

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio	:	
Edison Company, The Cleveland Electric	:	Case No. 14-1297-EL-SSO
Illuminating Company and The Toledo	:	
Edison Company for Authority to Provide	:	
for a Standard Service Offer Pursuant to	:	
R.C. 4928.143, in the Form of an Electric	:	
Security Plan.	:	

**PREFILED TESTIMONY
OF
MARK C. BELLAMY
SITING, EFFICIENCY & RENEWABLE ENERGY DIVISION
RATES AND ANALYSIS DEPARTMENT
PUBLIC UTILITIES COMMISSION OF OHIO**

Staff Exhibit _____

September 18, 2015

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

2 A. My name is Mark C. Bellamy. My business address is 180 East Broad
3 Street, Columbus, Ohio 43215.
4

5 2. Q. By whom are you employed and what is your position?

6 A. I am employed by the Public Utilities Commission of Ohio as a Utility
7 Specialist, in the Siting, Efficiency & Renewable Energy Division of the
8 Rates and Analysis Department.
9

10 3. Q. Please summarize your educational background.

11 A. I have earned a B.S.E. degree in Chemistry from Arkansas State University.
12

13 4. Q. Please summarize your work experience.

14 A. Prior to my employment with the PUCO, I served 6 years in the U.S. Navy
15 as a Machinist's Mate on a submarine. I operated and maintained
16 atmosphere control equipment, as well as performed duties as a quality
17 assurance inspector. After the Navy I was employed as a high school
18 science teacher. I joined the staff of the Public Utilities Commission of
19 Ohio in 2009. Part of my duties in my current position are to help
20 implement Ohio's Alternative Energy Portfolio Standard.
21
22

1 5. Q. Have you testified in prior proceedings before the Commission?

2 A. Yes.

3

4 6. Q. What is the purpose of your testimony?

5 A. The purpose of my testimony is to address Ohio Edison Company, The
6 Cleveland Electric Illuminating Company, and The Toledo Edison
7 Company's (the Companies) proposed changes to the Alternative Energy
8 Resource Rider (Rider AER).

9

10 7. Q. What changes are the Companies proposing for Rider AER?

11 A. In agreement with the recommendations of Goldenberg Schneider in its
12 Financial Audit of the Companies' Rider AER¹ for the period July 1, 2009
13 to December 31, 2011, the Companies propose the following changes: Each
14 quarterly calculation should be trued-up and any over or under recovery
15 included in the calculation should be reflected no later than in the next two
16 quarterly updates. The overall Rider AER rate for each Operating Company
17 should allocate the quarterly calculated rate to all rate classes rather than
18 allocating the overall rate based on the loss factors of the rate classes.

19

¹ *In the Matter of the Review of the Alternative Energy Rider Contained in the Tariffs of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company, Case No. 11-5201-EL-RDR (Final Report Financial Audit) (Aug. 15, 2012).*

1 8. Q. Does Staff oppose these changes?

2 A. No.

3

4 9. Q. On page 10 of the application,² the Companies state: “the gains or losses
5 associated with any sale of RECs or solar RECs would be included in Rider
6 AER as a credit or charge to customers in the two quarters immediately
7 following the transaction.” Would this clause allow the Companies to buy
8 and sell RECs/SRECs on a speculative basis?

9 A. No, as clarified by the Companies in response to a Staff interrogatory,
10 “[t]he above language is needed to allow for the Companies to true up their
11 portfolio of SRECs and RECs against changing renewable energy resource
12 obligations and legislative requirements.”³

13

14 10. Q. On page 11 of their application, the Companies assert that, “[a]mounts
15 collected through Rider AER in years previous to the audit year shall not be
16 subject to refund.” Does Staff have any observations related to this
17 assertion?

² *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan (Application at 10) (Aug. 4, 2014).*

³ Response to Request PUCO DR-4 10/7/14.

1 A. Staff presents no opinions on this this language, but simply notes that Staff
2 believes the Commission should be aware that this language was not
3 included in the Companies' prior ESP applications. Due to the Companies'
4 addition of this new language, Staff brings it to the attention of the
5 Commission for its review and analysis.

6

7 11. Q. Does this conclude your testimony?

8 A. Yes, it does. However, I reserve the right to submit supplemental testimony
9 as described herein, as new information subsequently becomes available or
10 in response to positions taken by other parties.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Prefiled Testimony of Mark C. Bellamy** 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 18th day of September, 2015.

/s/ Steven L. Beeler

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Summary: Testimony Prefiled Testimony of Mark C. Bellamy submitted by Assistant Attorney General Steven Beeler on behalf of the Staff of the Public Utilities Commission of Ohio. electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio