

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

FRANCES M. STEVENSON,  
Complainant,

V.

VECTREN ENERGY DELIVERY OF  
OHIO, INC. D/B/A CENTERPOINT  
ENERGY OHIO,

Respondent.

Case No. 20-0590-GA-CSS

**DIRECT TESTIMONY OF MICHELLE D. QUINN  
ON BEHALF OF VECTREN ENERGY DELIVERY OF OHIO, INC.  
D/B/A CENTERPOINT ENERGY OHIO**

**Direct Testimony of  
Michelle D. Quinn**

**I. INTRODUCTION**

**Q1. Please state your name and business address.**

A. My name is Michelle D. Quinn and my business address is 101 W. Ohio Street, Indianapolis, IN 46204.

**Q2. On whose behalf are you submitting this testimony?**

A. I am submitting testimony on behalf of Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio (“CEOH”, or the “Company”), which is an indirect subsidiary of CenterPoint Energy, Inc.

**Q3. What is your role with respect to CEOH?**

A. I am Manager, Regulatory Relations for CEOH. I hold the same role with two other utility subsidiaries of CenterPoint, Energy, Inc. – Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South (“CEI South”) and Indiana Gas Company, Inc. d/b/a CenterPoint Energy Indiana North (“CEI North”).

**Q4. Please describe your educational background.**

A. I graduated from DePauw University in Greencastle, Indiana with a bachelor of science degree in English. In addition, I earned a juris doctorate degree from Indiana University’s Robert H. McKinney School of Law in Indianapolis, Indiana.

**Q5. Please describe your professional experience.**

A. In 2009, I began working as Corporate Counsel for CenterPoint Energy, Inc., through its wholly-owned subsidiary Vectren Corporation. I served in that role for more than 8 years and in 2018, I became Manager, MISO Affairs. I held that position for approximately two years prior to becoming Manager, Regulatory Relations in early 2020.

1 **Q6. What are your present duties and responsibilities as Manager, Regulatory**  
2 **Relations?**

3 A. In my current role, I am responsible for working with internal stakeholders to manage the  
4 development and implementation of regulatory strategy in CenterPoint Energy, Inc.'s  
5 Indiana and Ohio ("IN/OH") region. In addition, I act as the primary liaison with  
6 regulatory bodies and their staffs, other industry stakeholders and peers within  
7 CenterPoint Energy, Inc.'s IN/OH region.

8 **Q7. Have you previously testified before any state regulatory commission?**

9 A. No. I have not previously testified before either the Public Utilities Commission of Ohio  
10 ("PUCO" or "Commission") or any other state regulatory commission.

11 **Q8. What is the purpose of your testimony?**

12 A. My testimony explains Ms. Frances Stevenson's account history for natural gas service at  
13 5085 Northcutt Place, Dayton, Ohio 45414 (the "Premises"). My testimony concludes  
14 that CEOH complied with the Ohio Revised Code Title 49; the applicable rules,  
15 regulations, and orders of the Public Utilities Commission of Ohio; and the Company's  
16 tariffs; and did not identify any error in the rates or the quantities billed.

17 **Q9. What Exhibits are you sponsoring in this proceeding?**

18 A. The following exhibit is attached to my testimony:

- 19 • Exhibit No. MDQ-1 – Incentive Credit Summary - Annotated

20 **Q10. What information have you reviewed to prepare your testimony?**

21 A. I have reviewed the Complaint, Ms. Stevenson's account history as documented in  
22 CEOH's customer information system, and Ms. Stevenson's billing statements.

**Q11. What is your understanding of the dispute giving rise to the Complaint?**

A. Ms. Stevenson alleges her utility account refund in the amount of \$296.14 was incorrect, and claims CEOH was negligent in calculating total accumulated utility allowance, noted from April 2015 to May 2019.

**II. CNP ACCOUNT AND RECORDS**

**Q12. Do you have knowledge of the history of Ms. Stevenson's account with CEOH?**

A. Yes. I am familiar with Ms. Stevenson's account and records pertaining to the service account referenced in Ms. Stevenson's complaint. All such information is recorded at, or near, the time; by a person with knowledge, or from information transmitted by a person with knowledge; and all such information is recorded and maintained in the course of CEOH's regularly conducted business activity.

**III. ACCOUNT HISTORY**

**Q13. When was Ms. Stevenson's service activated with CEOH?**

A. Ms. Stevenson applied for residential gas service at the Premises on June 19, 2014, and received natural gas services from June 20, 2014 to May 28, 2019.

**Q14. During what period of time was Ms. Stevenson receiving service under the Percentage of Income Payment Program (PIPP)?**

A. Ms. Stevenson formerly received service under the Percentage of Income Payment Program ("PIPP") from July 23, 2014 to November 7, 2018. Ms. Stevenson was removed from PIPP in November 2018 as a result of her failure to reverify eligibility pursuant to Ohio Administrative Code ("OAC") 4901:1-18-12(D)(1). Ms. Stevenson was re-enrolled in PIPP on April 25, 2019 and remained in the program until she received the final bill dated May 29, 2019.

1 **Q15. Did Ms. Stevenson receive a PIPP incentive for every on-time and in-full payment**  
2 **received by the Company for each month that she was eligible?**

3 A. Yes, Ms. Stevenson received a PIPP program incentive for every on-time and in-full  
4 payment received by the Company for each month she was eligible. On April 15, 2015,  
5 O.A.C. 4901:1-18-14(B) was amended to require that “[i]f a PIPP plus or graduate PIPP  
6 plus customer’s account balance becomes a credit balance, the customer will no longer be  
7 eligible for incentive credits until such time that the account balance is no longer a  
8 credit.” Ms. Stevenson maintained a credit balance on her account from July 23, 2014  
9 through May 28, 2019 when Ms. Stevenson’s service ended. Therefore from May 2015  
10 through May 2019, CEOH did not apply incentive credits to Ms. Stevenson’s account  
11 because the account had a credit balance.

12 **Q16. Does CEOH process Home Energy Assistance Program (“HEAP”) applications or**  
13 **determine HEAP payments?**

14 A. No, CEOH does not process HEAP applications nor determine eligibility for HEAP  
15 credits.

16 **Q17. If Ms. Stevenson was eligible for additional HEAP credits, would CEOH be**  
17 **responsible for correcting the amount of HEAP credits applied to Ms. Stevenson’s**  
18 **account?**

19 A. No. CEOH applies credits as submitted by the Energy Assistance Provider in the HEAP  
20 file transmitted to CEOH. Any questions or concerns about the determination of HEAP  
21 benefits should be directed to the Energy Assistance Provider.

22 **Q18. Why was Ms. Stevenson’s service shut off?**

23 A. Ms. Stevenson called to shut off her service on May 20, 2019 at which time she stated  
24 she thought that her credit balance should be over \$1400.00. A customer service  
25 associate for CEOH explained the credit that she would receive and that all credits due to  
26 Ms. Stevenson were already a part of her final account balance.

1 **Q19. Did Ms. Stevenson's final bill reflect a credit balance?**

2 A. Yes. Ms. Stevenson's final bill reflected an "Actual Account Balance" as a credit balance  
3 of \$296.14.

4 **Q20. What is the credit balance on Ms. Stevenson's account the result of?**

5 A. Please see Exhibit No. MDQ-1 (Incentive Credit Summary - Annotated). The credit  
6 balance at the time Ms. Stevenson's account was final is a net result of account activity  
7 including utility charges, customer/landlord payments, HEAP payments, incentive  
8 credits, and adjustments that resulted from application of the deposit and a cancel/rebill.

9 **Q21. Was a credit refund sent to Ms. Stevenson?**

10 A. Yes. A credit refund check was mailed on August 26, 2019 to the Premises in the amount  
11 of \$296.14, which was returned as undeliverable. CEOH resent the credit refund check in  
12 the amount of \$296.14 on November 6, 2019 and then again on December 31, 2019, to  
13 Ms. Stevenson at 535 E Yanonali Street, Santa Barbara, CA 93103 – the billing address  
14 on file. Credit refund check number 310041925 dated December 31, 2019 in the amount  
15 of \$296.14 was endorsed and cleared the Company's bank account on January 21, 2020.

16 **Q22. Has any error in either rates or the quantities billed been identified?**

17 A. No, however a cancel and rebill took place, reflected on the May 2017 billing statement  
18 due to the meter reader misreading of the meter. On March 21, 2017, the meter reader  
19 reported a read of 3,384. On April 21, 2017 the meter reader reported a read of 3,496.  
20 On May 17, 2017 the meter read came in at 3,404. Because the May reading of 3,404  
21 was lower than the read reported in April 2017, the April 2017 bill was cancelled. The  
22 May bill was then rebilled from March 21, 2017 through the May 17, 2017 reading (57  
23 days of service). The May 2017 billing statement reflected the correction for \$80.08  
24 which was the exact amount billed on the April statement.

1        **IV. CONCLUSION**

2        **Q23. Does that conclude your prepared direct testimony?**

3        A.        Yes, it does.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Direct Testimony of Michelle D. Quinn on behalf of Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio was served by regular U.S. mail this 27th day of July, 2021, to the following:

Frances M. Stevenson  
General Delivery  
Orlando, FL 32802

Attorney Examiner:  
daniel.fullen@puco.ohio.gov

/s/ Lucas A. Fykes  
One of the Attorneys for Vectren Energy  
Delivery of Ohio, Inc. d/b/a CenterPoint  
Energy Ohio



Frances Stevenson								
5085 Northcutt Pl								
Dayton, OH 45414								
03 401905482 2106826								
Date	Utility Charges	Customer Payments	HEAP Payment	Incentive Credits	Current PIPP Installment	Adjustments	Actual Account Balance	Comments
7/1/14	\$74.00							Deposit Charge
7/1/14		(\$74.33)					(\$0.33)	
7/23/14	\$22.18				\$10.00		\$21.85	
7/23/14						(\$74.00)	(\$52.15)	Deposit Applied
8/19/14			(\$144.00)					
8/25/14	\$22.18						(\$173.97)	
9/4/14		(\$10.00)					(\$183.97)	
9/9/14				(\$12.18)			(\$196.15)	
9/18/14		(\$10.00)						
9/23/14	\$23.36				\$10.00		(\$182.79)	
10/1/14		(\$10.00)						
10/8/14				(\$13.36)			(\$206.15)	
10/23/14	\$38.33				\$10.00		(\$167.82)	
10/30/14		(\$10.00)						
11/7/14				(\$28.33)				
11/20/14	\$50.22				\$10.00		(\$155.93)	
12/1/14		(\$10.00)						
12/5/14				(\$40.22)				
12/22/14	\$65.32				\$10.00		(\$140.83)	
12/31/14		(\$10.00)						
1/6/15				(\$55.32)				
1/23/15	\$71.54				\$10.00		(\$134.61)	
2/2/15		(\$10.00)						
2/9/15				(\$61.54)				
2/23/15	\$73.94				\$10.00		(\$132.21)	
3/2/15		(\$10.00)						
3/10/15				(\$63.94)				
3/23/15	\$55.69				\$10.00		(\$150.46)	
4/1/15		(\$10.00)						
4/7/15								
4/23/15	\$34.37			(\$45.69)	\$10.00		(\$171.78)	
5/4/15		(\$10.00)						
5/21/15	\$29.33				\$10.00		(\$152.45)	
5/21/15		(\$35.20)						
6/23/15	\$28.40				\$10.00		(\$159.25)	
7/10/15		(\$35.20)						
7/10/15		(\$45.20)						
7/23/15	\$26.57				\$10.00		(\$213.08)	
8/6/15		(\$34.80)						
8/24/15	\$24.55				\$10.00		(\$223.33)	
9/8/15		(\$45.20)						
9/23/15	\$26.77				\$10.00		(\$241.76)	
10/8/15								
10/8/15		(\$45.20)						
10/23/15	\$27.47				\$10.00		(\$259.49)	
11/10/15		(\$45.20)						
11/19/15	\$29.29				\$10.00		(\$275.40)	
12/15/15		(\$45.20)						
12/22/15	\$42.67				\$10.00		(\$277.93)	
1/5/16			(\$115.00)					
1/12/16		(\$45.20)						
1/25/16	\$49.27				\$10.00		(\$388.86)	
2/12/16		(\$45.20)						
2/22/16	\$50.00				\$10.00		(\$384.06)	
3/22/16	\$39.35							
3/22/16		(\$45.20)			\$10.00			
4/15/16		(\$45.20)					(\$435.11)	
4/22/16	\$37.52				\$10.00		(\$397.59)	
5/10/16		(\$45.20)						
5/23/16	\$28.27				\$10.00		(\$414.52)	

→ Balance at completion of Incentive Credit

Total Charges	\$531.13	
Adjustments	(\$74.00)	
Net Charges	\$457.13	
Less: Unpaid Charges		
7/23/14	\$22.18	D
4/23/15	\$34.37	D
Total Charges	\$400.58	A
Customer Payments	(\$164.33)	
Less: Unbilled Payments		
7/1/14	(\$74.33)	E
9/18/14	(\$10.00)	E
Total Payments	(\$80.00)	B
Incentive Credits	(\$320.58)	C
Net Balance	\$0.00	A+B+C
HEAP Funding	(\$144.00)	
Unpaid Charges	\$56.55	Sum of D
Unbilled Payments	(\$84.33)	Sum of E
Credit Balance	(\$171.78)	[1]
HEAP Funding		
1/5/16	(\$115.00)	
1/17/17	(\$97.00)	
1/9/18	(\$31.00)	
5/14/19	(\$31.00)	
Total Addtl HEAP Funding	(\$274.00)	F

Frances Stevenson								
5085 Northcutt Pl								
Dayton, OH 45414								
03 401905482 2106826								
Date	Utility Charges	Customer Payments	HEAP Payment	Incentive Credits	Current PIPP Installment	Adjustments	Actual Account Balance	Comments
6/22/16		(\$45.20)						
6/24/16	\$24.29				\$10.00		(\$435.43)	
7/25/16	\$24.29						(\$411.14)	
7/25/16		(\$38.80)			\$10.00			
8/19/16		(\$38.80)						
8/24/16	\$24.29				\$10.00		(\$464.45)	
9/20/16		(\$38.80)						
9/23/16	\$26.04				\$10.00		(\$477.21)	
10/21/16		(\$38.80)						
10/25/16	\$26.19				\$10.00		(\$489.82)	
11/18/16	\$34.35				\$10.00		(\$455.47)	
11/21/16		(\$38.80)						
12/21/16	\$39.91				\$10.00		(\$454.36)	
12/22/16		(\$38.80)						
1/17/17			(\$97.00)					
1/24/17	\$57.10				\$10.00		(\$533.06)	
1/24/17		(\$38.80)						
2/21/17	\$45.98				\$10.00		(\$525.88)	
2/23/17		(\$38.80)						
3/23/17	\$41.39				\$10.00		(\$523.29)	
3/23/17		(\$38.80)						
4/21/17		(\$38.80)						
4/25/17	\$80.08				\$10.00		(\$520.81)	
5/22/17		(\$38.80)						
5/23/17						(\$80.08)		Cancel/Rebill
5/24/17	\$59.49				\$10.00		(\$580.20)	
6/23/17	\$26.69				\$10.00		(\$553.51)	
7/25/17	\$26.19				\$10.00		(\$527.32)	
8/23/17	\$26.19				\$10.00		(\$501.13)	
9/22/17	\$27.12				\$10.00		(\$474.01)	
10/23/17	\$31.34				\$10.00		(\$442.67)	
11/20/17	\$36.78				\$10.00		(\$405.89)	
11/20/17		(\$31.60)						
12/20/17		(\$31.60)						
12/28/17	\$62.34				\$10.00		(\$406.75)	
1/9/18			(\$31.00)					
1/12/18		(\$31.60)						
1/30/18	\$28.49				\$10.00		(\$440.86)	
2/26/18		(\$31.60)						
3/5/18	\$50.85				\$10.00		(\$421.61)	
3/15/18		(\$31.60)						
4/4/18	\$42.40				\$10.00		(\$410.81)	
4/18/18		(\$31.60)						
5/3/18	\$38.30				\$10.00		(\$404.11)	
5/10/18		(\$31.60)						
6/11/18	\$33.07				\$10.00		(\$402.64)	
6/13/18		(\$31.60)						
7/11/18	\$27.58				\$10.00		(\$406.66)	
7/13/18		(\$31.60)						
8/10/18	\$27.58				\$10.00		(\$410.68)	
8/10/18		(\$25.20)						
9/12/18	\$27.88				\$10.00		(\$408.00)	
9/13/18		(\$25.20)						
10/10/18	\$28.97				\$10.00		(\$404.23)	
10/26/18		(\$25.20)						
11/7/18	\$30.35				\$10.00		(\$399.08)	
12/3/18		(\$25.20)						
12/10/18	\$46.42						(\$377.86)	
12/21/18		(\$25.20)						
1/9/19	\$51.71						(\$351.35)	
2/6/19		(\$25.20)						

Total Charges after April 2015	\$1,780.12	
Adjustments	(\$80.08)	Cancel/Rebill G
Net Charges after April 2015	\$1,700.04	
Total Payments after April 2015	(\$1,550.40)	H
Total Net Activity After April 2015	(\$124.36)	[2]=F+G+H
Ending Credit Balance	(\$296.14)	[1]+[2]

Frances Stevenson								
5085 Northcutt Pl								
Dayton, OH 45414								
03 401905482 2106826								
<u>Date</u>	<u>Utility Charges</u>	<u>Customer Payments</u>	<u>HEAP Payment</u>	<u>Incentive Credits</u>	<u>Current PIPP Installment</u>	<u>Adjustments</u>	<u>Actual Account Balance</u>	<u>Comments</u>
2/8/19	\$53.79						(\$322.76)	
2/27/19		(\$25.20)						
3/8/19	\$44.13						(\$303.83)	
3/15/19		(\$25.20)						
4/8/19	\$31.15				\$10.00		(\$297.88)	
4/30/19		(\$25.20)						
5/9/19	\$28.97				\$10.00		(\$294.11)	
5/14/19			(\$31.00)					
5/29/19	\$28.97						(\$296.14)	
<b>Totals</b>	<b>\$2,311.25</b>	<b>(\$1,714.73)</b>	<b>(\$418.00)</b>	<b>(\$320.58)</b>	.	<b>(\$154.08)</b>		

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**Case No(s). 20-0590-GA-CSS**

Summary: Testimony Direct Testimony of Michelle D. Quinn electronically filed by Mr. Lucas A  
Fykes on behalf of Vectren Energy Delivery of Ohio, Inc. d/b/a CenterPoint Energy Ohio