

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of                    )  
Ohio Power Company to Update Its                ) Case No. 15-240-EL-RDR  
gridSMART Rider.                                    )

In the Matter of the Application of                    )  
Ohio Power Company to Update Its                ) Case No. 15-1513-EL-RDR  
gridSMART Rider.                                    )

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**COMMENTS  
BY  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

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March 6, 2017

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**I. INTRODUCTION**

These cases mark the end of Ohio Power Company's ("Utility" or "Ohio Power") Phase I gridSMART project. Phase I of gridSMART was approved as part of the Utility's electric security plan under R.C. 4928.143. The law governing electric security plans requires that gridSMART programs be cost-effective.<sup>1</sup> In order for Ohio Power to legally collect a return on and of its gridSMART capital investments, the law also requires that "any property sought to be included in the calculation of utility rates must be used and useful in rendering public-utility service."<sup>2</sup> The Utility also has the burden to demonstrate that costs were prudently incurred and reasonable.<sup>3</sup>

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<sup>1</sup> R.C. 4928.02(D).

<sup>2</sup> *Indus. Energy Users-Ohio v. Pub. Utility Comm.*, 117 Ohio St.3d 486, 492 (2007), *Ohio Consumers' Counsel v. Pub. Util. Comm.*, 58 Ohio St.2d 449, 453 (1979).

<sup>3</sup> *Duke Energy Ohio v. Pub. Util. Comm.*, 131 Ohio St.3d 487, 488n (2012).

And yet, after the expenditure of nearly \$141 million<sup>4</sup>, of which consumers have paid more than \$60 million, there has been no showing that the gridSMART Phase I expenditures were cost effective. And there has been no showing that the capital investments in gridSMART Phase I are used and useful. Nor has there been any showing that the operation and maintenance (“O&M”) costs associated with gridSmart were prudently incurred.

The PUCO Staff’s review of gridSMART spending has been minimal, at best. In fact, this year’s initial review consisted of only a few pages and recommended a \$66,000 reduction to Ohio Power’s \$47 million revenue request.<sup>5</sup> This is only a one-tenth of one percent reduction in the amount Ohio Power would collect from customers through the gridSMART rider. The PUCO Staff admits that it only “examines the as-filed schedules for consistency with previous gridSMART orders to ensure proper accounting and regulatory treatment is applied.”<sup>6</sup>

Without a prudence review to determine if the expenditures are cost-effective and without a determination that gridSMART investment is used and useful and expenditures necessary to render service to customers (as required under R.C. 4909.15(A)(1)(4)), the PUCO cannot approve the collection of these costs from customers. All rates and charges to customers, according to R.C. 4905.22, must be just and reasonable. And to date, there has been no showing that the charges are just and reasonable and comply with the law. The PUCO should deny any further cost collection from customers of gridSMART Phase I costs until and unless it determines that the costs meet the above statutory standards.

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<sup>4</sup> Application at 4.

<sup>5</sup> Staff’s Updated Review and Recommendations at 3 (June 20, 2016).

<sup>6</sup> *Id.*

## II. PROCEDURAL BACKGROUND

On February 2, 2015, Ohio Power initiated Case No. 15-240 to review its gridSMART Phase I spending for 2014 and the projected revenue and spending for 2015.<sup>7</sup> Ohio Power requested approval to raise the monthly residential customer charge from \$0.51 to \$1.04.<sup>8</sup> At the time the application was filed, the gridSMART rider rate approved by the PUCO for 2013 gridSMART spending was in effect.<sup>9</sup> The PUCO had not issued an order in Case No. 14-192-EL-RDR regarding Ohio Power's gridSMART Phase I spending for 2014. After Ohio Power filed its application in Case No. 15-240, the PUCO approved a \$1.01 per month charge per residential customer for the gridSMART rider.<sup>10</sup>

On August 28, 2015, Ohio Power opened Case No. 15-1513, which is the final gridSMART Phase I rider case.<sup>11</sup> Case No. 15-1513 involves Ohio Power's actual gridSMART Phase I spending and revenue collection from customers for January through May 2015 and capital carrying costs from June through December 2015.<sup>12</sup>

On January 21, 2016, the PUCO Staff filed a Review in these cases. The PUCO Staff recommended that the gridSMART monthly charge for residential consumers be

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<sup>7</sup> Case No. 15-240-EL-RDR, Application at 2 (February 2, 2015).

<sup>8</sup> *Id.* at Attachment 4.

<sup>9</sup> *In the Matter of the Application of Ohio Power Company to Update Its gridSMART Rider*, Case No. 13-345-EL-RDR, Finding and Order (February 19, 2014).

<sup>10</sup> *In the Matter of the Application of Ohio Power Company to Update Its gridSMART Rider*, Case No. 14-192-EL-RDR, Finding and Order (March 18, 2015).

<sup>11</sup> In Ohio Power's second electric security plan case, the PUCO authorized Ohio Power to begin Phase II of gridSMART. The PUCO also directed Ohio Power to remove Phase I costs from the gridSMART rider to either the Distribution Investment Rider or a new gridSMART rider. This is because "the gridSMART Phase I rider was approved with specific limitations as to the equipment for which recovery could be sought, and a dollar limitation." *In the Matter of the Application of Columbus Southern Power company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan*, Case No. 11-346-EL-SSO, Opinion and Order (August 8, 2012) at 62-63 (footnote omitted).

<sup>12</sup> Case No. 15-1513-EL-RDR, Application at 3 (August 28, 2015).

lowered \$0.86, to \$0.15.<sup>13</sup> The PUCO Staff identified reductions totaling \$578,137 in Case No. 15-240 and another \$128,708 in Case No. 15-1513.<sup>14</sup>

Subsequently, Ohio Power filed Reply Comments disputing some of the adjustments that the PUCO Staff recommended.<sup>15</sup> On June 20, 2016, the PUCO Staff filed an Updated Review that agreed with some of Ohio Power's arguments. The PUCO Staff recommended that the gridSMART rider be reduced by only \$62,398 in Case No. 15-240 and \$210 in Case No. 15-1523.<sup>16</sup> The PUCO Staff recommended that the monthly charge to residential customers in the gridSMART rider be \$0.18.<sup>17</sup>

On February 9, 2017, the Attorney Examiner issued an Entry establishing March 6, 2017 as a deadline for Initial Comments and March 20, 2017 a deadline for filing Reply Comments.<sup>18</sup> OCC hereby timely files its Initial Comments.

The cost of Ohio Power's gridSMART Phase I project thus far is \$141.3 million.<sup>19</sup> The PUCO first approved gridSMART as part of Ohio Power's initial electric security plan. Notably at that time OCC as well as the PUCO Staff were skeptical of the program. At that time, the Staff of the PUCO argued that there should be risk-sharing between the ratepayers and shareholders, and the program should include an operational

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<sup>13</sup> Staff Review and Recommendations at 3 (January 21, 2016).

<sup>14</sup> *Id.* at 3-4.

<sup>15</sup> Reply Comments 2 – 11.

<sup>16</sup> Updated Review at 1-3.

<sup>17</sup> *Id.* at 4.

<sup>18</sup> Entry at 2.

<sup>19</sup> *In the Matter of the Application of Ohio Power Company to update its gridSMART Rider Rates*, Case No. 15-1513-EL-RDR, Application at 4 (Aug. 28, 2015).

savings or a cost-benefit analysis.<sup>20</sup> The Staff also pointed out that the Utility did not quantify any customer or societal benefits of the proposed gridSMART initiative.<sup>21</sup> The PUCO's Staff's arguments were well made, but seemingly ignored by the PUCO.

The PUCO did not adopt a risk-sharing approach between the ratepayers and shareholders. The PUCO did not expressly adopt a cost-benefit approach. And the PUCO failed to require Ohio Power to quantify any customer or societal benefits of gridSMART. Instead, the PUCO seemed focus on the potential long-term benefits to customers and the utility – primarily reliability, and customers' ability to manage and reduce their energy costs.

[I]t is important that steps be taken by the electric utilities to explore and implement technologies ... that will potentially provide long-term benefits to customers and the electric utility. GridSMART Phase 1 will provide CSP with beneficial information as to implementation, equipment preferences, customer expectations, and customer education requirements ... More reliable service is clearly beneficial to CSP's customers. The Commission strongly supports the implementation of AMI [advanced metering infrastructure] and DA [distribution automation initiative], with HAN [home area network], as we believe these advanced technologies are the foundation for AEP-Ohio providing its customers the ability to better manage their energy usage and reduce their energy costs.<sup>22</sup>

The PUCO stated that the technologies *should* provide long-term benefits to customers and the PUCO expected that more reliable service would clearly benefit its

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<sup>20</sup> *In the Matter of the Application of Columbus Southern Power Company for Approval of an Electric Security Plan; an Amendment to its Corporate Separation Plan; and the Sale or Transfer of Certain Generating Assets*, Case No. 08-917-EL-SSO, Order at 36 (March 18, 2009).

<sup>21</sup> *Id.*

<sup>22</sup> *In the Matter of the Application of Columbus Southern Power company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan*, Case No. 11-346-EL-SSO, Opinion and Order at 62 (Aug. 8, 2012), citing *In the Matter of the Application of Columbus Southern Power Company for Approval of an Electric Security Plan; an Amendment to its Corporate Separation Plan; and the Sale or Transfer of Certain Generating Assets*, Case No. 08-917-EL-SSO, Opinion and Order at 37 (March 18, 2009).

customers. However, the PUCO's assumptions for gridSMART have not come to fruition.

Ohio Power makes no pretense of providing more reliable service through gridSMART. In fact, its most recent reliability standards application requests that the PUCO allow it to worsen its standards.<sup>23</sup> And, an industry trade journal, SNL, reported that “[w]ith about 1.5 million customers in 2015, AEP subsidiary Ohio Power, known legally as Ohio Power Co., reported the highest SAIDI with MED [major event days] at 202 minutes, well above the industry average of 110 minutes, and SAIFI without MED of 1.32.”<sup>24</sup>

This is a clear indication that customers are not receiving more reliable service, which was part of the promise of gridSMART. Though customers continue to pay more and more for gridSMART, the purported reliability benefits are not being realized. Before approving the final costs of gridSMART Phase I, the PUCO should investigate, audit, and determine whether the costs customers are paying (and have paid) are reasonable, meet the standards of R.C. 4909.15, and, are cost effective, as required by law (R.C. 4828.02).

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<sup>23</sup> *In the Matter of the Establishment of 4901:1-10-10(B) Minimum Reliability Performance Standards for Ohio Power Company*, Case No. 16-1511-EL-ESS, Application (June 30, 2016).

<sup>24</sup> *Analysis: Electric utility reliability deteriorated in 2015*, Fawad, SNL, (Feb. 23, 2017). SAIFI and CAIDI are measurements for distribution system reliability. SAIFI is the system average interruption frequency index. It represents the average number of interruptions per customer. CAIDI is the customer average interruption duration index. It represents the average interruption duration or average time to restore service per interrupted customer. *See* Ohio Adm. Code 4901:1-10-10(B)(1).



### III. RECOMMENDATIONS

**A. Customers should not continue to pay for gridSMART Phase I investments in the Distribution Investment Rider that have not been found to be used and useful in providing service to customers, consistent with R.C. 4909.15**

Since the PUCO approved Ohio Power's gridSMART Phase I, the PUCO Staff has performed annual financial reviews of the costs associated with the gridSMART Phase I rider. These reviews are typically limited to an examination of expenditures from the previous year and projecting revenue needs for the upcoming year. In Case No. 15-240, the PUCO Staff reviewed the 2014 expenditures related to gridSMART. In Case No. 15-1513, the PUCO Staff reviewed the 2015 expenditures for the period January through May 2015. According to the ESP III Order, after June 1, 2015, the collection of gridSMART Phase I capital requirements (return on and of investment) will occur in the Ohio Power's Distribution Investment Rider ("DIR") cases.<sup>25</sup> Additional O&M requirements will be collected in the gridSMART Phase II rider.<sup>26</sup>

While financial reviews of the gridSMART Phase I rider are important, it is even more important that gridSMART Phase I investments be examined according to the standards under the law. Under R.C. 4928.02, the expenses of gridSMART Phase I must be cost effective. Under R.C. 4909.15(A)(1), the plant investments must be used and useful in providing service to customers. And under R.C. 4909.15(A)(4), the expenses for gridSmart Phase I must be shown to be necessary for providing service to customers. But Ohio Power has made no such showing; nor has the PUCO required such.

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<sup>25</sup> *In the Matter of the Application of Columbus Southern Power company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan*, Case No. 11-346-EL-SSO, Opinion and Order at 63(Aug. 8, 2012).

<sup>26</sup> *Id.*

Nor has the gridSMART Phase I program met the expectations that the PUCO espoused when first allowing Ohio Power to go forward with its pilot. For example, when the PUCO approved the gridSMART Phase I program, the PUCO mistakenly believed that the advanced technologies such as advanced metering infrastructure (“AMI”) and distribution automation (“DA”) were foundational for Ohio Power to provide customers with the ability to better manage their energy usage and reduce their energy costs.<sup>27</sup> And the PUCO expected that a properly designed AMI system and DA can decrease the scope and duration of electric outages.<sup>28</sup> But there has been no showing by Ohio Power that the AMI smart meters that Ohio Power installed have saved consumers money or provided all of the options necessary that could help customers reduce their electric bills. The reliability improvements associated with DA deployment on 70 circuits have not resulted in improved reliability. If anything, DA capabilities seem to be contributing to a decline in reliability performance.<sup>29</sup>

And yet despite these facts, customers continue to shoulder the bill for gridSMART Phase I investments that were never demonstrated to be cost effective. Customers will be paying a return on and of the gridSMART Phase I investments for many years through the DIR. Customers should not continue to pay for gridSMART investments that have not been found to be used and useful in providing utility service as required by R.C. 4909.15.

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<sup>27</sup> *In the Matter of the Application of Columbus Southern Power Company for Approval of an Electric Security Plan; an Amendment to its Corporate Separation Plan; and the Sale or Transfer of Certain Generating Assets*, Case No. 08-917-EL-SSO, Opinion and Order at 37 (March 18, 2009).

<sup>28</sup> *Id.*

<sup>29</sup> *In the Matter of the application of Ohio Power Company to Initiate Phase 2 of Its gridSMART Project and to Establish the gridSMART Phase 2 Rider*, Case No. 13-1939-EL-RDR, Direct Testimony of P. Lanzalotta at 29 - 32 (July 22, 2016).

**B. An examination of the reliability benefits that customers receive from the gridSMART Phase I is necessary to determine if customers should continue paying for the Distribution Automation capabilities through the DIR.**

The gridSMART Phase I project included Ohio Power deploying Distribution Automation Circuit Reconfiguration (“DACR”) capabilities on 70 circuits. When DACR is operating properly, customer interruptions can be avoided because electricity can be automatically rerouted around the location where a fault exists. As a result, fewer customers should be interrupted compared to the number of customers who would have lost power had DACR not been installed. DACR can also assist in identifying fault locations and in expediting restoration efforts.

DACR technology is expensive. In fact, Ohio Power spent approximately \$390,000 per circuit, or \$27.3 million collectively, in capital costs that are paid by customers to deploy DACR on the 70 circuits.<sup>30</sup> In addition, there is an on-going annual O&M cost of about \$800,000 that customers must pay associated with the 70 circuits that have DACR capabilities. These O&M costs will be collected from customers indefinitely through the gridSMART Phase II rider. Even though Ohio Power claims that the gridSMART DACR technology is supposed to improve reliability, it has proposed lowering its electric reliability standards. This comes at the same time that Ohio Power is also spending hundreds of millions of dollars annually through its DIR for infrastructure modernization through its DIR that is also supposed to improve reliability

In Ohio Power’s reliability standards case, Ohio Power now requests PUCO approval to lower its electric service reliability standards in a manner that puts all of its

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<sup>30</sup> *In the Matter of the Application of Ohio Power Company to Initiate Phase 2 of its gridSMART project and to Establish the gridSMART Phase 2 Rider*, Case No. 13-1939, Application, Attachment A at 8 (Sept. 13, 2013).

1.1 million customers at risk of more and longer service outages. This, despite Ohio Power's claim in its DIR work plan to "positively impact reliability performance to customers across the service territory."<sup>31</sup> Ohio Power's reliability standards Application seeks to allow longer customer outage times and more interruptions of electric service. Ohio Power proposes increasing both the SAIFI and the CAIDI reliability standards

Table 1 provides a comparison of Ohio Power's reliability for 2013 through 2015 compared with the PUCO Standard.

Table 1: AEP Reliability (2013 – 2015)

Ohio Power	2013	2014	2015
SAIFI Standard	1.2	1.2	1.2
CAIDI Standard (minutes)	150	150	150
SAIFI Performance	1.03	1.13	1.13
CAIDI Performance	140	134	139
gridSMART Phase I DACR SAIFI	0.85	1.28	1.36

While Ohio Power met the PUCO SAIFI standard of 1.2 and the CAIDI standard of 150 minutes for each year between 2013 and 2015, its SAIFI increased (became less reliable) in 2015 and 2014 compared with 2013. This means that the average number of outages that customers are experiencing is increasing. And SAIFI substantially increased (became less reliable) for the 70 circuits where the DACR was installed as part of the gridSMART Phase I. In 2013, the average number of outages for customers on the DACR feeder circuits experienced for the year was 0.85. Yet by 2015, the average number of outages customers on the DACR feeder circuits deteriorated to 1.36 (a decline

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<sup>31</sup> *In the Matter of the Commission's Review of the Ohio Power Company's Distribution Investment Rider Work Plan for 2016*, Case No. 16-24, Notice at 2 (Jan. 8, 2016).

in performance of approximately 63 percent). Reliability performance data for 2016 will be filed with the PUCO on March 31, 2017.

Even though Ohio Power claims that reliability performance would improve with gridSMART Phase I, the actual data shows something completely different. Customers have more outages and the durations are not substantially decreasing. Therefore, customers should not pay for technology that is not used and useful in providing the service. In other words customers should not be required to pay for gridSMART Phase I DACR costs that have not improved reliability.

**C. An examination of the costs and benefits of the AMI meters that Ohio Power purchased under the gridSMART Phase I program is necessary to justify charging customers for those costs through the DIR.**

The gridSMART Phase I program as approved by the PUCO included the installation of approximately 132,000 AMI meters deployed throughout the northeast quadrant of Franklin County.<sup>32</sup> The AMI meters cost approximately \$210 each,<sup>33</sup> or collectively \$27.7 million in capital costs, plus substantial investment in communications infrastructure. The actual quantifiable annual savings associated with the gridSMART Phase I AMI deployment is approximately \$6.50 per meter or \$858,000 annually.<sup>34</sup> Other benefits of the 132,000 AMI meters have either not been quantified or are unquantifiable. Regardless, a full examination of the AMI deployment is necessary to determine if the benefits that customers receive from the AMI meters support the costs. In other words, the charges that customers pay for gridSMART must be determined to be

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<sup>32</sup> *In the Matter of the Application of Ohio Power Company to Initiate Phase 2 of its gridSMART Project and to Establish the gridSMART Phase 2 Rider*, Case No. 13-1939-EL-RDR, Application, Attachment A at 2, 5 (Sept. 13, 2013).

<sup>33</sup> *Id.* at 8.

<sup>34</sup> *Id.* at 5.

reasonable. According to Title 49, the PUCO must ensure that utility charges are reasonable, cost-effective and that the property that the customers are paying for is used and useful in the provision of utility service.<sup>35</sup>

In considering the costs for the gridSMART Phase I AMI, the review should also consider the additional money Ohio Power is collecting from customers with AMI meters that are remotely disconnected for non-payment. Ohio Power sought and obtained PUCO approval to use the AMI technology to remotely disconnect customers who have gridSMART Phase I AMI meters without actually physically visiting the premises prior to the disconnection.<sup>36</sup> Remote disconnection/reconnection means that Ohio Power is able to avoid considerable labor and vehicle costs because its personnel do not have to make at least two physical visits to the customer's home, as required by PUCO rules. Ohio Power has not sought to reduce its base rates to customers to reflect its reduced costs.

Further, Ohio Power has not filed an application to reduce the reconnection fee for AMI disconnections to reflect the lower cost of service associated with automated remote disconnections. Customers who have AMI meters and are remotely disconnected for non-payment must still pay the same labor intensive tariffed reconnection fee of \$53 that a customer without AMI must pay to have services restored. Between June 1, 2015 and May 31, 2016, Ohio Power disconnected a total of 135,872 customers across all of the counties it serves in Ohio.<sup>37</sup> Nearly one third of those disconnections – 40,299 –

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<sup>35</sup> R.C. 4905.22, 4909.15, and 4928.02(D).

<sup>36</sup> *In the Matter of the Application of Ohio Power Company for a Limited Waiver of Ohio Adm. 4901:1-18(A)(2)*, Case No. 13-1398, Entry (March 18, 2015).

<sup>37</sup> *In the Matter of the Annual Report of Service Disconnections for Nonpayment Required by 4933.123 Ohio Revised Code*, Case No. 16-1224-GE-UNC, Ohio Power's Notice at 2 (June 30, 2016).

coincidentally occurred in the gridSMART Phase I service area (Northeast Franklin County) where the AMI meters are deployed.<sup>38</sup> The PUCO's review should ensure that Ohio Power cannot profit from the remote disconnection of customers who have AMI meters.

#### **IV. CONCLUSION**

According to R.C. 4905.22, the PUCO cannot allow utilities to charge customers unjust or unreasonable costs. Therefore, the PUCO must, in following its duties prescribed under R.C. 4905.04, ensure that its orders are in accordance with the law. However, the PUCO has never made a reasonableness determination concerning Ohio Power's gridSMART Phase I charges to customers. Because Title 49 requires that customers pay only reasonable charges for gridSMART Phase I, OCC asks the PUCO to order a prudence review of gridSMART Phase I capital investments and costs charged to customers before allowing Ohio Power to charge its customers any more dollars for the gridSMART Phase I program.

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<sup>38</sup> *In the Matter of the Application of Ohio Power Company to Initiate Phase 2 of Its gridSMART Project and to Establish the gridSMART Phase 2 Rider*, Case No. 13-1939-EL-RDR, Direct Testimony of J. Williams at 21 (July 22, 2016).

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