

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke	:	
Energy Ohio, Inc. for Approval of a Grid	:	Case Nos. 14-1160-EL-UNC
Modernization Opt-Out Tariff and for a	:	14-1161-EL-AAM
Change in Accounting Procedures	:	
Including a Cost Recovery Mechanism.	:	

**PREFILED TESTIMONY  
OF  
BARBARA BOSSART  
SERVICE MONITORING & ENFORCEMENT DEPARTMENT  
RELIABILITY & SERVICE ANALYSIS DIVISION  
PUBLIC UTILITIES COMMISSION OF OHIO**

**Staff Exhibit \_\_\_\_\_**

**October 2, 2015**

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

2 A. My name is Barbara Bossart. My business address is 180 E. Broad Street,  
3 Columbus, Ohio 43215-3793.  
4

5 2. Q. By whom are you employed?

6 A. I am employed by the Public Utilities Commission of Ohio.  
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 the Chief of the Reliability and Service Analysis Division of the  
11 Service Monitoring and Enforcement Department. My current duties  
12 include the oversight of the development and enforcement of service relia-  
13 bility and consumer protection policies and rules for gas, water, electric,  
14 telephone, and competitive gas and electric services.  
15

16 4. Q. Would you briefly state your educational background and work experience?

17 A. I have a bachelor's degree from Marshall University and I have been  
18 employed by the Public Utilities Commission of Ohio since 1999. For six  
19 years, I worked as an Investigator in the Investigation and Audits Division  
20 of the Service Monitoring and Enforcement Department. As an Investi-  
21 gator my duties included interacting with the consumers to investigate their  
22 concerns about utility companies' policies and practices. I also participated

1 in customer service audits to identify service issues or non-compliance with  
2 rules. In May 2005, I was promoted to Utility Specialist 2 in the Reliability  
3 and Service Analysis Division of the Service Monitoring and Enforcement  
4 Department where I was responsible for analyzing service quality per-  
5 formance as well as for recommending and enforcing service-quality and  
6 consumer-protection policies and rules. In January 2013, I was promoted  
7 to Chief of the Reliability and Service Analysis Division.

8  
9 5. Q. What is the purpose of your testimony?

10 A. The purpose of my testimony is to recommend changes to Duke Energy  
11 Ohio's proposed opt out tariff language filed in Case No. 14-1160-UNC  
12 and Case No. 14-1161-EL-AAM.

13  
14 6. Q. Does the proposed tariff language comply with the Ohio Administrative  
15 Code (O.A.C.)?

16 A. I believe that Duke's proposed tariff language does comply with  
17 O.A.C. 4901:1-10-05(J). However, the tariff language may be confusing to  
18 customers. For example, Duke titled the tariff sheet, "Non-Standard Meter  
19 Option (NSMO) – Residential." However, Duke uses "advanced meter" or  
20 "traditional meter" throughout the tariff when referencing the meter  
21 options. Because the Company's use of "non-standard meter" in the title

1 refers to a “traditional meter” under O.A.C. 4901:1-10-05(J), the use of  
2 both terms by Duke may cause confusion.

3  
4 7. Q. What do you recommend to help clarify Duke’s Tariff?

5 A. In order to reduce the possibility for confusion, Duke should use the same  
6 terminology as is used in O.A.C 4901:1-10-05(J). Therefore, I recommend  
7 changing the tariff title to “Advanced Meter Opt-Out (AMO) – Resi-  
8 dential.” In addition, Duke should use “Rider AMO” in the tariff rather  
9 than “Rider NSM.”  
10

11 8. Q. Do you have any other recommendation to help clarify Duke’s proposed  
12 opt-out tariff?

13 A. Yes, I do. Duke’s proposed tariff states that it is not available to customers  
14 with a history of tampering or theft. I believe Duke should clarify this  
15 statement to be consistent with the Commission’s Order in Case No. 12-  
16 2050-EL-ORD.<sup>1</sup> The Commission’s Order states, “If a utility chooses not  
17 to provide opt-out service to a customer with a history of tampering or  
18 theft, and the customer contests the EDU’s denial of advanced meter opt-

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<sup>1</sup> *In the Matter of the Commission’s Review of Chapter 4901:1-10, Ohio Administrative Code, Regarding Electric Companies*, Case No. 12-2050-EL-ORD (Entry on Rehearing at ¶ 14) (Dec. 18, 2013) (12-2050 Entry on Rehearing).

1 out service, then the burden is on the utility to demonstrate that such a his-  
2 tory of tampering exists and that advanced meter opt-out service should be  
3 denied.” Duke should modify its proposed tariff to state, “Pursuant to the  
4 Commission’s Order in Case No. 12-2050-El-ORD, Rider AMO is not  
5 available to customers with a history of tampering.”<sup>2</sup>  
6

7 9. Q. Do you have any other recommendation?

8 A. Yes. The Commission’s Entry on Rehearing<sup>3</sup> stated in part,  
9 “...if the electric utility is aware, or can reasonable ascertain, that a cus-  
10 tomer is enrolled in a product or service that requires an advanced meter,  
11 then the electric utility must notify the customer that a different product or  
12 service must be chosen prior to installation of the traditional meter.” To  
13 comply with this notification requirement, Staff believes Duke should  
14 include additional language in its Advanced Meter Opt-out tariff. Staff  
15 recommends the following language: “Customers enrolled in a product or  
16 service requiring an advanced meter as a condition of enrollment will be  
17 notified that the customer must choose a different product or service prior

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<sup>2</sup> 12-2050 Entry on Rehearing at ¶ 14.

<sup>3</sup> *Id.* at ¶ 16.

1 to the installation of a traditional meter. This opt out provision is not avail-  
2 able to any customer taking generation service under a time differentiated  
3 rate.”  
4

5 10. Q. Does this conclude your testimony?

6 A. Yes, it does. However, I reserve the right to submit supplemental testi-  
7 mony as described herein, as new information subsequently becomes avail-  
8 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 **Barbara Bossart** 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 2<sup>nd</sup> day of October, 2015.

*/s/ John H. Jones*

**John H. Jones**

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Summary: Testimony Prefiled Testimony of Barbara Bossart submitted by Assistant Attorney General John Jones on behalf of the Staff of the Public Utilities Commission of Ohio. electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio