

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Columbia Gas of Ohio, Inc. for An)	Case No. 19-1940-GA-RDR
Adjustment to Rider IRP and Rider DSM)	
Rates.)	

**DIRECT TESTIMONY OF
DAVID C. RINEBOLT
ON BEHALF OF OHIO PARTNERS FOR AFFORDABLE ENERGY**

April 20, 2020

1 Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

2 A. My name is David C. Rinebolt. My business address is PO Box 1793, Findlay,
3 Ohio 45839-1793. I am Executive Director of Ohio Partners for Affordable
4 Energy ("OPAE") and I appear in this case as a witness on its behalf.

5
6 Q. PLEASE DESCRIBE YOUR BACKGROUND AND QUALIFICATIONS FOR
7 YOUR TESTIMONY IN THIS PROCEEDING.

8 A. My career has covered a broad spectrum of activities in human services
9 programs and the energy industry, including policy analysis and program
10 management at both the federal and state levels. I served as Deputy Director of
11 the State of Minnesota Washington Office from 1983 through 1985, focusing on
12 human services, energy and environmental issues, including issues relating to
13 the Low Income Home Energy Assistance Program ("LIHEAP" or in Ohio
14 "HEAP") and the Weatherization Assistance Program ("WAP" or in Ohio
15 "HWAP"). Between 1985 and 1988 I served as Senior Research Associate for
16 Energy with the Coalition of Northeastern Governors Policy Research Center,
17 focusing on low income energy assistance programs, including LIHEAP and
18 WAP, new energy technologies, and wholesale markets and regulation. I was
19 Director of Research for the National Wood Energy Association and Counsel to
20 the Solar Energy Industries Association from 1988 through 1990, working on
21 research and development, regulatory issues, and siting and permitting of
22 renewable energy projects. I also served as Legislative Director for
23 Representative Collin Peterson of Minnesota from 1991 through 1993, and was

1 Director of Programs for the National Association of State Energy Officials from
2 1994 through 1996. In the latter position I worked on issues associated with
3 state management of WAP, and the design and delivery of DSM programs.

4
5 I became executive director of Ohio Partners for Affordable Energy (OPAE) in
6 1996. In this capacity I was actively involved in the development and passage of
7 legislation regulating electric and natural gas utilities, which required knowledge
8 of wholesale markets, regional transmission organizations (RTOs), renewable
9 energy technologies, energy efficiency, and consumer protection issues. I
10 worked closely with what is now the Ohio Development Services Agency
11 (“ODSA”) on issues related to HEAP, HWAP, the Percentage Income Payment
12 Plan (“PIPP”), and fuel funds. I continue to serve on the HWAP Policy Advisory
13 Council and was recently reappointed by Governor DeWine to the Public Benefits
14 Advisory Board. My organization has also overseen training on the HEAP, PIPP,
15 and fuel funds, and a separate annual training focused on HWAP and utility
16 weatherization programs.

17
18 After leaving OPAE in at the end of June 2016, I served as the Program Manager
19 for the Weatherization Assistance Program at the U.S. Department of Energy
20 (“DOE”) before rejoining OPAE in June 2018. During my service at DOE I
21 oversaw the final components of the National, and American Reinvestment and
22 Recovery Act evaluations. I was also responsible for updating the Standard
23 Work Specifications (“SWS”), the national weatherization standards; the

1 development of new health and safety guidance to states and delivery agencies;
2 and, worked with the U.S. Department of Health and Human Services, Office of
3 Community Services, to better coordinate LIHEAP and WAP services.

4
5 I currently serve on the Board of the National Energy Utility Assistance Coalition
6 (“NEUAC”), the national organization made up of utilities and nonprofit
7 organizations providing bill payment assistance to low-income households.
8 NEUAC serves as an advocacy and training organizations, pushing for additional
9 funding for LIHEAP and overseeing an annual national conference training
10 agencies and utilities in best practices for providing bill payment assistance,
11 financing fuel funds, and energy education. I have also been a speaker at the
12 National Association of Regulatory Utility Commissioners (“NARUC”), the
13 Midwest Association of Regulatory Commissioners, and the National Association
14 of State Utility Consumer Advocates. In many of these speaking engagements
15 my presentations focused on low-income assistance programs and consumer
16 protection issues.

17
18 I have a Bachelor of Liberal Studies from Bowling Green State University and a
19 Juris Doctor degree from the Columbus School of Law at The Catholic University
20 of America (1981). My professional career has focused on policy and consumer
21 advocacy; the development, funding, and operation of demand side management
22 (DSM) programs – particularly low-income energy assistance programs;
23 renewable energy development programs; and, utility regulation including rate

1 design, cost of service, forecasting, and related issues. These concentrations
2 require a broad-based knowledge of the energy and utility sectors of the U.S.
3 economy and related regulatory regimes, and specific expertise in the design and
4 deployment of bill payment assistance and low-income weatherization programs.

5
6 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE OHIO PUBLIC UTILITIES
7 COMMISSION ("PUCO" OR "COMMISSION")?

8 A. Yes. I have testified on behalf Ohio Partners for Affordable Energy in litigation
9 involving Duke Energy Ohio, Case No. 11-3549-EL-SSO; The Dayton Power and
10 Light Company, Case Nos. 12-426-EL-SSO, et.al.; Duke Energy Ohio, Case No.
11 13-753-EL-RDR; Case No. 14-1297-EL-SSO which involved FirstEnergy
12 distribution companies; Case No. 15-1046-EL-USF, a proceeding to set the
13 Universal Service Fund Rider; Case No.18-298-GA-AIR, et al., Vectren Energy
14 Delivery Ohio's rate case; Case Nos. 18-1205-GA-AIR, et al., Suburban Natural
15 Gas; Case No. 18-501-EL-FOR, et.al., AEP Ohio's forecasting case involving
16 renewable energy purchase agreements; and, Case No. 18-1840-GA-EXM, a
17 recent case involving Dominion East Ohio, which eliminated Market Variable
18 Rates and made the Standard Choice Offer the default service for residential and
19 small business customers.

20
21 Q. PLEASE DESCRIBE THE PURPOSE OF YOUR TESTIMONY.

22 A. The purpose of my testimony is to support the Columbia Gas of Ohio
23 ("Columbia") rider adjustment filing, the need to continue low-income

1 weatherization and other demand side management (DSM) programs, and the
2 appropriateness of diverting DSM funding to bill payment assistance.

3
4 Q. PLEASE PROVIDE A SUMMARY OF YOUR REASONS FOR SUPPORTING
5 THE PROPOSED ADJUSTMENT TO COLUMBIA'S RIDER DSM.

6 A. Columbia filed its annual rider adjustment for Rider DSM and the Infrastructure
7 Replacement Program Rider ("Rider IRP") on February 29, 2020. OPAE
8 intervened in this docket on March 20, 2020. After reviewing the filing, OPAE
9 determined that the requested adjustments for Rider IRP and Rider DSM were
10 appropriate as proposed by Columbia, which was confirmed by the Staff in its
11 Comments and Recommendations filed in this docket on March 20, 2020. OPAE
12 supports adjusting both Riders as submitted by Columbia.

13
14 All parties concurred on the appropriateness of adjusting Rider IRP, and ``agreed
15 to not oppose the bifurcation of the proceeding, allowing Rider IRP to move
16 forward. The update of DSM Rider was not agreed to and is the subject of the
17 current litigation phase of the case. OPAE supports adjustment of the DSM
18 Rider as proposed, continuation of the deployment of the DSM portfolio
19 programs, and, permitting Columbia to collect shared savings pursuant to the
20 Opinion and Order in Case No. 16-1309-GA-UNC.

1 Q. PLEASE EXPLAIN WHY THE DSM RIDER IS NOW BEFORE THE
2 COMMISSION.

3 A. In its initial comments, the Office of the Ohio Consumers' Counsel ("OCC")
4 proposed the elimination of all non-low-income DSM programs, and that the DSM
5 Rider should end or be used as bill payment assistance for residential and small
6 commercial customers. OCC proposes that any 'profits' Columbia makes off the
7 programs should also be repurposed for use as bill payment assistance.¹ OCC's
8 comments do not address Columbia's WarmChoice® program, which provides
9 services to low-income customers. These are OCC's only comments filed to
10 date.

11
12 However, in reply comments filed in Case No. 19-2084-GA-UNC on April 3,
13 2020, OCC called for elimination of all DSM programs and transferring funding
14 from Vectren Energy Delivery of Ohio's ("VEDO") VWP I and VWP II, both low-
15 income weatherization programs, along with market-rate home audit and
16 multifamily direct install programs to bill payment assistance for the balance of
17 2020, and all funding for WVP I and VWP II in 2021 also be transferred to bill
18 payment assistance.² OCC acknowledged that its positions continue to evolve in
19 a Memorandum Contra to the Motion to Strike filed in response to a motion jointly
20 filed by VEDO and OPAE; "OCC is constantly evaluating and reevaluating

¹ Utilities do not make profits off of DSM programs, but Columbia is permitted to recover a portion of the savings, referred to as shared savings, if the programs savings exceed targets.

² Case No. 19-2084-GA-UNC, Reply Comments by the Office of the Ohio Consumers' Counsel (April 4, 2020) at 3, <http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=fa20bc71-334b-4966-af7a-57da155d0e03> .

1 the ever-changing nature of the coronavirus crisis.³ OCC also was quoted on
2 April 6, 2020 in Hannah, a local newsletter covering state government, as “urging
3 the Public Utilities Commission of Ohio (PUCO) to divert nearly \$60 million from
4 energy efficiency programs...and earmark the funds for bill-paying assistance....”
5 Attached as Exhibit DR-1.

6
7 OPAE is faced with responding to the pleadings filed in this docket, but this
8 testimony also presumes OCC will veer away from its initial comments in this
9 docket and suggest something similar to what it has proposed in the VEDO DSM
10 portfolio case (and has indicated it will also raise in a pending VEDO DSM Rider
11 proceeding).⁴ This testimony assesses both the OCC proposal in its Comments
12 filed in this docket, and the possible recommendation to eliminate funding for
13 WarmChoice®, Columbia’s award-winning low-income weatherization program
14 and transfer the funding to bill payment assistance.

15
16 Q. WHY SHOULD THE COMMISSION REJECT OCC’S PROPOSAL TO
17 ELIMINATE DSM PROGRAMS?

18
19 OCC has proposed the elimination of all non-low-income programs in the
20 Columbia DSM program, and to either reduce the DSM Rider so it no longer

³ Memorandum Contra Motion to Strike by the Office of the Ohio Consumers’ Counsel (April 17, 2020) at 1, <http://dis.puc.state.oh.us/TiffToPdf/A1001001A20D17A92720B02662.pdf>

⁴ Case No. 20-640-GA-RDR, Motion to Intervene and Memorandum of Support of the Office of the Ohio Consumers’ Counsel (April 13, 2020), <http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=6dd9db07-9587-477a-9d4c-1f16fdc47635>.

1 collects program costs from customers or repurpose those funds to provide bill
2 payment assistance. The OCC testimony may also parrot its pleading in the
3 VEDO case referred to above, and propose transferring funding from DSM
4 programs that have been unable to deliver services because of Governor
5 DeWine's COVID-19 emergency order to bill payment assistance.

6
7 OCC misses a critical point -- there are no funds to transfer. The DSM Rider
8 adjustment Columbia is requesting is to recover funds expended during the 2019
9 program year; it is to reimburse Columbia for funds already spent. OCC can, and
10 does, request that the programs funded by the DSM Rider be terminated. That
11 issue is properly before the Commission. Even if OCC's request to terminate the
12 programs were granted, Columbia should be permitted to continue the DSM
13 Rider for the purpose of recovering the balance of costs already spent.

14
15 There are no funds to transfer, only debt to be recovered. To create a pool of
16 funds for bill payment assistance, there would need to be a new rider created or
17 shareholders would need to agree to provide funding. OCC is not and cannot
18 propose a new bill payment assistance rider in this docket. This is simply not the
19 appropriate case for such a request.

20
21 OCC has made clear its desire to eliminate or downsize natural gas DSM
22 programs since 2016. Now, it is cynically using the COVID-19 pandemic as a
23 smoke screen to pursue its long-term vision of eliminating DSM. An OCC

1 spokesperson recently provided an email response to a reporter which indicated
2 OCC would oppose DSM programs “even under the usual circumstances.”⁵ The
3 Commission has repeatedly addressed the arguments raised by OCC in
4 opposing DSM and rejected those arguments, recognizing the benefits of DSM
5 and authorized the recovery of shared savings consistent with ORC 4905.70 and
6 4929.02(A)(12). The COVID-19 pandemic has not changed anything about the
7 programs. OCC’s decision to ignore the benefits to customers does not mean
8 those benefits do not exist. Columbia’s portfolio of programs remains cost-
9 effective, continue to address market failures, and provides long-term financial,
10 health, and safety benefits to Columbia’s customers.

11
12 The only DSM programs that are not currently operating are those that provide
13 in-home services. Low-income programs are still funding emergency services to
14 clients that contact OPAE-member agencies with broken HVAC systems or hot
15 water tanks, or electrical problems. To the extent providers of these programs
16 are not able to fulfill their contracts and serve clients as planned, the
17 underspending will be captured in next year’s DSM Rider adjustment, effectively
18 returning unspent funds to customers.

19
20 As previously noted, OPAE members continue to provide emergency services. I
21 also have reason to believe that these programs are well prepared to go back

⁵ <https://energynews.us/2020/04/15/midwest/ohio-gas-rate-cases-threaten-efficiency-programs-for-low-income-families/>

1 into the field when the emergency is lifted. Technically, weatherization could
2 continue under Governor DeWine's emergency declaration because charitable
3 and social providers and critical trades are exempt.⁶ Energy coordinators from
4 local community agencies are reporting that customers are calling to inquire
5 when installation of weatherization measures can be scheduled. Existing service
6 protocols already include requirements for using Personal Protective Equipment
7 ("PPE") and field staff regularly don Tyvek suits, booties, and respirators or
8 masks when evaluating homes or installing certain measures such as blowing
9 insulation or working around asbestos or lead-based paint. All installers must be
10 certified by the U.S. Environmental Protection Agency's ("EPA") Lead
11 Renovation, Repair and Painting program, and receive extensive training on
12 Occupational Safety and Health Administration ("OSHA") standards.

13
14 OPAE is already working to engage with the public health community to build a
15 set of protocols and training that address the issues with the transmission of the
16 COVID-19 virus so agencies, staff, and contractors can return to serving our
17 clients.⁷ The effort in Ohio started April 16, 2020, with a discussion during the
18 Home Weatherization Assistance Program Policy Advisory Committee ("PAC")
19 meeting. The recommendations borne out of that meeting were referred to the
20 Technical Subcommittee of the PAC. OPAE is already looking for supplies of

⁶ <https://coronavirus.ohio.gov/wps/portal/gov/covid-19/families-and-individuals/stay-at-home-information/critical-trades>; <https://coronavirus.ohio.gov/wps/portal/gov/covid-19/families-and-individuals/stay-at-home-information/charitable-services>

⁷ The Ohio Weatherization Training Center, an OPAE member, has a well-established distance learning program, which will allow any required training to be delivered very quickly. The Center is certified by the EPA to provide lead safe training and OSHA safety training.

1 PPE, and while that is currently difficult, we expect product necessary to
2 supplement current stocks to be available by June. It is difficult to project a date
3 certain when all our funding partners agree that agencies can recommence
4 providing services, but a recent agency survey indicated it would take no more
5 than a week for many to schedule appointments and get back in the field.
6 Emergency services to clients will continue, regardless of whether the regular
7 programs reopen.

8
9 The benefits provided by DSM generally, and low-income weatherization in
10 particular, are even more important now. First, DSM saves participating
11 customers money. WarmChoice® has been serving customers since 1987, and
12 has provided weatherization to over 70,000 customers during that time.
13 Customers living in homes weatherized under WarmChoice® continue to save
14 money today. WarmChoice® has thrice been recognized as a model program by
15 the American Council for an Energy Efficient Economy (“ACEEE”).⁸ Because the
16 Program has a savings rate averaging 29% of the natural gas consumed in a
17 home, the dollar impact on a low-income family is substantial.

⁸ Kushler, Martin, Dan York, and Patti Witte, Meeting Essential Needs: The Results of a National Search for Exemplary Utility-Funded Low-Income Energy Efficiency Programs. Report Number U053 (September 2005), <https://www.aceee.org/sites/default/files/publications/researchreports/U053.pdf>; Gilleo, Annie, Seth Nowak, and Ariel Drehobl, Making a Difference: Strategies for Successful Low-Income Energy Efficiency Programs. Report No. U1713 (October 2017), <https://www.aceee.org/research-report/u1713>; Nowak, Seth, Martin Kushler, and Patti Witte, The New Leaders of the Pack: ACEEE’s Fourth National Review of Exemplary Energy Efficiency Programs. Report No. U1901 (January 2019), <https://www.aceee.org/sites/default/files/publications/researchreports/u1901.pdf>.

1 A key component of low-income weatherization programs is safety. Auditors look
2 for leaking gas pipes and fixtures, inspect furnaces to ensure they do not have a
3 cracked heat exchanger which will vent carbon monoxide (“CO”) into the living
4 area, and check the venting of combustion appliances to ensure there is no
5 backdrafting of CO, which can result in death or sickness of residents of the
6 home. This danger is one of many reasons agencies continue to provide
7 emergency services.

8
9 Weatherization is also widely recognized to have positive impacts on health,
10 particularly for those afflicted with breathing problems such as asthma and
11 chronic obstructive pulmonary disease (“COPD”), primarily because of the focus
12 of the program on improving indoor air quality by ensuring adequate air changes
13 per hour in all rooms of the home. A recent analysis by Oak Ridge National
14 Laboratory of the 2008 Weatherization Assistance Program found that the value
15 of health benefits resulting from weatherization saved the average family over
16 \$14,000 in fewer hospital visits, lost work days, and other avoided costs.⁹

17
18 These benefits more important now more than ever because COVID-19 is
19 particularly dangerous to individuals with breathing difficulties.¹⁰ The 70,000
20 homes that have already been weatherized under WarmChoice® offer improved

⁹ Tonn, Bruce, Erin Rose, Beth Hawkins, Brian Conlon, Health and Household-Related Benefits Attributable to the Weatherization Assistance Program, ORNL/TM-2014/345 (September 2014), https://weatherization.ornl.gov/wp-content/uploads/pdf/WAPRetroEvalFinalReports/ORNLTM-2014_345.pdf

¹⁰ “Coronavirus and COPD: What You Should Know,” Respiratory Health Association (March 9, 2020) <https://resphealth.org/coronavirus-effects-copd/>.

1 indoor air quality that can reduce the risk to patients with trouble breathing, and
2 likely improve the health outcomes for those with breathing problems who do
3 contract COVID-19. Moving forward, the additional homes that can be
4 weatherized will offer added protection for those at-risk individuals until and even
5 after a vaccine is developed.

6
7 DSM programs also provide jobs. WarmChoice® alone supports roughly 150
8 direct jobs. Other programs also support auditors, installers, and manufacturers,
9 along with a supply chain of large and small wholesalers and manufacturers.
10 One of the critical elements of recovering from this pandemic will be putting
11 people back to work. Eliminating programs that provide stable employment is not
12 in the best interest of Ohio.

13
14 To summarize, the OCC proposal to eliminate Columbia's DSM programs and
15 either eliminate the riders or 'repurpose' rider revenues to bill payment
16 assistance, is fundamentally flawed. The DSM Rider is retrospective and is
17 recovering costs that have already been incurred. The DSM Rider will continue
18 to do so for the balance of 2020 and into 2021. Because of the delay in the DSM
19 Rider adjustment resulting from OCC's intransigence, customers will pay more in
20 carrying charges than they would have had the Rider been adjusted as
21 requested. This also means there is no money to repurpose as OCC suggests.
22 What may make for a flashy story in the press, fails as a funding mechanism for
23 additional bill payment assistance.

1
2 Shutting down DSM programs would not be beneficial to customers. The
3 programs are cost-effective, and address the needs of Columbia's customers.
4 The low-income WarmChoice® Program is extremely beneficial to Columbia's
5 neediest clients. All programs should be retained and allowed to continue.
6

7 Q. IS THERE A NEED FOR RATE REDUCTIONS OR ADDITIONAL BILL
8 PAYMENT ASSISTANCE AS A RESULT OF THE COVID-19 PANDEMIC?
9

10 The State of Ohio's response to the COVID-19 pandemic have definitely affected
11 the ability of some customers to pay their utility bills. Non-essential businesses
12 have been required to close, and employment has declined at companies that
13 continue to provide other products and services. Benefits from an expanded
14 unemployment assistance program are starting to reach eligible workers, and
15 funds from the Payment Protection Programs are beginning to reach many small
16 businesses so employees can be retained or rehired.
17

18 Utility disconnections have been suspended, and customers that were recently
19 disconnected have been reconnected. Thousands of Ohioans have stopped
20 paying their utility bills because of a lack of funds. Families are using scarce
21 resources for expenses other than utility bills. People need to eat, keep gas in
22 their car, and pay for health care, among other necessities.
23

1 In my experience, moratoria always result in reduced payment compliance,
2 leaving customers indebted to the utility for services rendered. When the
3 emergency is lifted and the disconnection moratoria end, it will be necessary to
4 work with customers using a combination of benefits and repayment plans to get
5 them out of debt. This is a complex issue that will require well-designed policies
6 to maximize benefits at the minimum cost through a balanced approach.
7

8 Q. DOES THE OCC PROPOSAL APPROPRIATELY ADDRESS THE NEEDS OF
9 CUSTOMERS?

10 A. It is difficult to understand what OCC is actually proposing, both because the
11 position taken in its initial comments appears to have changed, and because of
12 the lack of detail regarding the bill payment assistance program it proposes.
13

14 There are three basic elements of a bill payment assistance program. The first is
15 eligibility. What is the income limit for eligibility? WarmChoice® is available to
16 households with incomes below 150% of the Federal Poverty Line ("FPL"), as is
17 the Percentage Income Payment Plan Plus ("PIPP"). Ohio's Home Energy
18 Assistance Program (HEAP) uses 60% of the state median income as required
19 by statute, which is 175% FPL in Ohio. Other utility weatherization programs,
20 including the Home Weatherization Assistance Program, use 200% FPL, and a
21 VEDO program, VWP II, serves clients up to 300% FPL. OCC offers no
22 suggestion regarding eligibility.
23

1 A second component is the benefit level. Again, OCC provides no guidance on
2 what it views as appropriate. Should it be a flat amount of money; geared to the
3 debt accumulated by the client; and/or, adjusted by income or other factors such
4 as age or disability? The more flexibility, the more the benefits can be structured
5 to meet each client's situation, but the trade-off is the cost of the personnel
6 necessary to deliver individualized assistance. A flat benefit can be done
7 relatively simply, much like the \$1,200 every taxpayer is receiving, and at a low
8 cost, but that approach fails to target customers in the most need. OCC offers no
9 opinion on the tradeoffs that must be made when structuring benefits and, more
10 importantly, no recommendations.

11
12 A third issue is how the program will be delivered. OPAE member agencies have
13 been operating bill payment assistance programs of all types since the mid-
14 1970's, and are a key component of current programs providing customers with
15 benefits from HEAP, PIPP, HWAP, utility weatherization, and various fuel funds.
16 Different computer systems for obligating and tracking benefits are used.
17 Applications are being taken by phone, via paper applications, and online. Many
18 Salvation Army locations, and other community nonprofits and churches
19 sporadically provide supplemental assistance, and our local agencies refer
20 clients or work with those agencies to coordinate funds to keep customers
21 connected.

OCC's proposal is devoid of any discussion of the management or delivery mechanisms for its bill payment assistance, nor does OCC acknowledge the need for administrative funding and salaries and benefits for the frontline workers who guide customers in obtaining benefits. OCC also fails to offer any views on how best to coordinate additional bill payment assistance with other funding sources and payment programs. Simply throwing money at a problem will not put customers on individualized paths to emerge from this emergency situation with no debt. Careful planning that coordinates available payment assistance, rate options, arrearage management, and repayment plans can get most customers current with their utility at the lowest possible cost. OCC's proposal fails to recognize the multiple options and policy tools available to efficiently and effectively transition customers back to normal. Instead, OCC is silent regarding these fundamental considerations.

Q. WHAT RESOURCES ARE CURRENTLY AVAILABLE IN OHIO TO ASSIST FAMILIES IN PAYING UTILITY BILLS?

A. Ohio receives funding from the U.S. Department of Health and Human Services under the Low Income Home Energy Assistance Program ("LIHEAP" or "HEAP" in Ohio). Fiscal Year 2020 regular appropriations provided Ohio with an initial release on November 1, 2019, of \$139,146,565. A second release occurred on February 27, 2020, providing an additional \$15,643,470. The most recent release was April 3, 2020, adding \$1,804,842, for a total of \$156,594,877. This money has been used for the Winter Crisis Program and the regular HEAP

1 benefit. Additional funds are reserved for a Summer Crisis Program. The State
2 has extended the program's timeframe, extending the Winter Crisis Program to
3 May 1, 2020, to match the Commission's extension of the Winter Reconnect
4 Order. Applications for regular benefits can be made through the end of May.
5

6 Q. HAS CONGRESS PROVIDED ADDITIONAL FUNDING FOR LIHEAP IN THE
7 COVID-19 SUPPLEMENTAL APPROPRIATIONS?

8 A. In the Third Supplemental COVID-19 Appropriations Bill, Congress provided an
9 additional \$900 million for LIHEAP. Ohio received 4.2% of the regular
10 distribution, so it is reasonable to project that the State will receive an additional
11 \$37.8 million in funding. The bill made no changes in eligibility criteria. However,
12 LIHEAP is a block grant and the State of Ohio has considerable latitude in how
13 benefits are structured.
14

15 Work has also begun on a Fourth, and potentially a Fifth Supplemental COVID-
16 19 Appropriations Bill. The National Energy Assistance Directors Association
17 ("NEADA") has called on Congress to provide an additional \$4.304 billion for
18 LIHEAP. According to the NEADA – of which the State of Ohio is a member --
19 \$4.304 billion would provide funding necessary to provide benefits to 5.6 million
20 newly laid-off workers; 2.8 million seniors sheltering in place; and, supplemental
21 benefits to 2.8 million current LIHEAP customers. While there is no guarantee
22 that additional funding will be provided at that level, it is certain that additional

1 funding will be made available, and will add to existing resources currently
2 available to address the fallout from the pandemic.

3
4 Q. ARE OTHER OPTIONS AVAILABLE FOR CUSTOMERS WITH ARREARAGES?

5 A. Yes. Ohio utilities must offer several standard payment plans, and are
6 authorized to create custom plans based on a customer's ability to repay.
7 Greater flexibility in repayment plans can ensure that customers, when once
8 again employed, are able to work themselves out of debt. Those who do not
9 immediately return to employment have access to PIPP Plus, which establishes
10 an affordable rate based on the percentage of income. So long as payments are
11 made on time, arrearages are forgiven, allowing customers to eliminate debts by
12 making timely payments.

13
14 I believe that Ohio already has policies in place that can help customers move
15 beyond this emergency. Many people will continue to pay their bills as they
16 always have. Those who were struggling before the pandemic will continue to
17 struggle, but are familiar with the system and will be served. Most of our clients
18 have someone in the family working. Many low-income individuals work in
19 essential businesses such as grocery stores, carryouts, and gas stations, though
20 they do not earn a living wage. But those who work in restaurants and retail are
21 out of work, as are many others in this economy as demonstrated by recent
22 applications for unemployment benefits. Existing resources are available to
23 serve those customers, and additional resources are anticipated.

1 OPAE member agencies are beginning to receive inquiries from the newly
2 unemployed, and are starting outreach efforts to ensure families that have never
3 asked for assistance can be connected with available resources. The agencies
4 have adapted their business models to allow many to work remotely, taking
5 applications and providing consumer education, while some continue to work out
6 of offices, though in most cases serving clients by phone. One exception is in
7 rural areas where internet and cell phone services are spotty. A few agencies
8 continue to see clients face-to-face, with protections. Agencies are enrolling
9 families in all the available benefits, including the Winter Crisis Program, regular
10 HEAP, and PIPP Plus. Some fuel funds are available for those who have
11 already tapped the one-time benefits.

12
13 Ohio's existing programs can be readily adapted to meet the needs of the various
14 types of clients we are anticipating. Those who have been laid off from a decent
15 job but are able to return to work quickly, having missed only a payment or two
16 should be able to catch up on the bills without much difficulty. An appropriate
17 payment plan should resolve the situation. Families of more modest incomes
18 that are no longer working are feeling the financial pain now. These are the
19 families beginning to contact our member agencies. Given the lack of income
20 during the past month (and that unemployment benefits have been delayed for
21 many), these families will qualify for existing benefits, including PIPP Plus. The
22 PIPP payment amount will be pegged to income.

1 When these customers are re-employed, the household is required to recertify
2 income, which will increase the PIPP payment proportionally. If the customer's
3 household is no longer eligible, the client can enroll in Graduate PIPP Plus,
4 which allows the customer to transition off PIPP with no debt remaining.
5 Because PIPP Plus is an individualized payment plan based on income, it offers
6 the most efficient mechanism for providing customers with needed assistance,
7 and minimizes or negates the need for additional fuel fund resources.

8
9 Q. ANY OTHER OBSERVATIONS ON THE OUTLOOK FOR BILL PAYMENT
10 ASSISTANCE NEEDS?

11 A. We are somewhat fortunate that natural gas prices remain low and that the
12 winter was much warmer than normal. This has kept bills relatively low and
13 reduced the demand for heating assistance. The initial Emergency Order was
14 issued March 9, 2020. The weather has been mild since then, typical of a
15 shoulder season. Much depends on when people can go back to work. If it is
16 sooner, and disconnection is delayed while people catch-up on bills, the need for
17 bill payment assistance will be modest. If it takes longer to return to work, or
18 significant numbers of people remain unemployed because of business failures,
19 there will be more emphasis on assistance, low income assistance programs,
20 and payment plans. It will be necessary to ensure that all customers and classes
21 make an equitable contribution to resolving the impact of the pandemic.

1 Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION?

2 A. I recommend that the Commission reject the OCC's proposal to terminate DSM
3 programs and transfer funds to bill payment assistance. The Columbia DSM
4 Rider adjustment should be approved as filed per the decision in Case No. 16-
5 1309-GA-UNC, including the modest shared savings component.

6

7 Those of us who have devoted our careers to helping customers stay connected
8 to essential utility service are developing the strategies that will allow customers
9 to address whatever debts they have incurred as a result of the COVID-19
10 pandemic. Existing programs and payment plans provide the funding
11 mechanisms necessary to meet customers' needs, obviating the need to
12 repurpose funds away from services that benefit customers. DSM programs
13 remain important to Columbia's customers, and should be continued as already
14 approved by the Commission.

15

16 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

17 A. Yes.

CERTIFICATE OF SERVICE

I hereby certify that the Public Utilities Commission of Ohio's DIS system will electronically serve the Testimony of David C. Rinebolt on Behalf of Ohio Partners for Affordable Energy on all parties of record on the 20th day of April 2020. An electronic courtesy copy was also provided to the following counsel:

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/s/ Robert Dove




OCC Urges PUCO to Divert \$60 Million to Natural Gas Customers Hit Hard by Coronavirus

The Ohio Consumers' Counsel (OCC) is urging the Public Utilities Commission of Ohio (PUCO) to divert nearly \$60 million from energy efficiency (EE) programs covering 75 percent of the state's natural gas grid and earmark the funds for bill-paying assistance for residents and businesses hard hit by the pandemic. PUCO could save Ohioans the same money by instead halting EE charges outright, the agency says.

The consumers' counsel says EE charges previously approved by the commission for Columbia Gas of Ohio in 2020–2022 and Vectren Energy of Ohio in 2021–2023 will have a more immediate, direct impact on energy costs if credited against customers' bills, even in the best of times. That has been OCC's standing position on EE charges for already-cheap natural gas and is doubly urgent for workers idled by the state of emergency, it says, especially the poor.

"At this time of Gov. DeWine's strong leadership rallying Ohioans to fight back against the virus and the PUCO's initiative with declaring an emergency to shield Ohioans from utility disconnections, door-to-door energy sales and more, it is not justifiable to continue taxing Columbia consumers for millions of dollars of unneeded energy efficiency programs," the consumers' counsel says, including savings that pad the utility's bottom line.

"Many can barely afford to pay for everyday necessities -- they should not be paying Columbia Gas 'shared savings' so that Columbia's shareholders can profit from energy efficiency in this time of emergency," OCC adds.

 "Columbia, the PUCO and others should ensure that customer funds are used for the best and best purpose. The goal is to soften the blow that many residential and small business customers are taking as the coronavirus takes its toll on Ohio's economy and society. Columbia's energy efficiency programs ... are not designed to provide the immediate relief that customers need."

Columbia Gas serves 61 counties and Vectren, which partly overlaps its territory, another nine counties. They include Dayton and Montgomery County, where roughly 17 percent of residents are at the poverty level and battle food insecurity.

"As the coronavirus pandemic continues to spread, Ohio businesses and families are facing financial burdens that were unforeseeable just a few weeks and months ago. Many customers who felt financially secure no longer feel that way. Many customers who have consistently paid their utility bills may find themselves choosing between paying those bills and affording other essentials," the consumers' counsel states, noting the working poor in Miami Valley who fall within 175–200 percent of the federal poverty guidelines do not qualify for the Home Energy Assistance Program (HEAP), a program of the U.S. Department of Health and Human Services (HHS) administered by the Ohio Development Services Agency (DSA).

"No one knows how long the financial impacts of the coronavirus will last. It is possible that customers will still be feeling the financial pain of the virus years from now. It does not make sense to approve [Vectren] energy efficiency programs for 2022 and 2023 right now. It makes more sense to defer that decision until a later date -- sometime in 2021 -- when we have more information about the state of affairs, including the economy and the true financial impact that the coronavirus has on utility customers," OCC says.

Story corrected 4/7/20.

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