

**FILE**

**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  
GREGORY C. SCHECK  
POLICY & MARKET ANALYSIS DIVISION  
PUBLIC UTILITIES COMMISSION OF OHIO**

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

October 6, 2008

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

2 A. My name is Gregory C. Scheck. I am employed by the Public Utilities  
3 Commission of Ohio, 180 East Broad Street, Columbus, Ohio, 43215-3793.

4

5 2. Q. What is your current position at the Commission?

6 A. I am a Utilities Specialist in the Policy and Market Analysis Division of the  
7 Energy and Environment Department. I am responsible for analyzing  
8 issues and providing recommendations pertaining to demand forecasting,  
9 demand side management, energy efficiency, demand reductions, and  
10 advanced metering infrastructure.

11

12 3. Q. What are your qualifications as they relate to your testimony in this  
13 proceeding?

14 A. I have worked at the Commission since 1985 in various capacities. Most of  
15 that time I have spent reviewing and evaluating demand forecasts, demand  
16 side management applications, and advanced metering issues.

17

18 4. Q. What is the purpose of your testimony in this proceeding?

19 A. I will address the Applicant's ESP filing with respect to its proposed Resi-  
20 dential AMI Pilot, current energy efficiency programs, and proposed  
21 energy efficiency expenditures and benchmarks associated with energy effi-  
22 ciency and demand reductions.

**Residential AMI Pilot**

5. Q. What is your knowledge or understanding of the Companies' proposed Residential AMI pilot?

A. The Applicant plans to deploy a residential AMI pilot constituting 500 residential customers with a control group for comparison purposes over the term of the ESP period. The Companies plan to contribute up to \$1 million dollars of shareholder money toward this effort. Anything expended above that amount, the Companies intend to recover through an energy efficiency rider. The Companies intend to notify its residential customers of this program through a direct mailing.

6. Q. What are the expected ranges of costs for deploying the Companies' proposed Residential AMI pilot?

A. Based on the Companies' estimated costs put forward in Attachment F of its filing, the Staff has estimated that the Residential AMI pilot costs can range anywhere from \$807,500 to \$1,057,000 over the ESP period. This would indicate that the estimated costs for this proposed pilot program is close to \$1 million.

7. Q. The Companies have proposed to recover any costs above \$1 million for the Residential AMI Pilot through the energy efficiency rider proposed in the ESP. Do you have an opinion with respect to the Companies' recover-

1 ing any of the AMI pilot costs above \$1 million through the proposed  
2 energy efficiency rider?

3 A. The Companies have estimated costs for meters at \$500 per endpoint and  
4 installation costs to be anywhere between \$500 to \$1000. These estimates  
5 appear to be higher than what is now estimated to be the deployment costs  
6 for these types of meters. There are estimates that endpoint costs for  
7 advanced metering and installation to be in the \$250 to \$350 range for resi-  
8 dential customers. If the Companies are able to deploy these meters at a  
9 lower cost than estimated, it would appear that the Companies could deploy  
10 more than 500 meters for the pilot before reaching the \$1 million threshold  
11 to recover additional costs. In addition, the Staff does not support recovery  
12 of AMI costs through the energy efficiency rider. Recovery, if any, should  
13 be sought through some type of AMI rider instead.

14  
15 8. Q. Why do you recommend that any incremental costs above \$1 million dol-  
16 lars associated with the Residential AMI Pilot be recovered through an  
17 AMI rider rather than through the energy efficiency rider?

18 A. Staff believes it is a better method to track those costs that are due to the  
19 Residential AMI Pilot independently from those costs that are assigned to  
20 the energy efficiency and peak demand programs. While there are likely to  
21 be some demand response benefits associated with the AMI Pilot deploy-  
22 ment, it will be easier to analyze the costs and benefits associated with this

1 type of program if they are separated out from the other Company spon-  
2 sored energy efficiency program expenditures and benefits. Generally,  
3 expanding the Companies' AMI residential pilot will be largely dependent  
4 upon the customer/societal benefits associated with the program that can be  
5 demonstrated.

6  
7 9. Q. In Attachment F of the Companies' filing, the Companies are proposing a  
8 collaborative process in which interested parties can provide input on the  
9 AMI process as well as the Companies' AMI pilot program. While Staff  
10 believes that a collaborative process may be a good thing in general, the  
11 Staff views the Companies' collaborative role to be limiting in nature. In  
12 what way do you think their collaborative role is limiting in nature?

13 A. According the Companies' application, the role of the collaborative is to  
14 provide input on the AMI process, discuss the Companies' proposed AMI  
15 pilot and work cooperatively with the Companies in potential AMI plan  
16 designs going forward. This description gives Staff the sense that the  
17 collaborative's role would be rather limited and could likely present a  
18 problem if collaborative members have a significant difference in opinion  
19 with respect to the size and scope of the Companies' proposed pilot.

20  
21 10. Q. Presently, do you have any concerns with respect to the Companies' AMI  
22 pilot program?

1           A.    Yes. I believe that the Companies' solicitation of customers into the AMI  
2               pilot program will likely result in some self selection bias by the customers  
3               choosing to participate in the experimental pilot. In other words, the pilot  
4               results may be somewhat skewed, because it is likely that those customers  
5               who sign up will be those customers who already reflect consumption  
6               behavior that will be lower than the average cost of the class.

7  
8   11.   Q.    What could this mean with respect to the AMI pilot program's purpose and  
9               results?

10          A.   As stated previously, it will be important to observe whether the Residential  
11               AMI Pilot program will result in any changes in customer consumption  
12               behavior with respect to price signals that are more closely correlated with  
13               real-time market conditions. Customers that have self selected to be in the  
14               AMI pilot program will likely demonstrate that customers as a whole, will  
15               likely save money by being on some form of dynamic rate rather than on  
16               the average rate of the class, even though they didn't change their behavior  
17               much or at all. Therefore, the results of the pilot may not be reflective of  
18               what a proper sampling of residential customers would do as a class.

19  
20   12.   Q.    What would you recommend that the Companies do with respect to select-  
21               ing the pilot participants?

1           A     I would recommend that the Companies select the residential pilot partici-  
2                   pants based on some form of stratification of the class so that the pilot sam-  
3                   ple more fully reflects the diversified makeup of the residential class rather  
4                   than those that are signed up on a first-come, first-served basis or preclud-  
5                   ing those that do not have some type of air conditioning. Also, if costs are  
6                   a consideration, it may be better to select customers on the basis of a  
7                   defined geographical area, rather than randomly throughout the whole ser-  
8                   vice area.

9    13.   Q.    What type of stratification would you recommend?

10           A.   I would recommend that customers should be stratified at least by those that  
11                   have air conditioning and those that don't, by income levels, and by loca-  
12                   tion. However, what is likely missing from a small, opt-in approach to the  
13                   pilot would be a good cross-section of residential customers reflecting the  
14                   many different characteristics that residential consumers may have that  
15                   would affect their electricity consumption. With that said, I would recom-  
16                   mend that the Companies' pilot be expanded beyond the 500 customers  
17                   proposed by the Companies.

18  
19   14.   Q.    With respect to the residential AMI pilot customers the Companies are  
20                   recommending that these customers be placed on Rider DPP, the Experi-  
21                   mental Dynamic Peak Pricing Rider. The purpose of this rider is to provide  
22                   customers prices that are more reflective of market based prices. Are there

any recommendations that you have with respect to the Companies' proposed dynamic pricing?

A. Yes. I would recommend that the Companies offer some form of Critical Peak Pricing Rebate for residential customers and for commercial customers offer some form of a hedged price for a fixed amount of the customers demand while the residual demand could be tied to a day-ahead market-based price. In this way, customers would know in advance that they would pay a fixed amount for a portion of their consumption, but they could pay more or less depending what they did on the margin

15. Q. Are there any other recommendations that you would like to make with respect to the Companies' Residential AMI Pilot?

A. Yes. I support the notion that the Companies are proposing to offer an AMI pilot in conjunction with some form of dynamic pricing to residential customers during the ESP period. However, I also believe a similar type of pilot should be made available to the commercial class as well. In addition, I would recommend that the Companies offer some of the pilot customers some form of technology such as a programmable thermostat that will enable them to more easily modify their consumption than just a pricing signal alone.



**Energy Efficiency and Demand Response**

16. Q. Has the Staff determined a preliminary estimate of the KWh savings and peak demand reductions that should be achieved by the First Energy electric distribution utilities for the calendar year 2009?

A. Yes. According to SB221 Section 4928.66, electric distribution utilities under the jurisdiction of this Commission are required to implement energy efficiency programs that will achieve energy savings equivalent to at least .3 of one percent of the Companies' total annual average normalized kilowatt-hour sales for the preceding three years to their customers in this state for the calendar year 2009. In addition, each electric distribution utility shall implement peak demand reduction programs which are designed to achieve a 1 percent reduction in the Companies' peak demand for the calendar year 2009. The baseline for the energy savings shall be determined from the average total kilowatt hours the electric distribution utility sold in the preceding three calendar years, while the baseline for the peak demand reduction shall be determined from the average peak demand on the utility in the preceding three years.

According to the Companies' energy sales for the FE-Ohio EDU Service territories for the calendar years 2006 through 2008 the Staff has developed the following estimates in Attachment 1 and 2 for the three year average of sales and peak load to end use customers, (see Total End-Use Delivery,

Column 6, PUCO Form FE4-D1 and EDU System Seasonal Demand Forecast, Summer, PUCO Form FE4-D4, FirstEnergy Corporation, 2008-Electric Long Term Forecast Report). Obviously, the historical sales and peak load data have not been weather normalized, but it is unlikely that the weather normalized historical data will alter the sales and peak demand values substantially. Also the Attachments provide an estimate of the energy and peak demand reduction benchmarks that the Companies must meet for calendar year 2009.

17. Q. Does the Staff recommend any change to the Companies' forecasting method to determine weather normalized sales and peak load?

A. Yes. The Staff recommends that the Companies utilize a 30-year rolling average of weather data with a 65 degree day as the basis for determining heating and cooling degree days.

18. Q. Will this result in a large difference in determining the annual Companies' benchmarks for energy sales and peak demand reductions?

A. No, but in terms of providing a consistent and an objective way in evaluating all of Ohio's EDU benchmarks, the Staff is recommending this method for each of the Companies.

1 19. Q. Currently, do the FE Companies deploy energy efficiency and peak demand  
2 reduction programs?

3 A. Yes.  
4

5 20. Q. Could you please describe these programs?

6 A. Yes. The Companies currently have two programs in addition to their low  
7 income weatherization program. The first program is entitled, "Home Per-  
8 formance with Energy Star" and the second one is entitled, "Direct Load  
9 Control Thermostat Program." The Home Performance with Energy Star  
10 program is essentially a complete energy audit of a customer's home by  
11 approved BPI certified contractors who will make recommendations of  
12 energy efficiency improvements to the customer at the end of the audit  
13 along with the costs associated with those improvements. The Companies  
14 defray the costs of each whole house audit by \$125. In addition, there  
15 maybe additional Energy Star appliance rebates that the customer may  
16 qualify for. The Direct Load Control Thermostat Program involves resi-  
17 dential customers agreeing to have a direct load control thermostat installed  
18 in conjunction with their central air conditioners, so that the Companies can  
19 cycle off the customer's air conditioner up to 20 times per summer in  
20 exchange for an incentive payment.  
21

1 21. Q. What is your current assessment of these programs in helping the Com-  
2 panies' reach their 2009 energy sales and demand reduction benchmarks?

3 A. The Companies' provide monthly updates with respect to their energy effi-  
4 ciency/demand-side management programs. Based on the most recent  
5 newsletter provided on October 2, 2008 the Companies have reported a  
6 total of 10,098 KWhs or the equivalent of 10 MWh of energy saved  
7 through the Home Performance with Energy Star Program which began in  
8 January, 2008. The Companies have spent approximately \$2.5 million to  
9 date on this program. However, the program results do not include the  
10 energy savings associated with natural gas consumption. When a customer  
11 installs housing shell measures such as insulation, it not only saves in air  
12 conditioning consumption, but gas consumption as well. However, even if  
13 those additional energy savings were counted as benefits, this program is  
14 very expensive from a cost-benefit standpoint.

15  
16 With respect to the Direct Load Control Thermostat Program of central air  
17 conditioners, the Companies have reported that 7,267 thermostats have  
18 been installed to date. It is estimated that the average savings per thermo-  
19 stat is approximately 1 Kw. This translates into 7.267 MW of summer peak  
20 load reduction. The Companies have spent approximately \$3 million dol-  
21 lars to date on this program. Again, this program is quite expensive relative  
22 to a cost-benefit standpoint.

1 When one compares the energy and peak demand reductions of these two  
2 programs to the estimated benchmarks for 2009, these savings numbers are  
3 quite small compared to what will be required. This would suggest that the  
4 Companies need to immediately begin preliminarily cost-effectiveness  
5 testing of the many other energy efficiency measures/programs for an  
6 aggressive deployment schedule starting early in calendar year 2009. The  
7 testing process should follow those evaluation procedures in the *California*  
8 *Standard Practice Manual, 2002* with the emphasis that measures and pro-  
9 grams should pass the Total Resource Cost test. This testing of energy effi-  
10 ciency measures should be a part of a larger analysis which should evaluate  
11 the entire technical, economic, and market potential of energy efficiency  
12 throughout the Companies service territory. This Market Potential Study  
13 should include an analysis of appropriate program designs that will result in  
14 the Companies achieving their benchmarks. The Company should com-  
15 mence such a market potential study and analysis of program designs  
16 immediately.

17  
18 22. Q. What would you suggest that the Companies do with respect to these pro-  
19 grams?

20 A. The Companies should strongly evaluate modifying either the program  
21 design and/or technology associated with these programs. Specifically, the  
22 Companies have deployed a two-way communication system with the

1 direct load control thermostat of air conditioners. The Staff would strongly  
2 encourage the Companies to look into a one-way communication system in  
3 conjunction with the direct load control switch in order to reduce program  
4 costs.

5  
6 23. Q. What about the potential of including the energy savings and peak demand  
7 reductions from mercantile customers to be committed to the FE distribu-  
8 tion companies for integration?

9 A. It is too premature to determine the amount of savings that would come  
10 from FE mercantile customers committing to integrate their energy effi-  
11 ciency programs to the Companies. However, if the Companies would like  
12 to count such efforts towards its benchmarks, the Staff would recommend  
13 that the Companies would need to make a case-by-case submittal for  
14 approval by the Commission to receive such credits.

15  
16 With respect to the Companies' interruptible/curtailable programs counting  
17 towards the annual benchmarks for demand reductions the Staff believes  
18 that such reductions must actually occur in order to receive credit.

19  
20 24. Q. What is your opinion regarding the Companies' commitment to contribute  
21 \$5 million per year for up to 5 years toward energy efficiency and peak  
22 demand reduction programs?

1           A.    The Staff finds that it is acceptable for the Companies to contribute this  
2                   amount of shareholder dollars towards energy efficiency and demand  
3                   reduction programs, but it is unlikely that such a funding level by itself will  
4                   meet the benchmarks required of the Companies' over the next 5 years.  
5           The Staff would recommend that the Companies form a collaborative  
6                   process with respect to the selection and development of energy efficiency  
7                   and peak demand reduction programs. It is clear that ratepayers will be  
8                   substantially funding these efforts for quite some time in the future, and  
9                   therefore they should have some input as to what programs get selected,  
10                  designed, and deployed. Since the goals for the Companies' energy  
11                  efficiency and demand reduction benchmarks are quite aggressive, the Staff  
12                  recommends that the Companies establish an energy efficiency  
13                  collaborative with the purpose of meeting the Companies' annual energy  
14                  efficiency and peak demand reduction benchmarks.

15  
16   25.   Q.    Are there any other recommendations that you have regarding the Com-  
17                   panies' energy efficiency and peak demand reduction programs?

18           A.    Yes. I would recommend that the Companies with input from the energy  
19                   efficiency collaborative contract with a qualified independent third party to  
20                   measure and verify the energy and peak reduction savings for each of the  
21                   deployed programs. Such evaluations of the programs should not exceed  
22                   more than five percent of the program costs

1    26.    Q.    Does this conclude your testimony?

2            A.    Yes it does, although I reserve the right to supplement my testimony as new  
3            information becomes available.



**ATTACHMENT 1**

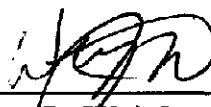
	Ohio Edison	CEI	Toledo Edison	FE Ohio EDUs
Year	EDU Seasonal Peak Load	EDU Seasonal Peak Load	EDU Seasonal Peak Load	EDU Seasonal Peak Load
2006	5,492	4,341	2,119	11,952
2007	5,345	4,155	2,002	11,502
2008	5,775	4,340	2,086	12,201
SUM	16,612	12,836	6,207	36,655
3 Year Average	5,537	4,279	2,069	11,885
2009 MW Peak Reduction Target	55.37	42.79	20.69	118.85

**ATTACHMENT 2**

	Ohio Edison	CEI	Toledo Edison	FE Ohio EDUs
Year	Total End-Use Delivery	Total End-Use Delivery	Total End-Use Delivery	Total End-Use Delivery
2006	25,432,000	19,294,000	10,448,000	55,174,000
2007	26,052,000	19,718,000	10,690,000	56,460,000
2008	26,167,000	19,794,000	10,687,000	56,648,000
SUM	77,651,000	58,806,000	31,825,000	168,282,000
3 Year Average	25,883,667	19,602,000	10,608,333	56,094,000
2009 MWh Energy Target	77,651	58,806	31,825	168,282

## PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prefiled Testimony of Gregory C. Scheck, 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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Assistant Attorney General

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