

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application Not)	
for an Increase in Rates Pursuant to)	
Section 4901.18, Revised Code, of)	Case No. 14-1158-EL-ATA
Ohio Power Company to Establish)	
Meter Opt Out Tariff)	

DIRECT TESTIMONY
OF
ANDREA E. MOORE
ON BEHALF OF
OHIO POWER COMPANY

Filed: April 24, 2015

INDEX TO DIRECT TESTIMONY OF
ANDREA E. MOORE

	<u>Page</u>
Personal Data	1
Purpose of Testimony	2
Signatory Parties	3
Overview of the Stipulation	3
Criteria for Considering Approval of a Stipulation	3

BEFORE
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ANDREA E MOORE
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1 **PERSONAL DATA**

2 **Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?**

3 **A.** My name is Andrea E. Moore, and my business address is 850 Tech Center Drive,
4 Gahanna, Ohio 43230.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 **A.** I am employed by Ohio Power Company, known as AEP Ohio or the Company, as
7 Director – Regulatory Services.

8 **Q. WHAT ARE YOUR RESPONSIBILITIES AS DIRECTOR – REGULATORY**
9 **SERVICES?**

10 **A.** I am responsible for directing the preparation and presentation of regulatory matters to
11 management as well as regulatory bodies. I plan, organize, and direct team activities to
12 develop and support pricing structures, rider and true-up filings, maintenance of tariffs,
13 pilot programs, special contracts, and other pricing initiatives.

14 **Q. WHAT IS YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND?**

15 **A.** I received a Bachelor of Science in Accounting degree from the University of Rio Grande
16 and a Master of Business Administration degree from Franklin University. In addition, I
17 have completed the Basic Concepts on Rate Making class through New Mexico State
18 University.

19 I joined American Electric Power Service Corporation (AEPSC) in 2001 as an
20 Accountant and joined the Regulatory Tariffs department as a Regulatory Analyst III in

1 2004. I progressed through various positions before being promoted to my current
2 position of Director – Regulatory Services for AEP Ohio. My duties within the
3 regulatory department have included preparing cost-of-service studies for regulatory
4 filings, preparing cost-based formula rates for wholesale customers, preparing rider
5 filings and rate designs, and maintaining tariff books. I have also handled other projects
6 related to regulatory issues and proceedings, individual customer requests, and general
7 rate matters.

8 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN A REGULATORY PROCEEDING?**

9 **A.** Yes. I testified before the Public Utilities Commission of Ohio in Case Nos. 13-2385-
10 EL-SSO and 13-419-EL-RDR.

11 **PURPOSE OF TESTIMONY**

12 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

13 **A.** The purpose of my testimony is to sponsor and summarize the Stipulation and
14 Recommendation (Stipulation) submitted on March 23, 2015 for the Commission's
15 consideration. The Stipulation provides the basis for resolving the pending order of the
16 Commission for Ohio Power Company to establish a meter opt-out tariff pursuant to
17 Section 4901:1-10-05 of the Ohio Administrative Code (OAC).

18 My testimony discusses the criteria that the Commission uses when considering
19 settlement agreements and explains how the Stipulation in this proceeding meets those
20 criteria. Specifically, my testimony supports the conclusion that the Stipulation (1) is the
21 product of serious bargaining among capable, knowledgeable, parties; (2) does not
22 violate any important regulatory principle or practice; and (3) as a package, benefits
23 ratepayers and the public interest.

1 **SIGNATORY PARTIES**

2 **Q. WHO ARE THE SIGNATORY PARTIES TO THE STIPULATION?**

3 **A.** In addition to the Company, the Staff of the Public Utilities Commission of Ohio has
4 signed the Stipulation.

5 **OVERVIEW OF THE STIPULATION**

6 **Q. PLEASE EXPLAIN THE STIPULATION.**

7 **A.** Due to a recent rule review, OAC 4901:1-10-05(J) requires an electric utility to “provide
8 customers with the option to remove an installed advanced meter and replace it with a
9 traditional meter, and the option to decline installation of an advanced meter and retain a
10 traditional meter, including a cost-based, tariffed opt-out service.” The Company filed in
11 this docket a cost-based meter opt-out charge as well as certain language changes to its
12 Terms and Conditions of Service in order to incorporate the new charge. The Stipulation
13 outlines both the charge to customers as well as the associated language to be reflected in
14 the Company tariff as shown on Stipulation Exhibits B-1 and B-2.

15 **CRITERIA FOR CONSIDERING APPROVAL OF A STIPULATION**

16 **Q. WHAT IS THE STANDARD THAT THE COMMISSION HAS USED WHEN**
17 **CONSIDERING APPROVAL OF A STIPULATION AMONG PARTIES TO**
18 **PROCEEDINGS?**

19 **A.** My understanding is that a stipulation must satisfy a three-part test. The questions that
20 the Commission considers are as follows: (1) Is the stipulation the product of serious
21 bargaining among capable, knowledgeable parties? (2) Does the stipulation violate any
22 important regulatory principle or practice? (3) As a package, does the stipulation benefit
23 ratepayers and the public interest?

1 **Q. IS THE STIPULATION SUBMITTED IN THIS CASE THE PRODUCT OF**
2 **SERIOUS BARGAINING AMONG CAPABLE AND KNOWLEDGEABLE**
3 **PARTIES?**

4 **A.** Yes. The Stipulation was the product of meetings and negotiations involving
5 experienced counsel as well as the technical experts from each party in the case. Among
6 other things, this Stipulation adopts a significantly lower charge than the cost-based
7 charge proposed by the Company, representing a compromise based on serious
8 bargaining and negotiation.

9 **Q. DOES THE STIPULATION VIOLATE ANY IMPORTANT REGULATORY**
10 **PRINCIPLE OR PRACTICE?**

11 **A.** No. The Stipulation is a settlement incorporating the interests of customers and
12 complying with the Ohio Administrative Code. The Stipulation provides a reasonable
13 settlement of charges. It follows OAC 4901:1-10-05 as adopted in Case No. 12-2050-
14 EL-ORD and is consistent with the Commission order in that case.

15 **Q. DOES THE STIPULATION AS A PACKAGE BENEFIT CUSTOMERS AND THE**
16 **PUBLIC INTEREST?**

17 **A.** Yes. The Stipulation provides for a reasonable charge for customers who refuse the
18 installation of an advanced meter or request removal of an existing advanced meter.
19 Previously, the Company already had the option to disconnect service for the refusal of
20 Company-approved equipment. This Stipulation gives customers the opportunity for
21 choices when it comes to the type of meter installed, and the Stipulation adequately
22 assures that a customer choosing to opt out is responsible for paying a fee based on the

1 ongoing cost resulting from the customer's decision. That result is fair and reasonable to
2 all other customers.

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

4 **A.** Yes.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing *Direct Testimony of Andrea E. Moore* was served this 24th day of April 2015 by electronic mail, upon the person listed below.

/s/Steven T. Nourse
Steven T. Nourse

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Summary: Testimony -Direct Testimony of Andrea E. Moore on behalf of Ohio Power Comapny
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