

**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. :

**PREFILED TESTIMONY
OF
KRYSTINA M. SCHAEFER
ENERGY & ENVIRONMENT DEPARTMENT
FACILITY, SITING & ENVIRONMENT DIVISION
PUBLIC UTILITIES COMMISSION OF OHIO**

Staff Exhibit _____

May 20, 2014

1 1. Q. Please state your name and your business address.

2 A. My name is Krystina M. Schaefer, and my business address is 180 East
3 Broad Street, Columbus OH 43215.

4

5 2. Q. By whom are you employed?

6 A. I am employed by the Public Utilities Commission of Ohio (PUCO).

7

8 3. Q. What is your present position with the Public Utilities Commission of Ohio
9 and what are your duties?

10 A. I am an Administrator in the Facilities, Siting and Environmental Analysis
11 Division of the Energy and Environment Department (E&E) at the PUCO.
12 My job duties include: developing, organizing, and directing activities
13 related to energy assurance and smart grid implementation as guided and
14 directed by Federal and State statute and administrative rules; serving as
15 technical expert on issues related to national and state energy assurance,
16 smart grid implementation and transition issues.

17

18 4. Q. Please summarize your educational background and work experience.

19 A. I received a Bachelor of Science in Political Science and business minor
20 from The Ohio State University (2008) and a Master of City and Regional
21 Planning from The Ohio State University (2010). Currently, I am enrolled
22 in the Master of Business Administration program at Capital University.

1 In July of 2009, I joined the Commission as an intern in the Facilities,
2 Siting, and Environmental Analysis Division of the Energy and Environ-
3 ment Department (E&E). In September of 2010, I was hired full-time as a
4 utility analyst in the Efficiency and Renewables Division of the E&E
5 Department. In March of 2011, I was promoted to my current position.
6

7 5. Q. Have you testified in prior proceedings before the Commission?

8 A. No.
9

10 6. Q. What is the purpose of your testimony in this proceeding?

11 A. The purpose of my testimony is to address the Company's proposed elim-
12 ination of the Schedule Standby Service (SBS) tariff.
13

14 7. Q. Does Staff agree with the elimination of the Schedule Standby Service
15 (SBS) tariff?

16 A. No, staff believes that as long as the standard service offer (SSO) is in
17 place, the Company has an obligation to continue to provide generation-
18 related backup and planned maintenance services for partial-service cus-
19 tomers. R.C. 4928.141 states that: "an electric distribution utility shall
20 provide consumers, on a comparable and nondiscriminatory basis within its
21 certified territory, a standard service offer of all competitive retail electric
22 services necessary to maintain essential electric service to consumers,

1 including a firm supply of electric generation service.” In addition, R.C.
2 4928.14 states that “the failure of a supplier to provide retail electric
3 generation service to customers within the certified territory of an electric
4 distribution utility shall result in the supplier's customers, after reasonable
5 notice, defaulting to the utility's standard service offer under sections
6 4928.141, 4928.142, and 4928.143 of the Revised Code until the customer
7 chooses an alternative supplier.”

8
9 Originally, Staff interpreted the Company’s testimony to mean that the
10 Company would no longer offer the generation-related services of the SBS
11 tariff. However, based on the Company’s conversation with Staff on May
12 14, 2014, clarifying the Company’s testimony and response to a data
13 request (INT-13-001), Staff believes the Company’s intent is to eliminate
14 the SBS tariff but still provide generation-related backup and planned
15 maintenance services through the applicable SSO riders. Specifically, the
16 generation-related charges for backup power and planned maintenance ser-
17 vices would be billed under the SSO riders for energy (GENE) and capacity
18 (GENC), based on the actual energy (kWh) used for those services during
19 the given billing period.

20 Given the potential confusion for partial-service customers, Staff believes
21 that the SBS tariff should be maintained, and instead, reference the applica-
22 ble riders for generation-related services (GENE and GENC), along with

1 the appropriate tariffs for distribution service. This will make it easier for
2 customers to understand how backup and planned maintenance charges will
3 be calculated and ensure that customers are aware that the services are pro-
4 vided through the SSO. Staff believes that these changes will help to fur-
5 ther the energy policy of the State of Ohio, as outlined in R.C. 4928.02(K),
6 which encourages the “implementation of distributed generation across
7 customer classes through regular review and updating of administrative
8 rules governing critical issues such as... standby charges.”

9
10 8. Q. Does this conclude your testimony?

11 A. Yes, it does. However, I reserve the right to submit supplemental testi-
12 mony as described herein, as new information subsequently becomes avail-
13 able or in response to positions taken by other parties.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prefiled Testimony of **Krystina M. Schaefer** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, hand-delivered, and/or delivered via electronic mail, upon the following parties of record, this 20th day of May, 2014.

/s/ Devin D. Parram

Devin D. Parram
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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/20/2014 2:57:51 PM

in

Case No(s). 13-2385-EL-SSO, 13-2386-EL-AAM

Summary: Testimony Prefiled Testimony of Krystina M. Schaefer submitted on behalf of the Staff of the Public Utilities Commission of Ohio by Assistant Attorney General Devin Parram electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio