

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Columbus Southern Power Company and)	
Ohio Power Company for Authority to)	Case No. 11-346-EL-SSO
Establish a Standard Service Offer)	
Pursuant to § 4928.143, Ohio Rev. Code,)	Case No. 11-348-EL-SSO
in the Form of an Electric Security Plan.)	
In the Matter of the Application of)	Case No. 11-349-EL-AAM
Columbus Southern Power Company and)	
Ohio Power Company for Approval of)	Case No. 11-350-EL-AAM
Certain Accounting Authority.)	

SUPPLEMENTAL TESTIMONY OF TERESA L. RINGENBACH
ON BEHALF OF THE RETAIL ENERGY SUPPLY ASSOCIATION,
DIRECT ENERGY BUSINESS, LLC AND DIRECT ENERGY SERVICES, LLC

June 1, 2012

1 **Q1. Please state your name and business address.**

2 **A1.** My name is Teresa Ringenbach. My business address is 9605 El Camino Lane, Plain
3 City, Ohio.

4 **Q2. Are you the same Teresa Ringenbach who caused to be filed Direct Testimony in**
5 **this proceeding on May 4, 2012?**

6 **A2.** Yes, I am.

7 **Q3. Do you have any additions or corrections to your May 4, 2012 Direct Testimony?**

8 **A3.** Yes, I do. These are found in the Errata Sheet attached as Attachment A.

9 **Q4. Subsequent to the filing of your testimony on May 4, 2012, has there been a major**
10 **change in practice that will affect the number of shopping customers?**

11 **A4.** Yes. On May 14, 2012 certain CRES suppliers in the AEP service area received what has
12 been marked as FES Exhibit 119. The notice indicated that starting on May 16, 2012,
13 AEP will return to standard service any shopping customer who is in arrears by \$50 for a
14 period of more than 60 days. It is not uncommon for customers to miss a monthly
15 payment deadline or to have an unpaid or underpay monthly invoice. Thus, this shift in
16 practice could result in a great number of customers, particularly those residential
17 customers who are most at risk financially, being involuntarily switched from shopping
18 to standard service. Further, such a switch could trigger the 12 month minimum stay
19 provision for the larger customers and the seasonal minimum stay for residential
20 customers.

21 **Q5. Were CRES suppliers aware of this shift in practice?**

22 **A5.** The May 14, 2012 notice from AEP Ohio to the CRES (FES Exhibit 119) was the first
23 my company knew of a change in practice. Counsel and my operations personnel have

1 informed me that the AEP tariff has provided that AEP Ohio may switch any shopping
2 customer to standard service if the customer is in arrears, but up until the May 14th notice,
3 to the best of our knowledge that was not the practice.

4 **Q6. How will this practice affect customers?**

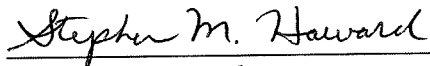
5 **A6.** Customers, particularly those who are struggling financially, may find themselves shifted
6 from the lower shopping rate they secured to higher standard service rates. It also puts
7 into question Mr. Allen's projected switching rates of 65% residential, 80% commercial
8 and 90% industrial which was based in part on observations from shopping migration in
9 the Duke Energy Ohio service area. Duke does not have such a practice of returning
10 customers to standard service. In Duke, customers who are in arrears can stay with their
11 lower cost CRES supplier. Further, since Duke purchases the receivables CRES
12 suppliers are not likely to drop the financially troubled customer.

13 **Q7. Does this conclude your Supplemental Testimony?**

14 **A7.** Yes, it does.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served this 1st day of June, 2012 by electronic mail, upon the persons listed below.



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ATTACHMENT A

ERRATA SHEET to Teresa L. Ringenbach Direct Testimony

Page No.	Line No.	Currently reads	Should read
3	19	"Power and a Columbus Power zone. Thus, merging the two utilities but not transferring"	"Power zone and a Columbus Power zone. Thus, merging the two utilities but not transferring"
5	13	"discriminatory, but interferes with the mission of the EDR rider to grow the local"	"discriminatory, but interferes with the mission of the EDR to grow the local"
6	19	"as well as access to GridSmart and GridSmart data will be available to shopping and"	"as well as access to SmartGrid and SmartGrid data will be available to shopping and"
12	5	"A15. Direct Energy and RESA do not support the shopping credit as it is proposed by AEP"	"A15. Direct Energy and RESA do not support the shopping credit alternative as it is proposed by AEP"
13	6	"Direct Energy and RESA believe that the discussion of Turning Point is also premature"	"Direct Energy and RESA believe that the discussion of Turning Point Solar is also premature"
13	9	"Further, the Turning Point application must have the proper dedication and be subjected"	"Further, the Turning Point Solar application must have the proper dedication and be subjected"
13	12	"collect through the GRR, Direct Energy and RESA urge the Commission to reject rider"	"collect through the GRR, Direct Energy and RESA urge the Commission to reject the rider"
16	8	"discussed earlier, GridSmart and potential future smart meter roll out plans under DIR."	"discussed earlier, SmartGrid and potential future smart meter roll out plans under DIR."

ERRATA SHEET - Teresa L. Ringenbach Direct Testimony

Page 2

Page No.	Line No.	Currently reads	Should read
16	15	"through riders such as GridSmart or DIR is available to all customers and their CRES"	"through riders such as SmartGrid" or DIR is available to all customers and their CRES"
17	5	"customer arrearage grow over time the CRES provider has no ability to verify if the funds"	"customer arrearages grow over time the CRES provider has no ability to verify if the funds"
17	6	"being sent by the utility are being applied appropriately.. In addition, payment plans,"	"being sent by the utility are being applied appropriately. In addition, payment plans,"
17	21	"collect past due amounts owed to CRES provider in a payment arrangement and could"	"collect past due amounts owed to a CRES provider in a payment arrangement and could"
19	3	"structure with uncollectible rider for bad debt recovery that has worked well for years."	"structure with an uncollectible rider for bad debt recovery that has worked well for years."

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Case No(s). 11-0346-EL-SSO, 11-0348-EL-SSO, 11-0349-EL-AAM, 11-0350-EL-AAM

Summary: Testimony Supplemental Testimony of Teresa L. Ringenbach on Behalf of the Retail Energy Supply Association, Direct Energy Business, LLC and Direct Energy Services, LLC electronically filed by M HOWARD PETRICOFF on behalf of Retail Energy Supply Association and Direct Energy Business, LLC and Direct Energy Services, LLC