

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the Dayton)	
Power and Light Company for an Increase in)	Case No. 15-1830-EL-AIR
Electric Distribution Rates.)	
 In the Matter of the Application of the Dayton)	
Power and Light Company for Approval to Change)	Case No. 15-1831-EL-AAM
Accounting Methods.)	
 In the Matter of the Application of the Dayton)	Case No. 15-1832-EL-ATA
Power and Light Company for Tariff Approval.)	

**DIRECT TESTIMONY
OF
JAMES D. WILLIAMS**

**On Behalf of
The Office of the Ohio Consumers' Counsel**
*65 East State Street, 7th Floor
Columbus, Ohio 43215*

April 11, 2018

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ATTACHMENTS

Attachment JDW-1 List of Previous Testimony Filed at the PUCO by James Williams

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 65 East State Street, 7th
5 Floor, Columbus, Ohio 43215. I am employed by the Office of the Ohio
6 Consumers' Counsel ("OCC") as a Senior Utility Consumer Policy Analyst.

7

8 ***Q2. PLEASE BRIEFLY SUMMARIZE YOUR EDUCATION AND***
9 ***PROFESSIONAL EXPERIENCE.***

10 ***A2.*** I am a 1994 graduate of Webster University, in St. Louis, Missouri, with a Master
11 of Business Administration, and a 1978 graduate of Franklin University, in
12 Columbus, Ohio, with a Bachelor of Science, Engineering Technology. My
13 professional experience includes a career in the United States Air Force and over
14 22 years of utility regulatory experience with the OCC.

15

16 Initially, I served as a Compliance Specialist with the OCC and my duties
17 included the development of compliance programs for electric, natural gas, and
18 water industries. Later, I was designated to manage all of the agency's specialists
19 who were developing compliance programs in each of the utility industries. My
20 role evolved into the management of OCC's consumer hotline, the direct service
21 provided to consumers to resolve complaints and inquiries that involved Ohio
22 utilities. More recently, following a stint as a Consumer Protection Research
23 Analyst, I was promoted to a Senior Utility Consumer Policy Analyst. In this

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1 role, I am responsible for developing and recommending policy positions on
2 utility issues that affect residential consumers.

3
4 I have been directly involved in the development of policy issues that impact
5 Ohio residential utility consumers involving electric, natural gas, water, and
6 telecommunications for many years. My responsibilities have included
7 participating in the evaluation of multiple Public Utilities Commission of Ohio
8 (“PUCO”) rate cases and other proceedings where utilities have sponsored and
9 promoted customers spending billions of dollars for infrastructure modernization
10 programs as a separate charge on their electric bills. Specific to this proceeding, I
11 have been involved in the review of the Distribution Investment Rider (“DIR”)
12 that was proposed by The Dayton Power and Light Company (“DP&L” or
13 “Utility”) and approved by the PUCO in Case No. 16-395-EL-SSO. I have
14 participated in numerous rulemaking cases at the PUCO involving service quality
15 standards and in each of the reliability standards proceedings that have been
16 proposed by DP&L. Finally, I have assisted in the preparation and review of
17 OCC’s objections to the report of investigation of the PUCO Staff (the “Staff
18 Report”) in this proceeding.¹

¹ Report of Investigation of the PUCO Staff (Mar. 12, 2018).

1 ***Q3. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY OR TESTIFIED***
2 ***BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO?***

3 ***A3.*** Yes. The cases that I have submitted testimony and/or have testified before the
4 PUCO can be found in Attachment JDW-1.

5

6 ***II. PURPOSE OF MY TESTIMONY***

7

8 ***Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS***
9 ***PROCEEDING?***

10 ***A4.*** The purpose of my testimony is to support OCC's objections to the Staff Report
11 in this proceeding.² More specifically, I provide testimony supporting OCC
12 objections (17) and (18) regarding the implementation of a Distribution
13 Investment Rider ("DIR"). My testimony demonstrates that the Staff Report fails
14 to protect consumers because it recommends approval for DP&L to spend more
15 than \$175 million of customer money for a distribution infrastructure
16 modernization program that has yet to be defined. Additionally the distribution
17 modernization at issue was not even proposed by DP&L in this proceeding. The
18 Staff Report's recommendations for the DIR, if adopted, would result in
19 customers being billed unjust and unreasonable charges for electric service.

² Objections to the PUCO Staff's Report of Investigation by the Office of the Ohio Consumers' Counsel (Apr. 11, 2018) (the "OCC Objections").

1 **III. DISTRIBUTION INVESTMENT RIDER**

2

3 ***Q5. CAN YOU PROVIDE A BRIEF SUMMARY REGARDING DP&L'S***
4 ***DISTRIBUTION INVESTMENT RIDER?***

5 **A5.** Yes. As part of DP&L's most recent electric security plan ("ESP"),³ the Utility
6 proposed a distribution infrastructure modernization plan under the single issue
7 ratemaking provisions in O.R.C. 4928.143(B)(2)(h), to be paid for by customers
8 through DIR charges on their bills. The DIR as proposed in the ESP would
9 enable the Utility to expedite the collection of certain incremental investment
10 costs from consumers.

11

12 Infrastructure modernization plans proposed in an ESP are required to adhere to
13 certain standard filing requirements found in Ohio Adm. Code 4901:1-35-
14 03(C)(9)(g). In general, an infrastructure modernization plan must contain
15 detailed descriptions of proposed programs, with supporting data and information
16 to allow an evaluation of the proposal, cost savings, avoidance of duplicative cost
17 recovery, and a demonstration of the alignment between the expectations of
18 consumers and the electric utility. Prior to approving an infrastructure
19 modernization plan, the PUCO is required to examine the reliability of the
20 utility's distribution system to confirm that customer and utility expectations for

³ *In re Application of the Dayton Power & Light Co. to Establish a Standard Service Offer in the Form of an Elec. Security Plan*, Case No. 16-395-EL-SSO (the "ESP Case").

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1 reliability are aligned and to verify that the utility is placing sufficient resources
2 towards the reliability of the distribution system.⁴

3

4 The PUCO approved a settlement in the ESP case that included the following
5 language regarding the DIR:⁵

6 A DP&L Distribution Investment Rider (“DIR”) will be established,
7 set initially at zero, to recover incremental distribution capital
8 investments recorded in Account 101 Plant In Service related to
9 FERC Plant Accounts 360-374. Recovery of revenue requirements
10 will be based upon and commence with the resolution of DP&L’s
11 distribution rate case (Case No. 15-1830-EL-AIR) or a future
12 distribution rate case. All other matters related to the DIR,
13 including, but not limited to cost allocation, term, rate design, and
14 annual revenue caps, shall be addressed in the pending (Case No.
15 15-1830-EL-AIR) or a future distribution rate case.
16

17 This settlement was not supported by any documentation regarding the proposed
18 infrastructure modernization plan, including the information that the PUCO
19 requires as part of the standard filing requirement. The PUCO essentially
20 approved the DIR in name only, initially to be set at zero and for the collection of
21 incremental distribution capital investments.⁶ All other matters related to the
22 DIR, including cost allocation, length, rate design, and annual revenue caps, were
23 to be addressed in the current rate case or in some future distribution rate case.
24 Furthermore, in addressing concerns OCC raised regarding the lack of support for
25 the DIR, the PUCO noted that OCC and any other interested stakeholders would

⁴ O.R.C. 4928.143(B)(2)(h).

⁵ ESP Case, Amended Stipulation & Recommendation at 6 (Mar. 14, 2017); Opinion & Order (Oct. 20, 2017).

⁶ ESP Case, Opinion & Order at 54 (Oct. 20, 2017).

1 have a full and fair opportunity to participate in the pending rate case, or any
2 future rate case, regarding the DIR.⁷

3
4 ***Q6. CAN YOU BRIEFLY SUMMARIZE THE STAFF REPORT***
5 ***RECOMMENDATIONS REGARDING THE DISTRIBUTION INVESTMENT***
6 ***RIDER?***

7 ***A6.*** Yes. The Staff Report recommended that the rate of return for the DIR be the
8 same as the rate of return adopted by the PUCO in this rate case.⁸ The Staff
9 Report also recommended that the term of the DIR be the same as the ESP term
10 (*i.e.*, ending October 31, 2023).⁹ However, the Staff Report also recommended
11 that DP&L be required to file a distribution rate case by October 31, 2022 as a
12 condition for continuing the DIR through October 31, 2023.¹⁰ The Staff Report
13 further recommended that DP&L be required to make two bi-annual filings with
14 rate adjustments (that include automatic approval), and that an annual compliance
15 audit be conducted by Staff or through an independent auditor under the direction
16 of Staff.¹¹ The Staff Report recommended that DP&L explain and quantify any
17 impending capitalization policy changes in its bi-annual DIR filings.¹²
18 Furthermore the Staff Report recommended revenue caps that would allow DP&L

⁷ *Id.*

⁸ Staff Report at 9.

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

¹² *Id.*

1 to charge customers more than \$175 million between 2018 through 2023.¹³ The
2 Staff Report recommended that the annual revenue caps be conditioned on a
3 requirement that DP&L complies with its PUCO-approved CAIDI and SAIFI
4 reliability standards.¹⁴ Finally, the Staff Report erroneously stated that the “other
5 provisions of the calculation and rate design DP&L proposed in its Application
6 for the DIR are acceptable to Staff.”¹⁵

7

8 ***Q7. DID THE STAFF REPORT REASONABLY ADDRESS THE DIR MATTERS***
9 ***THAT WERE UNRESOLVED FROM THE ELECTRIC SECURITY PLAN***
10 ***CASE?***

11 ***A7.*** No. The Staff Report supports customers being charged over \$175 million for an
12 infrastructure modernization plan that has not been defined. Customers would pay
13 the \$175 million through a DIR charge on their bills. The \$175 million represents
14 a capped amount where customers will pay DP&L on an expedited basis a return
15 on and of the investments. The Staff Report claims that DP&L requested the DIR
16 in the current rate case.¹⁶ But this is not accurate. DP&L’s rate case application
17 did not include a request for an infrastructure modernization plan to be funded
18 through a DIR. Therefore, there is no support for any of the Staff Report

¹³ *Id.* at 9-10.

¹⁴*Id.* at 10. CAIDI is the Customer Average Interruption Duration Index and represents the average number of minutes required to restore electric service to residential customers. SAIFI is the System Average Interruption Frequency Index and reflects the number of sustained interruptions in electric service the average consumer experiences over a predefined period of time.

¹⁵ *Id.* at 9.

¹⁶ *Id.* at 8.

1 recommendations regarding the DIR. This is especially problematic given that the
2 Staff Report claims that provisions in DP&L's Application regarding calculations
3 and rate design for the DIR are acceptable, when in fact there are no such
4 calculations or supporting documentation and analysis in the Application in this
5 case supporting a DIR rider.

6

7 ***Q8. DOES DP&L'S TESTIMONY IN THIS CASE INDICATE THAT***
8 ***ADDITIONAL CAPITAL SPENDING THROUGH A DISTRIBUTION***
9 ***INVESTMENT RIDER IS NECESSARY AT THIS TIME FOR DP&L TO***
10 ***CONTINUE PROVIDING CUSTOMERS SAFE AND RELIABLE SERVICE?***

11 ***A8.*** No. In fact, it demonstrates the opposite. The direct testimony of DP&L witness
12 Hall concludes that the Utility makes the capital investments in its distribution
13 system to serve new or growing load, maintain or improve the overall condition of
14 its distribution system, and return to service any failed assets due to failures or
15 storms.¹⁷ Mr. Hall did not identify any deficiencies in the existing capital
16 spending program or the need for any additional capital through a distribution
17 infrastructure modernization program. And in fact, a review of DP&L's capital
18 spending program over the last several years indicates that the Utility is already
19 prioritizing spending for reliability-specific programs.

20

21 Regarding system reliability, Ohio Adm. Code 4901:1-10-26 requires each Ohio
22 electric distribution utility to file an annual system improvement plan report.

¹⁷ Direct Testimony of Kevin L. Hall at 8 (Feb. 22, 2016).

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1 Table 1 provides a summary of the level of capital expenditures for reliability
2 specific programs that DP&L has made over the last three years and the ratio of
3 that investment to DP&L's total distribution capital expenditures.

4

5 ***Table 1: DP&L Investment in Reliability-Specific Programs (2015–2017)***

Year	Total Distribution Capital Expenditures	Expenditure for Reliability- Specific Program(s)	Percentage Spent for Reliability- Specific Program(s)
2017 ¹⁸	\$73,671,000 ¹⁹	\$44,440,000 ²⁰	60.3%
2016 ²¹	\$66,539,000 ²²	\$46,199,000 ²³	69.4%
2015 ²⁴	\$73,924,000 ²⁵	\$47,056,000 ²⁶	63.7%

6

7 As shown in Table 1, DP&L has spent between \$44.4 million and \$47 million
8 over each of the last three years toward reliability-specific capital programs. This
9 level of spending appears to be sufficient to enable DP&L to continue providing
10 the safe and reliable service that it is obligated to provide.²⁷ Additional customer

¹⁸ *In the Matter of the Annual Report of the Electric Service and Safety Standards, Pursuant to Rule 4901:1-10-26(B) of the Ohio Administrative Code*, Case No. 18-1000-EL-ESS (March 30, 2018).

¹⁹ *Id.* at 20.

²⁰ *Id.* at 21.

²¹ *In the Matter of the Annual Report of the Electric Service and Safety Standards, Pursuant to Rule 4901:1-10-26(B) of the Ohio Administrative Code*, Case No. 17-1000-EL-ESS (March 31, 2017).

²² *Id.* at 8a.

²³ *Id.* at 8b.

²⁴ *In the Matter of the Annual Report of the Electric Service and Safety Standards, Pursuant to Rule 4901:1-10-26(B) of the Ohio Administrative Code*, Case No. 16-1000-EL-ESS (March 31, 2016).

²⁵ *Id.* at 38. *See* Supplemental Filing (May 31, 2016).

²⁶ *Id.* at 40.

²⁷ O.R.C 4928.02(A).

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funding through the DIR to prioritize more capital spending for reliability does not appear to be necessary at this time.

A review of DP&L's reliability performance over the last several years also indicates that additional capital spending through a DIR is not necessary at this time. As shown in Table 2, DP&L has consistently met and exceeded its minimum reliability performance standards for each year since 2010 (when standards were initially mandated) with the exception of one year. Based on my review of the system improvement plan report,²⁸ the isolated single year miss in meeting a standard is likely attributed to DP&L not meeting its inspection and maintenance goals for a particular year. Spending more customer money through a DIR is not a surrogate for proper inspection and maintenance of the distribution system.

Table 2: DP&L Reliability Performance²⁹ (2010-2017)

	2010	2011	2012	2013	2014	2015	2016	2017 ³⁰
SAIFI Standard	1.07	1.07	1.07	0.88	0.88	0.88	0.88	0.88
SAIFI Performance	0.83	0.81	0.80	0.70	0.82	0.85	0.69	0.68
CAIDI Standard	125.51	125.51	125.51	125.04	125.04	125.04	125.04	125.04
CAIDI Performance	116.09	120.61	120.15	110.51	121.86	118.69	119.08	133.07

²⁸ *In the Matter of the Annual Report of the Electric Service and Safety Standards, Pursuant to Rule 4901:1-10-26(B) of the Ohio Administrative Code*, Case No. 18-1000-EL-ESS (March 30, 2018 at 31).

²⁹ <https://www.puco.ohio.gov/puco/index.cfm/industry-information/statistical-reports/electric-reliability-performance-data/dayton-power-light-company/>

³⁰ *In the Matter of the Annual Report of Electric Distribution System Reliability Pursuant to Rule 4901:1-10-10(C)*, Case No. 18-0995-EL-ESS, Annual Report (March 29, 2018).

1 ***Q9. DID THE PUCO ORDER APPROVING THE DISTRIBUTION***
2 ***INVESTMENT RIDER REQUIRE THAT THE RIDER BE FUNDED BY***
3 ***CUSTOMERS THROUGH THIS RATE CASE?***

4 ***A9.*** No. The PUCO explicitly stated that all other matters related to the DIR can be
5 addressed in this case (15-1830-EL-AIR) *or in a future distribution rate case.*³¹
6

7 **IV. RECOMMENDATION**
8

9 ***Q10. WHAT IS YOUR RECOMMENDATION REGARDING THE***
10 ***DISTRIBUTION INVESTMENT RIDER?***

11 ***A10.*** I recommend that the PUCO reject all of the Staff Report recommendations
12 regarding the DIR because the proposal for the DIR was not included in the rate
13 case application. There is no record evidence or other basis on which the PUCO
14 can evaluate and approve the PUCO Staff's recommendations in this case.
15

16 ***Q11. DOES YOUR RECOMMENDATION ALSO CONSIDER OTHER***
17 ***DISTRIBUTION INFRASTRUCTURE MODERNIZATION PLANS THAT***
18 ***DP&L IS REQUIRED TO FILE AND THE RESULTING IMPACT ON***
19 ***CONSUMERS?***

20 ***A11.*** Yes. Under the terms of its approved ESP, DP&L is required to file a
21 comprehensive distribution infrastructure modernization plan by May 1, 2018, if

³¹ ESP Case, Opinion & Order at 54 (Oct. 20, 2017).

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1 not sooner.³² Funding for the infrastructure modernization plan and subsequent
2 implementation of DP&L's grid modernization initiative will be collected from
3 customers through a Smart Grid Rider on their bills. While the costs that will
4 ultimately be paid by customers through the Smart Grid Rider are yet to be
5 developed, these costs could be substantial. It would therefore be premature to
6 allow DP&L, in this rate case, to begin charging customers for potentially the
7 same types of distribution investments under the DIR. I believe that it is prudent
8 for the PUCO to thoroughly evaluate the impact of each of these future
9 infrastructure modernization plans to moderate the financial impact on customers.

10
11 **V. CONCLUSION**

12
13 ***Q12. DOES THIS CONCLUDE YOUR TESTIMONY?***

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

³² ESP Case, Opinion & Order at 7 (Oct. 20, 2017) (requiring DP&L to file a distribution infrastructure modernization plan "within three months of completion of the Commission's Power Forward initiative or February 1, 2018, whichever is earlier").

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Direct 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 11st day of April 2018.

/s/ Christopher Healey
Christopher Healey
Assistant Consumers' Counsel

SERVICE LIST

Thomas.mcnamee@ohioattorneygeneral.gov	Michael.schuler@aes.com
Bojko@carpenterlipps.com	djureland@ficlaw.com
ORourke@carpenterlipps.com	jsharkey@ficlaw.com
ghiloni@carpenterlipps.com	Kurt.Helfrich@ThompsonHine.com
sechler@carpenterlipps.com	Stephanie.Chmiel@ThompsonHine.com
dboehm@BKLawfirm.com	Michael.Austin@ThompsonHine.com
mkurtz@BKLawfirm.com	mfleisher@elpc.org
jkylercohn@BKLawfirm.com	dparram@taftlaw.com
sam@mwncmh.com	thomas.jernigan.3@us.af.mil
fdarr@mwncmh.com	cmooney@ohiopartners.org
mpritchard@mwncmh.com	jschlesinger@kfwwlaw.com
jlang@calfee.com	dborchers@bricker.com
tallexander@calfee.com	mwarnock@bricker.com
slesser@calfee.com	ejacobs@ablelaw.org
jvickers@elpc.org	joliker@igsenergy.com
tdougherty@theOEC.org	lhawrot@spilmanlaw.com
mleppla@theOEC.org	dwilliamson@spilmanlaw.com
jfinnigan@edf.org	charris@spilmanlaw.com
swilliams@nrdc.org	mjsettineri@vorys.com
rdove@attorneydove.com	glpetrucci@vorys.com
kfield@elpc.org	whitt@whitt-sturtevant.com
mfleisher@elpc.org	campbell@whitt-sturtevant.com
Attorney Examiners:	glover@whitt-sturtevant.com
gregory.price@puc.state.oh.us	jdoll@djflawfirm.com
patricia.schabo@puc.state.oh.us	mcrawford@gjflawfirm.com

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Filed at the Public Utilities Commission of Ohio

1. *In the Matter of the Application of the Cincinnati Gas and Electric Company for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 95-0656-GA-AIR (August 12, 1996).*
2. *In the Matter of the Application of the Cincinnati Gas and Electric Company for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 01-1228-GA-AIR (February 15, 2002).*
3. *In the Matter of the Commission's Investigation into the Policies and Procedures of Ohio Power Company, Columbus Southern Power Company, The Cleveland Electric Illuminating Company, Ohio Edison Company, The Toledo Edison Company and Monongahela Power Company regarding installation of new line extensions, Case No. 01-2708-EL-COI (May 30, 2002).*
4. *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 07-0829-GA-AIR (June 23, 2008).*
5. *In the Matter of the Application of the Columbia Gas of Ohio, Inc. for Authority to Amend Filed Tariffs to Increase the Rates and Charges for Gas Distribution, Case No. 08-072-GA-AIR (September 25, 2008).*
6. *In the Matter of a Settlement Agreement Between the Staff of the Public Utilities Commission of Ohio, The Office of the Consumers' Counsel and Aqua Ohio, Inc. Relating to Compliance with Customer Service Terms and Conditions Outlined in the Stipulation and Recommendation in Case No. 07-564-WW-AIR and the Standards for Waterworks Companies and Disposal System Companies, Case No. 08-1125-WW-UNC (February 17, 2009).*
7. *In the Matter of the Application of the Ohio American Water Company to Increase its Rates for water and Sewer Services Provided to its Entire Service Area, Case No. 09-391-WS-AIR (January 4, 2010).*
8. *In the Matter of the Application of Aqua Ohio, Inc. for Authority to Increase its Rates and Charges in its Masury Division, Case No. 09-560-WW-AIR (February 22, 2010).*
9. *In the Matter of the Application of Aqua Ohio, Inc. for Authority to Increase its Rates and Charges in Its Lake Erie Division, Case No. 09-1044-WW-AIR (June 21, 2010).*

10. *In the Matter of the Application of The Ohio American Water Company to Increase its Rates for Water Service and Sewer Service*, Case No. 11-4161-WS-AIR (March 1, 2012).
11. *In the Matter of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan*, Case No. 11-346-EL-SSO, et al (May 4, 2012).
12. *In the Matter of the Application of The Dayton Power and Light Company for Approval of its Market Rate Offer*, Case No. 12-426-EL-SSO (June 13, 2012).
13. *In the Matter of the Application of Ohio Power Company to Establish Initial Storm Damage Recovery Rider Rates*, Case No. 12-3255-EL-RDR (December 27, 2013).
14. *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan*, Case No. 13-2385-EL-SSO (May 6, 2014).
15. *In the Matter of the Application of Duke Energy Ohio for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan, Accounting Modifications and Tariffs for Generation Service*, Case 14-841-EL-SSO (May 29, 2014).
16. *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan*, Case No. 14-1297-EL-SSO (December 22, 2014).
17. *In the Matter of the Application of Duke Energy Ohio, Inc., to Adjust Rider DR-IM and Rider AU for 2013 Grid Modernization Costs*, Case No. 14-1051-EL-RDR (December 31, 2014) and (February 6, 2015).
18. *In the Matter of the Application Not for an Increase in Rates Pursuant to Section 4901:18, Revised Code, of Ohio Power Company to Establish Meter Opt Out Tariff*, Case No. 14-1158-EL-ATA (April 24, 2015).
19. *In the Matter of the Application of Duke Energy of Ohio, Inc., for Approval of a Grid Modernization Opt-out Tariff and for a Change in Accounting Procedures Including a Cost Recovery Mechanism.*, Case 14-1160-EL-UNC and 14-1161-EL-AAM (September 18, 2015).

20. *In the Matter of the Application of Duke Energy Ohio, Inc., for Approval of an Alternative Rate Plan Pursuant to Section 4929.05, Revised Code, for an Accelerated Service Line Replacement Programs*, Case No. 14-1622-GA-ALT (November 6, 2015).
21. *In the Matter of the Complaint of Jeffrey Pitzer, Complainant, v. Duke Energy Ohio, Inc. Respondent.*, Case No. 15-298-GE-CSS (December 30, 2015).
22. *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 (July 22, 2016).
23. *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of Demand Side Management Program for its Residential and Commercial Customers.*, Case No. 16-1309-GA-UNC (September 13, 2016).
24. *In the Matter of the Application of the Dayton Power and Light Company for Approval of Its Electric Security Plan*, Case No. 16-0395-EL-SSO (November 21, 2016). Supplemental Testimony, (March 29, 2017).
25. *In the Matter of the Application of Aqua Ohio, Inc. to Increase Its Rates and Charges for Its Waterworks Service.*, Case No. 16-0907-WW-AIR (December 19, 2016).
26. *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, (May 2, 2017).
27. *In the Matter of the Application of the Ohio Development Services Agency for an Order Approving Adjustments to the Universal Service Fund Riders of Jurisdictional Ohio Electric Distribution Utilities*, Case No. 17-1377-EL-USF, (August 11, 2017).
28. *In the Matter of the Application of Duke Energy Ohio, Inc. to Adjust Rider AU for 2016 Grid Modernization Costs*, Case No. 17-690-GA-RDR, (August 18, 2017).
29. *In the Matter of the Application of Duke Energy Ohio, Inc., for an Adjustment to Rider AMRP Rates*, Case No. 17-2318-GA-RDR, (April 5, 2018). Supplemental Testimony (April 10, 2018).

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Case No(s). 15-1830-EL-AIR, 15-1831-EL-AAM, 15-1832-EL-ATA

Summary: Testimony Direct Testimony of James D. Williams on Behalf of The Office of the Ohio Consumers' Counsel electronically filed by Ms. Jamie Williams on behalf of Healey, Christopher Mr.