***OCC EXHIBIT\_\_\_\_\_\_\_***

**BEFORE**

**PUBLIC UTILITIES COMMISSION OF OHIO**

|  |  |  |
| --- | --- | --- |
| In the Matter of The Application of  Ohio Power Company for Authority to Abandon Electric Service Lines,  Pursuant To Ohio Revised Code Sections 4905.20 And 4905.21. | )  )  )  )  ) | Case No. 22-693-EL-ABN |

**DIRECT TESTIMONY**

**OF**

**JOSEPH P. BUCKLEY**

**On Behalf of**

**Office of the Ohio Consumers’ Counsel**

*65 East State Street, Suite 700*

*Columbus, Ohio 43215-4213*

**June 10, 2024**

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# **INTRODUCTION**

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

***A1*.** My name is Joseph P. Buckley. My business address is 65 East State Street, Suite 700, Columbus, Ohio 43215. I am a Senior Regulatory Analyst in the Analytical Services Department with the Office of the Ohio Consumers’ Counsel (“OCC”).

***Q2. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND.***

***A2*.** I earned a Bachelor of Science degree in Business Administration from The Ohio State University and a Master of Business Administration degree from the University of Dayton.

***Q3. PLEASE BRIEFLY SUMMARIZE YOUR PROFESSIONAL*** ***EXPERIENCE AS IT RELATES TO UTILITY REGULATION.***

***A3.*** From July 1987 to July 2022, I was employed by the PUCO. During that time, I held several positions (e.g., Rate Analyst, Utility Specialist I, and Utility Specialist 3) in various divisions and departments that focused on utility-related financial and accounting issues, including rates of return. In addition, I served on multiple federal-state joint audits and was Chairman and Vice Chairman of the finance committee for Mid-Continent Independent System Operator (MISO).

In 2000, I earned the designation of Certified in Financial Management (CFM), awarded by the Institute of Management Accountants. In 2011, I was awarded the professional designation of Certified Rate of Return Analyst (CRRA) by the Society of Utility and Regulatory Financial Analysts, which is granted based on experience and the successful completion of a written examination.

***Q4*. *WHAT ARE YOUR RESPONSIBILITIES AS A SENIOR REGULATORY ANALYST?***

***A4.*** As a Senior Regulatory Analyst in the Analytical Department my duties include performing analysis of and providing policy recommendations regarding the impact on residential utility consumers of filings before the Public Utilities Commission of Ohio (“PUCO”) and PUCO-initiated investigations. This includes examining utility-related financial and accounting records and policies and policy recommendations regarding needed consumer protections.

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

***A5.*** Yes. When I worked at the PUCO, I testified on numerous occasions to advocate the positions of the PUCO Staff to the PUCO.

# II. PURPOSE OF TESTIMONY

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

***A6.*** The purpose of my testimony is to explain and support OCC’s position and recommendations protecting residential consumers as it relates to AEP Ohio’s application to abandon distribution infrastructure serving its consumers at the Northtowne Apartments (“Northtowne”). This includes a discussion of the harm to existing AEP Ohio residential consumers that reside at Northtowne, as well as the impact on other consumers of AEP Ohio. I then conclude by explaining how AEP Ohio’s abandonment of its distribution infrastructure is not reasonable, having due regard for the welfare of the public and the cost of operating the service or facility.

***Q7. PLEASE DESCRIBE YOUR UNDERSTANDING OF THE NORTHTOWNE APARTMENT COMPLEX.***

***A7.*** Northtowne is an approximately 50-year-old apartment complex consisting of numerous buildings with 59 separate points of service located at 4621 Northtowne Boulevard, Columbus, Ohio 43229.[[1]](#footnote-1)AEP Ohio has been the exclusive provider of electric distribution services to Northtowne and has made significant investments in distribution facilities at Northtowne including distribution lines, conduit, meters, risers, and transformers.[[2]](#footnote-2) At the time that AEP Ohio filed its Application to Abandon AEP Ohio reported 293 AEP Ohio Accounts including 286 residential accounts at Northtowne that were being served by its distribution facilities. There were 160 consumers who received generation services through marketers with the electricity delivered through AEP Ohio’s facilities at Northtowne. Seventy-four Northtowne residents were participating in the Percentage of Income Payment Plan (“PIPP”) administered by the Ohio Department of Development. And fourteen consumers participated in AEP Ohio’s average monthly payment plan.[[3]](#footnote-3)

***Q8.*** ***WHY IS AEP OHIO REQUESTING AUTHORITY TO ABANDON ITS DISTRIBUTION LINES TO NORTHTOWNE RESIDENTS?***

***A8.*** On May 29, 2022, AEP Ohio received 59 new service requests (one for each of the 59 service points) from Nationwide Energy Partners (“NEP”) demanding that AEP Ohio abandon its service to its current Northtowne customers.[[4]](#footnote-4) NEP had contracted with the owners of the Northtowne apartment complex Preserve Partners, LLC (“Preserve”) to perform services related to the master-metering of Northtowne.[[5]](#footnote-5) Under master-metering electric utility service would be billed to the owner of Northtowne who would then charge the individual residents in a manner determined by the owner. Northtowne residents would no longer have individual utility accounts with AEP Ohio.

AEP Ohio does not want to abandon its infrastructure and customers at the Northtowne apartment complex. It filed this action seeking to have the PUCO reject the abandonment of the Northtowne residents under R.C. 4905.20 and 4905.21 (the “Miller Act”). The Miller Act requires that the PUCO determine whether an abandonment such as that deemed by NEP “is reasonable, having due regard for the welfare of the public and the cost of operating the service or facility….”[[6]](#footnote-6) Both OCC and AEP Ohio believe the PUCO should pursuant to the Miller Act reject NEP’s attempt to force AEP Ohio to abandon its customers and distribution infrastructure at Northtowne.

# III. AEP OHIO’S DUTY TO PROVIDE SAFE, ADEQUATE AND RELIABLE ELECTRIC SERVICE AT A REASONABLE COST AND THE PUCO’S MISSION

***Q9. DOES AEP OHIO HAVE A DUTY TO PROVIDE RELIABLE ELECTRIC SERVICE?***

***A9.*** Yes. Under R.C. 4905.22 and R.C. 4928.02(A), AEP Ohio has a duty to provide safe, adequate and reliable electric service at a reasonable cost.

***Q10. DOES OHIO HAVE ANY STATE POLICIES CONCERNING THE PROVISION OF ELECTRIC SERVICE?***

***A10.*** Yes. R.C. 4928.02 states “It is the *policy of this state* to do the following throughout this state: (A) Ensure the availability to consumers of adequate, reliable, safe, efficient, nondiscriminatory, and reasonably priced retail electric service.”[[7]](#footnote-7)

***Q11. DOES OHIO HAVE ANY STATE POLICIES CONCERNING PROVIDING CONSUMERS WITH CHOICES FOR THE PROVISION OF COMPETITIVE RETAIL ELECTRIC SERVICES?***

***A11.*** Yes. R.C. 4928.02 states “It is the *policy of this state* to do the following throughout this state…(B) Ensure the availability of unbundled and comparable retail electric service that provides consumers with the supplier, price, terms, conditions, and quality options they elect to meet their respective needs….”[[8]](#footnote-8)

***Q12. DOES OHIO HAVE ANY STATE POLICY REGARDING ELECTRIC SERVICE WITH RESPECT TO PROTECTING AT-RISK POPULATIONS?***

***A12.*** Yes. R.C. 4928.02 states “It is the *policy of this state* to do the following throughout this state…(L) **Protect at-risk populations**, including, but not limited to, when considering the implementation of any new advanced energy or renewable energy resource….”[[9]](#footnote-9)

***Q13. DOES THE PUCO PLAY ANY ROLE IN PROTECTING OHIO CONSUMERS’ RIGHT TO RECEIVE SAFE, ADEQUATE AND RELIABLE ELECTRIC SERVICE?***

***A13.*** Yes. The PUCO is responsible and obligated under R.C. 4928.11(A) to protect Ohioans by adopting rules that specify the minimum service quality, safety, and reliability requirements for electric services supplied by the Ohio electric distribution utilities (“EDUs”). And R.C. 4928.11(B) grants the PUCO authority to enforce compliance with its minimum service quality, safety, and reliability requirements for electric service provided to Ohioans.

The PUCO communicates its obligation to the public for protecting consumers on its web page describing its mission as follows:

Our mission is to assure all residential and business consumers access to adequate, safe and reliable utility services at fair prices, while facilitating an environment that provides competitive choices.

The mission is accomplished by:

Mandating the availability of adequate, safe and reliable utility service to all business, industrial and residential consumers.

Ensuring financial integrity and service reliability in the Ohio utility industry.[[10]](#footnote-10)

# IV. ABANDONMENT OF THE NORTHTOWNE PROPERTY WILL CAUSE HARM TO RESIDENTIAL CONSUMERS

***Q14. IN GENERAL, CAN YOU STATE WHY THE ABANDONMENT OF SERVICE BY AEP OHIO WOULD NOT BE BENEFICIAL TO RESIDENTIAL CONSUMERS?***

***A14*.** Yes:

* Residents would lose the right to PUCO-regulated rates and services;
* Residents would lose plans offered by AEP Ohio like its budget billing plan;
* Residents would lose the right to many public assistance programs for helping with utility bill payments including the Percentage of Income Payment Plan (“PIPP”);
* Residents would lose protections related to disconnection and reconnection of service.
* Residents would lose access to the years of experience that AEP Ohio has in running the electric distribution network within the Northtowne complex; and
* Residents would lose the ability to choose their electricity provider through the energy marketplace.

***Q15.*** ***AT THE TIME OF THE APPLICATION FOR ABANDONMENT IN THIS MATTER HOW MANY NORTHTOWNE RESIDENTS WERE RECEIVING ASSISTANCE WITH THE ELECTRIC BILL PAYMENTS THROUGH THE PIPP PLAN?***

***A15.*** More than 25% of the residents at Northtowne receive assistance with their electric utility bill payments through the PIPP program. This is 74 out of 286 residential Northtowne consumer families.

***Q16. HOW WILL AEP-OHIO HANDLE THE FINAL BILLS FOR CUSTOMERS TRANSFERRING SERVICE, REGARDLESS OF THEIR CURRENT PLAN (PIPP, BUDGET BILLING AEP-OHIO PAYMENT PLAN, SUPPLIER ENROLLMENT, OR DISCONNECT STATUS)?***

***A16.*** AEP Ohio has explained its procedure for handling the final customer bill if service is abandoned and customers transferred as follows:[[11]](#footnote-11)

Final Billing of Transferred Customers:

* Final Bill is presented and mailed to the mailing address on file.
* The final bill before the current balance due for the billing period along with any past due balances.

Customers on PIPP:

* Upon completion of customer transfers to the landlord or submetering company, PIPP customers will not be allowed to remain in the PIPP program. Customers will be billed a final bill and sent a letter. The final bill will reflect each customer’s total unpaid account balance due (not the reduced PIPP due amount). This will negatively impact these low-income customers as they will no longer be billed at a percentage of income or have other consumer protections allotted under the PIPP program.
* After the account closes, some customers will be offered Post PIPP, based on eligibility. Post PIPP assists customers with paying off final account balance due for up to 12 months by making reduced monthly payments. If payments are made in full and on time, the customer receives a credit towards his or her account balance.

Customers on Budget Billing:

* Budget cancels and total account balance becomes due.

Customers on AEP offered Payment Plan:

* Payment Agreement cancels, and total account balance become due.

Customers who chose a different supplier to generate their electricity:

* Marketer supplier accounts will close. Unpaid charges are sent back to the marketer after 30 days. The customer no longer has the freedom to choose his or her electricity generation supplier and is fully at the mercy of the new landlord/submetering company regarding rates. [[12]](#footnote-12)

***Q17. IN YOUR OPINION HOW DO YOU BELIEVE CONSUMERS WILL BE IMPACTED BY THIS TRANSFER?***

***A17.* The proposed changes have the potential to negatively impact AEP-Ohio’s Northtowne consumers. PIPP consumers may struggle to afford their bills, and budget billing participants could face unexpected high costs. Additionally, these changes will remove the right of Northtowne consumers to choose who generates their electricity.**

**This scenario could lead to an increase in uncollected bills, ultimately raising costs for all remaining AEP-Ohio customers.**

***Q18***. ***CAN YOU ELABORATE ON THE SPECIFIC SERVICES THAT MIGHT BE AFFECTED IF AEP OHIO ABANDONS ITS SERVICE LINES?***

***A18***. Yes. AEP Ohio’s Northtowne consumers take advantage of many of the programs available only to consumers serviced by Ohio’s regulated electric distribution utilities (“EDU’s”). Currently, according to AEP Ohio’s records, there are 293 AEP Ohio accounts (including 286 residential accounts) at the Northtowne apartment complex. Of those accounts, 160 of those customers are shopping for competitive generation services through the energy marketplace. In addition, 74 of the Northtowne customers are availing themselves of the PIPP Plan administered by the Ohio Department of Development. And 14 customers are availing themselves of AEP Ohio’s average monthly payment plan.[[13]](#footnote-13)

In addition, AEP Ohio provides the following:

**Essential Delivery Services:**

**Distribution Network Maintenance:** EDUs maintain the infrastructure that gets electricity to the doorstep, including power lines, transformers, and substations. This ensures safe and reliable power delivery.

**Metering and Billing:** EDUs install, maintain, and read meters to track electricity usage, and then send bills reflecting that usage.

**Customer Services:**

**Outage Response:** In case of power outages, EDUs work to restore electricity as quickly and safely as possible.

**Customer Support:** EDUs provide customer service representatives to answer questions about billing, outages, and other electricity-related issues.

**Bill Payment assistance:** Programs such as the PIPP.

**Electric Choice:**

**Shopping for alternative commodity suppliers**: In Ohio, EDUs offer the opportunity for customers to shop for different pricing options for the commodity portion of their bill.

Replacing AEP Ohio with an unregulated submetering company like NEP raises significant concerns about the quality and cost of electric service to the Northtowne residents beyond the loss of benefits and protections only available to consumers of utilities regulated by the PUCO. This would include issues regarding maintenance of the distribution system within the complex as well as interactions between management and consumers regarding electric services and bills.

***Q19. HAS NEP PROVIDED INFORMATION ADDRESSING THE MANY CONSUMERS PROTECTIN CONCERNS REGARDING THE POSSIBLE FORCED ABANDONMENT BY AEP OHIO OF THE NORTHTOWNE RESIDENTS?***

***A19.*** In response to discovery NEP objected to providing information on many consumer protection issues, some of which were:

* Information regarding occupant/tenant deposits for electric service for buildings at which NEP operates;[[14]](#footnote-14)
* Describing budget plans, average monthly payment plans, or similar programs (if any) related to electric service charges available to occupants/tenants of buildings at which NEP operates;[[15]](#footnote-15)
* Whether NEP and/or the Northtowne Owner will offer Northtowne residents access to budget plans, average monthly payment plans, or similar programs (if any) related to electric service charges;[[16]](#footnote-16)
* Low-income assistance or similar programs (if any) related to electric service charges that are available to occupants/tenants of building at which NEP operates;[[17]](#footnote-17)
* Whether NEP and/or the Northtowne Owner will offer Northtowne residents low-income assistance or similar programs (if any) related to electric service charges;[[18]](#footnote-18)
* Disconnection procedures followed in communities where NEP has a contract for services;[[19]](#footnote-19)
* Disconnection procedures that NEP will follow for the Northtowne Property;[[20]](#footnote-20)
* Whether NEP provides notice prior to disconnecting services for non-payment;[[21]](#footnote-21)
* How NEP determines the due date of a bill for electric service; and[[22]](#footnote-22)
* Whether NEP has a payment plan policy to address a lessee whose account is delinquent or who desires to avoid a delinquency.[[23]](#footnote-23)

Although NEP was clearly aware of the many consumer protection concerns that OCC and AEP Ohio had regarding its demand for master-metering it chose to refuse to provide any answers regarding those concerns as set forth above.

**Q20. HOW ARE OHIO’S POLICIES FOR ELECTRIC UTILITY SERVICE VIOLATED BY NEP’S MASTER-METERING DEMAND?**

**A20.** Master-metering the residents of Northtowne creates the following violations of state policy:

**Consumer Protections Will Likely Be Lost:** The PUCO which has enacted numerous consumer protection measures regarding, among other items, information that must be provided on consumer bills, procedures that utilities must follow before disconnecting consumers, availability of consumer call centers to resolve disputes, account billing practices and payment plans, will no longer have regulatory authority to protect the Northtowne residents against the actions of NEP acting on behalf of the owner.

**Fairness and Access:** The PUCO will no longer have authority to regulate the reasonableness of the cost of electricity and its availability to the Northtowne residents. It loses its ability to protect at-risk populations and prevent price gouging.

**Competitive Marketers:** At the time of AEP Ohio’s application 160 of the Northtowne accounts received electricity that was generated by a separate marketer. Those 160 resident accounts will be terminated along with the ability to select the supplier of their electricity.

***Q21. HOW ARE RESIDENTIAL CONSUMERS DISADVANTAGED WITH RESPECT TO THE PRICE OF ELECTRICITY IF THEY DON’T HAVE THE PROTECTION OF A REGULATED ELECTRIC DISTRIBUTION SYSTEM?***

***A21.*** If prices are set by a third-party unregulated sub-metering company, it distorts markets and harms consumers in several ways. Here are some key issues:

**Higher Prices:** Submetering companies can drive prices up.[[24]](#footnote-24) With respect to AEP Ohio both the utility and the PUCO have legal obligations to assure that reasonable prices are being charged.

**Lower Quality and Innovation:** Without competition, unregulated submetering companies have less incentive to improve product quality or invest in research and development.[[25]](#footnote-25)

**Limited Choice and Reduced Consumer Welfare:** Consumers have fewer options and may be forced to accept lower-quality service at higher prices.[[26]](#footnote-26)

***Q22.*** ***COULD ABANDONMENT BY AEP OHIO HARM RESIDENTS ACCESS TO ESSENTIAL SOCIAL SAFETY PROGRAMS?***

***A22.*** Yes. For example the PIPP program helps qualifying households manage their energy bills year-round, an excellent example of how being a consumer of a regulated utility can provide a social safety net. Here’s how it works:

**Eligibility:** PIPP is available to customers of regulated gas and electric companies in Ohio.

**Payment Structure:** Homes heated with gas pay 5% of their gross monthly income for both natural gas and electric bills. Homes heated solely by electricity pay 10% of their gross monthly income. There is a minimum monthly payment of $10.

**Subsidy:** The State of Ohio subsidizes the remaining balance of the bill after applying the income percentage.

Overall, PIPP provides a way for residents in Ohio to maintain essential utility services with affordable monthly payments. If consumers are no longer served by a PUCO-regulated distribution company, services like PIPP will not be available.

***Q23. BEYOND THE IMPACT ON APARTMENT COMPLEX RESIDENTS, HOW COULD AEP OHIO’S ABANDONMENT AFFECT OTHER CONSUMERS?***

***A23.*** There are two main concerns. First, abandoning these utility assets could lead to higher rates for all AEP Ohio customers to recoup any fixed or stranded costs. Second, the lack of PUCO regulation over the new service provider could lead to unfair pricing and the loss of consumer protection policies for the apartment complex residents, which could ultimately put a strain on the social service programs that many of these residents rely on.

# 

# V. CONCLUSION

***Q24. PLEASE SUMMARIZE SOME OF THE DISADVANTAGES OF AEP OHIO ABANDONING THE NORTHTOWNE APARTMENT COMPLEX.***

***A24.*** The abandonment of service by AEP Ohio would be harmful to both the residents of the apartment complex and all other AEP Ohio customers. Residents would lose access to essential services, reliable electricity delivery, and the ability to choose their electricity supplier and plan. Additionally, they would lose the protections and benefits afforded by a regulated utility, including regulated rates, customer service standards, and payment assistance programs like PIPP.

Furthermore, abandoning these assets could lead to higher rates for all AEP Ohio customers to recover any stranded costs. Finally, the lack of PUCO regulation over the new service provider could lead to unfair pricing for the apartment complex residents, potentially straining the social service programs those residents rely on.

In summary, AEP Ohio’s proposal to abandon service would hurt the residents of the Northtowne apartment complex, all AEP Ohio customers, and potentially social service programs. As a result, AEP Ohio’s abandonment of its distribution infrastructure is not reasonable, having due regard for the welfare of the public and the cost of operating the service or facility.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Direct Testimony of Joseph P. Buckley on behalf of the Office of the Ohio Consumers’ Counsel has been served upon those persons listed below via electronic service this 10th day of June, 2024.

*/s/ Donald J. Kral*

Donald J. Kral

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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| [john.jones@ohioAGO.gov](mailto:john.jones@ohioAGO.gov)  Attorney Examiners:  [david.hicks@puco.ohio.gov](mailto:david.hicks@puco.ohio.gov)  [matthew.sandor@puco.ohio.gov](mailto:matthew.sandor@puco.ohio.gov) | [stnourse@aep.com](mailto:stnourse@aep.com)  [mjschuler@aep.com](mailto:mjschuler@aep.com)  [dromig@nationwideenergypartners.com](mailto:dromig@nationwideenergypartners.com)  [apguran@vorys.com](mailto:apguran@vorys.com)  [aasanyal@vorys.com](mailto:aasanyal@vorys.com)  [mjsettineri@vorys.com](mailto:mjsettineri@vorys.com) |

1. *In the Matter of the Application of Ohio Power Company for Authority to Abandon Electric Service Lines, Pursuant to Ohio Revised Code Sections 4905.20 and 4905.21,* Case No. 22-0693-EL-ABN, Application for Abandonment by Ohio Power Company (July 11, 2022) at ⁋3. [↑](#footnote-ref-1)
2. *Id.* at ⁋4. [↑](#footnote-ref-2)
3. *Id.* at ⁋5. [↑](#footnote-ref-3)
4. *Id.* at ⁋11. [↑](#footnote-ref-4)
5. *In the Matter of the Application of Ohio Power Company for Authority to Abandon Electric Service Lines, Pursuant to Ohio Revised Code Sections 4905.20 and 4905.21,* Case No. 22-0693-EL-ABN, Comments of Nationwide Energy Partners, LLC (Dec. 4, 2023) at p.1. [↑](#footnote-ref-5)
6. O.R.C. §4905.21. [↑](#footnote-ref-6)
7. R.C. 4928.02(A)(emphasis added). [↑](#footnote-ref-7)
8. R.C. 4928.02(L)(emphasis added). [↑](#footnote-ref-8)
9. R.C. 4928.02(L)(emphasis added). [↑](#footnote-ref-9)
10. PUCO web page/About Us/PUCO Mission and Commitments, available at: <https://puco.ohio.gov/about-us/resources/mission-and-commitments> (last accessed Apr. 6, 2024). [↑](#footnote-ref-10)
11. *See*, Ohio Power Company’s Response to The Public Utilities Commission of Ohio’s Data Request, PUCO Case No. 22-0693-EL-ABN, First Set at Staff-01-007. [↑](#footnote-ref-11)
12. AEP’s Answer to PUCO Staff Data Request 01-007. [↑](#footnote-ref-12)
13. *In the Matter of the Application of Ohio Power Company for Authority to Abandon Electric Service Lines, Pursuant to Ohio Revised Code Sections 4905.20 and 4905.21*, Case No. 22-0693-EL-ABN, Application for Abandonment by Ohio Power Company at 1 (July 11, 2022). [↑](#footnote-ref-13)
14. Nationwide Energy Partners, LLC’s Responses to Ohio Power Company’s May 13, 2024 First Set of Interrogatories and Requests for Production of Documents, at Interrogatory No.7. [↑](#footnote-ref-14)
15. *Id.* at Interrogatory No. 8. [↑](#footnote-ref-15)
16. *Id.* at Interrogatory No. 9. [↑](#footnote-ref-16)
17. *Id.* at Interrogatory No. 10. [↑](#footnote-ref-17)
18. *Id.* at Interrogatory No. 11. [↑](#footnote-ref-18)
19. *Id.* at Interrogatory No. 19. [↑](#footnote-ref-19)
20. *Id.* at Interrogatory No. 20. [↑](#footnote-ref-20)
21. *Id.* at Interrogatory No. 23. [↑](#footnote-ref-21)
22. *Id.* at Interrogatory No. 26. [↑](#footnote-ref-22)
23. *Id.* at Interrogatory No. 32. [↑](#footnote-ref-23)
24. Stigler, George J., *The Theory of Economic Regulation*, The Bell Journal of Economics and Management Science 2.1 (1971) at 3-21. [↑](#footnote-ref-24)
25. Arrow, Kenneth J., *Public Policy and the Supply of Public Goods*, The Review of Economics and Statistics 49.3 (1967) at 320-329. [↑](#footnote-ref-25)
26. [Mankiw, N. Gregory., *Principles of Microeconomics*, Cengage Learning (2020).](https://www.cengage.com/c/principles-of-microeconomics-9e-mankiw/9780357133484/) [↑](#footnote-ref-26)