

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke Energy Ohio, Inc., for an Increase in Electric Distribution Rates.)	Case No. 17-32-EL-AIR
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval.)	Case No. 17-33-EL-ATA
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Change Accounting Methods.)	Case No. 17-34-EL-AAM
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Modify Rider PSR.)	Case No. 17-872-EL-RDR
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Amend Rider PSR.)	Case No. 17-873-EL-ATA
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Change Accounting Methods.)	Case No. 17-874-EL-AAM
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan, Accounting Modifications and Tariffs for Generation Service.)	Case No. 17-1263-EL-SSO
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Authority to Amend its Certified Supplier Tariff, P.U.C.O. No. 20.)	Case No. 17-1264-EL-ATA
)	
In the Matter of the Application of Duke Energy Ohio, Inc., for Authority to Defer Vegetation Management Costs.)	Case No. 17-1265-EL-AAM
)	

In the Matter of the Application of Duke)
Energy Ohio, Inc., to Establish) Case No. 16-1602-EL-ESS
Minimum Reliability Performance)
Standards Pursuant to Chapter 4901:1-)
10, Ohio Administrative Code.

PREFILED TESTIMONY IN RESPONSE TO OBJECTIONS TO THE STAFF
REPORT

OF

CHUCK GOINS
RATES AND ANALYSIS DEPARTMENT
PUBLIC UTILITIES COMMISSION OF OHIO

STAFF EXHIBIT____

July 2, 2018

1 **Name and Employer**

2
3 1. Q. Please state your name and business address.

4 A. My name is Chuck Goins. My business address is 180 East Broad Street,
5 Columbus, Ohio 43215.
6

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

8 A. I am employed by the Public Utilities Commission of Ohio (PUCO or
9 Commission) as a Utility Specialist 2 in the Rates and Analysis
10 Department.
11
12

13 **Academic Background and Professional Experience**

14
15 3. Q. Please briefly describe your educational and professional background.

16 A. I am a 1981 graduate of Findlay College, in Findlay, Ohio, with Bachelor
17 of Science Degrees in Business Management and Business Administration.
18

19 4. Q. Please describe your work experience.

20 A. I came to the Public Utilities Commission in September of 1990. In
21 January of 1992, I accepted the position of Utility Rate Analyst 1 in the
22 Energy and Water Division of the Commission's then Utilities Department.

1 In October of 1996, I was promoted to the position of Utility Rate Analyst
2 Coordinator. I was promoted to a Utility Specialist 1 in January of 2000.
3 In February of 2014, I was promoted to my current position of Utility
4 Specialist 2 in the Rates and Analysis Department.

5
6 5. Q. Have you testified in previous cases at the PUCO?

7 A. Yes. I have testified in cases before the PUCO, including distribution rate
8 proceedings.

9
10 **Purpose of Testimony**

11
12 6. Q. What is the purpose of your testimony?

13 A. The purpose of my testimony is to address issues in the Rates and Tariffs
14 section of the Staff Report of Investigation. I will specifically address the
15 following objections: Interstate Gas Supply (IGS) Objection A; Retail
16 Energy Supply Association (RESA) Objection 6; and Environmental
17 Defense Fund, Environmental Law and Policy Center, Natural Resources
18 Defense Council, and Ohio Environmental Council (Environmental
19 Intervenors) Objection 5.

20
21 **Responses to the Objections**

1 7. Q. The Environmental Intervenors' Objection 5 objects to Staff's acceptance
2 of the COSS as reasonable because the COSS uses a minimum system
3 analysis for classifying poles and conductor between customer number and
4 peak load.¹ How do you respond?

5 A. The Minimum Size methodology used by Duke in its COSS analysis is an
6 accepted practice used in the electric industry, and it does properly classify,
7 functionalize and allocate costs used in the COSS analysis.

8

9 8. Q. Does this conclude your testimony?

10 A. Yes it does. However, I reserve the right to submit supplemental testimony
11 as new information subsequently becomes available.

¹ *Duke Rate Case*, Objections to the Staff Report by Environmental Intervenors at 5 (Oct. 26, 2017).

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Pre-filed Testimony in Response to Objections to the Staff Report of Chuck Goins has been served upon the below-named counsel via electronic mail, this 2nd day of July, 2018.

/s/ Steven L. Beeler

Steven L. Beeler

Parties of Record:

Jeanne.kingery@duke-energy.com
Elizabeth.watts@duke-energy.com
Rocco.d'ascenzo@duke-energy.com
fdarr@mwncmh.com
mpritchard@mwncmh.com
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com
William.michael@occ.ohio.gov
Kevin.moore@occ.ohio.gov
Christopher.healy@occ.ohio.gov
Bojko@carpenterlipps.com
dressel@carpenterlipps.com
cmooney@ohiopartners.org
mfleisher@elpc.org
charris@spilmanlaw.com
dwilliamson@spilmanlaw.com
lbrandfass@spilmanlaw.com
paul@carpenterlipps.com
dborchers@bricker.com
dparram@bricker.com
eakhbari@bricker.com
tdougherty@theOEC.org
mleppla@theOEC.org

joliker@igsenergy.com
mnugent@igsenergy.com
slessor@calfee.com
jlang@calfee.com
talexander@calfee.com
mkeaney@calfee.com
mdortch@kravitzllc.com
rparsons@kravitzllc.com
jdortch@kravitzllc.com
whitt@whitt-sturtevant.com
campbell@whitt-sturtevant.com
glover@whitt-sturtevant.com
mjsettineri@vorys.com
glpetrucci@vorys.com
rsahli@columbus.rr.com
Tony.mendoza@sierraclub.org
jnewman@environlaw.com
rdove@attorneydove.com

ATTORNEY EXAMINERS

Stacie.Cathcart@puco.ohio.gov
Nicholas.Walstra@puco.ohio.gov

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/2/2018 9:57:48 AM

in

Case No(s). 17-0032-EL-AIR, 17-0033-EL-ATA, 17-0034-EL-AAM, 17-0872-EL-RDR, 17-0873-EL-ATA, 1

Summary: Testimony Prefiled Testimony in Response to Objections to the Staff Report of
Chuck Goins electronically filed by Ms. Tonnetta Scott on behalf of PUC