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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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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)
Pursuant to R.C. § 4928.143 in the Form)
of an Electric Security Plan.)

Case No. 10-388-EL-SSO

PUCO

PREPARED TESTIMONY OF JOHN D'ANGELO
ON BEHALF OF THE CLEVELAND CLINIC FOUNDATION

1 Q.1 What is your name, employer and business address?

2 A.1 My name is John D'Angelo. I am the Administrative Director of Facilities at the
3 Cleveland Clinic Foundation ("Cleveland Clinic" or "Clinic") and I have been
4 employed in this capacity by the Clinic since 2007. My business mailing address
5 is 9500 Euclid Avenue, Cleveland, OH 44195.

6 Q.2 Please describe your education as well as your work and other experience.

7 A.2 I received a Bachelor of Science degree in Aeronautical and Aerospace
8 Engineering from Purdue University in December 1987 and upon graduation I
9 was commissioned in the United States Navy through Purdue's ROTC program.
10 In my first tour of Navy duty, I was an Action Officer to the Joint Chiefs of Staff, J
11 5, European Plans and Forces. In 1988, I was selected for transfer to the Navy's
12 Civil Engineer Corps. During my active duty tours with the Navy, I was:
13 Construction Officer at Naval Station Great Lakes and Naval Air Station

1 Glenview, Illinois; Construction Director at Naval Station Pearl Harbor, Hawaii;
2 Facilities Director at the U.S. Naval Computer and Telecommunications Station
3 at Sigonella, Sicily, Italy; Facilities Director at Naval Base Ventura County,
4 California; Facilities Director at Naval Air Station Pensacola, Florida; Company
5 Commander and Detachment Officer in Charge for Naval Mobile Construction
6 Battalion THREE; Plans and Future Operations Officer for THIRD Naval
7 Construction Brigade; Current Operations Officer and Real Estate Director for
8 Navy Installations Command; and Eastern Accessions Officer for the Civil
9 Engineer Corps. In 1995, I obtained a MSCE degree in Civil Engineering from
10 the University of Maryland College Park. I am a member of various organizations
11 including the Society of American Military Engineers and the Association of
12 Energy Engineers. I have obtained certification as a Certified Measurement and
13 Verification Professional. I have worked in facilities management for my entire
14 career which spans 20 years as a naval officer where I was responsible for
15 facilities management, construction, and contingency construction and the time
16 since I joined the Clinic. I am a licensed professional mechanical engineer in
17 Ohio and Wisconsin.

18 Since joining the Clinic, I have managed a portfolio of over 200 health care and
19 mixed use facilities totaling over 23 million square feet across North America. My
20 duties with the Clinic include responsibility for infrastructure operations and
21 sustainment, energy management, facilities compliance, grounds and all other
22 aspects of facilities support necessary in the delivery of world class patient care.
23 Since joining the Clinic, I have also been actively involved in initiatives by the

1 U.S. Department of Energy ("DOE") to identify and implement programs to
2 address energy efficiency and environmental goals. For example, I hold two
3 subcommittee chairs under DOE's Hospital Energy Alliance ("HEA"), which aims
4 to improve energy efficiency and reduce greenhouse gas emissions of healthcare
5 systems throughout the country. HEA provides a national forum to document
6 and promote best practices in energy efficiency, offer DOE research on emerging
7 technologies, and share practical experiences and insights peer-to-peer.

8 I also represent the Clinic on the portfolio requirements compliance collaborative
9 formed as a result of the current electric security plan ("ESP") for Ohio Edison
10 Company ("OE"), The Cleveland Electric Illuminating Company ("CEI") and The
11 Toledo Edison Company ("TE") (collectively the "FE EDUs").

12 **Q.3 What is the purpose of your testimony?**

13 A.3 The purpose of my testimony is to provide the Public Utilities Commission of
14 Ohio ("Commission" or "PUCO") with information about the Clinic, the Clinic's
15 expansion plans for its Main Campus located in Cleveland, Ohio and the electric
16 infrastructure that must be installed to permit the Clinic to act on the Main
17 Campus expansion plans.

18 **Q.4 Please briefly describe the Clinic, its Main Campus located in Cleveland,**
19 **Ohio and the expansion plans for the Main Campus.**

20 A.4 The Clinic operates its Main Campus at 9500 Euclid Avenue in Cleveland, and
21 the Main Campus is the cornerstone of the Clinic's health system, with 50
22 buildings on 178 acres between the University Circle and Midtown areas of

1 Cleveland, Ohio. The Clinic is world renowned for its innovation and treatment
2 protocols. Home to the Lerner Research Institute, the Education Institute and the
3 Lerner College of Medicine, the Clinic has remained an international focal point
4 for research and education since its founding in 1921.¹ With more than 40,000
5 direct employees, the Clinic is one of the largest private employers in Ohio² and
6 Ohio continues to benefit from the Clinic's growth.³

7 Despite having just completed a major growth initiative resulting in the opening of
8 over three million square feet of new space in 2008, critical clinical services at
9 the Main Campus in Cleveland, Ohio are in need of additional facilities and
10 space. In order to accommodate local, national and international patient
11 demand, the Clinic's Main Campus must increase the size of its physical footprint
12 to support critical additional clinical services and to accelerate its plan to meet

¹ The Clinic sponsors one of the nation's largest physician-graduate training programs. Doctors from around the world come to the Clinic for residency training in specialty areas and for advanced fellowship work in more specialized disciplines. In May 2002, the Clinic and Case Western Reserve University entered into a unique partnership to create a medical school dedicated to educating physician-scientists. The Lerner College of Medicine of Case Western Reserve University combines education and research in an innovative program that mentors medical students to become physician-scientists. The Clinic's positive achievements have also been recognized by *U.S. News & World Report* which consistently names the Cleveland Clinic as one of the nation's best hospitals in its annual "America's Best Hospitals" survey.

² In addition to direct employees, the Clinic hires numerous full-time contract employees in food service, property management, environmental services, security, linen and many other clinical support functions. Normal operations require a robust supply and service small-business base supported by Cleveland Clinic, whose internal policies ensure fair and open competition with a preference for local businesses.

³ As the owner of one of the fastest growing facilities in Ohio, the Clinic supports a significant number of construction jobs. Announced 2010 growth projects in Ohio include the construction of a new Data Center in Brecksville, a new Family Health and Ambulatory Surgery Center in Twinsburg, a new Family Health and Ambulatory Surgery Center in Avon, an addition to Fairview Hospital, an addition to Marymount Hospital, the continuation of the addition to Hillcrest Hospital, and a new Laboratory in Cleveland. These projects are valued at well over \$500 million and will result in continued growth of direct, indirect and construction jobs.

1 this demand. The Clinic's accelerated growth plan for the Main Campus involves
2 an expenditure that is currently estimated at \$1.4 billion.

3 As a prerequisite to this growth, the size and functionality of the utility
4 infrastructure that serves the Main Campus must grow. This includes production
5 of process steam, chilled water, emergency power supply and normal power
6 supply. The balance of my testimony is focused on the external or utility electric
7 system architecture that must be in place to support the Clinic's expansion of its
8 Main Campus.

9 In addition to the increased physical capacity that must be available as a result of
10 the Clinic's planned growth at its Main Campus, electric system architecture
11 changes are needed. Current hospital planning requires a level of system
12 redundancy and recoverability to protect patients from power transients and
13 outages. One of the lessons learned from the recent natural disaster recovery
14 events such as Hurricane Katrina is that these same features are required to
15 protect the community so that area hospitals have the ability to stay open during
16 crises. Accordingly, hospital accreditation standards now recognize that the
17 historically acceptable approach to the development of utility infrastructure does
18 not satisfy system redundancy and recoverability objectives. In the case of the
19 Clinic's Main Campus, the existing utility system architecture limits future growth,
20 jeopardizes the ability of the Main Campus to effectively accommodate local,
21 national and international patient demand and interferes with the Clinic's
22 objective to deliver ancillary benefits to Ohio's economy in general and, more
23 specifically, Cleveland's economy in the case of the Main Campus.

1 **Q.5 Is there an effort underway to identify the electric system architecture that**
2 **must be installed to support the expansion plans at the Clinic's Main**
3 **Campus and do so in compliance with these hospital accreditation**
4 **standards?**

5 **A.5 Yes. Based on extensive analysis, the most prudent course of action to develop**
6 **the necessary electric infrastructure is to design, build and operate a new**
7 **substation that will be large enough to meet expected growth and meet the**
8 **reliability needs at the Main Campus and the area adjacent to the Main Campus.**
9 **Because of the proximity of CEI's 138,800 volt transmission lines to the Main**
10 **Campus and their inherent capacity and fundamental reliability, development of a**
11 **new substation near the 138,800 volt lines provides an extremely cost-effective**
12 **and functional solution. The analysis that has been conducted jointly and very**
13 **constructively by the Clinic and CEI in conjunction with examining this**
14 **opportunity has identified the best site location for the new substation as being a**
15 **parcel already owned by the Clinic. The medium voltage substations that can be**
16 **fed by this 138,800 volt substation could likewise be situated either on land**
17 **owned by CEI or the Clinic, thereby offering a very simple, cost-effective siting**
18 **opportunity.**

19 The above-described infrastructure design and construction plan has the added
20 benefit of increasing reliability of community services during an emergency since
21 both the Main Campus and Marymount Hospital are currently fed off of a single
22 medium voltage substation. Under present circumstances, an outage of this
23 medium voltage segment could leave both hospitals without external power

1 supply. Freeing up the capacity of the medium voltage substation also works to
2 help address potential growth in electric demand in an area of Cleveland that is
3 expected to grow rapidly following the completion of the "Opportunity Corridor".⁴

4 **Q.6 As part of your effort to work with CEI to design the infrastructure required**
5 **to support the desired growth at the Main Campus, did you discuss how**
6 **the cost of this infrastructure would be addressed?**

7 A.6 Yes. I was advised by CEI that the Clinic would have to make an up-front
8 payment to cover almost all of the cost associated with the required infrastructure
9 which I currently estimate to mean that the Clinic would have to provide CEI with
10 an up-front payment of about \$70 million. Based on my discussion with CEI, it is
11 my understanding that this is a requirement of CEI's current tariff.

12 **Q.7 From the Clinic's perspective, does an up-front payment of \$70 million**
13 **present a problem?**

14 A.7 Yes, it certainly does. The current estimated cost of the Main Campus expansion
15 plan will require the Clinic to raise and invest an estimated \$1.4 billion. This
16 investment includes amounts associated with electrical infrastructure that the
17 Clinic must install on its side of the power supply delivery point to reliably meet
18 the needs of the expanded Main Campus. The Clinic believes that the capital it

⁴ Cleveland's Opportunity Corridor is an economic development project aimed at connecting I-490 to the University Circle neighborhood. The Opportunity Corridor encompasses nearly 1,000 acres on Cleveland's southeast side and is anchored by University Circle and the Cleveland Clinic. The area between I-490 and University Circle has become known as the "Forgotten Triangle" due to the lack of economic activity. Outside of the transportation benefits it could bring to the Cleveland area, this effort opens the potential for new economic development, new jobs and a new identity for the community. Information on Opportunity Corridor is available via the Internet at <http://www.dot.state.oh.us/projects/ClevelandUrbanCoreProjects/OpportunityCorridor/Pages/default.aspx> (last visited April 15, 2010).

1 invests will provide the greatest return on investment to its patients and the
2 community if its investment capacity is focused on facilities that the Clinic owns
3 or operates. This perspective is not a for-profit perspective since the Clinic is a
4 not-for-profit organization. It is rooted in the Clinic's mission and its experience
5 gained over time since it was established in 1921. In short, investment in a
6 clinical footprint provides short-term construction jobs and long-term clinical and
7 clinical support jobs. That same \$70 million invested in infrastructure provides
8 only the short-term construction jobs. Although the electrical infrastructure is a
9 critical component of the environment of care, the Clinic cannot treat patients
10 without a physical space to do so and every Clinic dollar invested in the electrical
11 infrastructure is one less that can be invested in the physical space that becomes
12 the destination of local, national and international patients for Northeast Ohio.

13 **Q.8 Did you do anything to address the Clinic's concerns about the effect of**
14 **this up-front payment?**

15 **A.8** Yes, with advice of counsel, I initiated discussions with CEI and then the Staff of
16 the Commission ("Staff") to consider addressing the concern by making an
17 application to the Commission for approval of what I understand is called a
18 reasonable arrangement. These discussions eventually included some
19 consideration of the Clinic's energy efficiency, alternative energy and peak
20 demand reduction capabilities. The Clinic consumes more than 700,000 kWh
21 annually and is, as I understand Ohio law, a "mercantile customer".

Q.9 Has the Clinic filed an application for a reasonable arrangement?

A.9 No. As the discussions with CEI and the PUCO Staff were progressing, the negotiations related to the ESP that I understand has been filed in this proceeding commenced. As you know, a portion of that ESP contains a provision that is designed to address the Clinic's concern about the above-described up-front payment and also address how the Clinic's customer-sited capabilities can be applied to facilitate compliance by the FE EDUs with the mandatory portfolio requirements in ways that I believe will help to reduce the cost of such compliance. But for the opportunity to address the Clinic's concern through the ESP process, the Clinic intended to file an application for approval of a reasonable arrangement.

Q.10 Through your testimony, are you offering any opinion as to the reasonableness of the proposed ESP?

A.10 No, the scope of my testimony does not address the overall merit of the ESP. The scope of my testimony is designed solely to provide background information on the origins of the Clinic-specific provision in the ESP Stipulation and Recommendation ("Stipulation") which I understand has been filed in this proceeding. The Clinic is a member of the Industrial Energy Users-Ohio ("IEU-Ohio") and the Ohio Hospital Association ("OHA"). Both OHA and IEU-Ohio are signatories to that Stipulation. From the Clinic's membership in OHA and IEU-Ohio, one might infer that the Clinic favors the establishment of a sensible ESP through the type of settlement process that took place in this case, but that is not the purpose of my testimony.

1 **Q.11 Will the prompt approval of the ESP Stipulation facilitate the Clinic's ability**
2 **to move forward with its expansion plan for the Main Campus?**

3 A.11 Yes. The Main Campus expansion plan includes an aggressive investment and
4 construction schedule. As with most large electric infrastructure items, such as
5 transformers, equipment must be ordered well in advance of the needed delivery
6 date. We have been working diligently with CEI on the infrastructure design and
7 I believe that prompt approval of the ESP Stipulation will permit us to maintain
8 the type of progress that is required to timely complete the Main Campus
9 expansion.

10 **Q.12 If the ESP Stipulation is approved, do you intend to keep the Commission's**
11 **Staff and CEI informed about the status of the Clinic's Main Campus**
12 **expansion plan?**

13 A.12 Yes. This will be one of the largest growth programs in an area sorely in need of
14 good news on the job creation front. The Clinic intends to continue to provide
15 timely information that may be useful to the Staff and CEI to ensure that the
16 Clinic is doing the things that the Staff and CEI expect the Clinic to do based on
17 our discussions and the language in the Clinic-specific section of the ESP
18 Stipulation. My experience from interacting with both the Commission's Staff and
19 CEI demonstrates that they share the Clinic's commitment to its community in
20 and around the Main Campus.

21 The Clinic's roots are in Cleveland – Cleveland is in our name. It wants to
22 deepen those roots by expanding its Main Campus. I believe the expansion plan

1 will bring many jobs to an important area of Cleveland at a time when the
2 economy could use some good news.

3 **Q.13 Do you have anything further that you wish to say at this time?**

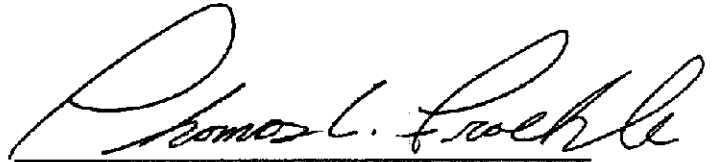
4 A.13 Simply to thank the Commission's Staff and CEI for their continued time and
5 assistance in navigating these processes.

6 **Q.14 Does that conclude your testimony?**

7 A.14 Yes, I have nothing further at this time.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Prepared Testimony of John D'Angelo on Behalf of the Cleveland Clinic Foundation* was served upon the following parties of record this 15th day of April 2010, via electronic transmission, hand-delivery or first class mail, postage prepaid.



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