

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of the)
Operational Benefits Assessment of the) Case No. 18-1618-EL-RDR
gridSMART Deployment of Ohio Power)
Company.)

**DIRECT TESTIMONY
OF
JAMES D. WILLIAMS
IN SUPPORT OF THE SETTLEMENT**

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

October 25, 2019

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ATTACHMENTS

Attachment JDW-01 List of Previous Testimony Filed at the PUCO by James Williams

I. INTRODUCTION

Q1. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.

A1. My name is James D. Williams. My business address is 65 East State Street, 7th Floor, Columbus, Ohio 43215. I am employed by the Office of the Ohio Consumers' Counsel ("OCC") as a Utility Consumer Policy Expert.

Q2. PLEASE BRIEFLY SUMMARIZE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

A2. I am a 1994 graduate of Webster University, in St. Louis, Missouri, with a Master of Business Administration, and a 1978 graduate of Franklin University, in Columbus, Ohio, with a Bachelor of Science, Engineering Technology. My professional experience includes a career in the United States Air Force and over 23 years of utility regulatory experience with the OCC.

Initially, I served as a compliance specialist with the OCC and my duties included the development of compliance programs for electric, natural gas, and water industries including competitive suppliers of natural gas and electric service.

Later, I was designated to manage all of the agency's specialists who were developing compliance programs in each of the utility industries. My role evolved into the management of OCC's consumer hotline, the direct service provided to consumers to resolve complaints and inquiries that involved Ohio utilities and competitive suppliers of retail natural gas and electric services. More recently, my

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1 role has expanded as the Senior Utility Consumer Policy Analyst to include the
2 examination of grid modernization initiatives proposed by the electric industry
3 regarding cost-benefit analysis, customer bill impacts, operational savings,
4 reliability enhancements, and helping ensure that consumers receive the full
5 benefits from deployment of these programs.

6
7 Related to this proceeding, I have been directly involved in Ohio Power
8 Company's ("AEP Ohio" or "Utility") gridSMART 2 deployment since the
9 Utility filed its original application,¹ assisting in preparation of various comments
10 and stages of litigation, analysis of the settlement regarding gridSMART 2, and
11 the Public Utilities Commission of Ohio ("PUCO") order approving the
12 settlement,² and regular participation in gridSMART collaborative meetings. In
13 addition, I have reviewed the gridSMART deployment audit that was prepared by
14 Daymark Energy Advisors and have participated in multiple settlement
15 discussions with other parties.³ Finally, I have reviewed the Joint Stipulation and
16 Recommendation ("Settlement") filed in this proceeding.⁴

¹ *In the Matter of the Application of Ohio Power Company to Initiate Phase 2 of its gridSMART Project and to Establish the gridSMART 2 Rider*, Case No. 13-1939-EL-RDR, Application (September 13, 2013). Case No. 13-1939-EL-RDR, Stipulation and Recommendation (April 7, 2016) and Opinion and Order (February 1, 2017).

² *In the Matter of the Commission Review of the Capacity Charges of Ohio Power Company and Columbus Southern Power Company*, Case No. 10-2929-EL-UNC et al., Order on Global Settlement Stipulation (February 23, 2017) ("Global Settlement").

³ Case No. 18-1618-EL-RDR, AEP Ohio GRIDSMART Deployment Audit: Review of the Phase 1 and Phase 2 Operational Benefits, Daymark Energy Advisors, Final Report (April 12, 2019).

⁴ *In the Matter of the Review of the Operational Benefits Assessment of the gridSMART Deployment of Ohio Power Company*, Joint Stipulation and Recommendation (October 2, 2019).

1 ***Q3. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY OR TESTIFIED***
2 ***BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO?***

3 ***A3.*** Yes. The cases in which I have submitted testimony and/or have testified before
4 the PUCO can be found in Attachment JDW-1.

5

6 ***II. PURPOSE***

7

8 ***Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY?***

9 ***A4.*** The purpose of my testimony is to recommend that the PUCO approve the
10 Settlement that was reached among the PUCO Staff, OCC, and AEP Ohio filed in
11 this proceeding.⁵ OCC appreciates the constructive conversations with the PUCO
12 Staff and AEP Ohio that led to the Settlement.

13

14 ***Q5. CAN YOU PROVIDE A BRIEF OVERVIEW OF THIS CASE?***

15 ***A5.*** Yes. The case relates to AEP Ohio's deployment of the so-called gridSMART 2
16 (which is a \$560 million infrastructure project to upgrade the electric grid that
17 provides electric distribution service to consumers). When the PUCO approved
18 AEP Ohio's gridSMART 2 deployment in 2017, the PUCO also established an
19 operational cost savings credit on consumers' electric bills. That credit amounted
20 to a mere \$400,000 per quarter, which would continue until a new operational
21 cost savings credit was determined for consumers' bills. The operational cost
22 savings credit is supposed to provide AEP Ohio's 1.2 million consumers with the

⁵ *Id.*

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1 financial benefits associated with AEP Ohio's reduced operations and
2 maintenance ("O&M") expenses resulting from replacing older plant with new
3 plant. These O&M expense reductions (and related electric bill reductions) are
4 primarily associated with lower metering reading and meter operations costs for
5 AEP Ohio. However, many other measures that result in cost savings for AEP
6 Ohio can be attributed to gridSMART. AEP Ohio's operational cost savings
7 should be reflected in a credit on electric bills to lower the overall amount of
8 money that consumers pay for the gridSMART program. This Settlement
9 accomplishes a much better sharing of AEP Ohio's cost savings on consumers'
10 electric bills, with an increase to about \$2 million per quarter for credits on
11 consumers' bills.

12
13 To help quantify the operational savings credit for consumers' bills, the PUCO
14 required its Staff (or a consultant retained by its Staff) to perform an operational
15 benefits assessment of AEP Ohio's gridSMART program. Daymark Energy
16 Advisors performed the operational savings assessment for the Staff, and it was
17 filed on April 12, 2019. As stated, this case establishes the level of the
18 operational savings credit that would replace the current \$400,000 quarterly credit
19 until the conclusion of AEP Ohio's next distribution rate case. In the next rate
20 case, the savings attributed to AEP Ohio's gridSMART deployment should then
21 be reflected in the base rates that consumers pay.

1 ***Q6. CAN YOU BRIEFLY DESCRIBE THE SETTLEMENT?***

2 ***A6.*** Yes. The Settlement among the PUCO Staff, OCC, and AEP Ohio results in the
3 following:

- 4 • Establishes additional operational savings for 2019 beyond the
5 current \$400,000 quarterly credit;
- 6 • Replaces the current operational savings credit for 2020 and 2021
7 with credits of \$8.230 million and \$8.396 million, respectively;
- 8 • Provides an appropriate allocation of savings to the residential
9 class;
- 10 • Maintains the operational savings beyond 2021 if new distribution
11 base rates are not established by that time;
- 12 • Defers credit and collection expense reductions until the tariffed
13 reconnection charges are adjusted in the distribution base rate case;
- 14 • More accurately tracks the benefits associated with customer
15 minutes of interruption on distribution automated circuit
16 reconfiguration (“DACR”) equipped circuits based on the
17 customer mix for the circuit; and
- 18 • Extends the reporting of non-financial metrics through 2024.

III. EVALUATION OF THE SETTLEMENT REGARDING THE THREE-PRONG TEST USED BY THE PUCO FOR EVALUATING SETTLEMENTS

Q7. WHAT CRITERIA DOES THE PUCO RELY UPON IN CONSIDERING WHETHER TO ADOPT A SETTLEMENT?

A7. In my regulatory experience, it is my understanding that the PUCO will adopt a stipulation only if it meets all of the three criteria delineated below. The PUCO must analyze the Settlement and decide the following:

1. Is the settlement a product of serious bargaining among capable, knowledgeable parties?
2. Does the settlement, as a package, benefit customers and the public interest?
3. Does the settlement package violate any important regulatory principle or practice?⁶

Q8. IN YOUR OPINION, IS THE SETTLEMENT A PRODUCT OF SERIOUS BARGAINING AMONG CAPABLE, KNOWLEDGEABLE PARTIES?

A8. Yes. The Settlement is a product of serious bargaining among capable, knowledgeable parties. There were multiple settlement meetings and discussions where there was ample opportunity for parties to advocate for the interests of their

⁶ *Consumers' Counsel v. Pub. Util. Comm'n.* (1992), 64 Ohio St.3d 123, 126.

1 clients. In my opinion, full inclusion of all intervening parties in these discussions
2 encouraged the development of a settlement that represented a more fair and
3 equitable resolution to the issues for all parties. Specific to OCC, the inclusion of
4 OCC in the Settlement demonstrates a willingness on behalf of the parties to
5 promote diversity of interests (especially across the residential class). This is
6 important because the PUCO sometimes considers whether the parties to a
7 settlement represent diverse interests.⁷

8

9 ***Q9. DID OCC MAKE ANY CONCESSIONS IN THE NEGOTIATION OF THIS***
10 ***SETTLEMENT THAT SHOULD NOT BE DETERMINATIVE OF***
11 ***EXPECTATIONS FOR CONCESSIONS IN FUTURE SETTLEMENTS?***

12 ***A9.*** Yes. In this case, OCC agreed to the removal of a paragraph from the typical
13 boilerplate language that appears in most PUCO settlements that paragraph states:

14

15 Upon notice of termination or withdrawal by any Signatory Party
16 pursuant to the above provisions, the Stipulation shall immediately
17 become null and void. In such event, this proceeding shall go
18 forward at the procedural point at which this Stipulation and
19 Recommendation was filed, and the parties will be afforded the
20 opportunity to present evidence through witnesses, to cross-
21 examine witnesses, to present rebuttal testimony, and to brief

⁷ See: *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Establish a Standard Service Offer*, Case No. 10-388-EL-SSO, Opinion and Order at 48 (August 25, 2010).

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1 all issues that the Commission shall decide based upon the
2 record and briefs as if this Stipulation had never been executed.

3
4 However, Parties should understand that OCC's agreement with the removal of
5 the above boilerplate paragraph should not to be taken to mean that OCC would
6 accept removal of that paragraph in future cases.

7
8 ***Q10. IN YOUR OPINION, DOES THE SETTLEMENT, AS A PACKAGE,***
9 ***BENEFIT CUSTOMERS AND THE PUBLIC INTEREST?***

10 ***A10.*** Yes. The Settlement as a package benefits customers and the public interest in
11 several ways. The Settlement results in an increase in the level of the operational
12 savings credit from the current \$400,000 quarterly credit to approximately \$18.5
13 million between 2019 and 2021. On an annualized basis, the savings credit for
14 2019 is \$1.858 million between July and December 2019 which more than
15 doubles the level of the current credit. The annual operational savings credit in
16 2020 and 2021 are substantially higher at \$8.320 million and \$8.396 million
17 respectively. While all customers benefit from the additional operational savings,
18 residential customers are appropriately allocated a 60 percent share of the total
19 savings. This allocation does not affect the cost allocation agreed to in the Global
20 Settlement.

1 ***Q11. DOES THE SETTLEMENT END THE OPERATIONAL SAVINGS CREDITS***
2 ***IN 2021?***

3 ***A11.*** No. Under the Settlement, the operational savings credits will continue at the
4 2021 level of \$8.396 million until new base rates become effective. AEP Ohio is
5 required to file a distribution rate case by June 1, 2020 as a condition for
6 continuing its distribution investment rider past December 31, 2020.⁸ The rate
7 case will provide the opportunity for a more complete examination of AEP Ohio's
8 revenues and expenses during a test year period to better assess the level of
9 operational savings for customers that can be attributed to gridSMART.⁹
10 However, even if the rate case is not completed in 2021, the Settlement ensures
11 that customers will continue to receive the operational savings credits at the 2021
12 level until new distribution rates become effective.

13
14 ***Q12. DOES THE SETTLEMENT IDENTIFY OTHER OPERATIONAL SAVINGS***
15 ***THAT WILL BE QUANTIFIED AND ADJUSTED IN THE BASE RATE***
16 ***CASE?***

17 ***A12.*** Yes. Credit and collection savings associated with remote disconnections and
18 reconnections of advanced metering infrastructure meters ("advanced meters")
19 will be quantified during the base rate case. Currently AEP Ohio has deployed
20 approximately one million advanced meters that are capable of being remotely

⁸ *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143, in the Form of an Electric Security Plan*, Case No. 18-1852-EL-SSO, Opinion and Order (April 5, 2018) at 19.

⁹ Ohio Revised Code 4909.15.

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1 disconnected and reconnected. The capability to remotely disconnect and
2 reconnect services reduces the expenses associated with credit and collections.
3 The current tariffed reconnection charge was adjusted in AEP Ohio's last
4 distribution rate case based on the number of advanced meters deployed at that
5 time. As part of the rate case that AEP Ohio will file by June 1, 2020, the tariffed
6 reconnection charge will need to be adjusted based on the cost of service to
7 perform remote disconnections and reconnections. Because the PUCO had
8 previously directed the PUCO Staff to examine AEP Ohio's reconnection charge
9 in the Utility's next base rate case,¹⁰ no reductions were made in the reconnection
10 charges in this case.

11
12 ***Q13. DOES THE SETTLEMENT IMPROVE THE ACCURACY AND REPORTING***
13 ***OF RELIABILITY DATA ASSOCIATED WITH THE GRIDSMART***
14 ***DISTRIBUTION AUTOMATED CIRCUIT RECONFIGURATION***
15 ***DEPLOYMENT?***

16 ***A13.*** Yes. The gridSMART deployment includes approximately 250 circuits that will
17 be equipped with DACR capabilities (often referred to as self-healing teams) at a
18 cost to consumers of \$106 million that permit automatic rerouting of electricity
19 around potential fault areas. DACR can reduce the number of customers
20 interrupted during an outage event. Under the Settlement, AEP Ohio will track the
21 number of customer minutes interrupted that are avoided through DACR,

¹⁰ *In the Matter of the Applications of Ohio Power Company for a Limited Waiver of Ohio Adm. Code 4901:1-18-06(A)(2), Case No. 13-1938-EL-WVR (April 11, 2018) at 14.*

1 allocated based on the customer mix (i.e., the number of customers from each
2 customer class) for the circuit. This information is helpful in assessing the overall
3 cost effectiveness of the DACR capability for this expensive grid upgrade.
4 Additionally, the Settlement extends the requirement for AEP Ohio to track
5 certain non-financial performance metrics through 2024. The continuation of the
6 reporting requirements is necessary to enable a more comprehensive evaluation of
7 DACR circuit performance over a longer period of time.

8

9 ***Q14. IN YOUR OPINION, DOES THE SETTLEMENT AMONG THE PUCO***
10 ***STAFF, OCC, AND AEP OHIO VIOLATE ANY IMPORTANT***
11 ***REGULATORY PRINCIPLES OR PRACTICES?***

12 ***A14.*** No.

13

14 **IV. RECOMMENDATION**

15

16 ***Q15. WHAT IS YOUR RECOMMENDATION REGARDING THE SETTLEMENT***
17 ***IN THIS CASE?***

18 ***A15.*** As I discuss in my testimony, the Settlement meets the PUCO's three criteria for
19 approving stipulations. The PUCO should adopt the Settlement without
20 modifications.

1 **V. CONCLUSION**

2

3 ***Q16. DOES THIS CONCLUDE YOUR TESTIMONY?***

4 ***A16.*** Yes. However, I reserve the right to incorporate new information that may
5 subsequently become available through outstanding discovery or otherwise.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Direct Testimony of James D. Williams on Behalf of the Office of the Ohio Consumers' Counsel*, was served via electronic transmission to the persons listed below on this 25th day of October 2019.

/s/ Terry L. Etter
Terry L. Etter
Assistant Consumers' Counsel

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

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Filed at the Public Utilities Commission of Ohio

1. *In the Matter of the Application of the Cincinnati Gas and Electric Company for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 95-0656-GA-AIR (August 12, 1996).*
2. *In the Matter of the Application of the Cincinnati Gas and Electric Company for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 01-1228-GA-AIR (February 15, 2002).*
3. *In the Matter of the Commission's Investigation into the Policies and Procedures of Ohio Power Company, Columbus Southern Power Company, The Cleveland Electric Illuminating Company, Ohio Edison Company, The Toledo Edison Company and Monongahela Power Company regarding installation of new line extensions, Case No. 01-2708-EL-COI (May 30, 2002).*
4. *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 07-0829-GA-AIR (June 23, 2008).*
5. *In the Matter of the Application of the Columbia Gas of Ohio, Inc. for Authority to Amend Filed Tariffs to Increase the Rates and Charges for Gas Distribution, Case No. 08-072-GA-AIR (September 25, 2008).*
6. *In the Matter of a Settlement Agreement Between the Staff of the Public Utilities Commission of Ohio, The Office of the Consumers' Counsel and Aqua Ohio, Inc. Relating to Compliance with Customer Service Terms and Conditions Outlined in the Stipulation and Recommendation in Case No. 07-564-WW-AIR and the Standards for Waterworks Companies and Disposal System Companies, Case No. 08-1125-WW-UNC (February 17, 2009).*
7. *In the Matter of the Application of the Ohio American Water Company to Increase its Rates for water and Sewer Services Provided to its Entire Service Area, Case No. 09-391-WS-AIR (January 4, 2010).*
8. *In the Matter of the Application of Aqua Ohio, Inc. for Authority to Increase its Rates and Charges in its Masury Division, Case No. 09-560-WW-AIR (February 22, 2010).*
9. *In the Matter of the Application of Aqua Ohio, Inc. for Authority to Increase its Rates and Charges in Its Lake Erie Division, Case No. 09-1044-WW-AIR (June 21, 2010).*

- IO. *In the Matter of the Application of The Ohio American Water Company to Increase its Rates/or Water Service and Sewer Service*, Case No. 11-4161-WS-AIR (March 1, 2012).
11. *In the Matter of/Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan*, Case No. 11-346-EL-SSO, et al (May 4, 2012).
12. *In the Matter of the Application of/The Dayton Power and Light Company for Approval of its Market Rate Offer*, Case No. 12-426-EL-SSO (June 13, 2012).
13. *In the Matter of the Application of Ohio Power Company to Establish Initial Storm Damage Recovery Rider Rates*, Case No. 12-3255-EL-RDR (December 27, 2013).
14. *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan*, Case No. 13-2385-EL-SSO (May 6, 2014).
15. *In the Matter of the Application of Duke Energy Ohio/or 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 14-841-EL-SSO (May 29, 2014).
16. *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan*, Case No. 14-1297-EL-SSO (December 22, 2014).
17. *In the Matter of the Application of Duke Energy Ohio, Inc., to A4just Rider DR- IM and Rider AU for 2013 Grid Modernization Costs*, Case No. 14-1051-EL- RDR (December 31, 2014) and (February 6, 2015).
18. *In the Matter of the Application Not for an Increase in Rates Pursuant to Section 4901:18, Revised Code, of Ohio Power Company to Establish Meter Opt-Out Tariff*, Case No. 14-1158-EL-ATA (April 24, 2015).
19. *In the Matter of the Application of Duke Energy of Ohio, Inc., for Approval of a Grid Modernization Opt-out Tariff and for a Change in Accounting Procedures Including a Cost Recovery Mechanism.*, Case 14-1160-EL-UNC and 14-1161-EL- AAM (September 18, 2015).

20. *In the Matter of the Application of Duke Energy Ohio, Inc., for Approval of an Alternative Rate Plan Pursuant to Section 4929.05, Revised Code, for an Accelerated Service Line Replacement Programs*, Case No. 14-1622-GA-ALT (November 6, 2015).
21. *In the Matter of the Complaint of Jeffrey Pitzer, Complainant, v. Duke Energy Ohio, Inc. Respondent.*, Case No. 15-298-GE-CSS (December 30, 2015).
22. *In the Matter of the Application of Ohio Power Company to Initiate Phase 2 of Its gridSMART Project and to Establish the gridSMART Phase 2 Rider*, Case No. 13-1939-EL-RDR (July 22, 2016).
23. *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of Demand Side Management Program for its Residential and Commercial Customers*, Case No. 16-1309-GA-UNC (September 13, 2016).
24. *In the Matter of the Application of the Dayton Power and Light Company for Approval of Its Electric Security Plan*, Case No. 16-0395-EL-SSO (November 21, 2016). Supplemental Testimony, (March 29, 2017).
25. *In the Matter of the Application of Aqua Ohio, Inc. to Increase Its Rates and Charges for Its Waterworks Service.*, Case No. 16-0907-WW-AIR (December 19, 2016).
26. *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143, in the Form of an Electric Security Plan*, Case No. 16-1852-EL-SSO, (May 2, 2017).
27. *In the Matter of the Application of the Ohio Development Services Agency for an Order Approving Adjustments to the Universal Service Fund Riders of Jurisdictional Ohio Electric Distribution Utilities*, Case No. 17-1377-EL-USF, (August 11, 2017).
28. *In the Matter of the Application of Duke Energy Ohio, Inc. to Adjust Rider AU for 2016 Grid Modernization Costs*, Case No. 17-690-GA-RDR, (August 18, 2017).
29. *In the Matter of the Application of Duke Energy Ohio, Inc., for an Adjustment to Rider AMRP Rates*, Case No. 17-2318-GA-RDR, (April 5, 2018).
30. *In the Matter of the Application of Dayton Power and Light Company for an Increase in Electric Distribution Rates*, Case No. 15-1830-EL-AIR, (April 11, 2018).
31. *In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Electric Distribution Rates*, Case No. 17-032-EL-AIR, et al, (June 25, 2018).

32. *In the Matter of the Complaint of Citizens Against Clear Cutting, et al., Complainants, v. Duke Energy Ohio, Inc. Respondent*, Case No. 17-2344-EL-CSS (August 27, 2018). Supplemented Direct Testimony (November 9, 2018).
33. *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval of an Increase in Gas Rates*, Case No. 18-0298-GA-AIR (November 7, 2018). Supplemental Testimony (January 22, 2019).
34. *In the Matter of the Application of Ohio Power Company to Update Its Enhanced Service Reliability Rider*, Case No. 17-1914-EL-RDR (May 3, 2019).
35. *In the Matter of the Application of the Review of Duke Energy Ohio, Inc.'s Distribution Capital Investment Rider*, Case No. 18-1036-EL-RDR, (July 8, 2019).
36. *In the Matter of the Review of the Distribution Investment Rider Contained in the Tariff of Ohio Power Company*, Case No. 17-38-EL-RDR (August 20, 2019).
37. *In the Matter of the Commission's Investigation into Verde Energy USA Ohio, LLC's Compliance with the Ohio Administrative Code and Potential Remedial Actions for Non-Compliance*, Case No. 19-958-GE-COI, (October 2, 2019).
38. *In the Matter of the Review of the Operational Benefits Assessment of the gridSMART Deployment of Ohio Power Company*, Case No. 18-1618-EL-RDR, (October 25, 2019).

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Summary: Testimony Direct Testimony of James D. Williams in Support of the Settlement on Behalf of the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Etter, Terry L.