

**OCC EXHIBIT NO. \_\_\_\_\_**

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of )  
Northeast Ohio Natural Gas Corp. for an ) Case No. 18-1720-GA-AIR  
Increase in Gas Distribution Rates. )

In the Matter of the Application of )  
Northeast Ohio Natural Gas Corp. for ) Case No. 18-1721-GA-ATA  
Tariff Approval. )

In the Matter of the Application of )  
Northeast Ohio Natural Gas Corp. for ) Case No. 18-1722-GA-ALT  
Approval of Alternative Regulation. )

**DIRECT TESTIMONY  
OF  
ROBERT B. FORTNEY**

**On Behalf of  
The Office of the Ohio Consumers' Counsel  
65 East State Street, 7<sup>th</sup> Floor  
Columbus, Ohio 43215-4213**

**July 25, 2019**

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### **ATTACHMENTS:**

Attachment RBF-1	Prior Testimony Listing
Attachment RBF-2	OCC Proposed Distribution of the Revenue Increase
Attachment RBF-3	OCC Proposed Rates

*Direct Testimony of Robert B. Fortney  
On Behalf of the Office of the Ohio Consumers' Counsel  
PUCO Case No. 18-1720-GA-AIR, et al.*

1    **I.        INTRODUCTION**

2

3    ***Q1.    PLEASE STATE YOUR NAME, ADDRESS AND POSITION.***

4    ***A1.***    My name is Robert B. Fortney. My business address is 65 East State Street, Suite  
5            700, Columbus, Ohio 43215. I am a Rate Design and Cost of Service Analyst for  
6            the Office of the Ohio Consumers' Counsel ("OCC").

7

8    ***Q2.    WHAT ARE YOUR RESPONSIBILITIES AS A RATE DESIGN AND COST***  
9            ***OF SERVICE ANALYST?***

10   ***A2.***    I am responsible for investigating utility applications regarding rate and tariff  
11            activities related to tariff language, cost of service studies, revenue distribution,  
12            cost allocation, and rate design that impact the residential consumers of Ohio. My  
13            primary focus is to make recommendations to protect residential consumers from  
14            unnecessary utility rate increases and unfair regulatory practices.

15

16   ***Q3.    PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND.***

17   ***A3.***    I earned a Bachelor of Science degree in Business Administration from Ball State  
18            University in Muncie, Indiana in 1971. I earned a Master of Business  
19            Administration degree from the University of Dayton in 1979.

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1   ***Q4. PLEASE SUMMARIZE YOUR PROFESSIONAL BACKGROUND AS IT***  
2   ***RELATES TO UTILITY REGULATION.***

3   ***A4.*** From July 1985 to August 2012, I was employed by the Public Utilities  
4   Commission of Ohio (“PUCO”). During that time, I held a number of positions  
5   (e.g., Rate Analyst, Rate Analyst Supervisor, Public Utilities Administrator) in  
6   various divisions and departments that focused on utility applications regarding  
7   rates and tariff issues. In August 2012, I retired from the PUCO as a Public  
8   Utilities Administrator 2, Chief of the Rates and Tariffs Division, which focused  
9   on utility rates and tariff matters. The role of that division was to investigate and  
10   analyze the rate- and tariff-related filings and applications of the electric, gas, and  
11   water utilities regulated by the PUCO and to make Staff recommendations to the  
12   PUCO regarding those filings. I joined the OCC in December of 2015.

13

14   ***Q5. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE***  
15   ***PUCO?***

16   ***A5.*** Yes. I have testified on numerous occasions to advocate to the PUCO the  
17   positions of the PUCO Staff. Over the course of my career at the PUCO, I often  
18   recommended to the PUCO cost allocation methodologies needed to develop a  
19   reasonable distribution of revenues. I also was responsible for recommending  
20   reasonable rate designs needed to recover the revenue requirement, by class of  
21   service and in total. In addition, I have testified for OCC in five proceedings  
22   since joining its staff. A list of proceedings where I have submitted testimony to  
23   the PUCO is provided in Attachment RBF-1 to this testimony.

1    **II.     PURPOSE OF TESTIMONY**

2

3    ***Q6.    WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS***  
4        ***PROCEEDING?***

5    **A6.**    The purpose of my testimony is to explain and support OCC's position protecting  
6            residential customers as it relates to the Application of Northeast Ohio Natural  
7            Gas Company for an Increase in Gas Distribution Rates ("Application") filed by  
8            Northeast Ohio Natural Gas Company ("NEO" or the "Utility") in Case No. 18-  
9            1720-GA-AIR.<sup>1</sup> OCC filed its Objections to the PUCO Staff Report of  
10          Investigation. Specifically, I provide support for the OCC Objection Nos. 5, 6, 7,  
11          and 8 to certain recommendations made by the PUCO Staff in the Rates and  
12          Tariffs Section of the June 25, 2019 Staff Report of Investigation ("Staff  
13          Report"). The Staff Report was issued in response to NEO's Application.

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<sup>1</sup> See *In the Matter of the Application of Northeast Ohio Natural Gas Company. for an Increase in Gas Distribution Rates*, Case No 18-1720-GA-AIR (December 28, 2018) ("Application").

1    **III.    RECOMMENDATIONS REGARDING RATES AND TARIFFS**

2

3        **A.    REVENUE TABLES**

4

5    ***Q7.    DID STAFF MAKE A RECOMMENDATION REGARDING THE***  
6        ***ALLOCATION OF REVENUES TO THE CLASSES AS A RESULT OF THIS***  
7        ***PROCEEDING.***

8    **A7.** Yes. On Tables 3 and 4 on page 24 of the Staff Report, Staff presents the current  
9        revenue, the Applicant's proposed revenue and Staff's proposed revenue. The  
10       Tables also show the resulting increases excluding gas costs (Table 3) and  
11       including gas costs (Table 4). Table 3 indicates that Staff is proposing a  
12       \$1,393,620 increase to revenues excluding gas cost and contract customers and a  
13       \$2,309,795 increase to revenues including gas costs, miscellaneous revenues and  
14       contract customers. Generally, the increases in revenues excluding and including  
15       fuel should be equal. As indicated in OCC Objection No. 8, the Staff Report does  
16       not explain why the increase is substantially higher when including gas costs,  
17       miscellaneous revenue, and contract customers. Until this apparent discrepancy is  
18       explained and becomes transparent, the PUCO should not consider adopting the  
19       Staff Report's proposed revenue increases.

1   **Q8.   HOW DID STAFF RECOMMEND THAT THE REVENUE INCREASE BE**  
2       **ALLOCATED?**

3   **A8.**   As noted in OCC Objection No. 5, the Staff Report unreasonably recommends a  
4       rate **decrease** for the nonresidential large general service class while  
5       recommending a significant rate increase for residential and small commercial  
6       classes. The Staff Report recommends a 15% increase in distribution charges to  
7       residential and small business customers in the Small General Service (“SGS”)  
8       class, a 2% increase in distribution charges to nonresidential customers in the  
9       General Service (“GS”) class, but a 14% **decrease** in the distribution charges to  
10      large nonresidential customers in the Large General Service (“LGS”) class.<sup>2</sup> As a  
11      result, SGS (including residential customers) and GS customers would pay for the  
12      entirety of NEO’s rate increase. On top of that, they would pay for the LGS  
13      customers’ rate decrease. This would result in unjust and unreasonable rates for  
14      residential customers. Other than moving closer to the class costs of service,  
15      there are no fast and hard rules for allocating approved revenue increases. Based  
16      on my experience as a regulatory expert, in order to maintain continuity of rates, I  
17      recommend setting a revenue increase allocation guideline that if an overall  
18      revenue increase is granted, then no customer class should receive a rate decrease.  
19      As an alternative, in order to move revenues closer to the cost of service, that rate  
20      class could simply be assigned a “0” increase, or a relatively small increase.

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<sup>2</sup> Staff Report at 24, Table 3.

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1 In addition, Staff has indicated on page 24 of the Staff Report that “Staff finds the  
2 Company’s revenue allocation proposal to be reasonable because it moves the  
3 customer classes closer to the average rate of return while respecting the  
4 principles of gradualism”<sup>3</sup> One of the components of the Utility’s revenue  
5 allocation proposal is that there should be increases to all classes, spreading the  
6 costs more equitably between customer class while serving to moderate the  
7 resulting bill impacts<sup>4</sup>. So, in spite of finding the Utility’s revenue allocation  
8 proposal reasonable, Staff has modified the revenue allocation to violate one of  
9 the important guidelines of the Utility’s proposal.<sup>5</sup>

10 If the PUCO grants a rate increase for NEO in this case, then no class of service  
11 should receive a rate decrease.

12  
13 ***Q9. DO YOU HAVE A RECOMMENDATION AS TO HOW THE RATE***  
14 ***INCREASE (IF ANY) GRANTED BY THE PUCO IN THIS PROCEEDING***  
15 ***SHOULD BE ALLOCATED?***

16 ***A9.*** Yes. Any increase granted by the PUCO in this case should be allocated as  
17 shown in Attachment RBF-2 to my testimony. That is, the allocation of the  
18 increase to the SGS class excluding fuel should be 81.62% of the total increase.<sup>6</sup>

19  

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<sup>3</sup> Staff Report at 24.

<sup>4</sup> Case No. 18-1720-GA-AIR, Direct Testimony of Charles Lo, pgs. 9 – 10.

<sup>5</sup> Staff Report at 24, Table 3.

<sup>6</sup> Attachment RBF-2.



1           **B.    TARIFF MODIFICATION**

2

3    ***Q10.   DID THE STAFF MAKE ANY RECOMMENDATIONS REGARDING THE***  
4           ***CUSTOMER MAKE-UP OF THE TARIFF CLASSES?***

5    ***A10.***   Yes. The Staff recommended that NEO's proposed rate design be accepted, but  
6           General Service customers using less than 200 Mcf per year be reclassified as  
7           Small General Service customers.<sup>7</sup>

8

9    ***Q11.   DO YOU AGREE WITH THAT RECOMMENDATION?***

10   ***A11.***   No. I believe the recommendation is unnecessary. Rate SGS is available for  
11           residential, commercial and industrial customers using less than 500 Mcf per year  
12           between August 1<sup>st</sup> and July 31<sup>st</sup>. Rate GS is available to any nonresidential  
13           customer using at least 500 Mcf per year between August 1<sup>st</sup> and July 31<sup>st</sup>. Plus,  
14           both Rate Sheets indicate that the customer's rate selection is subject to review by  
15           the Utility of their annual usage or by customer request of review and rate  
16           change.<sup>8</sup> It appears to me that if a General Service customer is using less than  
17           200 Mcf per year, it would already have been reclassified to the SGS class, so the  
18           Staff recommendation is unnecessary. Plus, even if there are GS customers that  
19           have not already been reclassified, and now are reclassified at SGS customers, the  
20           billing determinants for all GS and SGS customers—including residential  
21           customers—would change. This reclassification could result in consumer

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<sup>7</sup> Staff Report at 25.

<sup>8</sup> Application, Schedule E-1, Proposed Tariffs, Original Sheets 39 – 42.

1 migration causing costs to shift from current nonresidential GS customers to  
2 current residential SGS customers, potentially increasing residential customers'  
3 rates. The PUCO should not adopt this recommendation.

4

5 **C. RATE DESIGN**

6

7 ***Q12. WHAT CUSTOMER CHARGES DID STAFF RECOMMEND FOR THE SGS***  
8 ***CLASS?***

9 ***A12.*** The Staff Report unreasonably recommends that the fixed monthly charge for  
10 residential NEO customers increase from \$6.30 to \$20.00, a 217% increase.<sup>9</sup> The  
11 Staff Report unreasonably recommends that the fixed monthly charge for  
12 residential Brainard customers increase from \$7.00 to \$20.00, a 185% increase.<sup>10</sup>  
13 The Staff Report unreasonably recommends that the fixed monthly charge for  
14 residential Orwell customers increase from \$9.00 to \$20.00, a 122% increase.<sup>11</sup>

15

16 ***Q13. WHY DO YOU CHARACTERIZE THE STAFF-PROPOSED CUSTOMER***  
17 ***CHARGES AS “UNREASONABLE?”***

18 ***A13.*** The \$20 customer charges are what the Applicant has proposed. However, that  
19 proposal was accompanied by a proposed overall revenue increase of

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<sup>9</sup> Staff Report at 25.

<sup>10</sup> Staff Report at 25.

<sup>11</sup> Staff Report at 25, Table 5.

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1       \$3,526,053.<sup>12</sup> The midpoint of the Staff-recommended revenue increase is  
2       \$688,797.<sup>13</sup> So, even though the Staff -recommended revenue increase is less than  
3       20% of what the Applicant has requested, Staff recommends that the PUCO  
4       approve the \$20 Customer Charges for the SGS Class as proposed by the  
5       Applicant.

6  
7       ***Q14. WHAT RATIONALE DID STAFF GIVE FOR THE LARGE INCREASES TO***  
8       ***THE SGS CUSTOMER CHARGES?***

9       ***A14.*** Staff states that “The current rate design leaves the Applicant very sensitive to  
10       weather. Increasing the amount of base revenue recovered through a fixed charge  
11       would make a monthly distribution charge less weather sensitive. It also will  
12       reduce large spikes in winter bills while still giving customers the opportunity to  
13       control costs by reducing consumption.”<sup>14</sup>

14  
15       ***Q15. IS THIS RATIONALE SUFFICIENT JUSTIFICATION FOR THE LARGE***  
16       ***INCREASES TO THE SGS CUSTOMER CHARGE?***

17       ***A15.*** No. The PUCO has approved several applications for the adoption of a modified  
18       Straight Fixed Variable (“SFV”) rate design (a relatively large fixed customer  
19       charge accompanied by a relatively small volumetric component) or a full SFV  
20       rate design (a fixed customer charge with no volumetric component) for the

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<sup>12</sup> Staff Report, Schedule A-1, p. 31.

<sup>13</sup> Staff Report, Schedule A-1, p. 31.

<sup>14</sup> Staff Report at 24.

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1 residential customers of gas utilities. While I have great respect for PUCO  
2 precedent, there have been some significant changes to the relevant circumstances  
3 that the PUCO relied upon as rationale for implementing its initial SFV policy.  
4 The PUCO should avoid a situation where a costing method, once adopted,  
5 becomes the predominant and unchallenged determinant of rate design.<sup>15</sup> I  
6 recommend that the PUCO revisit its policy of promoting a full, or nearly full,  
7 SFV rate design for residential gas customers.

8

9 ***Q16. WHAT CHANGES HAVE OCCURRED IN THE CIRCUMSTANCES UPON***  
10 ***WHICH THE PUCO RELIED?***

11 ***A16.*** Very simply, the price of gas has decreased significantly in recent years. In Case  
12 No. 03-2170-GA-AIR, the assumed cost of gas utilized in NEO's E-4 schedules  
13 (which summarize current and proposed revenues, excluding and including fuel)  
14 was \$7.00 per Mcf. In the current proceeding the assumed cost of gas for NEO is  
15 \$4.7611, a reduction of 32%. Contrary to what the PUCO previously observed in  
16 Case No. 07-829-GA-AIR ("Therefore, the largest portion of the bill, the other  
17 70%, is for the gas that the customer uses. This commodity portion, the cost of  
18 the actual gas used, is the biggest driver of the amount of a customer's bill.  
19 Therefore, we believe that the gas usage will still have the biggest influence on  
20 the price signals received by customers when making gas consumption

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<sup>15</sup> Charging for Distribution Utility Services: Issues in Rate Design, page 39, December 2000, Frederick Weston, The Regulatory Assistance Project, Montpelier VT ("Weston").

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1 decisions”<sup>16</sup>), the price of gas is no longer the biggest influence on the price  
2 signals received by consumers when making gas consumption decisions. The  
3 distribution portion of the bill, not the cost of gas, is the biggest influence on the  
4 price signals sent to consumers when they are making gas consumption decisions.  
5 In Case No. 07-589-GA-AIR, the PUCO further observed that “Conditions in the  
6 natural gas industry have changed markedly in the past several years. The natural  
7 gas market is now characterized by volatile and sustained price increases, causing  
8 customers to increase their efforts to conserve gas.”<sup>17</sup> The natural gas market is  
9 not now characterized by volatile and sustained price increases. Just as the PUCO  
10 recognized in 2008 that the gas industry had changed markedly in the past several  
11 years, thus justifying SFV rate design, the gas industry has once again had some  
12 significant changes that warrant revisiting the SFV rate design.

13  
14 ***Q17. WHAT PRICE SIGNALS ARE SENT TO THE CONSUMER BY A SFV RATE***  
15 ***DESIGN?***

16 ***A17.*** The SFV rate design sends an improper price signal to the consumer, fails to  
17 encourage customer-initiated conservation, and adversely affects the Utility’s and  
18 its customers' energy efficiency efforts. High fixed rate structures actually  
19 promote additional consumption because a customer’s price of incremental  
20 consumption is less than what an energy efficient price structure would otherwise

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<sup>16</sup> Case No. 07-829-GA-AIR, East Ohio Gas, Opinion and Order, October 15, 2008, page 24.

<sup>17</sup> Case No. 07-589-GA AIR, Duke Energy Ohio, Inc., Opinion and Order, May 28, 2008, page 17.

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1 be. A pricing structure that is largely fixed, such that prices do not vary with  
2 consumption, promotes the inefficient utilization of resources. One of the most  
3 effective tools that a regulatory agency has to promote conservation and energy  
4 efficiency is by developing rates that send proper pricing signals to customers to  
5 conserve and utilize resources efficiently. Pricing structures that are based  
6 predominantly on fixed charges are inferior from a conservation and energy  
7 efficiency standpoint, to pricing structures that require customers to pay more for  
8 additional consumption.<sup>18</sup> Increasing fixed charges can significantly diminish  
9 incentives for customers to reduce consumption through energy efficiency. By  
10 reducing the value of a Ccf saved, a higher fixed charge gives customers less  
11 incentive to lower their bills by reducing consumption.<sup>19</sup>

12  
13 ***Q18. ARE THERE CONSUMERS WHO ARE MORE ADVERSELY IMPACTED***  
14 ***BY A SFV RATE DESIGN?***

15 ***A18.*** Yes. The SFV rate design causes a disproportionately higher bill impact (some of  
16 the increases are double digit) to low usage residential customers when compared  
17 to large residential users. Residential customers who use less energy will  
18 experience the greatest percentage jumps in their gas bill under the SFV rate  
19 design. The larger the customer charge, the lower the percentage increase in bills

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<sup>18</sup> See, e.g., Petition of Indianapolis Power & Light Company to Increase Rates and Charges for Electric Utility Services, Cause Nos. 44756 and 44602, Direct Testimony of Glenn A. Watkins on behalf of the Indiana Office of Utility Consumer Counsel, July 27, 2015 ("Watkins"), page 60.

<sup>19</sup> See, e.g., Caught In a Fix: The Problem with Fixed Charges for Electricity, February 9, 2016, pages 16 and 17, Melissa Whited, Tim Woolf, and Joseph Daniel, Prepared for Consumers Union by Synapse Energy Economics, Cambridge, MA ("Whited et al").

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1 for high use customers. Under the rates proposed in the Staff Report, a residential  
2 customer of NEO using 0 Ccf would see a total bill **increase** of 217.53%. A  
3 customer using 150 Ccf would see a total bill **decrease** of 4.62%.<sup>20</sup>

4  
5 ***Q19. ARE THERE ANY OTHER SHORTFALLS IN THE SFV RATE DESIGN?***

6 ***A19.*** For residential customers, Staff erred in recommending that the proposed  
7 modified SFV concept be adopted (*i.e.* there will be a \$20.00 Customer Charge  
8 and a small volumetric component to base distribution rates). While the SFV rate  
9 design may produce less volatile bills over the course of a year for gas consumers  
10 than those based on consumption, it is generally preferable that individual  
11 customers make their own decisions. If a gas customer wants year-around stable  
12 bills, the customer can opt to enroll in budget billing. The SFV rate design is not  
13 easier for consumers to understand than a rate per Ccf that charges a set amount  
14 for each Ccf used. Most items are purchased on a per unit basis and customers  
15 understand that concept. Customers do not understand why a consumer who uses  
16 100 Ccf of gas pays nearly the same distribution bill as one who uses no gas  
17 whatsoever.

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<sup>20</sup> Staff Report, page 82, Schedule E-5, page 1 of 13.

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1   ***Q20.   WHAT SHOULD STAFF HAVE RECOMMENDED REGARDING THE***  
2   ***RATE DESIGN FOR CONSUMERS IN THE SGS RATE CLASS?***

3   ***A20.***   Given the significant reduction in the requested revenue increase, as summarized  
4           in the A-1 Schedule of the Staff Report, Staff should have recommended a much  
5           smaller increase to the proposed customer charge. For example, instead of  
6           recommending a fixed charge of \$20.00, Staff should have recommended that  
7           NEO's fixed charge for consumers on the SGS rate schedule should be no more  
8           than \$12.50, and the volumetric charge should be reduced to \$2.00/MCF for  
9           Northeast, \$2.95/MCF for Orwell and \$2.24/MCF for Brainard in order to recover  
10          the OCC-recommended SGS revenue of \$10,168,586.<sup>21</sup> These rates are solely for  
11          illustrative purposes. The revenue is derived by assuming the OCC-proposed  
12          distribution of the revenue increase to the Staff-recommended revenue increase of  
13          \$688,797 from Schedule A-1 of the Staff Report. In providing this example, OCC  
14          does not concede that the Staff Report's recommended revenue increase is  
15          appropriate.

16

17   ***Q21.   DOES THAT CONCLUDE YOUR TESTIMONY?***

18   ***A21.***   Yes, it does. However, I reserve the right to incorporate new information that  
19           may subsequently become available. I also reserve the right to supplement my  
20           testimony in the event the Utility, the PUCO Staff, or any other party submits new  
21           or corrected information in connection with this proceeding.

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<sup>21</sup> Attachment RBF-3.



## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Direct Testimony of Robert B. Fortney on behalf of the Office of the Ohio Consumers' Counsel* has been served upon those persons listed below via electronic service this 25th day of July 2018.

/s/ Christopher Healey  
Christopher Healey  
Assistant Consumers' Counsel

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Robert Fortney

Proceedings with Testimony Submitted to the Public Utilities Commission of Ohio

Company	Docket No.	Date
Cleveland Electric Illuminating Company	85-675-EL-AIR	1986
Cleveland Electric Illuminating Company	86-2025-EL-AIR	1987
Toledo Edison Company	86-2026-EL-AIR	1987
Ohio Edison Company	87-689-EL-AIR	1987
Cleveland Electric Illuminating Company	88-170-EL-AIR	1988
Toledo Edison Company	88-171-EL-AIR	1988
Ohio Edison Company	89-1001-EL-AIR	1990
Cincinnati Gas & Electric Company	91-410-EL-AIR	1991
Columbus Southern Power Company	91-418-EL-AIR	1992
Cincinnati Gas & Electric Company	92-1464-EL-AIR	1993
Ohio Power Company	94-996-EL-AIR	1994
Toledo Edison Company	94-1987-EL-CSS	1995
Cleveland Electric Illuminating Company	94-1964-EL-CSS	1995
Toledo Edison Company	95-299-EL-AIR	1995
Cleveland Electric Illuminating Company	95-300-EL-AIR	1996
All Electric Companies (Rulemaking Proceeding)	96-406-EL-COI	1998
Cleveland Electric Illuminating Company	97-358-EL-ATA	1998
Toledo Edison Company	97-359-EL-ATA	1998
Cleveland Electric Illuminating Company	97-1146-EL-COI	1998
Toledo Edison Company	97-1147-EL-COI	1998
FirstEnergy	96-1211-EL-UNC	1998
Columbus Southern Power Company	01-1356-EL-ATA	2002
Columbus Southern Power Company	01-1357-EL-AAM	2002
Rulemaking Proceeding	01-2708-EL-COI	2002
FirstEnergy	01-3019-EL-UNC	2002
Ohio Power Company	01-1358-EL-ATA	2002
Ohio Power Company	01-1359-EL-AAM	2002
The Dayton Power and Light Company	02-0570-EL-ATA	2003
Dayton Power and Light Company	02-2364-EL-CSS	2003
Dayton Power and Light Company	02-2879-EL-AAM	2003
Dayton Power and Light Company	02-2779-EL-ATA	2003
FirstEnergy Corporation	03-2144-EL-ATA	2004
Cincinnati Gas & Electric Company	03-0093-EL-ATA	2004
Cincinnati Gas & Electric Company	03-2079-EL-AAM	2004
Cincinnati Gas & Electric Company	03-2081-EL-AAM	2004
Monongahela Power Company	04-0880-EL-UNC	2004

Monongahela Power Company	05-0765-EL-UNC	2005
Dayton Power and Light Company	05-0276-EL-AIR	2005
FirstEnergy	07-0551-EL-AIR	2008
FirstEnergy	08-0936-EL-SSO	2008
FirstEnergy	08-0935-EL-SSO	2008
Ormet Primary Aluminum Corporation	09-0119-EL-AEC	2009
Cleveland Electric Illuminating Company	08-1238-EL-AEC	2009
Columbus Southern Power Company	09-0516-EL-AEC	2009
FirstEnergy	10-0388-EL-SSO	2010
FirstEnergy	10-0176-EL-ATA	2011
Columbus Southern Power Company	11-0346-EL-SSO	2011
Ohio Power Company	11-0348-EL-SSO	2011
Columbus Southern Power Company	10-0343-EL-ATA	2011
Ohio Power Company	10-0344-EL-ATA	2011
AEP Ohio	10-2376-EL-UNC	2011
AEP Ohio	10-2929-EL-UNC	2011
AEP Ohio	11-4921-EL-RDR	2011
FirstEnergy	12-1230-EL-SSO	2012
AEP Ohio	14-1693-EL-RDR	2015
Aqua	16-0907-WW-AIR	2016
Dayton Power and Light Company	16-0395-EL-SSO	2017
AEP Ohio	16-1852-EL-SSO	2017
Dayton Power and Light Company	15-1830-EL-AIR	2018
Vectren Energy Delivery	18-0298-GA-AIR	2018
Suburban Gas	18-1205-GA-AIR	2019

## ATTACHMENT RBF-2

	Current Rev	Cur Rev	Applicant Pro	App Pro			Staff Pro Rev	Dist of		Dist of Staff	OCC Pro
	Excl Fuel,	Excl Fuel	Excl Fuel	Excl Fuel	App Proposed	Dist of App	Excl Fuel	Staff Pro	Staff	Pro Incr	Revenue
	Incl Con rev	Allocation	Incl Con Rev	Rev Alloc	Increase	Pro Incr	Incl Cotract Rev	Rev	Proposed Incr	Excl Fuel	Excl Fuel*
SGS	\$ 9,606,395	63.83%	\$ 12,484,244	67.20%	\$ 2,877,849	81.62%	\$ 11,006,204	66.93%	\$ 1,399,809	100.44%	\$ 10,168,586
GS	\$ 4,092,216	27.19%	\$ 4,678,598	25.19%	\$ 586,382	16.63%	\$ 4,150,223	25.24%	\$ 58,007	4.16%	\$ 4,206,766
LGS	\$ 1,257,676	8.36%	\$ 1,319,386	7.10%	\$ 61,710	1.75%	\$ 1,193,485	7.26%	\$ (64,191)	-4.61%	\$ 1,269,731
Tot Incl Con Rev w/o Misc	\$ 14,956,288	99.37%	\$ 18,482,229	99.49%	\$ 3,525,941	100.00%	\$ 16,349,912	99.43%	\$ 1,393,624	100.00%	\$ 15,645,085
Misc Rev	\$ 94,152	0.63%	\$ 94,152	0.51%	\$ -	0.00%	\$ 94,152	0.57%	\$ -	0.00%	\$ 94,152
TOTAL	\$ 15,050,440	100.00%	\$ 18,576,381	100.00%	\$ 3,525,941	100.00%	\$ 16,444,064	100.00%	\$ 1,393,624	100.00%	\$ 15,739,237
											*Applicant
											Current Rev
											Plus SRI Sched
											A-1 Incr
					App Pro				Staff Pro		
					Excl Fuel Incr %				Excl Fuel Incr %		
				SGS	29.96%				14.57%		
				GS	14.33%				1.42%		
				LGS	4.91%				-5.10%		
				Sub Tot	23.57%				9.32%		
				MISC	0.00%				0.00%		
				Tot Excl	23.43%				9.26%		

### ATTACHMENT RBF-3

						Staff	Staff	Staff	OCC	
Rate	Service	Customer	Sales	Current	Current	Proposed	Proposed	Proposed	Proposed	
Code	Description	Bills	MCF	Rate	Revenue	Rate	Revenue	Increase	Rate	
36-SGS-NEO	Small Gen Svc				Less Fuel		Less Fuel			
	Customer Charge	204,872		\$ 6.30	\$ 1,290,694	\$ 20.00	\$ 4,097,440	\$ 2,806,746	\$ 12.50	\$
	Commodity Charge		1,594,831	\$ 2.49	\$ 3,971,129	\$ 1.331	\$ 2,122,720	\$ (1,848,409)	\$ 2.00	\$
	Tot SGS-NEO				\$ 5,261,823		\$ 6,220,160	\$ 958,337		\$
								\$ -		\$
36-SGS-ONG	Small Gen Svc							\$ -		\$
	Customer Charge	121,841		\$ 9.00	\$ 1,096,569	\$ 20.00	\$ 2,436,820	\$ 1,340,251	\$ 12.50	\$
	Commodity Charge		925,137	\$ 3.33	\$ 3,080,401	\$ 1.963	\$ 1,816,044	\$ (1,264,357)	\$ 2.95	\$
	Tot SGS-ONG				\$ 4,176,970		\$ 4,252,864	\$ 75,894		\$
								\$ -		\$
36-SGS-BRN	Small Gen Svc							\$ -		\$
	Customer Charge	2,490		\$ 7.00	\$ 17,430	\$ 20.00	\$ 49,800	\$ 32,370	\$ 12.50	\$
	Commodity Charge		60,069	\$ 2.50	\$ 150,173	\$ 1.510	\$ 90,704	\$ (59,468)	\$ 2.24	\$
	Tot SGS-BRN				\$ 167,603		\$ 140,504	\$ (27,098)		\$
TOTAL SGS		329,203	2,580,037		\$ 9,606,395		\$ 10,613,528	\$ 1,007,133		\$

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**7/25/2019 11:19:24 AM**

**in**

**Case No(s). 18-1720-GA-AIR, 18-1721-GA-ATA, 18-1722-GA-ALT**

Summary: Testimony Direct Testimony of Robert B. Fortney on Behalf of the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Healey, Christopher Mr.