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 BARBARA BOSSART

SERVICE MONITORING AND ENFORCEMENT DEPARTMENT RELIABILITY AND SERVICE ANALYSIS DIVISION 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 Barbara Bossart. My business address is 180 E. Broad Street,
3			Columbus, Ohio 43215-3793.
4			
5	2.	Q.	By whom are you employed?
6		А.	I am employed by the Public Utilities Commission of Ohio.
7			
8	3.	Q.	What is your present position with the Public Utilities Commission of Ohio
9			and what are your duties?
10		А.	I am the Chief of the Reliability and Service Analysis Division of the
11			Service Monitoring and Enforcement Department. My current duties
12			include the oversight of the development and enforcement of service relia-
13			bility and consumer protection policies, rules and Commission orders for
14			gas, water, electric, telephone, and competitive gas and electric services.
15			
16	4.	Q.	Would you briefly state your educational background and work experience.
17		А.	I have a bachelor's degree from Marshall University and I have been
18			employed by the Public Utilities Commission of Ohio since 1999. For six
19			years, I worked as an Investigator in the Investigation and Audits Division
20			of the Service Monitoring and Enforcement Department. As an Investiga-
21			tor my duties included interacting with the consumers to investigate their
22			concerns about utility companies' policies and practices. I also participated

1			in customer service audits to identify service issues or non-compliance with
2			rules. In May 2005, I was promoted to Utility Specialist 2 in the Reliability
3			and Service Analysis Division of the Service Monitoring and Enforcement
4			Department where I was responsible for analyzing service quality perfor-
5			mance as well as for recommending and enforcing service-quality and con-
6			sumer-protection policies and rules. In January 2013, I was promoted to
7			Chief of the Reliability and Service Analysis Division.
8			
9	5.	Q.	What is the purpose of your testimony?
10		A.	The purpose of this testimony is to first address the portion of the Electric
11			Service Plan filed by The Ohio Edison Company, The Cleveland Electric
12			Illuminating Company, and The Toledo Edison Company (collectively, the
13			"Companies") proposing a Government Directives Rider (Rider GDR)
14			which is intended to recover costs associated with publishing Competitive
15			Retail Electric Service (CRES) providers' logos on the Companies' consol-
16			idated bills, as described in the direct testimony of Marybeth Smialek ¹ .
17			Second, I will address the Companies' bill format filed in this case.
18			
19			

Direct Testimony of Marybeth Smialek at 8, lines 15-20.

1	6.	Q.	Do you support the Companies' above mentioned proposal?
2		A.	No, I do not support the Companies' proposal to recover its cost for provid-
3			ing CRES providers' logos on its consolidated bill in a new rider.
4			
5	7.	Q.	Why do you not support the Companies' proposal?
6		A.	On page 26, paragraph 26, of its March 26, 2014 Finding and Order in Case
7			No. 12-3151-EL-COI, the Commission addressed the issue of cost recovery
8			to implement this change: "Accordingly, the EDUs [electric distribution
9			utilities] may file applications for recovery for those costs in their next dis-
10			tribution rate case." In the May 21, 2014 Entry on Rehearing in Case No.
11			12-3151-EL-COI, the Commission specifically speaks to the cost associ-
12			ated with providing CRES providers' logos on EDU bills and recovery of
13			those costs in paragraph (23) on page 15. The Commission reinforced its
14			decision by stating, "billing is a distribution service and changes to an
15			EDU's billing system to revise the bill format should be appropriately
16			recovered through base distribution rates." In light of the Commission's
17			directive, I do not believe that cost recovery for adding the CRES provid-
18			ers' logo to the EDUs' bill should be approved outside of a distribution rate
19			case.
20			
21			

1	8.	Q.	Does the Companies' proposed bill format meet the requirements of the
2			Commission's Order in Case No. 12-3151-EL-COI?
3		A.	In part, the Companies' proposed bill format does meet the requirements
4			for placement of the CRES providers' logo on the bill and modifying the
5			Price to Compare (PTC) notice language on the bill. However, Ohio Adm.
6			Code 4901:1-10-22(B)(24) also requires that in addition to the PTC notice,
7			a notice that such customers can obtain a written explanation of the price-
8			to-compare from the utility shall be include on the bill. ²
9			
10	9.	Q.	What is your recommendation regarding approval of the Companies' bill
11			format?
12		A.	I recommend that the Companies' bill format be approved upon modifying
13			their bill format to include a notice in compliance with Ohio Adm. Code
14			4901:1-10-22 (B)(24).
15			
16	10.	Q.	Does this conclude your testimony?
17		A.	Yes, it does. However, I reserve the right to submit supplemental testi-
18			mony as described herein, as new information subsequently becomes avail-
19			able or in response to positions taken by other parties.

² Ohio Adm. Code 4901:1-10-22 (B)(24): "The price-to-compare notice on residential customer bills and a notice that such customers can obtain a written explanation of the price-to-compare from their electric utility."

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Prefiled Testimony of Barbara Bossart** 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

Steven L. Beeler Assistant Attorney General

Parties of Record:

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Commission of Ohio Docketing Information System on

9/18/2015 11:25:03 AM

in

Case No(s). 14-1297-EL-SSO

Summary: Testimony Prefiled Testimony of Barbara Bossart 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