

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of the	:	
Ohio Development Services Agency for	:	
an Order Approving Adjustments to the	:	Case No. 16-1223-EL-USF
Universal Service Fund Riders of	:	
Jurisdictional Ohio Electric Distribution	:	
Utilities.	:	

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TESTIMONY IN SUPPORT OF JOINT STIPULATION

BY

**SUSAN M. MOSER**

ON BEHALF OF  
THE OHIO DEVELOPMENT SERVICES AGENCY

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November 30, 2016

**TESTIMONY OF SUSAN MOSER**  
**On Behalf of The Ohio Development Services Agency**

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

2   A.     My name is Susan M. Moser. My business address is Ohio Development Services  
3           Agency ("ODSA"), 77 South High Street, 26th Floor, Columbus, Ohio 43216-1001.

4   **Q.     By whom are you employed and in what capacity?**

5   A.     I am employed by ODSA in its Office of Community Assistance ("OCA") as Section  
6           Supervisor of the EPP/PIPP Plus section.

7   **Q.     Are you the same Susan M. Moser who filed direct testimony in support of the**  
8           **Universal Service Fund ("USF") rider adjustment application in this proceeding on**  
9           **October 31, 2016?**

10  A.     Yes, I am. That testimony sets forth my educational background and employment  
11           experience, as well as my duties and responsibilities with respect to the percentage of  
12           income payment plan ("PIPP") program and the Electric Partnership Program ("EPP").

13  **Q.     Have you previously testified before this Commission?**

14  A.     Yes, I testified in prior USF rider adjustment proceedings, Case Nos. 12-1719-EL-USF,  
15           13-1296-EL-USF, 14-1002-EL-USF AND 15-1046-EL-USF. I also filed direct and  
16           supplemental testimony in this proceeding on October 31, and November 28, 2016,  
17           respectively.

18  **Q.     What is the purpose of your testimony?**

19  A.     The purpose of my testimony is to support the Joint Stipulation and Recommendation  
20           ("Joint Stipulation") filed contemporaneously with this testimony in support. The Joint

1 Stipulation seeks approval of the ODSA's amended application ("Amended  
2 Application") filed November 29, 2015, and was entered into by ODSA, The Dayton  
3 Power & Light Company, The Cleveland Electric Illuminating Company, The Toledo  
4 Edison Company, Ohio Edison Company. The Staff of the Public Utilities Commission  
5 of Ohio ("Staff") and Duke Energy Ohio, Inc. have not joined the stipulation, but do not  
6 oppose it. The Signatory Parties recommend that the Commission issue an Opinion and  
7 Order approving the Amended Application filed November 29, 2016. This testimony  
8 demonstrates that: (1) the Joint Stipulation is a product of serious bargaining among  
9 capable, knowledgeable parties; (2) the Joint Stipulation does not violate any important  
10 regulatory principle or practice; and (3) the Joint Stipulation, as a whole, will benefit  
11 customers and the public interest.

12 **Q. Please summarize the major provisions of the Joint Stipulation.**

13 A. The Joint Stipulation adopts the annual USF rider revenue requirement and the USF rider  
14 rate to collect the revenue requirement for each of the EDUs in 2017. The Joint  
15 Stipulation further agrees to follow the Notice of Intent ("NOI") process first adopted in  
16 Case No. 04-1616-EL-UNC and requires ODSA to file its NOI by May 31, 2017, and its  
17 application no later than October 31, 2017

18 **Q. Does the Joint Stipulation represent a product of serious bargaining among capable,**  
19 **knowledgeable parties?**

20 A. Yes, it does. The parties to this case have been actively participating in the USF  
21 proceedings and a number of other Commission proceedings for several years. All  
22 parties were represented by experienced, competent counsel. All parties were given the

1 opportunity to enter into settlement discussions on the Application, the Amended  
2 Application, and the proposed Stipulation. No party requested a prehearing conference or  
3 a settlement conference. Most of the parties to this USF proceeding are signatories to  
4 prior stipulations. Therefore, the Joint Stipulation represents a product of serious  
5 bargaining among capable, knowledgeable parties.

6 **Q. Does the Joint Stipulation benefit consumers and the public interest?**

7 A. Yes, it does. The Joint Stipulation ensures adequate funding for the low-income  
8 customer assistance programs and the consumer education programs administered by  
9 ODSA. Moreover, the Joint Stipulation benefits consumers and the public interest  
10 because the USF rider rates represent the minimal rates necessary to collect the EDUs'  
11 USF rider revenue requirements.

12 **Q. Does the Joint Stipulation violate any important regulatory principles and**  
13 **practices?**

14 A. No. The USF rider revenue requirement and rider rate were determined in accordance  
15 with the NOI methodology approved by Opinion and Order issued September 7, 2016.

16 **Q. Should the Commission approve the Joint Stipulation and Recommendation?**

17 A. Yes.

18 **Q. Does this conclude your direct testimony?**

19 A. Yes.

## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Testimony of Susan M. Moser* has been served upon the following parties by first class mail, postage prepaid, and/or electronic mail this 30<sup>th</sup> day November 2016.



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