

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio )	
Power Company for Authority to )	Case No. 13-2385-EL-SSO
Establish a Standard Service Offer )	
Pursuant to Section 4928.143, Revised )	
Code, in the Form of an Electric Security )	
Plan. )	
)	
In the Matter of the Application of Ohio )	
Power Company for Approval of Certain )	Case No. 13-2386-EL-AAM
Accounting Authority )	

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**DIRECT TESTIMONY OF EVAN WILSON**

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On behalf of Interstate Gas Supply, Inc.

1 **Q. Please introduce yourself.**

2 A. My name is Evan Wilson. I am employed as Senior Strategy Analyst with IGS  
3 Energy Home Services (“IGS”). My business address is 6100 Emerald Parkway,  
4 Dublin, Ohio 43016.

5 **Q. Please describe your educational background and work history?**

6 A. I studied Environmental Management and Business at Indiana University,  
7 Bloomington. My professional experience includes time with Opower working to  
8 advance the adoption of energy efficiency home products and rebate programs;  
9 additionally, I worked at Whirlpool Corporation on the smart grid appliances team  
10 working to test and commercialize grid-interactive appliances. At IGS I am  
11 responsible for evaluating and testing smart grid enable products with intention to  
12 make them available to residential IGS customers

13 **Q. Can you identify when AEP-Ohio started the GridSMART program?**

14 A. The Commission authorized AEP-Ohio to implement the GridSMART program in  
15 the March 18, 2009 Opinion and Order approving AEP-Ohio’s electric security  
16 plan (“ESP”) case.

17 **Q. Why did the Commission approve the GridSMART program?**

18 A. AEP-Ohio indicated that GridSMART would improve reliability and provide  
19 opportunities for customers to better manage their energy usages, including

20 through demand response programs.<sup>1</sup> In reliance on AEP-Ohio's representation,  
21 the Opinion and Order indicated that:

22 "The Commission strongly supports the implementation of AMI [advanced  
23 metering infrastructure] and DA [distribution automation initiative], with HAN  
24 [home area network], as we believe these advanced technologies are the  
25 foundation for AEP-Ohio providing its customers the ability to better manage their  
26 energy usage and reduce their energy costs."<sup>2</sup>

27 **Q. The Commission Order indicated that GridSMART will allow customers to**  
28 **improve their energy usage and reduce costs. How do customers currently**  
29 **use energy?**

30 A. Residential customers typically do not have a constant pattern of electricity  
31 usage. Thus, residential customers have low load factors. Residential  
32 customers collectively typically achieve peak load on summer days between the  
33 hours of 4:00 and 6:00 pm. For example, in July and August, most residential  
34 customers come home from work and immediately turn on their air conditioner.

35 **Q. Does this usage pattern impact the supply and price of electricity?**

36 A. Yes, for several reasons. Electricity must be produced and consumed  
37 simultaneously in real time. Thus, PJM must ensure that there is sufficient  
38 capacity available to produce energy for the highest possible system load.  
39 Consequently, customers are forced to pay for generation capacity that may be

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<sup>1</sup> In the Matter of the Application of Columbus Southern Power Company for Approval of its Electric Security Plan; an Amendment to its Corporate Separation Plan; and the Sale or Transfer of Certain Generating Assets, Case Nos. 08-917-EL-SSO, *et al.*, Opinion and Order at 34-35 (Mar. 18, 2009).

<sup>2</sup> *Id.* at 37.

40 used for only a few hours a year (usually between 4:00 p.m. and 6:00 p.m. for a  
41 few days in July and August). This costs customers millions of dollars annually.

42 **Q. What type of products can CRES providers offer to customers with  
43 appropriate energy usage data?**

44 A. Time-of-use (“TOU”) products, residential demand response, and residential  
45 peak shaving products are some of the products CRES suppliers offer to  
46 customers with the right access to the right energy usage data.

47 **Q. What data do you recommend that the Commission require AEP-Ohio to  
48 provide to CRES providers so that they may offer these products to  
49 customers?**

50  
51 A. Even the most basic TOU products require CRES suppliers to have access to the  
52 customer’s interval meter data. Also, residential demand management products  
53 individual customer’s interval meter data and peak load contribution (“PLC”) data.

54 **Q. What is a PLC?**

55 A. A PLC is based upon a customer’s contribution to the five highest hours of load  
56 on the PJM system. It is important though that the PLC not be a profiled PLC,  
57 but rather a PLC specific for an individual customer that is calculated with the  
58 specific customer’s five highest hours of load on the PJM system.

59 **Q. Why is a PLC important?**

60 A. As discussed above, residential customers contribute significantly to the system-  
61 wide peak. Once AEP-Ohio makes customers’ actual PLC available, CRES  
62 providers can offer products that will incentivize customers to manage their  
63 PLCs. As a result, there will be less stress on the electric grid during peak  
64 periods and customers will see a reduction in their electric bills.

65 **Q. What interval data do CRES providers need?**

66 A. The purpose of interval meter data is to allow a CRES provider and PJM to  
67 evaluate a customer's ability to reduce their load relative to the customer's PLC.  
68 The more granular the data, the easier it will be for CRES providers to offer  
69 beneficial products to customers. For participation in PJM's demand response  
70 programs, it is likely that PJM will require fifteen minute interval meter data.<sup>3</sup>

71

72 **Q. Is interval data required for CRES providers to offer time-of-use rates?**

73 A. Yes. Interval data is also necessary for CRES suppliers to offer customers time-  
74 of-use products. Time-of-use rates allow customers to receive different prices for  
75 electric supply at different periods throughout the day and throughout the week.  
76 Time-of-use rates incentivize customers to switch their electric consumption to  
77 periods of time when

78 **Q. What do you recommend with respect to AEP's GridSMART Rider?**

79 A. IGS supports AEP's GridSMART program and recovery of costs of such  
80 program. However, any approval of GridSMART should be conditioned on AEP  
81 implementing the program that provides timely, verified transmission of customer  
82 usage data described above so that CRES providers are able to offer a diverse  
83 range of beneficial products such as those described in my testimony.

84 **Q. Does this conclude your testimony?**

85 A. Yes, it does. However, I reserve the right to supplement my testimony.

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<sup>3</sup> The Federal Energy Regulatory Commission is currently evaluating a PJM proposal that may impact rules related to demand response. At the time I filed this testimony, FERC had not issued its order. I reserve the right to supplement my testimony after FERC issues its final order.

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Direct Testimony of Evan Wilson on Behalf of Interstate Gas Supply, Inc.* was served upon the following parties of record this 6<sup>th</sup> day of May 2014, *via* electronic transmission, hand-delivery or first class mail, U.S. postage prepaid.

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Summary: Testimony of Evan Wilson electronically filed by Mr. Gregory L. Williams on behalf of Interstate Gas Supply, Inc.