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Date of Hearing: 1/31/17

Case No. 16-2020-EL-AEC

PUCO Case Caption: U.S. STEEL SEAMLESS

Tubular Operations

List of exhibits being filed:

JOINT Exhibits

1 Stipulation - Public Version

~~1A~~ Stipulation - Confidential Version

2 Testimony of Nalakh Mibovich

Reporter's Signature: Michael O. Menes
Date Submitted: 2/1/17

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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

- - -

In the Matter of the :
Application for Establishment :
of a Reasonable Arrangement : Case No.
Between U.S. Steel Seamless : 16-2020-EL-AEC
Tubular Operations, LLC, :
Lorain Tubular Operations and :
The Ohio Edison Company. :

- - -

PROCEEDINGS

Before Nick Walstra, Attorney Examiner, held at
the Public Utilities Commission of Ohio, 180
East Broad Street, Hearing Room 11-A, Columbus,
Ohio, on Tuesday, January 31, 2017, at 11:00
A.M.

- - -

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- - -

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application for)
Establishment of a Reasonable) Case No. 16-2020-EL-AEC
Arrangement Between U. S. Steel)
Seamless Tubular Operations, LLC,)
Lorain Tubular Operations and)
The Ohio Edison Company)

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PUBLIC UTILITIES COMMISSION
OF OHIO

**JOINT
STIPULATION AND RECOMMENDATION**

[PUBLIC VERSION]

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**ON BEHALF OF U. S. STEEL SEAMLESS
TUBULAR OPERATIONS, LLC, LORAIN
TUBULAR OPERATIONS**

January 23, 2017

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**ON BEHALF OF THE STAFF OF THE PUBLIC
UTILITIES COMMISSION OF OHIO**

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application for)	
Establishment of a Reasonable)	Case No. 16-2020-EL-AEC
Arrangement Between U. S. Steel)	
Seamless Tubular Operations, LLC,)	
Lorain Tubular Operations and)	
The Ohio Edison Company)	

**JOINT
STIPULATION AND RECOMMENDATION
[PUBLIC VERSION]**

BACKGROUND

For purposes of resolving any contested issues that may have been raised in this proceeding, the undersigned Parties stipulate and agree that the following statements are, based on information and belief, true and correct.

On October 13, 2016, U. S. Steel Seamless Tubular Operations, LLC, Lorain Tubular Operations ("LTO"), a mercantile customer as defined by Section 4928.01, Revised Code, and a producer of Oil Country Tubular Goods ("OCTG"), casing and drill pipe, standard and line pipe and coupling stock, properly filed an application ("Application") seeking approval of a reasonable arrangement between Ohio Edison Company ("OE") and LTO. The Application was properly filed with the Public Utilities Commission of Ohio ("Commission" or "PUCO") pursuant to Section 4905.31, Revised Code.

On October 28, 2016, November 1, 2016 and November 2, 2016, motions to intervene were filed by the Office of the Ohio Consumers' Counsel ("OCC"), OE and the Ohio Manufacturers' Association Energy Group ("OMAEG"), respectively. On November 2, 2016, OCC and OMAEG submitted comments on the Application.

Since the filing of LTO's Application on October 13, 2016, OCC, OMAEG, OE and the Staff of the Commission ("Staff") have engaged in good faith discussions to address and resolve any issues and exchange information related to LTO's Application.

LTO represents that its current manufacturing facilities and its corporate offices are located in or around Lorain, Ohio. LTO's facilities and offices obtain electricity through a substation ("Gary Avenue Substation") owned by another manufacturer (Republic Steel), a condition that exists because LTO's facilities and the facilities of the adjacent manufacturer were, at one time, under common ownership. As a result of LTO investing approximately \$17.5 million in a new substation ("Palm Avenue Substation"), LTO became a direct mercantile customer of OE on or about January 11, 2017 as the Palm Avenue Substation became operational.

LTO's manufacturing facilities are located within the certified service area of OE, an electric distribution utility ("EDU") as defined by Section 4928.01, Revised Code. Upon commercial operation of its new substation, LTO will receive electric distribution service from OE at transmission voltage of 138 kV.

During the time that LTO received its electricity supply through the Gary Avenue Substation owned by Republic Steel, Republic Steel subscribed to an interruptible

service rider¹ offered by OE and LTO's demand response capabilities were aggregated with the demand response capabilities of Republic Steel for purposes of the subscription to and participation in OE's interruptible service offerings. Even though LTO's demand response capability historically and indirectly participated in Rider ELR, the applicability provisions of Rider ELR do not recognize this historical participation since LTO was not, during the period of such participation, directly served by OE.

LTO's capital investment in the Palm Avenue Substation is part of LTO's efforts to more fully utilize the productive capacity of its manufacturing facilities. LTO believes that this capital investment, accompanied by a reasonable delivered price of electricity, will position its Ohio manufacturing facility to be viable for many years.

INTRODUCTION

Among other things, Section 4905.31, Revised Code, authorizes, with Commission approval and upon application by a mercantile customer, the filing of a schedule and establishing or entering of a reasonable arrangement that addresses a classification of service or involves any other financial device that may be practicable or advantageous.

Rule 4901-1-30, Ohio Administrative Code ("O.A.C."), provides that any two or more parties to a proceeding may enter into a written stipulation covering the issues presented in such a proceeding. The purpose of this document is to set forth the understanding and agreement of the parties who have signed below and to recommend that the Commission approve and adopt this Joint Stipulation and Recommendation

¹ Currently, the OE interruptible service rider that is relevant here is Rider ELR, Economic Load Response Program Rider, Sheet 101. In addition, Rider EDR, Economic Development Rider, Interruptible Credit Provision, Sheet 116, is applicable to customers participating under Rider ELR.

("Stipulation") as part of its Opinion and Order in this proceeding, resolving all of the contested issues that have been or could have been raised in this proceeding.

This Stipulation is supported by adequate data and information; represents a just and reasonable resolution of issues in this proceeding; violates no regulatory principle or precedent; and is the product of lengthy, serious bargaining among knowledgeable and capable parties in a cooperative process and undertaken by parties representing a wide range of interests to resolve the aforementioned issues. This Stipulation represents an accommodation of the diverse interests represented by the Parties, and it is entitled to careful consideration by the Commission. For purposes of resolving the issues raised by this proceeding, the undersigned parties further stipulate, agree and recommend as set forth below.

PARTIES

This Stipulation is entered into by the Commission's Staff and LTO ("the Parties"). Further, OCC,² OMAEG and OE (the "Non-Opposing Intervenors") do not oppose this Stipulation.

RECITALS

Section 4905.31, Revised Code, permits the Commission to approve and authorize a reasonable schedule or arrangement between a mercantile customer and an EDU or a public utility electric light company upon application by a mercantile customer. LTO filed such an application with the Commission in this docket.

² OCC's non-opposition to this Stipulation is explained in correspondence filed in this proceeding.

Following the submission of LTO's Application and at the request of the Staff, LTO identified alternatives to the "all-in rate" approach to a reasonable arrangement that LTO advanced as part of its Application. More specifically and in light of the unique circumstances presented by LTO's historical but indirect demand response participation in the above-described interruptible service rider, LTO suggested that its electricity pricing objectives could be served by a Commission finding that LTO is eligible to participate in Rider ELR and Rider EDR so as to obtain the interruptible credits available pursuant to such riders.

In view of the foregoing, the Parties agree and recommend that the Commission approve this Stipulation, the components of which are all set forth below:

1. Provided that OE recovers the costs described in and as specified by paragraph number 4 below, LTO shall be deemed to be eligible to subscribe to Riders ELR and EDR (Interruptible Credit Provision) for all bills rendered by OE on or after January 1, 2017 and for so long as such Riders or their successors may continue.³ Providing LTO with such eligibility status will facilitate LTO's efforts to compete in the global economy and is otherwise in accord with Ohio's state policy in Section 4928.02, Revised Code.
2. For all bills rendered by OE to LTO as a direct customer of OE on or after January 1, 2017 and in in light of the unique circumstances presented by LTO's historical but indirect demand response participation in the above-described interruptible service riders, the Commission shall issue an Opinion and Order finding that LTO shall be eligible to participate in Rider ELR and Rider EDR and successors so as to obtain the interruptible credits available pursuant to such Riders and their successors. Such Opinion and Order should state that LTO's firm demand and total firm and interruptible demand should be initially set at the levels identified in

³ As a customer eligible to subscribe to Riders ELR and EDR (Interruptible Credit Provision), LTO will be subject to the other duties and have the rights that attach or are available to all other customers that subscribe to the Riders. This Stipulation does not seek or recommend any alteration or modification of the administration of Riders ELR and EDR (Interruptible Credit Provision) other than with regard to LTO's eligibility to subscribe to such Riders and it does so with regard to such eligibility based on the historical participation of LTO's demand response capability which is described herein.

the Stipulation.⁴ The Parties agree that such Opinion and Order shall result in a classification of service, pursuant to Section 4905.31, Revised Code, which is warranted in view of the unique circumstance presented by the fact that LTO's demand response historically and indirectly was deployed for purposes of participation in the above-described interruptible service riders.

3. Commencing on January 1, 2017, LTO shall undertake reasonable and good faith efforts (with regard to factors within its control and subject to the limitations of market conditions) to retain an annual average direct employment level of [REDACTED] people including bargaining unit and management employees. On or before April 30 of each year subsequent to 2017 and provided that confidentiality protection acceptable to LTO is in place, LTO shall submit to the Staff of the Commission, OCC⁵ and OE information on the average level of direct employment retained during the prior year as well as the average direct employment retained for the entire period of time LTO has, as of the date of the report, received the benefit of Riders ELR and EDR (Interruptible Credit Provision) and successors.
4. OE shall recover all costs incurred by it in conjunction with LTO's subscription to Riders ELR and EDR (Interruptible Credit Provision) and any successors, including full and timely recovery of all credits received by LTO under Riders ELR and EDR. Such cost shall be recovered by OE through the existing recovery mechanisms [OE Sheet 115, Rider DSE1, Page 1 of 3 and successors and OE Sheet 116, Rider EDR(e), Standard Charge Provision 1, page 3 of 5] and successors.
5. Upon the Commission's issuance of an Opinion and Order finding that LTO shall be eligible to participate in Rider ELR and Rider EDR (Interruptible Credit Provision) and successors, any issues raised by LTO's Application, any comments submitted by OCC and OMAEG or raised in any other fashion shall be deemed fully resolved without need for further action.
6. For the limited purposes of the Commission's evaluation of the Stipulation contained herein, the Parties agree that the Application, this Stipulation, and the comments filed by OMAEG and OCC may,

⁴ LTO's firm demand and total firm and interruptible demand shall be initially set at [REDACTED] and [REDACTED] megawatts, respectively.

⁵ Subject to there being in place mutually acceptable protections for confidential information, OCC shall receive the information at the same time that the information is provided to the Staff of the Commission. The parties shall work in good faith to establish mutually acceptable protections for such confidential information. Nothing herein shall be construed or applied to cause OCC to waive any rights it may have under applicable Ohio public records requirements.

to the extent necessary, be admitted into the record and that, if so admitted for such purposes, each Party waives any right to conduct discovery, conduct cross-examination, submit briefs or otherwise exercise rights that are typically extended to parties in contested proceedings.

7. All of the related issues and concerns raised by the Parties have been addressed in the substantive provisions of this Stipulation and reflect, as a result of such discussions and compromises by the Parties, an overall reasonable resolution of all such issues.
8. This Stipulation is the product of the discussions and negotiations of the Parties, and is not intended to reflect the procedural or substantive views or proposals which any individual party may have advanced acting unilaterally. Accordingly, this Stipulation represents an accommodation of the diverse interests represented by the Parties, and is entitled to careful consideration by the Commission. This Stipulation is submitted for purposes of this proceeding only, is not deemed binding in any other proceeding and shall not be offered or relied upon in any other proceedings, except as necessary to enforce the terms of this Stipulation. More specifically, nothing in this Stipulation shall be construed or applied so as to disregard the unique circumstance presented by the fact that LTO's demand response historically and indirectly was deployed for purposes of participation in the above-described interruptible service rider. The agreement of the Parties reflected in this document is expressly conditioned upon its acceptance in its entirety and without alteration by the Commission. Any party to this Stipulation has the right to withdraw and terminate the Stipulation if the Commission, or any court of competent jurisdiction, rejects all or any part of the Stipulation or otherwise modifies its terms or provisions. The Parties agree that if the Commission or any court of competent jurisdiction rejects all or any material part of this Stipulation, or otherwise materially modifies its terms, any adversely affected party shall have the right to file an application for rehearing or a motion for reconsideration.

This Stipulation has been signed as of this 23rd day of January 2017. The Parties respectfully request that the Commission promptly issue its Opinion and Order in accordance with the terms of this Stipulation.

Respectfully submitted,

The Parties:



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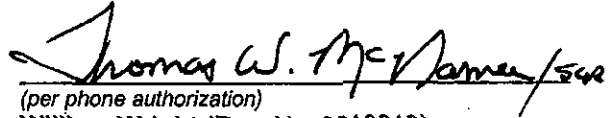
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**ON BEHALF OF U.S. STEEL SEAMLESS TUBULAR
OPERATIONS, LLC AND LORAIN TUBULAR
OPERATIONS**



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**ON BEHALF OF THE STAFF OF THE PUBLIC
UTILITIES COMMISSION OF OHIO**

The Non-Opposing Intervenor:



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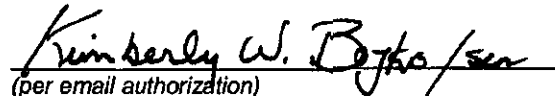
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**ON BEHALF OF THE OHIO MANUFACTURERS'
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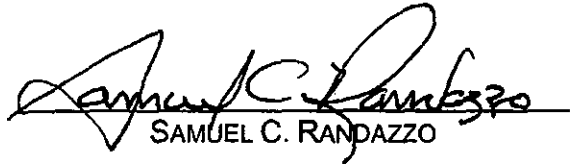
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**ON BEHALF OF THE OFFICE OF THE OHIO
CONSUMERS' COUNSEL**

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Joint Stipulation and Recommendation [PUBLIC VERSION]* was sent by, or on behalf of, the undersigned counsel for LTO to the following parties of record this 23rd day of January 2017, via electronic transmission.



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ATTORNEY EXAMINER

CONFIDENTIAL

Joint Exhibit 1a

CONFIDENTIAL

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application for)
Establishment of a Reasonable)
Arrangement Between U. S. Steel)
Seamless Tubular Operations, LLC,)
Lorain Tubular Operations and)
The Ohio Edison Company)

Case No. 16-2020-EL-AEC

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**JOINT
STIPULATION AND RECOMMENDATION**

[CONFIDENTIAL VERSION]

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**ON BEHALF OF U. S. STEEL SEAMLESS
TUBULAR OPERATIONS, LLC, LORAIN
TUBULAR OPERATIONS**

January 23, 2017

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**ON BEHALF OF THE STAFF OF THE PUBLIC
UTILITIES COMMISSION OF OHIO**



**Public Utilities
Commission**

Asim Z. Haque, Chairman

Commissioners

Lynn Slaby
M. Beth Trombold
Thomas W. Johnson
M. Howard Petricoff

CONFIDENTIAL

Confidential treatment has been requested for the following document:

Case Number: 16-2020-EL-AEC

Page Count: 10

Date Filed: January 23, 2017

Filed By: S. Randazzo, T. McNamee, Erika Ostrowski, K. Bojko, and M. Willis

On Behalf Of: U.S. Steel Seamless Tubular Operations, LLC, Lorain Tubular Operations, Public Utilities Commission of Ohio, Ohio Edison Company, Ohio Manufacturers' Association Energy Group and The Office of the Ohio Consumers' Counsel

Summary of Document: Joint Stipulation and Recommendation

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application for)	
Establishment of a Reasonable)	Case No. 16-2020-EL-AEC
Arrangement Between U. S. Steel)	
Seamless Tubular Operations, LLC,)	
Lorain Tubular Operations and)	
The Ohio Edison Company)	

DIRECT TESTIMONY OF RALPH R. RIBERICH, JR.

January 25, 2017

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application for)	
Establishment of a Reasonable)	Case No. 16-2020-EL-AEC
Arrangement Between U. S. Steel)	
Seamless Tubular Operations, LLC,)	
Lorain Tubular Operations and)	
The Ohio Edison Company)	

DIRECT TESTIMONY OF RALPH R. RIBERICH, JR.

1 **Q1. Please state you name and business address.**

2 A. My name is Ralph R. Riberich, Jr. and my business address is 600 Grant Street,
3 Room 2028, Pittsburgh, Pennsylvania 15219-4776.

4

5 **Q2. By whom are you employed?**

6 A. I am employed by United States Steel Corporation ("U. S. Steel") and I am the
7 Director of Energy and Metals within the Global Procurement Division.

8

9 **Q3. Please briefly describe your position with U. S. Steel and the responsibilities**
10 **that you have in that position.**

11 A. I supervise a team of Commodity Managers responsible for procuring energy-
12 related products for U. S. Steel Operations in North America. I am responsible for

1 negotiating, executing and managing strategic procurement actions for electricity,
2 natural gas, industrial gases, coating metals, fuels and bulk chemicals.
3

4 **Q4. Please describe your educational background.**

5 A. I received a Bachelor of Science degree in engineering from the University of
6 Pittsburgh in 1997. In 2001, I received a Master of Business Administration degree
7 from the Joseph M. Katz School of Business at the University of Pittsburgh, with
8 concentration in Information Systems and Finance.
9

10 **Q5. Do you hold any professional licenses or certifications?**

11 A. Yes, I have been a Professional Engineer licensed in Pennsylvania since 2003
12 and I am also a Certified Professional in Supply Management ("CPSM").
13

14 **Q6. Have you previously submitted testimony in regulatory proceedings?**

15 A. Yes, I submitted testimony in a proceeding before the Indiana Utility Regulatory
16 Commission. The case was eventually settled so it was not necessary for me to
17 actually testify.
18

19 **Q7. What is the purpose of your testimony?**

20 A. The purpose of my testimony is to provide a brief description of the Joint Stipulation
21 and Recommendation that was filed in this proceeding on January 23, 2017. It is
22 my understanding that this Joint Stipulation and Recommendation has been

1 marked for identification as Joint Exhibit 1 (public version) and Joint Exhibit 1A
2 (confidential version). I was either directly involved in the negotiations that led to
3 this Joint Stipulation and Recommendation or supervised other people who were
4 directly involved in such negotiations. My testimony also addresses whether the
5 Joint Stipulation and Recommendation is the result of serious negotiations among
6 and between knowledgeable parties, whether it provides benefits to ratepayers
7 and the public interest and whether the Joint Stipulation and Recommendation
8 seeks to violate any regulatory principles or practices.
9

10 **Q8. Prior to describing the Joint Stipulation and Recommendation, please**
11 **summarize what happened in this proceeding prior to the submission of the**
12 **Joint Stipulation and Recommendation.**

13 A. On October 13, 2016, U. S. Steel Seamless Tubular Operations, LLC, Lorain
14 Tubular Operations ("LTO"), filed an application ("Application") seeking approval
15 of a reasonable arrangement between Ohio Edison Company ("OE") and LTO. At
16 the time this application was filed, LTO was working to complete a new high voltage
17 substation that was necessary to allow LTO to become a direct customer of OE
18 rather than to continue to receive electricity through facilities owned and controlled
19 by Republic Steel. In the Application, LTO requested that the Public Utilities
20 Commission of Ohio ("Commission") approve a reasonable arrangement that
21 would provide LTO with a fixed, "all-in" delivered price of electricity so that LTO
22 would have a predictable, stable and reasonable delivered price of electricity. The
23 construction of the new substation (costing about \$17.5 million) and the Application

1 were part of a larger effort to more fully utilize the productive capacity of this Lorain,
2 Ohio manufacturing facility.

3
4 **Q9. What happened after the Application was filed?**

5 A. Both before and after the Application was filed, LTO reached out to state and local
6 officials to inform them of our efforts to increase the utilization of the productive
7 capacity at LTO and we also reached out to the Commission's Staff and other
8 knowledgeable parties that we expected to seek to intervene in the reasonable
9 arrangement case. The discussions and interaction with the Commission's Staff
10 and other parties began proactively because we wanted to identify and, if possible,
11 resolve any issues and concerns through a good faith settlement process.

12
13 **Q10. Have you reviewed and are you familiar with the Application that was filed**
14 **on October 13, 2016?**

15 A. Yes.

16
17 **Q11. Are the claims and assertions contained in that Application true and**
18 **accurate based on your knowledge and belief?**

19 A. Yes.

1 **Q12. Please describe the Joint Stipulation and Recommendation.**

2 A. Based on the input, comments and suggestions we received from the
3 Commission's Staff, the Office of the Ohio Consumers' Counsel ("OCC"), OE, and
4 the Ohio Manufacturers' Association Energy Group ("OMAEG"), we identified and
5 eventually agreed upon an approach that was different than the "all-in" delivered
6 price approach proposed in the Application. More specifically and in light of the
7 past indirect participation of LTO's demand response capability in OE's
8 interruptible service offerings, the approach in the Joint Stipulation and
9 Recommendation confirms LTO's eligibility to subscribe to OE's current
10 interruptible service riders, Rider ELR, Economic Load Response, and Rider EDR,
11 Economic Development Rider, Interruptible Credit Provision, and successor riders.
12 The outcome proposed by the Joint Stipulation and Recommendation is
13 directionally consistent with what LTO was requesting through the Application and
14 it had the worthwhile benefit of either being supported or not opposed by the
15 Commission's Staff, OCC, OE and OMAEG. The approach in the Joint Stipulation
16 and Recommendation is also much simpler to administer and implement than the
17 approach in the Application because it resorted almost entirely to tariff provisions
18 that have already been approved by the Commission and are currently in effect.

19
20 **Q13. During the negotiation process that produced the Joint Stipulation and**
21 **Recommendation, did LTO respond to the other parties' questions and**
22 **requests for information?**

23 A. Yes and we did so promptly.

1 **Q14. Based on your interaction with the Commission's Staff, OCC, OE and**
2 **OMAEG, were the negotiations that produced the Joint Stipulation and**
3 **Recommendation between knowledgeable parties conducted in good faith?**

4 A. Yes.

5
6 **Q15. Previously you stated that you were directly involved in the negotiations that**
7 **produced the Joint Stipulation and Recommendation. Have you reviewed**
8 **the Joint Stipulation and Recommendation?**

9 A. Yes.

10
11 **Q16. Are the representations, claims and assertions contained in the Joint**
12 **Stipulation and Recommendation true and accurate based on your**
13 **knowledge and belief?**

14 A. Yes.

15
16 **Q17. And, does the Joint Stipulation and Recommendation fully and completely**
17 **describe the compromise and resolution of issues that are either supported**
18 **or not opposed by all the parties in this proceeding?**

19 A. Yes it does.

20

1 **Q18. Does the Joint Stipulation and Recommendation provide benefits to**
2 **ratepayers and the public interest?**

3 A. Yes. As explained above, the Joint Stipulation and Recommendation effectively
4 confirms LTO's eligibility for tariff provisions that have already been reviewed and
5 approved by the Commission as being reasonable and in the public interest. The
6 historical but indirect participation of LTO's demand response in OE's interruptible
7 service programs is the factual foundation for this confirmation. The interruptible
8 credits that LTO will receive will facilitate LTO's efforts to compete in the global
9 economy and give LTO a better opportunity to more fully utilize its productive
10 capacity. Fuller utilization of this productive capacity helps to keep direct and
11 indirect jobs in Ohio and makes other contributions to the state and local economy
12 through things like property and income taxes. In exchange for the interruptible
13 credits, LTO is obligated to reduce its demand in an emergency to make it more
14 likely that OE will be able to meet the needs of other customers. The Joint
15 Stipulation and Recommendation effectively produces the same result for LTO and
16 OE's other customers as the result that would have otherwise occurred had LTO
17 previously been a direct customer of OE.

18
19 **Q19. Is LTO now a direct customer of OE?**

20 A. Yes, the new substation became operational on or about January 11, 2017 as
21 mentioned in the Joint Stipulation and Recommendation.

1 **Q20. Does the Joint Stipulation and Recommendation violate any regulatory**
2 **principles or practices?**

3 A. No, as already explained, the Joint Stipulation and Recommendation effectively
4 confirms LTO's eligibility for tariff provisions that have already been reviewed and
5 approved by the Commission as being reasonable and in the public interest.
6

7 **Q21. Does that conclude your direct testimony?**

8 A. Not quite. On behalf of U. S. Steel, I offer thanks to the Commission's Staff, OCC,
9 OE and OMAEG for their assistance and cooperation throughout the process that
10 produced the Joint Stipulation and Recommendation. And I ask that the
11 Commission promptly approve the Joint Stipulation and Recommendation.
12

13 With that, I have no further direct testimony.

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Direct Testimony of Ralph R. Riberich, Jr.* was sent by, or on behalf of, the undersigned counsel for LTO to the following parties of record this 25th day of January 2017, *via* electronic transmission.

/s/ Samuel C. Randazzo

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