

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)
Ohio Power Company for Authority to)
Establish a Standard Service Offer) Case No. 16-1852-EL-SSO
Pursuant to R.C. 4928.143, in the Form of)
an Electric Security Plan.)

In the Matter of the Application of Ohio)
Power Company for Approval of Certain) Case No. 16-1853-EL-AAM
Accounting Authority.)

**SUPPLEMENTAL TESTIMONY
OF
JAMES D. WILLIAMS**

**IN OPPOSITION TO THE
JOINT STIPULATION AND RECOMMENDATION**

On Behalf of
The Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485

October 11, 2017

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1 **I. INTRODUCTION**

2

3 ***Q1. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.***

4 ***A1.*** My name is James D. Williams. My business address is 10 West Broad Street,
5 18th Floor, Columbus, Ohio 43215-3485. I am employed by the Office of the
6 Ohio Consumers' Counsel ("OCC") as a Senior Utility Consumer Policy Analyst.

7

8 ***Q2. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING***
9 ***BEFORE THE PUCO?***

10 ***A2.*** Yes. I filed Direct Testimony in this case on May 2, 2017. My professional
11 experience and qualifications are included in that Direct Testimony.

12

13 **II. PURPOSE OF MY TESTIMONY**

14

15 ***Q3. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY IN***
16 ***THIS PROCEEDING?***

17 ***A3.*** The purpose of my Supplemental Direct Testimony is to address certain issues
18 related to a Joint Stipulation and Recommendation ("Settlement") that was signed
19 by certain parties to this case and filed at the Public Utilities Commission of Ohio
20 ("PUCO") on August 25, 2017.¹ The Settlement includes provisions related to the
21 Distribution Investment Rider ("DIR"), and Enhanced Service Reliability Rider

¹ In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143, in the Form of an Electric Security Plan, Case No. 16-1852-EL-SSO, Joint Stipulation and Recommendation (August 25, 2017) ("Settlement").

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1 (“ESRR”) or Tree-trimming Rider. I believe approval of these riders by the
2 PUCO, as proposed, would not benefit customers nor be in the public interest.

3

4 ***Q4. PLEASE EXPLAIN WHY YOU DO NOT BELIEVE THE DIR AND ESRR AS***
5 ***PROPOSED IN THE SETTLEMENT WILL NOT BENEFIT CUSTOMERS***
6 ***OR BE IN THE PUBLIC INTEREST.***

7 ***A4.*** It is my understanding that the PUCO will adopt a settlement only if it meets all
8 of the three criteria below. In analyzing a settlement, the PUCO must decide the
9 following:

- 10 1. Is the proposed stipulation a product of serious bargaining among
11 capable, knowledgeable parties?
- 12 2. Does the proposed stipulation, as a package, benefit customers and
13 the public interest?
- 14 3. Does the proposed stipulation violate any important regulatory
15 principle or practice?²

16 In addition to these three criteria, the PUCO also routinely considers
17 whether the parties to the stipulation represent diverse interests.³ My
18 analysis of the Settlement concludes that the continuation of both the DIR

² Consumers' Counsel v. Pub. Util. Comm., 64 Ohio St 3d 123, 125(1992), citing Akron v. Pub. Util. Comm., 55 Ohio St. 2d 155, 157 (1978).

³ 3 See, e.g., In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company, Individually and, if Their Proposed Merger Is Approved, as a Merged Company (collectively, AEP Ohio) for an Increase in Electric Distribution Rates, Case No. 11-351-EL-AIR, et al., Opinion and Order (December 14, 2011) at 9; In re Application of the Dayton Power & Light Co. for Approval to Modify its Competitive Bid True-up Rider, Case No. 14-563-EL-RDR (Sep. 9, 2015); In re Application of the Columbus S. Power Co. & Ohio Power Co. for Authority to Recover Costs Associated with the Ultimate Construction and Operation of an Integrated Gasification Combined Cycle Electric Generation Facility, Case No. 05-376- EL-UNC (Feb. 11, 2015).

1 and ESRR is not beneficial for customers and is not in the public interest
2 as explained below.

3
4 **III. SPECIFIC ISSUES IN THE SETTLEMENT**

5
6 ***Q5. PLEASE EXPLAIN HOW THE SETTLEMENT ADDRESSES THE DIR***
7 ***THAT CUSTOMERS MUST PAY.***

8 **A5.** The Settlement supports AEP Ohio continuing the DIR through the extended term
9 of the Electric Security Plan (“ESP”) III.⁴ The Settlement proposes annual DIR
10 revenue caps of \$215 million in 2018, \$240 million in 2019, \$265 million in
11 2020, and \$290 million in 2021. AEP Ohio also agreed to file a distribution base
12 rate case by June 1, 2020, to address concerns with the amount of money being
13 collected from customers as a result of excessive distribution riders.⁵ If AEP
14 Ohio does not file a distribution rate case by June 1, 2020, the DIR revenue cap
15 for 2021 and beyond would be zero.⁶ The Settlement contemplates distribution
16 rate cases being filed every five years following the next distribution rate case, if
17 the DIR continues in effect.⁷

⁴ See Settlement at 4-6.

⁵ Settlement Section (C)(1) states “In order to help address concerns about some of the distribution riders becoming excessive and to recalibrate the costs being reflected in base rates versus the riders, the Company agrees to file a base distribution case by June 1, 2020.”

⁶ Settlement at 5.

⁷ Id.

1 ***Q6. CAN YOU BRIEFLY EXPLAIN WHY THE SETTLEMENT PROVISIONS***
2 ***REGARDING THE DIR RIDER THAT CUSTOMERS MUST PAY DO NOT***
3 ***PROVIDE BENEFITS TO CONSUMERS AND ARE NOT IN THE PUBLIC***
4 ***INTEREST?***

5 ***A6.*** Yes. As stated in my Direct Testimony, the DIR is expensive and is driving up
6 the costs of customer electric bills during a time when lower energy prices should
7 be reducing electric bills.⁸ A residential customer using 1,000 kWh is currently
8 paying \$8.10 per month⁹ (or almost \$100.00 annually) for a rider that is not
9 contributing to better distribution reliability or reasonably priced AEP Ohio bills.
10 Having spent over \$1.5 billion in distribution investments since the DIR was
11 initiated,¹⁰ AEP Ohio is now seeking less stringent distribution reliability
12 standards that support customers having more frequent annual outages that last for
13 much longer durations of time.¹¹ This could be because AEP Ohio is not
14 performing studies or analysis to determine the relationship between reliability,
15 distribution investment, and customer satisfaction.¹² DIR incents the Utility to
16 increase its spending of customer money - - not providing benefits for customers.

⁸ Williams, Direct Testimony at 18.

⁹ <https://www.aepohio.com/account/bills/rates/>.

¹⁰ Williams, Direct Testimony at 18.

¹¹ Williams, Direct Testimony at 24.

¹² According to the AEP Ohio response to Stip-INT-1-058 (attached herein as JDW-1).

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1 The excessive DIR spending (as supported in the Settlement) comes at a time
2 when many Ohioans are not even getting enough to eat.¹³ According to the most
3 recent research performed by the Health Policy Institute of Ohio, Ohio is ranked
4 45th in the nation for states that have high percentages of the population having
5 insecure access to food on a daily basis. 16 percent of Ohioans live in food-
6 insecure households including nearly a quarter of children and 18 percent of
7 seniors. Consequently, the DIR proposal in the Settlement, which would charge
8 customers approximately \$100 annually, will harm customers who would benefit
9 more by using this money to purchase food and other necessities for their
10 families.

11
12 Until and unless there is a distribution rate case, customers will continue to
13 experience regular increases in their electric bills because of the increasing DIR
14 caps. Furthermore, without a base distribution rate case, there is no opportunity
15 for a thorough examination of investments being funded through the DIR,¹⁴ or a
16 comprehensive examination of AEP Ohio financial records where all distribution
17 revenues and expenses are reviewed contemporaneously.¹⁵ And, a rate case is
18 necessary to adjust electric rates as appropriate so that any operational cost
19 savings that AEP Ohio has obtained through its massive DIR investments are
20 passed along to customers in the form of lower bills.

¹³ Health Policy Institute of Ohio. State Policy Options to Increase Food Security and Access to Healthy Food, Updated April 2017 (Attached herein as JDW-2).

¹⁴ According to the AEP Ohio response to Stip-INT-1-059 (attached herein as JDW-3), there is no indication that AEP Ohio requires even basic cost benefit analysis for investments made through the DIR.

¹⁵ Williams Direct Testimony at 13.

1 ***Q7. DOES THE SETTLEMENT OBLIGATE AEP OHIO TO FILE***
2 ***DISTRIBUTION BASE RATE CASES?***

3 ***A7.*** No. The Settlement claims that AEP Ohio has made a commitment to file a
4 distribution rate case by June 1, 2020. Yet, the same Settlement specifically
5 conditions the rate case commitment on continuance of the DIR.¹⁶

6 *If no distribution rate case application is filed by June 1, 2020, the*
7 *DIR Rider mechanism will sunset on December 31, 2020 and the*
8 *DIR rider revenue cap for 2021 and beyond will be zero.*
9

10 In other words, AEP Ohio ultimately gets to decide if a distribution rate case is
11 filed in 2020 regardless of the supposed commitment in the Settlement. The DIR
12 is scheduled to end at the conclusion of the ESP (May 31, 2018). The Settlement
13 supports AEP Ohio continuing the DIR through at least 2020 even if AEP Ohio
14 chooses not to file a distribution rate case by June 1, 2020. Therefore, even
15 though the Settlement mentions that the costs of the AEP Ohio riders are
16 excessive,¹⁷ it does nothing to expeditiously end the constant extraction of money
17 from customers' wallets. Between 2018 and 2020, the Settlement supports AEP
18 Ohio spending another \$720 million of customer-funded money through the DIR.
19 And if the rate case is filed by June 1, 2020, the Settlement supports AEP Ohio
20 spending another \$290 million in 2021. Finally, the Settlement alludes to some
21 obligation for AEP Ohio to file distribution rate cases every five years after the

¹⁶ Settlement at 5.

¹⁷ See fn 3.

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1 next rate case.¹⁸ However, according to the AEP Ohio response to Stip-OCC-
2 INT-1-052 (attached herein as JDW-4), AEP Ohio is making no commitment for
3 filing distribution base rate cases every five years if the DIR continues.

4

5 ***Q8. DO YOU HAVE A SPECIFIC RECOMMENDATION FOR THE***
6 ***COMMISSION CONCERNING WHETHER CUSTOMERS SHOULD***
7 ***CONTINUE TO FUND THE DIR?***

8 ***A8.*** Yes. My recommendation is that the Commission should reject the Settlement
9 and end customer funding of the DIR concurrent with the term of the current ESP
10 (May 31, 2018). Additionally, AEP Ohio should be ordered to file a distribution
11 base rate case concurrent with the conclusion of the current ESP that updates the
12 Utility rate base to include DIR investments made since the date certain in the last
13 distribution base rate case. And the PUCO should require AEP to adopt rates to
14 customers that are more reflective of current operating income and expenses.

15

16 ***Q9. PLEASE EXPLAIN HOW THE SETTLEMENT ADDRESSES THE ESRR***
17 ***RIDER THAT CUSTOMERS PAY.***

18 ***A9.*** The Settlement supports AEP Ohio continuing to collect \$27.6 million annually
19 from customers for the ESRR tree-trimming rider until at least December 31,
20 2020.¹⁹ However, if AEP Ohio files a distribution rate case by June 1, 2020, the

¹⁸ Settlement at 5. "It is contemplated that new distribution rate cases will be filed every fifth year following the next AIR case filing at which time the DIR baseline, if the DIR is still in use, will be reset in a manner consistent with the new rate base."

¹⁹ Settlement at 33-34.

1 Utility would be able to continue collecting money from customers until an order
2 is issued in that base rate case. Furthermore, the Settlement supports the
3 continuance of the ESRR as an issue to be addressed in the next base rate case.
4

5 ***Q10. CAN YOU EXPLAIN WHY THE SETTLEMENT PROVISION REGARDING***
6 ***THE ESRR RIDER THAT CUSTOMERS PAY DOES NOT PROVIDE***
7 ***BENEFITS TO CONSUMERS AND IS NOT IN THE PUBLIC INTEREST?***

8 ***A10.*** Yes. As I explained in my Direct Testimony, the ESRR has not proven effective
9 in significantly reducing outages caused by trees and customers should not have
10 to continue paying for the ESRR as a separate rider on their bill.²⁰ AEP Ohio is
11 collecting \$24.2 million annually in base rates for tree-trimming expenses.²¹ In
12 addition, the Utility is collecting approximately \$27.6 annually through the ESRR
13 Rider.²² Without the Settlement, the ESRR Rider is slated to end at the
14 conclusion of the current ESP (May 31, 2018). The Settlement will cost AEP
15 Ohio customers at-least an additional \$82.8 million between 2018 and 2020 for
16 tree-trimming expenses that rightfully should be included in base rates. For
17 individual residential consumers using 1,000 KWh per month, the ESRR currently
18 costs almost \$2.00 per month or \$24.00 annually.

²⁰ Williams Direct Testimony at 28.

²¹ Williams Direct Testimony at 26.

²² Id.

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1 The ESRR was approved initially in 2009 to provide AEP Ohio funding to
2 transition to a four-year cycle-based tree-trimming program.²³ Eight years later,
3 the Settlement indicates that AEP Ohio has agreed to maintain a four-year cycle
4 based tree-trimming program.²⁴ However, the Utility is required according to its
5 Maintenance, Repair, Replacement and Inspection program to maintain a four
6 year cycle based tree-trimming program regardless of the Settlement.²⁵
7 Customers have already paid over \$450 million since the ESRR was initiated.²⁶

8

9 ***Q11. DO YOU HAVE A SPECIFIC RECOMMENDATION FOR THE***
10 ***COMMISSION CONCERNING WHETHER CUSTOMERS SHOULD***
11 ***CONTINUE TO PAY THE ESRR?***

12 ***A11.*** Yes. My recommendation is that the Commission should reject the Settlement
13 and end customer funding of the ESRR concurrent with the term of the current
14 ESP (May 31, 2018). AEP Ohio should have the opportunity to justify the level
15 of expenses necessary in base rates to comply with PUCO requirements in its next
16 distribution base rate case.

²³ *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 08-917-EL-SSO, Opinion and Order (March 18, 2009 at 34).

²⁴ Settlement at 34.

²⁵ *In the matter of the Report -Update to Ohio Power Company's program for maintenance, repair and inspection of transmission and distribution line as required by 4901:1-10-27(E),* Case No. 15-2071-EL-ESS (December 14, 2015).

²⁶ Williams Direct Testimony at 26.

1 **IV. CONCLUSION**

2

3 ***Q12. DOES THIS CONCLUDE YOUR TESTIMONY?***

4 ***A12.*** Yes. However, I reserve the right to incorporate new information that may
5 subsequently become available through outstanding discovery or otherwise.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Supplemental Testimony of James D. Williams on Behalf of the Office of the Ohio Consumers' Counsel* was served via electronic transmission to the persons listed below on this 11th day of October 2017.

/s/ William J. Michael
William J. Michael
Assistant Consumers' Counsel

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**OHIO POWER COMPANY'S RESPONSE TO
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S
DISCOVERY REQUEST
PUCO CASE NO. 16-1852-EL-SSO et al.
FIRST SET-STIPULATION**

DATA REQUEST

STIP-OCC-INT-1-058 Relative to the Company planning for the DIR, has the Company performed any studies or analyses to determine the relationship between reliability, distribution investment, and customer satisfaction.

RESPONSE

The Company objects to the form of the question as this request is vague, overbroad and/or unduly burdensome. Without waiving the foregoing objections or any general objection the Company may have, the Company states as follows. The Company has not performed a separate or distinct study that determines the relationship between reliability, distribution investment, and customer satisfaction that supports the proposition being discussed. The DIR investments inherently support reliability and no study is needed to confirm that relationship. The Company maintains that its position is just and reasonable. The relationship between reliability, distribution investment, and customer satisfaction is based on discussions with experienced AEP Ohio employees and a review of the Company trends.

Prepared by: William A. Allen
 Counsel



POLICY OPTIONS FACT SHEET

Updated April 2017

State policy options to increase food security and access to healthy food

The **2017 HPIO Health Value Dashboard** identified food insecurity as one of Ohio's greatest health challenges. This fact sheet highlights effective strategies to increase food security and improve access to healthy food and nutrition outcomes.

Food insecurity in Ohio

- **Ohio is in the bottom quartile of states for food insecurity, ranking 45th.** This means that a higher percent of Ohioans are living without reliable, daily access to enough food compared to the percent in most other states.¹
- **Sixteen percent of Ohioans live in food-insecure households,**² including nearly a quarter of children³ and 18 percent of seniors.⁴

Health outcomes and costs

- Poor nutrition is a key factor in many of the leading causes of death in Ohio, including **heart disease, stroke, diabetes and cancer.**⁵
- Food insecurity is associated with **increased diabetes risk and poor diabetes control in adults**⁶ and **poor academic performance in children.**⁷
- Almost 15 percent of working-age adults enrolled in Medicaid in Ohio report having diabetes, well above the state rate of about 11 percent.⁸ **Managing diabetes is estimated to cost Medicaid nearly \$4,000 per person per year in medical costs.**⁹

Evidence-based strategies relevant to state policy	Proven outcomes	
	Increased access to/sales of healthy foods and/or improved nutrition	Increased food security
Fruit and vegetable incentive programs. See detail on page 2	✓	
Healthy food in convenience stores/small retailers. ★ See detail on page 3	✓	
Nutrition interventions in preschool and child care. Healthy food for children in child care could be incentivized through the Step Up to Quality rating system and supported through increased training and technical assistance (Ohio Healthy Program).	✓	
Diabetes Prevention Program. Use of this nutrition and physical activity coaching program could be expanded through increased provider screening and referral, funding for new sites and/or Medicaid reimbursement.	✓	
School breakfast programs. ★ Participation in this federally-funded program could be increased. Ohio had more than \$26 million in unclaimed federal reimbursements in 2015-16. ¹⁰	✓	✓
Housing assistance, such as rental housing vouchers or rapid re-housing programs. ★ Many low-income families spend more than half of their income on housing, leaving little left for food.		✓

★=Likely to reduce health disparities (**What Works for Health** has indicated that the strategy is likely to decrease disparities, including racial/ethnic, socioeconomic, geographic or other disparities, based upon the best available evidence.)

Blue text indicates link to detailed strategy description

Fruit and vegetable incentive programs

Nutrition incentives increase the value of Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps) dollars when spent on produce, making fruits and vegetables more affordable for low-income consumers.¹¹ For example, when a consumer spends \$10 in SNAP on fruits and vegetables, they get an additional \$10 to spend on fruits and vegetables.

These incentive programs bring new dollars into local economies through payments to farmers and food retailers.

Ohio status

- In 2016, SNAP incentive programs were operating in 12 Ohio counties. Seventy-three of Ohio's 316 farmers markets participated (23 percent).¹² Local programs included Produce Perks in Cincinnati and Cleveland, Veggie SNAPS in central Ohio, Carrot Cash in Akron and Double Food Bucks in Toledo.
- Expanding in 2017 under the statewide name **Produce Perks**, these programs will include a small number of grocery stores, as well as farmers markets. The goal is to reach approximately 27,000 low-income Ohioans this year.
- Produce Perks is currently supported by local and state funding, as well as federal funding from the U.S. Department of Agriculture (USDA) Food Insecurity Nutrition Incentive (FINI) grant program.

Policy options

The Produce Perks incentive program could be scaled up to reach more low-income and rural communities by:

- Expanding the number of SNAP consumers and retailers (grocery stores, convenience stores, farmers markets, etc.) participating in Produce Perks.
- Increasing the efficiency of electronic benefits transfer (EBT) for Ohio's SNAP processing vendors by providing wireless EBT equipment and service to all farmers markets as part of their state SNAP contract.

In addition to fruit and vegetable incentives, limiting unhealthy foods purchased with SNAP funds may increase the effectiveness of incentive programs.¹³ However, the USDA has not allowed any jurisdictions to implement restrictions.

Possible funding sources

- Support the Ohio Nutrition Incentive Network's effort to secure a large-scale FINI grant from the USDA. A 100 percent non-federal match is required.
- Invest a portion of existing soft drink sales tax revenue toward food access strategies, such as Produce Perks. (Ohio's sales tax applies to soft drinks.¹⁴)
- Encourage investment through private philanthropy, corporate sponsorship, hospital community benefit and/or state general revenue to expand Produce Perks.

See **Evidence Inventory** publication for details and additional strategies

Healthy food in convenience stores/small retailers

Small retailers such as convenience stores, gas stations and corner stores are sometimes the only food retail options in low-income or rural communities. These stores typically carry foods such as sugary drinks, chips and candy, rather than fruits, vegetables or other nutritious foods.

Initiatives that include financial incentives, infrastructure (such as refrigeration) and marketing can support small retailers to carry fresh produce and other healthier options. These programs can lead to increased customer traffic and profit for small food retailers.¹⁵

Ohio status

- Ohio's **Good Food Here** initiative, coordinated by the Ohio Department of Health, provides technical assistance and marketing materials to local communities to encourage small food retailers to stock fruits, vegetables, whole grains and other healthier food options. Using grant funds, some local communities also provide incentives for store improvements, such as paying for shelving and refrigeration.
- In 2016, 80 stores in 11 counties were participating in the Good Food Here program.¹⁶

Policy options

The Good Food Here initiative could be scaled up to reach more low-income and rural communities by:

- Providing financial incentives to small retail stores to participate.
- Assisting small retailers with infrastructure improvements (refrigeration, shelving, signage, etc.) and marketing, and providing education for consumers.
- Increasing coordination between the Ohio Department of Health and the Ohio Department of Agriculture to promote the sale of Ohio-grown produce in small retail stores.

Possible funding sources

- Increase state investment in **Healthy Food for Ohio**, a public-private partnership that provides loans and grants to food retailers developing new or renovating existing fresh food retail in underserved communities.
- Leverage Community Development Block Grant funds to support business development for healthy food retailers.
- Invest a portion of existing soft drink sales tax revenue toward food access strategies, such as the Good Food Here initiative. (Ohio's sales tax applies to soft drinks.¹⁷)
- Encourage investment through private philanthropy, corporate sponsorship, hospital community benefit and/or state general revenue to expand Good Food Here.

Our approach

To identify the strategies in this publication, HPIO and the Center for Public Health Practice (CPHP) at the Ohio State University developed an **Evidence Inventory** summarizing the following research reviews:

- What Works for Health (County Health Rankings and Roadmaps)
- Nutrition Evidence Library (USDA)
- The Guide to Community Preventive Services (CDC)
- U.S. Preventive Services Task Force Recommendations (Agency for Healthcare Research and Quality)

HPIO and CPHP selected strategies from the Evidence Inventory to include in this fact sheet that met the following criteria:

- Strong evidence for increasing food security and access to and/or sales of healthy food and improved nutrition
- Relevant to state policy and actionable by state legislators and/or state agency leaders
- Timely opportunity for our state given Ohio's current status and alignment with existing efforts, such as the **2017-2019 state health improvement plan**

How can we improve health value in Ohio?

The **2017 HPIO Health Value Dashboard** identifies areas in which Ohio's performance is worse than most other states, including:

- Adult smoking
- Secondhand smoke exposure for children
- Cardiovascular disease
- Food insecurity
- Drug overdose deaths
- Infant mortality



HPIO's Guide to Improving Health Value provides policymakers, community health improvement planners and philanthropy with the best-available sources of evidence for what works to address many of these challenges.

This fact sheet is part of a series of tools that comprise the Guide to Improving Health Value. HPIO will continue to add tools on specific health challenges throughout 2017. All publications can be found at: www.hpio.net/guide-to-improving-health-value

Notes

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2. Ibid.
3. Data from the 2014 U.S. Census Bureau Current Population Survey, as compiled by Feeding America. Map the Meal Gap 2016. Accessed June 2016. <http://www.feedingamerica.org/hunger-in-america/our-research/map-the-meal-gap/2014/map-the-meal-gap-2014-exec-sum.pdf>
4. Data from 2014 U.S. Census Bureau Current Population Survey, as compiled by the National Foundation to End Senior Hunger. "The State of Senior Hunger in America 2014: An Annual Report." June 2016. Accessed June 2016. <http://www.nfesh.org/wp-content/uploads/2016/05/State-of-Senior-Hunger-in-America-2014.pdf>.
5. *The Impact of Chronic Disease in Ohio: 2015*. Ohio Department of Health, Bureau of Health Promotion, Chronic Disease Epidemiology and Evaluation Section, 2015. http://www.health.ohio.gov/-/media/ODH/ASSETS/Files/health/Chronic-Disease-Plan/CD-Burden-Final_Webv2.pdf.
6. Seligman, H., et al. "Food Insecurity is Associated with Diabetes Mellitus: Results from the National Health Examination and Nutrition Examination Survey (NHANES) 1999–2002." *Journal of General Internal Medicine* 22, no. 7 (2007): 1018–1023. See also, Seligman, H., et al. "Food Insecurity and Glycemic Control among Low-Income Patients with Type 2 Diabetes." *Diabetes Care* 35, no. 2 (2012): 233–238. See also, Seligman, H.K., Laraia, B., Kushel, M.B. "Food Insecurity is Associated with Chronic Disease among Low-Income NHANES Participants." *Journal of Nutrition* 140, no. 2 (2010): 304–310.
7. Shepard, Donald S., Elizabeth Setren and Donna Cooper. "Hunger in America: Suffering We All Pay For." *Center for American Progress*, October 2011. <https://www.americanprogress.org/issues/poverty/report/2011/10/05/10504/hunger-in-america/>.
8. Data from the 2015 Ohio Medicaid Assessment Survey (OMAS) Adult Dashboard. Ever been told had diabetes (all ages). Accessed June 2016. <http://grcapps.osu.edu/dashboards/OMAS/adult/>.
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**OHIO POWER COMPANY'S RESPONSE TO
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S
DISCOVERY REQUEST
PUCO CASE NO. 16-1852-EL-SSO et al.
FIRST SET-STIPULATION**

DATA REQUEST

STIP-OCC-INT-1-059 Does AEP Ohio perform cost-benefit analysis and studies for each program that is funded through the DIR? If not, why are cost-benefit studies not performed?

RESPONSE

The Company objects to this request as seeking information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The Company also objects to the form of the question as this request is vague, overbroad and/or unduly burdensome. Without waiving the foregoing objection(s) or any general objection the Company may have, the Company states as follows. Distribution investments are made to provide reliable electric service to our customers and are evaluated based upon the prudence of those investments.

Prepared by: William A. Allen
 Counsel

**OHIO POWER COMPANY'S RESPONSE TO
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PUCO CASE NO. 16-1852-EL-SSO et al.
FIRST SET-STIPULATION**

DATA REQUEST

STIP-OCC-INT-1-052 Referring to the Settlement section C.2., does the Settlement require AEP Ohio as a condition for continuing the DIR to file a distribution rate case every five years after the 2020 distribution rate case?

RESPONSE

No.

Prepared by: William A. Allen

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Summary: Testimony Supplemental Testimony of James D. Williams on Behalf of the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Michael, William J. Mr.