

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

THE DAYTON POWER AND LIGHT COMPANY

CASE NO. 16-0395-EL-SSO
CASE NO. 16-0397-EL-AAM
CASE NO. 16-0396-EL-ATA

DIRECT TESTIMONY
OF KEVIN L. HALL

PUBLIC VERSION

OCTOBER 11, 2016

- ☐ **MANAGEMENT POLICIES, PRACTICES, AND ORGANIZATION**
- ☐ **OPERATING INCOME**
- ☐ **RATE BASE**
- ☐ **ALLOCATIONS**
- ☐ **RATE OF RETURN**
- ☐ **RATES AND TARIFFS**
- ☒ **OTHER**

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KEVIN L. HALL
ON BEHALF OF
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I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Kevin L. Hall. My business address is 1900 Dryden Rd., Dayton, Ohio 45439.

Q. By whom and in what capacity are you employed?

A. I am employed by AES U.S. Services, LLC ("AES Services"), an affiliate of The Dayton Power & Light Company ("DP&L"), as Director of Transmission and Distribution Engineering.

Q. How long have you been in your present position?

A. I assumed my present position in July of 2013. Prior to that time, I was Director of Operations for DP&L with responsibility for distribution engineering, drafting, real estate services, facilities and telecommunications.

Q. What are your responsibilities in your current position?

A. In my current position, I am responsible for the safe and economic design of the distribution systems for both The Dayton Power & Light Company and the Indianapolis Power & Light Company. Additionally, I am responsible for the drafting, real estate, and right-of-way functions of both companies. Specific to Dayton Power & Light, I have responsibility for the distribution planning and transmission engineering functions, along with budgeting oversight for both capital and Operations and Maintenance ("O&M") activities within the DP&L Customer Operations organization.

Q. Will you describe briefly your educational and business background?

1 A. I earned a Bachelor of Science degree in Electrical Engineering from the University of
2 Cincinnati in 1991 and a Masters in Business Administration from the University of
3 Dayton in 2005. I am a Senior Member of the Institute of Electrical and Electronics
4 Engineers (“IEEE”) and am a registered Professional Engineer (“P.E.”) in the states of
5 Ohio and Indiana.

6 Since June 1991, I have been continuously employed by DP&L or its affiliate(s). From
7 1991 through 1995, I was assigned to the substation and transmission maintenance and
8 construction groups as a maintenance engineer, project manager and finally a group
9 leader. In 1996, I was promoted to Manager of System Operating and had the
10 responsibility of leading the real-time grid operations team through wholesale
11 transmission access change.

12 Between 1999 and 2003 I was Manager of Control Area Services, responsible for the
13 start-up of processes and systems that supported both wholesale and retail settlements in
14 the context of retail choice within the State of Ohio.

15 During 2004, I led the Company's integration into the PJM Regional Transmission
16 Organization (“RTO”). Also in 2004, I was a member of the North American Electric
17 Reliability Corporation (“NERC”) Readiness Audit Team that conducted a Control Area
18 Readiness Audit on FirstEnergy. In 2005, I was promoted to Director of Design
19 Engineering, with responsibility for the design and engineering of the Company's
20 distribution facilities. During the time period from 2007 through 2009, I was a member
21 of the project team responsible for the development of DP&L's smart grid plan which
22 was included as part of Case No. 08-1094-EL-SSO.

1 **Q. Have you previously provided testimony before the Public Utilities Commission of**
2 **Ohio ("PUCO" or the "Commission"), any other state utilities commission, or the**
3 **Federal Energy Regulatory Commission ("FERC")?**

4 A. Yes. I sponsored testimony before the PUCO in several cases, including Case No. 08-
5 1094-EL-SSO and most recently Case No. 15-1830-EL-AIR. I have also provided
6 written testimony before the FERC on DP&L's Open Access Transmission Tariff.

7 **II. PURPOSE OF TESTIMONY**

8 **Q. What is the purpose of this testimony?**

9 A. The purpose of this testimony is to support and explain DP&L's request for a Distribution
10 Investment Rider ("DIR"). I will provide an overview of the DIR plan and outline some
11 of the specific projects proposed along with their estimated costs.

12 **Q. Are you supporting any exhibits or workpapers?**

13 A. I am not supporting any exhibits. I am supporting the following workpaper:

- 14
 - Confidential Workpaper KLH-1 (DIR Project Estimates)

15 **III. OVERVIEW OF DP&L'S DISTRIBUTION INVESTMENT RIDER**

16 **Q. Please describe the proposed Distribution Investment Rider ("DIR").**

17 A. DP&L is proposing a Distribution Investment Rider as a mechanism to implement
18 incremental capital investment as well as the O&M necessary to address its aging
19 distribution infrastructure along with supporting additional key technical resources for the
20 future of DP&L. This DIR represents DP&L's infrastructure modernization plan
21 consistent with Ohio Revised Code 4928.143(B)(2)(h) and O.A.C. 4901:1-35-03(C)(9)(g)

1 as part of its Electric Security Plan (“ESP”). The proposed DIR is a balanced approach to
2 addressing specific infrastructure needs and vulnerabilities while continuing to provide
3 safe and affordable energy delivery to its customers. Company Witness Adams explains
4 how the DIR will work from a revenue requirement and rate perspective and how
5 adjustments will be made.

6 **Q. How has DP&L's distribution infrastructure performed, as measured by the**
7 **Company's PUCO approved reliability standards?**

8 A. DP&L has performed well. DP&L’s distribution system consistently exceeds the CAIDI
9 and SAIFI reliability standards approved by the Commission pursuant to Ohio Adm.
10 Code Section 4901:1-10-10(B)(2).

11 **Q. Does DP&L measure or attempt to quantify customer expectations as it relates to**
12 **the Company's reliability standards?**

13 A. Yes. As required by Ohio Adm. Code Section 4901:1-10-10(B)(4)(b), the Company
14 performs a customer perception survey under PUCO Staff oversight. The objective of the
15 survey is to measure customer perceptions, including, but not limited to expectations and
16 achievements of electric service reliability.

17 **Q. Can you describe briefly the results of DP&L's latest residential customer**
18 **perception survey as it pertains to sustained outages experienced?**

19 A. Yes. The results of the survey indicated that 45% of the residential sample did not
20 experience a sustained outage over the survey period. This measure outperforms the 25%
21 of residential respondents who indicated that zero sustained outages was acceptable. This
22 result illustrates that the Company's performance is in line with customer expectation.

1 **Q. What are the goals for DP&L's Distribution Investment Rider?**

2 A. DP&L, along with other utilities across the nation, has assets that make up its delivery
3 system infrastructure that are in excess of 30 years of age. Typical electric distribution
4 infrastructure is designed for a useful life of approximately 30 years. However, it is
5 nearly impossible, either operationally or financially, to proactively address all aging
6 infrastructure. An asset performing within design specifications in the field and
7 preventatively maintained can outlast its design life. Proactively replacing such an asset
8 would be premature unless the asset owner had an indication that its near-term
9 performance and life was at risk.

10 An asset remains in service until it experiences a failure, requires forced maintenance or
11 repair, or a preventive maintenance activity indicates replacement is necessary. The risk
12 in this, particularly with the older assets, is that they may fail and require replacement
13 before giving any indication of possible problem. The older the assets get, the higher the
14 probability of failure without sufficient indication or warning. As the overall
15 infrastructure ages, there is a higher probability of failures across the system. This could
16 certainly have a negative impact on reliability which will translate into both poorer
17 customer satisfaction as well as declining reliability metrics, including SAIFI and CAIDI.

18 **Q. What is DP&L's approach to defining the content of its proposed DIR?**

19 A. The DIR is designed to address three areas of growing risk that are concerns today across
20 the utility industry.

- 21 1. Equipment or conditions with industry-wide known failure risks;
- 22 2. Technology migration; and

3. Workforce adaptation.

The primary objective of the DIR is to make specific investments in the distribution system to replace assets at greatest risk of failure and to augment technical resources in such a way as to improve safety while maintaining and enhancing reliability and customer satisfaction. The systematic and focused approach that DP&L has developed for the DIR addresses the areas of greatest risk for the reliable operation of its distribution system. This includes developing a methodology for identification and replacement in order to prioritize the types of and locations of assets to replace.

Q. What methodology will DP&L use to prioritize the DIR investments?

A. DP&L is proposing its DIR to place a strong focus on equipment that has known industry-wide failure modes as well as replacement of older assets where the distribution system can benefit from newer technologies or replacement of technical obsolescence. DP&L will review asset performance and operating trends both within the utility itself as well as across the entire industry. Specifically, there are industry-wide equipment problems where products are known to be pre-disposed to certain modes of failure or have identified design concerns, which can result in certain types of equipment failure. There are also assets with older technology where the operation of the asset is more prone to failure or operates ineffectively due to the type of technology and design of the asset.

DP&L is proposing its DIR to place a strong focus on equipment that has known industry-wide failure modes as well as replacement of older assets where the distribution system can benefit from newer technologies or replacement of technical obsolescence. While there are no guarantees that there will be improvement in specific reliability

1 metrics or increased customer satisfaction scores with the replacement of aging
2 infrastructure, DP&L's goal with this program is to prevent additional outages and the
3 erosion of reliability and/or customer satisfaction. Both would be sure to suffer should
4 the Company not take action on these identified assets.

5 Additionally, DP&L is proposing a human resource aspect to its DIR. Presently, the
6 entire industry is facing the loss of highly skilled, technical talent due to the "aging" of its
7 workforce. The types of positions and skills required to fill these roles takes a
8 combination of both post-secondary education as well as many years of training, both
9 formal and on-the-job. Replacing employees in these specific jobs on a one-for-one basis
10 will not be enough to ensure DP&L has the highly trained and competent workforce
11 prepared to operate and maintain the distribution infrastructure going forward.
12 Therefore, as part of its DIR, DP&L is proposing a "Workforce Adaptation" plan to hire
13 and train the anticipated number of employees to fill these imminent future vacancies.
14 Hiring in groups promotes efficiencies in training and more easily facilitates transition of
15 institutional knowledge.

16 **Q. Please describe the first part of the DIR program, "Equipment or conditions with**
17 **industry-wide known failure risks."**

18 A. The first area of growing risk for DP&L's distribution system is equipment or conditions
19 with industry-wide known failure risks. This includes assets or field conditions that have
20 demonstrated a specific at-risk condition that has contributed to equipment failure and/or
21 outages over an extended period of time.

1 **Q. Please provide examples of equipment or conditions with industry-wide known**
2 **failure risks.**

3 A. A specific example is underground cable with a bare concentric neutral. This type of
4 cable has been widely observed across the industry to experience deterioration of the
5 neutral due to exposure directly to the earth. Such deterioration ultimately results in a
6 fault or failure of the cable, which necessitates repairing or replacing the cable.

7 A second example is danger trees. Danger trees are trees located outside of the right-of-
8 way or easement that have experienced disease and decay so that environmental
9 conditions such as wind and storms places the tree at risk of falling into nearby power
10 lines. Wide-spread diseases including the emerald ash borer and the elm bark beetle are
11 making danger trees a significant concern across the industry. Trees outside of the right-
12 of-way are not managed within the scope of the typical utility vegetation management
13 program. DP&L addresses trees outside of the right-of-way where such tree poses an
14 imminent danger to its distribution system. However, with the tree diseases mentioned
15 above, the number of danger trees continues to grow and the number of outages caused
16 by danger trees is increasing.

17 Other examples of such equipment include porcelain cut-outs, a family of network
18 protectors, certain types of transformer bushings and some older design substation
19 transformers.

20 **Q. What specific projects or programs are being proposed as part of Equipment or**
21 **Conditions with Industry-Wide Known Failure Risks?**

1 A. Capital projects proposed as part of this program include replacement of underground
2 cable having the bare concentric neutral technology, network protector replacements and
3 cutout replacements. O&M activities that are proposed as part of this plan include danger
4 tree removals and replacement of bushings in substation transformers. A total of [REDACTED]
5 in capital and [REDACTED] in O&M is proposed over a five-year period within this category.

6 **Q. Please describe the second part of the DIR program, “Technology Migration.”**

7 A. Technology Migration is the second area of identified risk for DP&L’s aging
8 infrastructure. This portion of the DIR program will include replacement of outdated,
9 and/or inefficient equipment or equipment that is prone to operational problems with
10 technology that is more efficient and reliable. An example of Technology Migration is
11 the conversion of DP&L’s 4kV system to a standard 12kV configuration. The 4kV
12 system was installed over 50 years ago and the design is less efficient than a 12kV
13 system. Conversion of the 4kV system will provide benefits such as lower line losses.

14 **Q. What specific projects or programs are being proposed as part of Technology**
15 **Migration?**

16 A. There are three primary projects proposed: conversion of the 4kV system to 12kV,
17 replacement of electromechanical relays with digital relays, and upgrading substation
18 remote terminal units (“RTUs”). The proposed capital investment totals [REDACTED] over the
19 planned five-year period.

20 **Q. Please describe the third part of the DIR, “Workforce Adaptation.”**

21 A. Workforce Adaptation refers to the need for a workforce in the future that can install,
22 maintain and repair a utility’s more technically advanced and complex distribution

1 system. It is no secret that the industry is experiencing an aging workforce and DP&L is
2 no exception. An analysis of current staffing reveals that retirements could leave large
3 gaps of engineering and technical knowledge, particularly if DP&L replaces those
4 employees on a one-by-one basis. Formal training for many of the engineering and
5 technician positions spans three to five years and longer, in some cases.

6 Additionally, the installation of equipment with newer technology will require additional
7 technical skills that today's workforce is beginning to learn. The workforce of the future
8 will have stronger and more demanding educational and training requirements than its
9 predecessor. To stave off the impact of the anticipated large departure of technical talent,
10 hiring and training a "class" of engineering and technical talent now is essential to
11 minimize any negative impacts of the loss of institutional knowledge as retirements
12 occur.

13 **Q. What is DP&L proposing for its Workforce Adaptation plan?**

14 A. DP&L is proposing the hiring and formal training of twenty (20) full-time employees to
15 fill engineering and technical positions. These 20 positions will be a combination of
16 engineers, engineering technicians, protection and control specialists and IT-related
17 positions. These identified positions will be a combination of both exempt and union
18 hires. Based on an anticipated five-year formal job-specific training period, DP&L
19 anticipates a total projected cost of [REDACTED] which includes salaries and costs for training.

20 **IV. CONCLUSION**

21 **Q. Please summarize your testimony.**

1 A. This testimony supports DP&L's request for a Distribution Investment Rider. The
2 proposed DIR represents DP&L's infrastructure modernization plan consistent with Ohio
3 Revised Code 4928.143(B)(2)(h) and O.A.C. 4901:1-35-03(C)(9)(g) and consists of a
4 three-part plan that addresses assets and resources in a systematic and focused manner.
5 Implementing this infrastructure modernization plan will reduce the risk associated with
6 aging infrastructure that is an industry-wide area of concern. Continuing to operate older
7 assets that have been identified with potential failure risks could pose a higher likelihood
8 of outages, thereby eroding reliability and customer satisfaction.

9 The DIR is a five-year plan that includes [REDACTED] in capital and [REDACTED] in O&M. The
10 program is focused on three areas that pose significant operational or reliability risk to
11 DP&L and its customers: Equipment or conditions with industry-wide known failure
12 risks, technology migration, and workforce adaptation.

13 **Q. Does this conclude your direct testimony?**

14 A. Yes, it does.

Distribution Investment Rider Project Estimates

Project	Cost (\$000)					Total
	Year 1	Year 2	Year 3	Year 4	Year 5	

Category 1. Equipment or Conditions with Industry-Wide Known Failure Risks

Capital

Underground Cable with BCN
Substation Risers with BCN
Cutout Replacements
Network Protector Replacements

Total Capital - Category 1

O&M

Danger Trees
Substation Transformer Bushings

Total O&M - Category 1

Category 2. Technology Migration

Capital

RTU Upgrades - Distribution substations
Digital Relays
4kV System Conversion

Total Category 2

Category 3. Workforce Adaptation

O&M

New Hires - Labor & Training

Total Category 3

Total All Projects

Capital

O&M

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing testimony has been served via electronic mail

upon the following counsel of record, this 11th day of October, 2016:

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