

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**CASE NO. 16-0395-EL-SSO  
CASE NO. 16-0396-EL-ATA  
CASE NO. 16-0397-EL-AAM**

**DIRECT TESTIMONY OF  
DR. CHARLES J. SHREVE, SUPERINTENDENT  
ON BEHALF OF  
MANCHESTER LOCAL SCHOOL DISTRICT  
ADAMS COUNTY, OHIO**

Q. Please state your name for the record.

A. Dr. Charles J. Shreve

Q. What position do you hold in local government?

A. I am superintendent of the Manchester Local School District. The Manchester LSD serves approximately 930 students pre-Kindergarten through grade 12 in the southern portion of Adams County, Ohio.

Q. How have the presence of the Stuart and Killen generating plants economically benefitted the School District?

A. At the beginning of the current school year (fiscal year), the District's annual revenue was approximately \$11,000,000, all but \$4,000,000 of which is locally generated through the Stuart and Killen plants.

Q. What economic concerns do you have?

A. If the plants close, this will automatically devalue the existing holdings as well as the property itself. If the plants close, the total loss to the District could reach as much as \$7,000,000 out of what was, at the beginning of this school year, an \$11,000,000 budget.

Q. What effect would that have on the Manchester LSD?

A. Obviously, the District cannot cut enough people and/or programs to cover that level of loss and still deliver to the boys and girls of the District an education that meets the Minimum Standards for Ohio Elementary and Secondary Schools.

Q. Is that the only effect that plants closure would have?

A. Actually, no. Because of the dependence of the Village of Manchester and the townships that comprise the School District (as well as Adams County itself) on the tax revenue

generated by Stuart and Killen, support services such as police, fire, ambulance, and social services would be severely affected.

Q. What are you requesting that the PUCO take into consideration in this case?

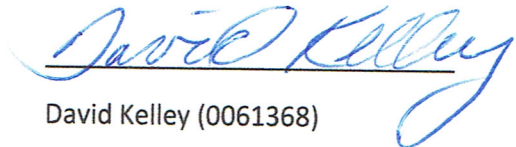
A. I would ask the members of the PUCO to address whether the granting or denial of a rate increase would directly result in either further devaluation or subsequent closure of the two power stations in Adams County. I would ask them to approve any agreement between the parties in front of this Commission that is most likely to result in no further reduction in valuation, and ideally, the continued operation of the two power stations in Adams County to at least until 2023 or beyond. The economic impact facing our county and schools if devaluation and closure do in fact continue and take place, will far surpass the Two Million Dollars allotted for economic development in our area.

Q. Does this conclude your direct testimony on this matter?

A. Yes.

## CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to these cases. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 29th day of March 2017.



David Kelley (0061368)

<a href="mailto:thomas.mcnamee@ohioattorneygeneral.gov">thomas.mcnamee@ohioattorneygeneral.gov</a> <a href="mailto:natalia.messenger@ohioattorneygeneral.gov">natalia.messenger@ohioattorneygeneral.gov</a> <a href="mailto:fdarr@mwncmh.com">fdarr@mwncmh.com</a> <a href="mailto:mpritchard@mwncmh.com">mpritchard@mwncmh.com</a> <a href="mailto:william.michael@occ.ohio.gov">william.michael@occ.ohio.gov</a> <a href="mailto:andrew.garver@occ.ohio.gov">andrew.garver@occ.ohio.gov</a> <a href="mailto:kevin.moore@occ.ohio.gov">kevin.moore@occ.ohio.gov</a> <a href="mailto:ajay.kumar@occ.ohio.gov">ajay.kumar@occ.ohio.gov</a> <a href="mailto:dboehm@BKLLawfirm.com">dboehm@BKLLawfirm.com</a> <a href="mailto:mkurtz@BKLLawfirm.com">mkurtz@BKLLawfirm.com</a> <a href="mailto:kboehm@BKLLawfirm.com">kboehm@BKLLawfirm.com</a> <a href="mailto:jkylercohn@BKLLawfirm.com">jkylercohn@BKLLawfirm.com</a> <a href="mailto:bojko@carpenterlipps.com">bojko@carpenterlipps.com</a> <a href="mailto:perko@carpenterlipps.com">perko@carpenterlipps.com</a> <a href="mailto:joliker@igsenergy.com">joliker@igsenergy.com</a> <a href="mailto:mswhite@igsenergy.com">mswhite@igsenergy.com</a> <a href="mailto:Ebetterton@igsenergy.com">Ebetterton@igsenergy.com</a> <a href="mailto:schmidt@sppgrp.com">schmidt@sppgrp.com</a> <a href="mailto:evelyn.robinson@pjm.com">evelyn.robinson@pjm.com</a> <a href="mailto:jeffrey.mayes@monitoringanalytics.com">jeffrey.mayes@monitoringanalytics.com</a> <a href="mailto:sechler@carpenterlipps.com">sechler@carpenterlipps.com</a> <a href="mailto:tdougherty@theOEC.org">tdougherty@theOEC.org</a> <a href="mailto:paul@carpenterlipps.com">paul@carpenterlipps.com</a> <a href="mailto:mleppla@theOEC.org">mleppla@theOEC.org</a> <a href="mailto:cmooney@ohiopartners.org">cmooney@ohiopartners.org</a> <a href="mailto:mdortch@kravitzllc.com">mdortch@kravitzllc.com</a> <a href="mailto:rparsons@kravitzfic.com">rparsons@kravitzfic.com</a> <a href="mailto:mfleisher@elpc.org">mfleisher@elpc.org</a> <a href="mailto:kfield@elpc.org">kfield@elpc.org</a> <a href="mailto:rsahli@columbus.rr.com">rsahli@columbus.rr.com</a> <a href="mailto:lhawrot@spilmanlaw.com">lhawrot@spilmanlaw.com</a> <a href="mailto:cpirik@dickinsonwright.com">cpirik@dickinsonwright.com</a> <a href="mailto:wvorys@dickinsonwright.com">wvorys@dickinsonwright.com</a> <a href="mailto:crtamm@classicconnectors.com">crtamm@classicconnectors.com</a> <a href="mailto:jstock@beneschlaw.com">jstock@beneschlaw.com</a>	<a href="mailto:chris@envlaw.com">chris@envlaw.com</a> <a href="mailto:dwilliamson@spilmanlaw.com">dwilliamson@spilmanlaw.com</a> <a href="mailto:tony.mendoza@sierraclub.org">tony.mendoza@sierraclub.org</a> <a href="mailto:kristin.henry@sierraclub.org">kristin.henry@sierraclub.org</a> <a href="mailto:charris@spilmanlaw.com">charris@spilmanlaw.com</a> <a href="mailto:michelle.d.grant@dynegey.com">michelle.d.grant@dynegey.com</a> <a href="mailto:Stephen.Christ@walmart.com">Stephen.Christ@walmart.com</a> <a href="mailto:Greg.Tillman@walmart.com">Greg.Tillman@walmart.com</a> <a href="mailto:mjsettinieri@vorys.com">mjsettinieri@vorys.com</a> <a href="mailto:smhoward@vorys.com">smhoward@vorys.com</a> <a href="mailto:glpetrucci@vorys.com">glpetrucci@vorys.com</a> <a href="mailto:ibatikov@vorys.com">ibatikov@vorys.com</a> <a href="mailto:wasieck@vorys.com">wasieck@vorys.com</a> <a href="mailto:slessor@calfee.com">slessor@calfee.com</a> <a href="mailto:ilang@calfee.com">ilang@calfee.com</a> <a href="mailto:talexander@calfee.com">talexander@calfee.com</a> <a href="mailto:mkeaney@calfee.com">mkeaney@calfee.com</a> <a href="mailto:gthomas@gtpowergroup.com">gthomas@gtpowergroup.com</a> <a href="mailto:jdoll@djflawfirm.com">jdoll@djflawfirm.com</a> <a href="mailto:mccrawford@djflawfirm.com">mccrawford@djflawfirm.com</a> <a href="mailto:stheodore@epsa.org">stheodore@epsa.org</a> <a href="mailto:laurac@chappelleconsulting.net">laurac@chappelleconsulting.net</a> <a href="mailto:rick.sites@ohiohospitals.org">rick.sites@ohiohospitals.org</a> <a href="mailto:ejacobs@ablelaw.org">ejacobs@ablelaw.org</a> <a href="mailto:mwarnock@bricker.com">mwarnock@bricker.com</a> <a href="mailto:dborchers@bricker.com">dborchers@bricker.com</a> <a href="mailto:amy.spiller@duke-energy.com">amy.spiller@duke-energy.com</a> <a href="mailto:jeanne.kingery@duke-energy.com">jeanne.kingery@duke-energy.com</a> <a href="mailto:elizabeth.watts@duke-energy.com">elizabeth.watts@duke-energy.com</a> <a href="mailto:todonnell@dickinsonwright.com">todonnell@dickinsonwright.com</a> <a href="mailto:rseiler@dickinsonwright.com">rseiler@dickinsonwright.com</a> <a href="mailto:ocollier@beneschlaw.com">ocollier@beneschlaw.com</a> <a href="mailto:prosecutorkelley@usa.com">prosecutorkelley@usa.com</a> <a href="mailto:dana.whalen@adamscountyoh.gov">dana.whalen@adamscountyoh.gov</a> <a href="mailto:dparram@bricker.com">dparram@bricker.com</a>
--	--

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**3/29/2017 1:11:20 PM**

**in**

**Case No(s). 16-0395-EL-SSO, 16-0396-EL-ATA, 16-0397-EL-AAM**

Summary: Testimony of Dr. Charles J. Shreve, Superintendent electronically filed by Mrs. Dana N Whalen on behalf of Manchester Local School District