

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint and)	
Investigation of Staff of the Public)	
Utilities Commission of Ohio,)	
)	Case No. 19-1582-TP-COC
Complainant,)	
)	
v.)	
)	
Frontier North Inc,)	
)	
Respondent.)	

SUPPLEMENTAL TESTIMONY

OF

ROBERT STEWART

ON BEHALF OF

FRONTIER NORTH INC.

IN SUPPORT OF THE STIPULATION AND RECOMMENDATION

Direct Testimony of
Robert Stewart
in Support of the Stipulation and Recommendation

1 I, Robert Stewart, supplement my testimony as follows:

2
3 **Q14. What facts support that the Stipulation benefits customers and is in the public**
4 **interest?**

5 A. The Stipulation benefits Frontier's customers and the public interest by
6 resolving all the issues raised within the Complaint, without engaging in litigation to
7 delay the timely implementation of the benefits to customers. The Stipulation provides a
8 guaranteed minimum capital expenditure for 2021-2023 along with 5 years of service
9 quality metrics, reporting and penalties for failing to meet metrics to ensure that
10 Frontier's telephone customers receive quality service. My prior testimony included a
11 typographical error in the last sentence.

12
13 **Q17. Could you describe the circumstances in the Stipulation where Frontier**
14 **would be required to identify and commit an additional \$150,000 for missing**
15 **a metric?**

16
17 Pursuant to the Stipulation at Section IV.5.c, if Frontier has not met certain
18 metrics for two consecutive quarters, Frontier shall commit an additional \$150,000
19 in capital investment or operating expense for every year remaining in the term.
20 The metrics that subject Frontier to the additional capital investment or operating
21 expenses are identified in Sections 5.a.i, 5.a.ii, and 5.a.iii.
22

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Revised Testimony of Robert Stewart in Support of the Stipulation has been served upon the below-named counsel via electronic mail, this 20th day of July 2020.

/s/ Michele L Noble

Michele L Noble

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/20/2020 9:21:54 AM

in

Case No(s). 19-1582-TP-COC

Summary: Testimony Supplemental of Robert Stewart electronically filed by Michele L Noble on behalf of Frontier North Inc.