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18 On behalf of the Mid-Ohio Regional
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19
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22 On behalf of the NOAC Communities.

23 ALSO PRESENT:

24 Mr. John A. Laverty.
Ms. Melissa L. Thompson (via phone).

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1 Monday Morning Session,
2 September 26, 2016.

3 - - -

4 MR. HEALEY: Let's take appearances. I'm
5 Christopher Healey. We represent the residential
6 consumers of Columbia Gas of Ohio, Inc., on behalf of
7 Bruce Weston, Ohio Consumers' Counsel. And with me
8 is Kim Bojko, outside counsel for OCC with the
9 Carpenter Lipps law firm.

10 MR. CLARK: On behalf of Columbia Gas,
11 Joseph Clark. With me is Eric Gallon from the firm
12 Porter, Wright. Additionally with us is Jack
13 Laverty.

14 MR. HEALEY: And appearances on the
15 phone, please.

16 MR. ALLWEIN: On behalf of Mid-Ohio
17 Regional Planning Commission, this is Christopher
18 Allwein of Kegler, Brown, Hill & Ritter.

19 MS. TISCHLER: Beth Tischler from the
20 City of Maumee representing the NOAC Communities.

21 MR. HEALEY: Okay. And I believe that
22 Melissa Thompson from Columbia Gas is also on the
23 line.

24 MR. CLARK: Thank you.

25 - - -

1 SARAH POE

2 being by me first duly sworn, as hereinafter
3 certified, deposes and says as follows:

4 CROSS-EXAMINATION

5 By Mr. Healey:

6 Q. Ms. Poe, can you please state your name
7 and business address.

8 A. Sarah Poe, 290 West Nationwide Boulevard,
9 Columbus, Ohio 43215.

10 MR. CLARK: Chris, I'm sorry. The only
11 preliminary issue I had was I had the same objection
12 on the breadth of the document request for Ms. Poe's
13 deposition. To the extent there are things that, you
14 know, you need, will come up in cross, we want to put
15 it on the record.

16 MR. HEALEY: Sure. We can cover that
17 now.

18 Q. Did you receive your deposition notice
19 for today's deposition?

20 A. I did.

21 Q. And did you review the notice?

22 A. I did.

23 Q. And you are aware that the deposition
24 notice asked you to bring certain documents with you
25 today?

1 A. Yes.

2 Q. Did you bring any documents with you
3 today in response to the deposition notice?

4 A. I did.

5 Q. What did you bring?

6 A. I brought with me a copy of Columbia's
7 application, a copy of Mr. Laverty's direct
8 testimony, and a copy of Ms. Melissa Thompson's
9 direct testimony as well as a copy of discovery
10 requests which I was responsible for.

11 Q. Did you bring anything else?

12 A. A notepad and a pen.

13 Q. Okay. Have you been deposed before?

14 A. I have not.

15 Q. Just a couple of preliminary things, if
16 you don't understand the question I ask, you can
17 either ask the court reporter to read it back, or you
18 can ask me to rephrase. I'll ask that you give a
19 verbal response to all questions so we create a
20 record for this deposition. If you need a break, you
21 just let me know but let's finish whatever question
22 we are on, and we will move to the next one after the
23 break.

24 Does that all -- is that okay with you,
25 that all make sense?

1 A. Yes.

2 Q. Just a couple defined terms so we are on
3 the same page, the phrases demand-side management, is
4 also abbreviated DSM, may also refer to that as
5 energy efficiency, those are all meant to mean the
6 same thing, so I think we'll both understand if we
7 use any of those phrases, they are not meant to
8 distinguish from the other; is that okay?

9 A. Yes.

10 Q. If I refer to Columbia or Columbia Gas or
11 the company or utility, those all mean Columbia Gas
12 of Ohio, Inc.; is that okay?

13 A. Yes.

14 Q. Can you tell me about your educational
15 background.

16 A. I attended the University of Dayton. I
17 graduated in 2007 with a Bachelor's of Science
18 degree, and I majored in mathematics.

19 Q. Do you have any other postsecondary
20 education?

21 A. I do. I have a Master of Business
22 Administration from Ohio University.

23 Q. What year did you graduate from college?

24 A. My Master's?

25 Q. Your undergrad.

1 A. 2007.

2 Q. And when you did finish your MBA?

3 A. In 2015.

4 Q. And what was your first job out of
5 college?

6 A. I worked for FirstEnergy.

7 Q. What did you do for FirstEnergy?

8 A. I worked in their rates and regulatory
9 affairs department and their enterprisewide risk
10 management department.

11 Q. What time -- what years -- let me
12 rephrase.

13 When were you at FirstEnergy?

14 A. From 2007 until 2009.

15 Q. Did you work in energy efficiency at
16 FirstEnergy?

17 A. I did not.

18 Q. And you said you left FirstEnergy in 2009
19 and where did you go from there?

20 A. I began working for Columbia Gas of Ohio
21 in 2009.

22 Q. What was your position at Columbia Gas
23 when you started in 2009?

24 A. I was the data and performance metrics
25 analyst in the energy efficiency department.

1 Q. What does that mean? What were your
2 responsibilities when you first started?

3 A. May I?

4 Q. Sure.

5 A. I don't want to say anything. I was
6 responsible for tracking of data for Columbia's
7 energy efficiency programs, reporting metrics,
8 performing analysis on data that we collected, and I
9 assisted in our rider filing.

10 Q. When you say "rider filing," what are you
11 referring to?

12 A. Columbia's annual rider where we
13 collect -- or we file to collect for expenses of our
14 DSM programs.

15 Q. Just the DSM, is that the only rider you
16 were responsible for?

17 A. That's correct.

18 Q. And what's your current position with
19 Columbia?

20 A. My title is evaluation team leader.

21 Q. And do you have different
22 responsibilities now as evaluation team leader than
23 when you started?

24 A. I have expanded my responsibilities to
25 include management of Columbia's impact and process

1 evaluations as well as direct management of the data
2 and performance metrics analysts.

3 Q. And what do you do as manager of --

4 MR. HEALEY: Can you read back her last
5 response, please.

6 (Record read.)

7 Q. So what are your responsibilities as
8 director of the impact and process evaluation?

9 A. I directly manage third-party contractors
10 who perform impact and process evaluations for the
11 company.

12 Q. Do you manage any internal Columbia
13 employees?

14 A. I do.

15 Q. How many?

16 A. One.

17 Q. And who is that?

18 A. Andrew Metz.

19 Q. And how many outside parties do you
20 manage?

21 A. Manage two different companies.

22 Q. Now, you said you have been with Columbia
23 since 2009. You are aware that Columbia filed an
24 application in 2011 for the current 2012 to 2016
25 programs; is that right?

1 A. Yes.

2 Q. Were you part of the Columbia team that
3 prepared that previous application?

4 A. I reviewed the application that was filed
5 in 2011.

6 Q. What I asked were you part of the team
7 that helped prepare the application. When you say
8 you "reviewed," do you mean before it was filed?

9 A. Correct.

10 Q. And were you part of the Columbia team
11 that designed the programs in that portfolio?

12 A. I don't recall.

13 Q. Are you part of the -- let's backtrack.

14 You are aware that Columbia filed an
15 application in this current case on June 10, correct?

16 A. Correct.

17 Q. And that application seeks to continue
18 Columbia's DSM programs that were in place for 2012
19 to 2016?

20 A. That is correct.

21 Q. And you brought a copy of that
22 application with you today?

23 A. I did.

24 Q. What was your role in designing the
25 programs that are in the application in this case?

1 THE WITNESS: Can you repeat the
2 question?

3 (Record read.)

4 A. As a member of Columbia's energy
5 efficiency team, I worked with program managers and
6 the DSM team to review programmatic changes that were
7 included in the application.

8 Q. When you say "review programmatic
9 changes," are you referring to the changes identified
10 in the application on page 10?

11 A. That is correct.

12 Q. And what -- what specifically was your
13 role in deciding that Columbia would make these
14 changes to the programs?

15 A. My role included providing process
16 evaluation results to program managers which were
17 used in some of the programs to be incorporated into
18 the changes that are shown on page 10.

19 Q. Did you do anything other than provide
20 the process evaluation results to the program
21 managers?

22 A. I also met with program managers and the
23 DSM team to discuss potential changes and their
24 impacts to the portfolio.

25 Q. In those discussions did you discuss the

1 extent to which these program changes would affect
2 the program budgets?

3 THE WITNESS: Can you reread that?

4 (Record read.)

5 A. Yes, I believe we did.

6 Q. Were you the person at Columbia primarily
7 responsible for analyzing the program budgets?

8 A. I would say I was responsible along with
9 other members of the team.

10 Q. Who else was responsible?

11 A. I believe Jack Laverty reviewed
12 programmatic budgets as well as the program managers.

13 Q. Anyone else?

14 A. Not that I can recall.

15 Q. Did you analyze the cost effectiveness of
16 the programs when you were considering what changes
17 to make to programs?

18 A. Yes, I believe that I did.

19 Q. And did you analyze what -- what did you
20 consider with respect to cost effectiveness when
21 making recommendations to make changes to the
22 programs?

23 A. I'm sorry. Can you restate your
24 question?

25 Q. Sure.

1 MR. HEALEY: Before that one can you read
2 my last question and her answer, please.

3 (Record read.)

4 Q. Did you analyze whether these changes to
5 the programs made the programs more cost effective?

6 A. I believe that I analyzed the impact of
7 programmatic changes on program cost effectiveness.

8 Q. Did you do this while Columbia was
9 considering whether to make these changes, or did you
10 analyze cost effectiveness after the decision to make
11 the changes was already made?

12 A. I believe it was while we were making the
13 decision.

14 Q. You mentioned program managers a few
15 times. Are you referring to Adrian Andrews, Paul
16 Roucher I think is the name.

17 MR. LAVERTY: Racher.

18 A. Racher.

19 Q. Racher and Megan Melby, are those the
20 three program managers?

21 A. Yes.

22 Q. You mentioned before that you were
23 involved with the 2000 application -- let's go back.
24 Strike that.

25 I understand that Columbia's application

1 includes a table in Appendix B, that it's Appendix B,
2 Table 1 on page 24. Can you turn to that, please.

3 A. Yes.

4 Q. Are you familiar with this table?

5 A. I am.

6 Q. Did you personally prepare this table?

7 A. I believe that I did.

8 Q. Did you perform the underlying
9 calculations that resulted in the numbers in this
10 table?

11 A. Yes.

12 Q. So it's fair to say you were responsible
13 for the cost effectiveness test results.

14 A. I believe that's fair to say.

15 Q. You mentioned before you were involved in
16 the 2011 application that Columbia filed for its 2012
17 to 2016 programs. Were you responsible for cost
18 effectiveness calculations in that application?

19 A. I was not.

20 Q. Were you part of the team that assisted
21 who was in charge with the cost effectiveness
22 calculations in 2011?

23 A. I do not believe that I was.

24 Q. Who was in charge of the cost
25 effectiveness calculations in the 2011 application?

1 Do you recall?

2 A. I believe that Mr. Lavery prepared -- or
3 I believe that Mr. Lavery was involved in preparing
4 those.

5 Q. But you're not sure?

6 A. Correct.

7 Q. Before this case had you performed any
8 analysis to calculate the cost effectiveness of
9 energy efficiency or DSM programs?

10 A. I have.

11 Q. Can you tell me about your past
12 experience calculating cost effectiveness test
13 results?

14 A. I have been involved in Columbia's annual
15 energy efficiency rider which utilizes the utility
16 cost test.

17 Q. How many rider filings have you been
18 involved in?

19 A. I can't remember specifically how many.

20 Q. Is it more than five? Let me go back.

21 How many of Columbia's DSM rider filings
22 have you been involved in?

23 A. I don't know specifically.

24 Q. Is it more than five?

25 A. I believe so.

1 Q. And those riders are filed annually?

2 A. That is correct.

3 Q. You said in those riders the UCT test was
4 used?

5 A. For some of those filings the
6 calculations utilized in the UCT test were used.

7 Q. Did any of the filings -- when you say
8 "UCT test," you are referring to the utility cost
9 test; is that right?

10 A. That is correct.

11 Q. Did any of the rider filings utilize a
12 cost effectiveness test other than the utility cost
13 test?

14 A. Not that I recall.

15 Q. Did any of the rider filings involve
16 calculating cost effectiveness under the total
17 resource cost test?

18 THE WITNESS: I'm sorry. Can you repeat
19 that.

20 Q. I can rephrase. Did any of Columbia's
21 DSM rider filings that you have been involved in
22 include calculations of cost effectiveness under the
23 total resource cost test?

24 A. Not that I recall.

25 Q. Did any of Columbia's past DSM rider

1 filings that you were involved in include
2 calculations of cost effectiveness test results under
3 the societal cost test?

4 A. Not that I recall.

5 Q. Other than Columbia's rider filings --
6 other than Columbia's DSM rider filings and other
7 than the calculations you did for this application,
8 have you performed cost effectiveness test
9 calculations in any other case?

10 A. I don't believe so.

11 Q. I would ask you to look again at Table 1
12 on Appendix B. This is the -- this provides the cost
13 effectiveness test results for five different cost
14 effectiveness tests; is that right?

15 A. That's correct.

16 Q. And we just discussed the societal cost
17 test. Is that the second column, "SCT"?

18 A. Yes.

19 Q. And then the next column says "TRC,"
20 that's total resource cost test?

21 A. Yes.

22 Q. And then the next column is the "PCT,"
23 participant cost test?

24 A. Yes.

25 Q. And then the UCT is the utility cost test

1 that we just discussed?

2 A. Yes.

3 Q. And what is the RIM in the last column?

4 A. Is the ratepayer impact measure test.

5 Q. What is the TRC test?

6 A. The TRC test is a cost effectiveness test
7 that attempts to compare all utility and customer
8 costs with all utility and customer benefits.

9 Q. What -- just descriptively what are the
10 costs that are included in the total resource cost
11 test?

12 A. Can I refer back to one of my discovery
13 responses?

14 Q. Sure. Just let me know which one you are
15 referring back to.

16 A. Uh-huh.

17 THE WITNESS: Can you please reread his
18 question for me.

19 (Record read.)

20 A. The costs that were included include
21 utility administration costs as well as customer
22 incremental costs for measures.

23 Q. What do you mean by "customer incremental
24 costs"?

25 A. Customer incremental costs would include

1 the costs for the customer -- the additional cost for
2 the customer to go from a baseline efficiency to a
3 high efficiency product.

4 MR. HEALEY: Can you please read back my
5 last question and answer.

6 (Record read.)

7 Q. First, before I asked the question about
8 the -- what cost goes into the TRC test and you said
9 you wanted to refer to your discovery. Did you refer
10 back to your discovery to answer that question?

11 A. I did not.

12 Q. Okay. Now, in your response to my
13 question about the participant increment -- the
14 incremental costs, you mentioned base -- a baseline
15 technology I think is what you said? Can you
16 describe what that means, or did I use the wrong
17 phrase?

18 MR. CLARK: Can we have the question
19 reread.

20 MR. HEALEY: Reread the question and then
21 I will rephrase, please.

22 (Record read.)

23 Q. What do you mean by a "baseline
24 efficiency"?

25 A. I was referring to the minimum efficiency

1 for certain products as required by law.

2 Q. So the incremental cost would be the
3 difference between the cost of a high efficiency
4 product and the cost of the lowest legal -- legally
5 efficient product you can buy; is that correct?

6 A. Yes, I believe that's correct.

7 Q. Does the TRC test include costs that
8 customers pay for measures under Columbia's programs
9 out of their own pocket?

10 A. I believe -- can I refer back to a
11 discovery response where I believe we discussed this?

12 Q. Sure.

13 THE WITNESS: Can you please reread the
14 question.

15 (Record read.)

16 A. Yes, I believe some of them would be
17 included.

18 Q. Some but not all?

19 A. Correct.

20 Q. And in answering that question, did you
21 refer back to your discovery responses?

22 A. I did not.

23 Q. You said some costs that customers pay
24 out of pocket are included in the TRC test but others
25 are not. What out-of-pocket costs paid by customers

1 would be excluded from the TRC test?

2 A. As I previously responded, TRC included
3 incremental costs for customers which includes the
4 cost of going from a baseline to high efficiency.
5 Therefore, the costs to the customer of purchasing a
6 baseline efficient measure would not be included.

7 Q. Does the projected costs of natural gas
8 affect the TRC score?

9 A. Yes.

10 Q. And if the projected costs of natural gas
11 is higher, the TRC would be higher as well; is that
12 right?

13 A. All else being equal, yes, that's
14 correct.

15 Q. I would like you to turn to page 26 of
16 the application. This is Appendix B, Table 4 of the
17 application titled "Columbia DSM Gas Cost
18 Projections." Did you prepare this table?

19 A. Yes.

20 MR. HEALEY: I would like to mark as
21 Exhibit 1 for the Poe deposition this is Columbia's
22 response to OCC Information Request Set 1 No. 8.

23 (EXHIBIT MARKED FOR IDENTIFICATION.)

24 Q. Can you take a look at this discovery
25 response that's been marked as Deposition Exhibit 1,

1 please, and let me know when you have reviewed it.

2 A. I'm ready.

3 Q. Now, this discovery response states that
4 Columbia based its gas cost projections in Appendix
5 B, which we just reviewed, on the Energy Information
6 Administration's Annual Energy Outlook 2015 reference
7 case price projection scenario. Why did you decide
8 to use the EIA 2015 reference case as the base --
9 basis for Columbia's natural gas cost projections?

10 A. I believe it was a decision made by
11 members of the energy efficiency team and myself.

12 Q. You said and yourself?

13 A. Yes. I was included in I believe those
14 conversations.

15 Q. And are you a member of the energy
16 efficiency team?

17 A. I am.

18 Q. And who else on the energy efficiency
19 team helped decide that the EIA 2015 reference case
20 should be used for Columbia's DSM gas cost
21 projections?

22 A. I don't recall specifically each person
23 that was included in that decision.

24 Q. Do you recall anyone that was involved in
25 that decision other than yourself?

1 A. I believe Mr. Lavery and Ms. Thompson
2 were also involved and potentially Mr. Martin.

3 Q. When you say energy efficiency team, is
4 that the same as the DSM team?

5 A. Yes.

6 Q. Why did Columbia decide to use the 2015
7 EIA reference case for its natural gas cost
8 projections?

9 A. The 2015 reference case price projections
10 were what was available at the time of our filing.

11 Q. They weren't the only thing that was
12 available though, were they?

13 A. That's correct.

14 Q. So why did you choose the 2015 reference
15 case as opposed to any of the other conceivable
16 available natural gas projections?

17 A. The 2015 -- or the reference case price
18 projections are consistent with what we've used
19 previously.

20 Q. And why did you choose the 2015 -- so you
21 decided to use the reference case because that's what
22 you have used in the past. Why did you choose the
23 2015 reference case instead of the, say the 2008
24 reference case or 2012 reference case or 2014
25 reference case?

1 A. It didn't occur to me to use the other
2 reference cases that you just said.

3 Q. So when you went to look at the EIA data,
4 you just found 2015 because it was the most recent
5 and used that instead of the old data?

6 A. Yes. It was the estimate available at
7 that time.

8 MR. HEALEY: Can you repeat my last
9 question and answer, please.

10 (Record read.)

11 Q. I am not sure that answers my question.
12 You say it was the one available at the time, but all
13 past ones were also available so why did you use the
14 2015 reference case instead of one of the older
15 reference cases?

16 A. I believe my previous response is still
17 valid. It was what was available at the time.
18 That's why I decided to use it.

19 Q. Are you aware of any other natural gas
20 cost projections that you believed to be more
21 accurate than the 2015 reference case?

22 A. I don't know how accurate the 2015
23 reference case will be because the future has not yet
24 occurred.

25 Q. My question was are there any other

1 natural gas cost projections that you believe will be
2 more accurate -- that you believe are more accurate
3 than the 2015 reference case?

4 A. No.

5 Q. Now, the last sentence of this
6 information request Columbia stated that it added
7 certain costs to the reference case. One thing that
8 Columbia added to the reference case was the
9 Percentage of Income Payment Plan rider. Why did
10 Columbia add the Percentage of Income Payment Plan
11 rider to the cost of natural gas in the 2015 EIA
12 reference case projections?

13 A. I included that in one of my discovery
14 responses.

15 Q. Okay.

16 A. May I reference it?

17 Q. Yes.

18 A. Columbia included the PIPP rider in
19 development of its 2014 forecasts in recognition of
20 the fact that its DSM programs lower its customers'
21 natural gas bills through its consumption. By using
22 less natural gas, the PIPP rider commodity expense is
23 avoided.

24 Q. And you relied on one of your discovery
25 responses for that answer?

1 A. I did.

2 Q. Which response is that, please?

3 A. OCC Interrogatories Set 4 No. 71. This
4 is marked as confidential. Sorry.

5 MR. CLARK: It's marked confidential
6 because its in your -- the question itself was
7 confidential in that particular, not the response.
8 You put it -- you graciously did separate
9 confidential sets, and it's one of the confidential
10 sets so.

11 MR. HEALEY: Okay. Got it.

12 MR. CLARK: To the extent you don't give
13 away the -- I think we've established the -- I think,
14 Chris, as you go down the individual line with
15 different questions, to the extent you can answer
16 without using particular numbers related to the
17 riders, you can answer those for the rationale. Just
18 avoid numbers related to that.

19 THE WITNESS: Okay.

20 Q. Now, you said you included the PIPP rider
21 because it's a volumetric charge, and when a customer
22 reduces their usage, they are paying less for that
23 volumetric charge; is that accurate?

24 A. Yes.

25 Q. Are you -- now, when a customer reduces

1 their usage and pays less under the PIPP rider, if
2 that customer is not on PIPP, does that affect the
3 total amount that all customers pay for the PIPP
4 rider?

5 THE WITNESS: I'm sorry. Can you reread
6 that?

7 (Record read.)

8 A. I don't believe so.

9 Q. So it's fair to say when a customer
10 reduces their usage and pays less for the PIPP rider,
11 the total amount of the PIPP rider doesn't change so
12 that results in a transfer from that customer to
13 other customers, not a total reduction in the amount
14 paid by customers.

15 A. I believe that's correct.

16 Q. So if the amount of -- if the total
17 amount of the PIPP rider doesn't change as a result
18 of a non-PIPP customer participating in a Columbia
19 DSM program, why would the PIPP rider charge be
20 included in the avoided cost of natural gas for
21 non-PIPP customers?

22 A. We made the decision to include the PIPP
23 rider internally and through consultation with our
24 consultant.

25 Q. I understand that, but I don't think

1 that's responsive.

2 MR. HEALEY: Can you please read my last
3 question.

4 (Record read.)

5 A. We made the decision to include the PIPP
6 rider because using less natural gas, the PIPP rider
7 commodity expense is avoided.

8 Q. In your previous response you mentioned
9 that you made that decision in conjunction with work
10 with a consultant. In Mr. Laverty's deposition we
11 determined that Columbia used three different
12 consultants. There were two design consultants, one
13 I believe evaluation consultant. Which one of the
14 consultants are you referring to there? Is it one of
15 the design consultants?

16 MR. CLARK: Objection. I'm assuming you
17 are not asking for the name.

18 MR. HEALEY: I am asking if it is one of
19 the two design consultants.

20 MR. CLARK: You can answer in those
21 general terms.

22 A. Yes.

23 Q. Now, similar to the PIPP rider, Columbia
24 also added the uncollectible expense rider. Is that
25 also a volumetric rider?

1 A. Yes.

2 Q. And if a customer reduces their usage and
3 doesn't pay the uncollectible expense rider, does the
4 total amount of the uncollectible expense rider go
5 down as paid by all customers?

6 THE WITNESS: Sorry. Can you repeat
7 that?

8 (Record read.)

9 A. Can you rephrase that, Chris?

10 Q. Sure. The uncollectible expense rider is
11 included in your avoided cost of natural gas based on
12 the theory that when a customer reduces his or her
13 usage, he pays less under the uncollectible expense
14 rider. My question is when a customer participates
15 in one of Columbia's natural gas DSM programs and
16 reduces the amount that that particular customer pays
17 under the uncollectible expense rider, does the total
18 revenue collected by Columbia from all customers for
19 the uncollectible expense rider go down?

20 A. No. I don't believe so.

21 Q. So if the -- with respect to the
22 uncollectible expense rider, if the total revenue
23 collected by the utility doesn't change as a result
24 of customers reducing their usage through Columbia's
25 DSM programs, then the net result would be the

1 uncollectible expense rider rate would have to go up,
2 right, to collect the same amount of revenue that is
3 currently collected from higher usage?

4 A. I don't know.

5 MR. HEALEY: Can we take a 5-minute
6 break?

7 (Recess taken.)

8 Q. So we can go back on the record, please.

9 Coming back to Columbia's use of the 2015
10 EIA reference case, did you consider using more than
11 one gas cost projection as the basis for your natural
12 gas cost projections in the cost effectiveness test
13 as opposed to a single source?

14 MR. CLARK: Object. There is a privilege
15 to the -- she can answer to the extent it's not
16 privileged.

17 A. Can you rephrase that for me?

18 Q. Sure. You used a single year of the
19 20 -- you used -- when calculating your gas cost
20 projections for the cost effectiveness test, you used
21 the 2015 EIA reference case. Did you consider using
22 multiple sources or multiple years as opposed to a
23 single projection, for example, an average of
24 multiple years of EIA reference cases or an average
25 of EIA and other sources or any combination of

1 multiple sources?

2 A. No. I don't believe so.

3 Q. When you say "no," are you referring
4 to -- I apologize. My question was compound, so
5 maybe I'll rephrase and we can just do it again.

6 MR. HEALEY: Sorry, Joe.

7 Q. Did you use a single year 2015 EIA
8 reference case for your natural gas cost projections?
9 Did you consider using multiple years of the EIA
10 reference cases when projecting the cost of natural
11 gas?

12 A. Can you rephrase that for me, please?

13 Q. Sure. When projecting the natural -- the
14 cost of natural gas, Columbia used the 2015 EIA
15 reference case. Did you consider using a combination
16 of multiple years of the EIA reference cases, for
17 example, an average of 2012 through 2015 EIA
18 reference cases?

19 A. No, I don't believe so.

20 Q. And would your answer be the same for
21 multiple sources of data, for example, EIA
22 projections and some other source?

23 THE WITNESS: Can you reread his question
24 for me.

25 (Record read.)

1 A. Yes, I believe it would.

2 MR. HEALEY: That's all I have for the
3 nonconfidential portion of Ms. Poe's deposition so I
4 would ask at this point do we have anybody on the
5 line that doesn't have --

6 MR. CLARK: Chris is on the line.

7 MR. HEALEY: Chris, if you are still on
8 the line, would you like to drop off now so we can
9 go -- sorry, so we can go to the confidential portion
10 of Ms. Poe's deposition?

11 MR. ALLWEIN: Yes. So you guys are
12 finished with your nonconfidential questions?

13 MR. HEALEY: Yes.

14 MR. ALLWEIN: Yes. Thanks. See you,
15 everybody.

16 MR. HEALEY: Thanks, Chris.

17 MR. CLARK: Let's double-check. I don't
18 think anybody else has joined but.

19 MS. TISCHLER: I'm still here, and I have
20 got my confidentiality agreement.

21 MR. CLARK: Yeah, you sent me that.

22 MS. TISCHLER: So I am going to stay on
23 the call, if that's okay.

24 MR. CLARK: Yes, that's fine.

25 MS. TISCHLER: Yes.

1 MR. CLARK: Melissa, are you still on the
2 line? Is there anybody else on the line?

3 Thanks. I think we are good now.

4 (CONFIDENTIAL PORTION EXCERPTED.)

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1 State of Ohio :
 : SS:
 2 County of _____ :

3 I, Sarah Poe, do hereby certify that I have
 4 read the foregoing transcript of my deposition given
 on Monday, September 26, 2016; that together with the
 5 correction page attached hereto noting changes in
 form or substance, if any, it is true and correct.

6

7

 Sarah Poe

8

9 I do hereby certify that the foregoing
 transcript of the deposition of Sarah Poe was
 10 submitted to the witness for reading and signing;
 that after she had stated to the undersigned Notary
 11 Public that she had read and examined her deposition,
 she signed the same in my presence on the _____
 12 day of _____, 2016.

13

14

 Notary Public

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16 My commission expires _____, _____.

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1 CERTIFICATE

2 State of Ohio :
3 County of Franklin : SS:

4 I, Karen Sue Gibson, Notary Public in and for
5 the State of Ohio, duly commissioned and qualified,
6 certify that the within named Sarah Poe was by me
7 duly sworn to testify to the whole truth in the cause
8 aforesaid; that the testimony was taken down by me in
9 stenotypy in the presence of said witness, afterwards
transcribed upon a computer; that the foregoing is a
true and correct transcript of the testimony given by
said witness taken at the time and place in the
foregoing caption specified and completed without
adjournment.

10 I certify that I am not a relative, employee,
11 or attorney of any of the parties hereto, or of any
12 attorney or counsel employed by the parties, or
financially interested in the action.

13 IN WITNESS WHEREOF, I have hereunto set my
14 hand and affixed my seal of office at Columbus, Ohio,
on this 27th day of September, 2016.

15 _____
16 Karen Sue Gibson, Registered
17 Merit Reporter and Notary Public
in and for the State of Ohio.

18 My commission expires August 14, 2020.

19 (KSG-6247)

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