

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Vectren Energy Delivery of Ohio,)	Case No. 18-0298-GA-AIR
Inc. for approval of an increase in)	
Gas Rates		

**TESTIMONY
OF
SUZANNE WILLIAMS
RESEARCH AND POLICY DIVISION
RATES AND ANALYSIS DEPARTMENT**

STAFF EXHIBIT NO._____

January 22, 2019

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

2 A. My name is Suzanne Williams. My business address is 180 East Broad
3 Street, Columbus, Ohio 43215-3793.
4

5 2. Q. By whom are you employed?

6 A. I am employed by the Public Utilities Commission of Ohio (PUCO or
7 Commission).
8

9 3. Q. What is your current position with the Public Utilities Commission of Ohio
10 and what are your duties?

11 A. My current position is Public Utilities Administrator in the Research and
12 Policy Division of the Rates and Analysis Department. My job duties include
13 assisting in the audit and analysis of various utility filings, including the audit
14 and evaluation of various energy efficiency riders.
15

16 4. Q. Would you briefly state your educational background?

17 A. I graduated with a Masters in Business Administration from Franklin
18 University and earned a Bachelor of Science in Business Administration,
19 with a major in accounting, from Youngstown State University.
20

21 5. Q. Please outline your work experience.

1 A. I previously served as an analyst for the Ohio Board of Regents (now known
2 as the Ohio Department of Higher Education) and a financial analyst for both
3 NiSource and American Electric Power Company. In 2012, I joined the
4 PUCO as an analyst in the Energy and Environment Department. In 2013, I
5 was promoted to a Utility Specialist in the Utilities Department. In 2014, I
6 was promoted to my current position as a Public Utilities Administrator in
7 the Rates and Analysis Department.

8
9 6. Q. What is the purpose of your testimony?

10 A. The purpose of my testimony is to address matters concerning Vectren
11 Energy Delivery of Ohio Inc.'s (VEDO) proposed changes to its
12 Conservation Program. I will specifically address the following objections:
13 Ohio Partners for Affordable Energy (OPAE)'s Objection 1, Environmental
14 Law & Policy Center's (ELPC) Objections 1, 2, and 3, and Ohio Consumers'
15 Counsel's (OCC) Objections 17 and 24.

16
17 7. Q. OPAE's and ELPC's Objections 1 objects to Staff's recommendation to limit
18 demand-side management (DSM) and weatherization funding to \$5.6
19 million. ELPC also argues that the Staff Report is unreasonable because
20 Staff's recommendation for an increase in fixed charges for residential and
21 small commercial customers and low natural gas prices will reduce price

1 signals for investment in EE and will expose customers to high or volatile
2 prices in the future. How does Staff respond?

3 A. Staff agrees with VEDO's proposal to increase their DSM program's level
4 of funding to \$5.6 million, but believes that those funds should come from
5 the EEFR rider and not base rates. Staff considers the current funding to be
6 adequate. Data received from VEDO indicates that, on average, VEDO spent
7 approximately \$5.2 million annually on its DSM and weatherization
8 programs for years 2013 through 2017. As of September 2018, VEDO had
9 only spent approximately 70% of its \$5.7 million budget. The testimony of
10 Staff witness Matthew Snider will address ELPC's argument that the Staff
11 Report is unreasonable because increases in fixed charges for residential and
12 small commercial customers and low natural gas prices reduce price signals
13 for EE investment.

14
15 8. Q. OPAE's Objection 1 and ELPC's Objection 3 object to eliminating the
16 collaborative process to approve energy efficiency programs. What is the
17 Staff's response?

18 A. Staff did not recommend elimination of the collaborative process. Staff
19 simply pointed out that the DSM program initiatives and funding levels,
20 while approved by the Conservation Working Group (CWG), were not
21 Commission approved. The Staff's recommendation is to continue the
22 current collaborative process but recommends that the DSM programs and

1 funding levels should be approved by the Commission prior to implementing
2 the programs.

3
4 9. Q. ELPC's Objection 2 claims that the Staff Report did not propose any
5 recommendations to ensure that VEDO's DSM program maximizes
6 customer benefits. Similarly, OCC's Objection 24 claims that the Staff
7 Report failed to address whether EE programs are cost-effective and should
8 have recommended discontinuation of non-low income programs. Finally,
9 OCC's Objection 17 claims that the Staff Report should have found that
10 DSM programs are not beneficial to non-participating customers and that
11 customer's should only be charged for low-income DSM programs. How
12 does the Staff respond?

13 A. Customer benefits and the cost-effectiveness of DSM programs should be
14 determined when VEDO files its true-up application and an audit has been
15 conducted. In addition, Staff did not propose any recommendations or
16 comment on whether DSM programs are beneficial to non-participating
17 customers or whether customers should only be charged for low-income
18 DSM programs, as this is a function of the CWG. As stated in the Opinion
19 and Order in Case No. 04-571-GA-AIR, et al., "The Conservation Working
20 Group (CWG) . . . will be responsible for reviewing data and criteria related

1 to DSM program initiative effectiveness. Decisions of the CWG shall be
2 made by consensus.”¹

3
4 10. Q. Does this conclude your testimony?

5 A. Yes. However, I reserve the right to submit supplemental testimony as new
6 information subsequently becomes available.

¹ *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Authority to Amend its Filed Tariffs to Increase the Rates and Charges for Gas Service and Related Matters*, Case No. 04-571-GA-AIR, et al., Opinion and Order at 6 (April 13, 2005).

CERTIFICATE OF SERVICE

This is to certify that the foregoing **Testimony of Suzanne Williams** has been served upon all of the parties of record in Case No. 18-0298-GA-AIR by electronic and/or U.S. mail, postage pre-paid mail this 22nd day of January, 2019.

/s/Werner L. Margard III

Werner L. Margard III

Assistant Attorney General

Parties of Record:

Mark A. Whitt (0067996)
Andrew J. Campbell (0081485)
Shannon K. Rust (0090182)
Christopher T. Kennedy (0075228)
Whitt Sturtevant LLP
The KeyBank Building, Suite 1590
88 East Broad Street
Columbus, Ohio 43215
whitt@whitt-sturtevant.com
campbell@whitt-sturtevant.com
rust@whitt-sturtevant.com
kennedy@whitt-sturtevant.com

Frank P. Darr (0025469)
Matthew R. Pritchard (0088070)
McNees Wallace & Nurick LLC
21 East State Street, 17TH Floor
Columbus, OH 43215
fdarr@mcneeslaw.com
mpritichard@mcneeslaw.com

William J. Michael (0070921)
Amy Botschner-O'Brien (0074423)
Christopher Healey (0086027)
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
65 East State Street, 7th Floor
Columbus, Ohio 43215-4213
William.michael@occ.ohio.gov
amy.botschner.obrien@occ.ohio.gov
christopher.healey@occ.ohio.gov

*Counsel for the Office of the Ohio
Consumers' Counsel*

Colleen L. Mooney (0015668)
Ohio Partners for Affordable Energy
PO Box 12451
Columbus, OH 43212-2451
cmooney@ohiopartners.org

*Counsel for Ohio Partners for
Affordable Energy*

P. Jason Stephenson (21839-49)
Vectren Corporation
One Vectren Square
211 N.W. Riverside Drive
Evansville, Indiana 47708
jstephenson@vectren.com

*Counsel for Vectren Energy Delivery Of
Ohio, Inc.*

Steven D. Lesser (0020242)
N. Trevor Alexander (0080713)
Mark T. Keaney (095318)
Calfee, Halter & Griswold LLP
41 S. High St., 1200 Huntington Center
Columbus OH 43215
slesser@calfee.com
mkeaney@calfee.com
talexander@calfee.com

*Counsel for the City of Dayton and
Honda North America, Inc.*

Joseph Olikier (0086088)
Michael Nugent (0090408)
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
joliker@igsenergy.com
mnugent@igsenergy.com

Counsel for IGS Energy

Darryl Brown (0062635)
Deputy Director & Senior Supervisory
Attorney
88th ABW Legal Office
5135 Pearson Road
Wright-Patterson AFB OH 45433-5319
Darryl.Brown@us.af.mil

Madeline Fleisher (0091862)
Environmental Law & Policy Center
21 West Broad St., 8th Floor
Columbus, OH 43215
mfleisher@elpc.org

Robert Kelter (PHV-2685-2018)
Senior Attorney
Environmental Law & Policy Center
35 E. Wacker Drive, Suite 1600
Chicago, IL 60601
rkelter@elpc.org

*Counsel for the Environmental Law &
Policy Center*

Michael J. Settineri (0073369)
Gretchen L. Petrucci (0046608)
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
Columbus, OH 43215
mjsettineri@vorys.com
glpetrucci@vorys.com

*Counsel for the Retail Energy Supply
Association*

Robert J. Friedman
(OH PHV 20930-2019)
AFLOA-JACE-ULFSC
139 Barnes Drive, Suite 1
Tyndall AFB, FL 32403
Robert.Friedman.5@us.af.mil

Counsel for Federal Executive Agencies

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Summary: Testimony of Suzanne Williams electronically filed by Ms. Tonnetta Scott on behalf of PUC