this commitment because it represents a continuation of  
17 the operating companies' recent capital spending over the past five years [in  
18 the aggregate]. This funding level, along with the Companies' current  
19 budget for operation and maintenance expenses projected through 2013  
20 should enable each operating company to maintain a satisfactory level of  
21 service reliability. For CEI, this is subject to its implementation of the

1 UMS recommendations that it did not object to in Case No. 07-551-EL-  
2 AIR.

3  
4 9. Q. What is the nature of the UMS recommendations?

5 A. Consultant UMS recommended a number of service reliability improve-  
6 ments. CEI agreed to what UMS identified as a number of short term and  
7 long term actions to improve service reliability, including maintaining  
8 capital spending at \$84.7 million for a minimum of five years.

9  
10 10. Q. Does the Staff believe in the use of a SAIDI target as the only performance  
11 measurement to determine the level of electric service that an electric dis-  
12 tribution utility should provide its customers? Please explain.

13 A. No. SAIDI is the product of the System Average Interruption Frequency  
14 Index (SAIFI) [average frequency of sustained outages] times the Customer  
15 Average Interruption Duration Index (CAIDI) [average duration of sus-  
16 tained outages]. As a performance measurement, SAIDI represents a blend  
17 of sustained outage frequency and sustained outage duration. Using SAIDI  
18 alone would not provide any indication as to the extent to which a perform-  
19 ance change was due to either the number of sustained outages that custom-  
20 ers experience (SAIFI) or the time it takes the utility to restore service once  
21 a sustained outage occurs (CAIDI). This is why Staff is recommending that  
22 the Commission adopt the proposed modifications to Ohio Administrative

1 Code (O.A.C.) § 4901:1-10-10(B)(1) that eliminates the requirements to  
2 both set a minimum performance target for SAIDI and to report annual  
3 SAIDI performance [Case No. 06-653-EL-ORD]. Maintaining the  
4 requirements for setting minimum SAIFI and CAIDI performance targets  
5 and for annual reporting of performance against those targets would pro-  
6 vide the Staff with a clear indication as to whether frequency of sustained  
7 outages or the duration of sustained outages was the cause of a performance  
8 change.

9  
10 11. Q. Does the Staff support the Company's proposal to reduce customer outage  
11 minutes by a factor of fifty percent on CEI distribution circuits where fifty  
12 percent or more of the premises are served by rear lot facilities? Please  
13 explain.

14 A. Staff does not support this exclusion, but first I want to explain how cus-  
15 tomer outage minutes are used in the calculation of the CAIDI performance  
16 index. In the calculation of CAIDI, the customer outage minutes represent  
17 the total number of sustained outage minutes for a measured period and are  
18 used as the numerator, which is divided by the number of customer inter-  
19 ruptions to arrive at the average restoration time for each customer experi-  
20 encing a sustained interruption during that same period. Now turning to  
21 the Company's proposal, all of the electric distribution utilities in Ohio  
22 have circuits where fifty percent or more of the premises are served by rear

1 lot facilities. Therefore, this issue is not unique to CEI or to FirstEnergy's  
2 operating companies located in Ohio, but it may impact each electric distri-  
3 bution utility on a different magnitude. The Company's proposal would  
4 artificially reduce CEI's actual restoration time of sustained outages by  
5 fifty-percent for outages experienced on the aforementioned types of cir-  
6 cuits. This would distort the length of the outage that the customer actually  
7 experienced causing a misalignment of customer-company service expecta-  
8 tions. Moreover, any extra time necessary to restore service involving rear  
9 lot outages is something that CEI has dealt with for many years and it  
10 should already be reflected in its CAIDI target.

11  
12 12. Q. Are the electric distribution utilities in Ohio required to make adjustments  
13 to the calculations of both their distribution system and circuit performance,  
14 respectively?

15 A. Yes. O.A.C. §§ 4901:1-10-10(B)(3) and 4901:1-10-11(B)(1) require only  
16 two adjustments to the calculations of both distribution system and circuit  
17 performance. These adjustments are the same for both O.A.C. rules. The  
18 rules require that performance data related to "major storms" and outages  
19 caused by transmission facilities be excluded from the performance data  
20 used to calculate and set minimum performance targets for both SAIFI and  
21 CAIDI and used to calculate the reported annual SAIFI and CAIDI distri-  
22 bution system and circuit performance.



1 13. Q. What is the rationale for allowing these exclusions under the rules?

2 A. The reason behind excluding “major storm” data from the system and cir-  
3 cuit performance data is because these “major storms” are of a magnitude  
4 that causes damage to the electric distribution utilities equipment and  
5 facilities that is beyond system design [e.g. winds 60 mile per hour or  
6 greater, icing one-half inch or greater on conductors, sustained outages  
7 affecting large numbers of customers, etc.]. The reason behind excluding  
8 performance data related to sustained outages caused by transmission  
9 facilities is because transmission system performance data is required to be  
10 reported separately under O.A.C. § 4901:1-10-27(C). O.A.C. § 4901:1-10-  
11 10(C)(1) still requires that each electric distribution utility annually report  
12 performance data during “major storms”.

13  
14 The exclusion of “major storm” data and sustained outage data caused by  
15 transmission facilities is required of all electric distribution utilities,  
16 whereas the Company’s rear lot reduction factor proposal only affects CEI.  
17 Electric distribution utilities frequently express their desire to exclude per-  
18 formance data related to various outage causes that are more frequent for  
19 those utilities [e.g. exclusions because a utility is experiencing a high num-  
20 ber of vehicle accident caused outages, exclusions of scheduled/planned  
21 outages by some but not others, exclusions of all non-controllable outages,  
22 etc.]. Staff has routinely denied these requests.

1 14. Q. Does the Staff support the Company's proposal to apply a performance  
2 band to the Company's system SAIDI performance target? Please explain.  
3 A. No. Staff has always considered the SAIFI, CAIDI, SAIDI, and ASAI per-  
4 formance targets to be minimum performance levels. When a minimum  
5 performance target is not met this automatically triggers the reporting of an  
6 action plan for electric distribution utility improvement to a level that meets  
7 or exceeds the target level for each missed reliability index as required by  
8 O.A.C. § 4901:1-10-10(C)(2). Under the Company's proposed perform-  
9 ance band, its performance can fall below the set minimum performance  
10 levels and not require the Company to take action to improve performance  
11 that meets or exceeds the targeted level. As far as performing better than  
12 the minimum performance targets, Staff believes that all electric distribu-  
13 tion utilities should strive to perform better than their respective minimum  
14 performance targets. Additionally, in Case No. 06-653-EL-ORD, the Staff  
15 is recommending that the Commission adopt proposed modifications to  
16 O.A.C. § 4901:1-10-10(B)(1) that eliminate the requirements for setting  
17 minimum SAIDI and ASAI performance targets and for annual reporting of  
18 performance against those targets. Adoption of this revision would elimi-  
19 nate the need for the Company's proposal.

20  
21 15. Q. Does this conclude your testimony?

22 A. Yes.

## PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prefiled Testimony of Daniel R. Johnson, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, hand-delivered, and/or delivered via electronic mail, upon the following parties of record, this 6<sup>th</sup> day of October, 2008.



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