

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

- - -

In the Matter of the 2018 :  
Long-Term Forecast Report : Case No. 18-501-EL-FOR  
of Ohio Power Company and :  
Related Matters. :

In the Matter of the :  
Application of Ohio Power :  
Company for Approval to :  
Enter Into Renewable : Case No. 18-1392-EL-RDR  
Energy Purchase :  
Agreements for Inclusion :  
in the Renewable :  
Generation Rider. :

In the Matter of the :  
Application of Ohio Power : Case No. 18-1393-EL-ATA  
Company for Approval to :  
Amend its Tariffs. :

- - -

PROCEEDINGS

before Ms. Sarah Parrot and Ms. Greta See, Attorney  
Examiners, at the Public Utilities Commission of  
Ohio, 180 East Broad Street, Room 11-A, Columbus,  
Ohio, called at 2:00 p.m. on Wednesday, February 6,  
2019.

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VOLUME XI

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## WITNESS

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## OCC EXHIBIT

## IDENTIFIED ADMITTED

24 Direct Testimony of  
Noah Dormady

VIII-2275 2738

- - -

1 Wednesday Afternoon Session,  
2 February 6, 2019.

3 - - -

4 EXAMINER PARROT: All right. Let's go  
5 back on the record.

6 This is the continuation of the hearing  
7 in Case No. 18-501-EL-FOR, et al.

8 Let's start with brief appearances,  
9 starting with the Company, and we'll work our way  
10 around.

11 MR. NOURSE: Thank you, your Honor. On  
12 behalf of Ohio Power Company, Steven T. Nourse,  
13 Christen M. Blend, and the law firm of Ice Miller,  
14 Christopher L. Miller; the law firm of Porter,  
15 Wright, L. Bradford Hughes and Eric B. Gallon.

16 MS. WILLIS: Thank you, your Honor. On  
17 behalf of the residential customers of the Ohio --  
18 residential customers of the Ohio Power Company,  
19 Bruce Weston, Consumers' Counsel, by Maureen Willis,  
20 Christopher Healey, and William Michael.

21 MR. McNAMEE: For the Staff of the PUCO,  
22 Tom McNamee.

23 MR. KURTZ: Good afternoon, your Honors.  
24 Mike Kurtz, OEG.

25 MR. OLIKER: Good afternoon, your Honors.

1 On behalf of Interstate Gas Supply, Inc. and IGS  
2 Solar, LLC, Joe Olikier and Mike Nugent.

3 MS. BOJKO: Good afternoon, your Honors.  
4 On behalf of the Ohio Manufacturers' Association  
5 Energy Group, Kimberly W. Bojko and Brian W. Dressel.

6 MS. WHITFIELD: Good afternoon, your  
7 Honors. On behalf of The Kroger Company, Angie Paul  
8 Whitfield and Stephen E. Dutton.

9 MR. DOVE: Good afternoon, your Honors.  
10 On behalf of Natural Resources Defense Council,  
11 Robert Dove.

12 MS. MOONEY: On behalf of Ohio Partners  
13 for Affordable Energy, Colleen Mooney.

14 MS. LEPPLA: Good afternoon, your Honors.  
15 On behalf of the Ohio Environmental Council, Miranda  
16 Leppla.

17 MR. DARR: For Industrial Energy  
18 Users-Ohio, Frank Darr.

19 MS. GLOVER: On behalf of the Retail  
20 Energy Supply Association and Direct Energy, Mark  
21 Whitt and Rebekah Glover.

22 EXAMINER PARROT: Thank you, everyone.

23 Ms. Willis.

24 MS. WILLIS: Thank you, your Honor. OCC  
25 would call to the witness stand, Professor Noah



1 Dormady.

2 EXAMINER PARROT: We will go ahead and  
3 just remind you that you have already been sworn in  
4 as a witness. Go ahead and have a seat.

5 Dr. Dormady, before we start, I would  
6 just note that you were not present with us on  
7 Friday. At that point, the Bench did issue a ruling  
8 with respect to the motion to exclude your testimony  
9 that was filed by NRDC and OPAE.

10 THE WITNESS: Great.

11 EXAMINER PARROT: I am not going to go  
12 through all that again, but I would just note  
13 although the Commission -- well, I should say the  
14 Bench found it was appropriate to proceed with your  
15 testimony. On the issue of whether or not there is a  
16 conflict, we noted only that if you proceed with your  
17 testimony, you are doing so at your own election and  
18 that we are not issuing any sort of ruling on the  
19 alleged conflict.

20 THE WITNESS: Okay.

21 EXAMINER PARROT: Is that your  
22 understanding and you are prepared to proceed today?

23 THE WITNESS: Yes. Thank you.

24 EXAMINER PARROT: Ms. Willis, did you  
25 have anything before we proceed with cross?

1 MS. WILLIS: No, your Honor. I believe  
2 we have marked already, Professor Dormady's testimony  
3 as OCC Exhibit No. 24. I believe we also gave Dr. --  
4 or, Professor Dormady an opportunity to -- for  
5 corrections, additions, and deletions, so we would,  
6 at this point, reoffer Dr. Dormady for  
7 cross-examination and move for admission of OCC  
8 Exhibit No. 24.

9 EXAMINER PARROT: Thank you, Ms. Willis.  
10 Ms. Glover?

11 MS. GLOVER: No questions, your Honor.

12 EXAMINER PARROT: Mr. Darr?

13 MR. DARR: No questions.

14 EXAMINER PARROT: Ms. Whitfield?

15 MS. WHITFIELD: No questions, your Honor.

16 EXAMINER PARROT: Ms. Bojko?

17 MS. BOJKO: I do have some, your Honor.

18 - - -

19 NOAH DORMADY, PH.D.

20 being first duly sworn, as prescribed by law, was  
21 examined and testified as follows:

22 CROSS-EXAMINATION

23 By Ms. Bojko:

24 Q. Good afternoon, Mr. Dormady or Professor,  
25 excuse me. I have a couple of questions about your

1 testimony beginning on page 9. Starting on line 10,  
2 you discuss the concept of the coding that was done  
3 with regard to the survey performed by Navigant; is  
4 that correct?

5 A. That's correct.

6 Q. And on lines 10 and 12, you talk about  
7 reliability checks in place and that there's no way  
8 to effectively rely upon the coded responses without  
9 that reliability check; is that correct?

10 A. That's correct, yeah.

11 Q. So then if we turn to page 10 of your  
12 testimony, you talk about qualitative coding on lines  
13 9 through 12. And here you conclude that Navigant's  
14 qualitative coding for open-ended responses did not  
15 include the coding reliability checks; is that  
16 correct?

17 A. That's correct.

18 Q. And in that conclusion you are relying on  
19 a discovery response attached to your testimony as  
20 Exhibit ND-5 which explains that one human coder  
21 reviewed, analyzed, and coded the various responses  
22 subjectively; is that accurate?

23 A. Just a moment.

24 That's incorrect. I believe it's  
25 Footnote 6 which I believe is the next item there.

1 Give me just a moment. Yeah, it's Interrogatory  
2 8-086 which is my sixth footnote.

3 Q. Oh, I'm sorry, sixth footnote, but it's  
4 ND-05, is that the attachment name?

5 A. That's correct.

6 Q. Okay.

7 A. Yeah.

8 Q. And what are coding reliability checks  
9 that you refer to in this section?

10 A. Coding reliability checks, there are two  
11 measures, Inter- and Intra-Coder Reliability. Coder  
12 reliability checks are typically used to assess the  
13 internal consistency with which qualitative responses  
14 are coded into a numeric entry. In this case it's  
15 done, in the exhibit that was offered in this case, a  
16 simple binary coding was used, 1 or 0, indicating  
17 whether or not a qualitative response was supportive  
18 or not supportive of the initiative. And that's the  
19 quantitative coding that's typically used. So the  
20 two measures that are typically used in response to  
21 your question are Inter-Coder Reliability checks and  
22 Intra-Coder Reliability checks which I describe later  
23 in the testimony.

24 Q. Okay. So if you could turn to page 27.  
25 I am trying to connect different pieces of your

1 testimony so I understand. On page 27 is where you  
2 discuss specifically, I believe, on lines, I guess it  
3 starts on line 1, but you're talking about the single  
4 researcher coding and that coding is the Inter-Coder  
5 Reliability that you discuss?

6 A. Yes. And I mention these explicitly on  
7 the next page, on page 28, beginning on line 2, where  
8 I discuss the difference between Inter- and  
9 Intra-Coder Reliability.

10 Q. Okay. Talking about the -- focusing on  
11 the Inter-Coder Reliability, you state that if  
12 there's only one single reviewer, there's no  
13 confidence that another person wouldn't come to a  
14 different conclusion if they read the same comments  
15 and also did their own coding, correct?

16 A. That's correct.

17 Q. Okay. So the coding that you are talking  
18 about in these sections is the coding from the  
19 Navigant survey where Navigant used the coding  
20 terminology of mixed, supportive, neutral/unclear,  
21 and negative?

22 A. I don't remember.

23 MR. MILLER: Your Honor, we're going down  
24 a path here that I am not really sure what we are  
25 doing. This is sort of friendly cross and we're

1 putting a bunch of additional items into the record.  
2 I think the witness has indicated he explained this  
3 in his testimony and now we are having him elaborate  
4 significantly on the additional detail. And I  
5 believe that counsel had hostile cross for the AEP  
6 witness that talked about the survey and now we're  
7 simply embellishing effectively the testimony that's  
8 in the record.

9 MS. BOJKO: Your Honor, I sole -- I  
10 disagree with that. I do not know what Professor  
11 Dormady's responses are. He is the witness that  
12 brought up Inter-Coder Reliability and Intra-Coder  
13 Reliability, and I'm trying to ascertain if that is  
14 connected to the survey coding and labeling that --  
15 the terms that were used by Navigant. I'm trying to  
16 understand his testimony. I think this is very akin  
17 to what Mr. Kurtz did when he stated he was trying to  
18 understand testimony earlier and connect some dots  
19 and that's exactly what I am trying to do. No other  
20 witness has talked about inter-coded or inter-coder  
21 reliability and related to the Navigant survey.

22 MR. MILLER: Your Honor, if I may?

23 MS. BOJKO: So I wouldn't have been able  
24 to ask the other survey witness about that.

25 MR. MILLER: If I may, the AEP witness,

1     Witness Horner, I believe was asked these specific  
2     questions about coding and I think she even went so  
3     far as to name the individual in the Navigant  
4     organization who was responsible for the coding  
5     process. There was a fair amount of questions of  
6     that witness about how that worked and what the  
7     detail happened to be. And I think we have asked  
8     other witnesses in this case. This is not in  
9     response to that. This is additional detail in  
10    regards to embellishment of an extension of his  
11    testimony that is essentially, I would argue,  
12    friendly.

13                 MS. BOJKO: Your Honor, she did not talk  
14    about the methodology. He is challenging the  
15    methodology used and I'm trying to connect the  
16    methodology to the survey and understand where his  
17    position is and what recommendations he's made based  
18    upon on his testimony. No other witness has  
19    testified to this.

20                 MR. MILLER: We had the opportunity to  
21    ask the AEP witness these questions. We did that.  
22    We went through that process. We are now taking that  
23    and extending it illogically and asking this  
24    gentleman to provide additional detail that he did  
25    not choose to put into his prefiled direct testimony.

1 MS. BOJKO: Your Honor, I couldn't have  
2 asked the other witness about Mr. Dormady's  
3 testimony.

4 EXAMINER PARROT: The objection is  
5 overruled with respect to the question that's  
6 pending.

7 Go ahead, Ms. Bojko. You are going to  
8 need to rephrase it or we will have it read back.

9 MS. BOJKO: I am happy to rephrase, your  
10 Honor.

11 Q. (By Ms. Bojko) The coding that you  
12 referred to is a labeling of the comments that were  
13 taken from customers and labeled by Navigant into --  
14 there were four categories, the mixed, supportive,  
15 neutral/unclear and negative; is that correct?

16 A. I don't recall the exact categories. I  
17 seem to recall only them being coded as supportive or  
18 not supportive. But in response to your question, I  
19 am referring to the qualitative coding where  
20 qualitative responses were coded into a numeric or  
21 categorical entry as described. So that's,  
22 regardless of what the categories are, the bins are,  
23 yes, that's what I am referring to.

24 MS. BOJKO: Okay. Your Honor, that's all  
25 the questions I have. Thank you.



1 (Discussion off the record.)

2 EXAMINER PARROT: Mr. Olikier, any  
3 questions?

4 MR. OLIKER: No, thank you, your Honor.

5 EXAMINER PARROT: Mr. McNamee.

6 MR. MCNAMEE: No questions for the  
7 Professor. Thank you.

8 EXAMINER PARROT: Mr. Kurtz.

9 MR. KURTZ: No questions.

10 EXAMINER PARROT: All right.

11 Ms. Leppla.

12 MS. LEPPLA: No, your Honor.

13 EXAMINER PARROT: Ms. Mooney.

14 MS. MOONEY: No, your Honor.

15 EXAMINER PARROT: Mr. Dove.

16 MR. DOVE: Just a few, your Honor.

17 - - -

18 CROSS-EXAMINATION

19 By Mr. Dove:

20 Q. Good afternoon, Dr. Dormady. Your  
21 testimony is based on analyzing the Navigant customer  
22 survey, correct?

23 A. That's correct.

24 Q. Did you conduct your own survey of AEP  
25 Ohio's customers?

1           A.    I did not.

2           Q.    Have you ever conducted a survey on the  
3 views of Ohioans in general on utility-scale  
4 renewable energy?

5           A.    Could you repeat the question?

6           MR. DOVE:  Can I have the question read  
7 back, please?

8                   (Record read.)

9           A.    No.

10          MR. DOVE:  Thank you.  That's all I have.

11          EXAMINER PARROT:  Mr. Miller.

12          MR. MILLER:  I do have some questions,  
13 your Honor.

14                               - - -

15                               CROSS-EXAMINATION

16   By Mr. Miller:

17          Q.    Good morning, Dr. Dormady.  How are you?

18          A.    Good.

19          Q.    So I don't screw this up,  
20 Professor/Doctor, which is appropriate?

21          A.    It doesn't matter.

22          Q.    Okay.  Thank you.  Good to see you again.

23   As you know, I am a Chris Miller and I am a lawyer  
24 for the Company.  A couple of quick questions.

25                You're employed by Ohio State; is that

1 correct?

2 A. That's correct.

3 Q. And you are an Assistant Professor of  
4 Public Policy?

5 A. That's correct.

6 Q. So you -- I believe your teaching and  
7 research focuses on energy and environmental  
8 economics and policy, and the economics of resilience  
9 to terrorism and natural hazards. Did I get that  
10 right?

11 A. That's correct.

12 Q. So just to be clear, the testimony we're  
13 discussing here today doesn't include any analysis  
14 regarding the economics of resilience to terrorism or  
15 natural hazards, does it?

16 A. It does not.

17 Q. Your educational background, can you run  
18 me through that real quick?

19 A. Say that one more time.

20 Q. Your educational background, can you -- I  
21 know it's in your testimony, but can you kind of give  
22 me an idea of your studies, your focus of studies in  
23 each of your degrees, so I understand what they are?

24 A. Sure. I have a Ph.D. in Public Policy,  
25 Planning and Development, which is -- you can refer

1 to simply as like an applied economics degree, from  
2 USC, from the Price School of Public Policy; ranked 2  
3 in our field. I have Master's degrees -- a Master's  
4 degree and Bachelor's degree from the University of  
5 California in Political Science. Specifically with  
6 application in public policy.

7 Q. And do you have a degree in statistics or  
8 marketing?

9 A. My -- when you do a Ph.D., when you do a  
10 doctorate, one can complete minor programs or  
11 complete a minor course of study. My minor course of  
12 study was in methodology with respect to statistical  
13 analysis and econometric analysis.

14 Q. And so I understand, what types of course  
15 work would that involve?

16 A. That would include things like  
17 statistical analysis, econometric analysis,  
18 forecasting analysis, analysis of market data, survey  
19 data, et cetera.

20 Q. So is it fair to say you consider  
21 yourself a statistician?

22 A. No, not at all.

23 Q. So you consider yourself a public policy  
24 expert; is that --

25 A. Public policy professor, that's correct.

1           Q.    In the courses you described, have you  
2 taken any courses in survey design?

3           A.    Have I taken any courses in survey  
4 design?

5           Q.    Or coursework.

6           A.    Good question.  I can't recall all the  
7 courses I've taken.  I know I covered survey design  
8 in courses that I've taken at the graduate level for  
9 sure.  But I don't recall the titles of the courses.

10          Q.    So subsequent to your --

11          A.    That was some time ago.

12          Q.    Thank you; some time ago.

13                Subsequent to obtaining your degrees and  
14 in your current teaching career, do you administer  
15 surveys on a regular basis?

16          A.    I do.

17          Q.    What types?

18          A.    I administer surveys.  My surveys have  
19 been sponsored by the National Science Foundation and  
20 the U.S. Department of Homeland Security,  
21 specifically to evaluate resilience to critical  
22 infrastructure disruptions, predominantly surveys of  
23 utility customers, to focus on their ability to  
24 recover and respond to large-area natural and  
25 human-caused hazards.

1 Q. How are those --

2 A. These are economic surveys. Economic  
3 analyses.

4 Q. Economic. How --

5 A. Let me clarify. To evaluate economic  
6 resilience.

7 Q. How were those surveys conducted? What  
8 methodologies do you use to get that information?

9 A. Well, typically, I mean, I could run  
10 through specific examples if that would be helpful.

11 Q. Let me -- instead of having you do that,  
12 I know we want to get out of here at a reasonable  
13 time today.

14 A. Sure.

15 Q. I'm just curious, what's the outreach, I  
16 guess, is the way to say it. How do you obtain the  
17 connection with these individuals or these  
18 organizations you are surveying?

19 A. Typically we'll develop a -- I know where  
20 you are going -- we will develop a sampling frame  
21 which is consistent with good practice. Let me give  
22 you an example. When I conducted a survey funded by  
23 the National Science Foundation, I worked with the  
24 Natural Hazards Center at the University of Colorado  
25 Boulder with a survey research team. I took the lead

1 in developing the survey instrument itself. But we  
2 worked very hard with organizations like Dun &  
3 Bradstreet and other organizations to develop a  
4 rigorous sampling frame of the firms that we would  
5 sample for our survey, to develop that sampling  
6 approach.

7 Q. And in that example, just so I  
8 understand, you're sampling you said firms? You are  
9 sampling entities?

10 A. Exactly. We're -- this, in this  
11 particular survey, we were focused specifically on  
12 firms, small businesses, mid-size businesses, to  
13 evaluate how they recovered and what they did right  
14 or wrong to recover effectively from a natural  
15 disaster.

16 Q. Have you had the occasion to sample  
17 individuals as opposed to organizations?

18 A. My survey research has been predominantly  
19 focused on mid-size businesses.

20 Q. Okay. And how do you -- when I asked  
21 earlier about the outreach, what's the contact  
22 methodology? Do you mail them a survey or do you  
23 call them on the phone? How does that work?

24 A. Oh, great question. So typically we  
25 will -- I will solicit and hire a professional survey

1 firm to conduct the outreach and engagement with the  
2 survey respondents. I don't always do that but  
3 typically that's the case.

4 Q. So typically you hire a firm to do that,  
5 like, I guess kind of like Navigant was for AEP? You  
6 hire another firm to do that?

7 A. That's correct.

8 Q. And get those results? Do you ever  
9 administer those surveys?

10 A. I have administered a survey -- well, let  
11 me clarify. Our research team has administered the  
12 survey. My role has always been to design the survey  
13 instrument or to conduct the analysis or lead the  
14 team that conducts the analysis of the survey data.  
15 So as a -- in my particular role, I've never been the  
16 person to actually do the actual administration of  
17 the survey. I design and analyze the survey.

18 Q. Have you had the occasion to hire  
19 Navigant ever?

20 A. I have never hired Navigant.

21 Q. Some of their peers perhaps?

22 A. Not to the best of my knowledge, no.

23 Q. Okay. And how did you go about selecting  
24 who you hire for that kind of work just so I  
25 understand?



1           A.    In my case, I always hire the same firm  
2    which has a contract with our university.

3           Q.    For the national surveys you do --

4           A.    Yes, that's correct.

5           Q.    -- including -- okay. I believe -- I  
6    asked you the question, I guess, have you read the  
7    Company's Application in this case, the long-term  
8    forecast?

9           A.    The Application itself?

10          Q.    Yes.

11          A.    I have not.

12          Q.    Have you -- there is an Amendment to that  
13   also. Have you read that?

14          A.    I don't know what you are referring to.  
15   Probably not, but.

16          Q.    So -- so the Company, on April 16, in  
17   last year, filed a -- what was called a long-term  
18   forecast and that's what I am referring to, I guess,  
19   as the Application.

20          A.    Right.

21          Q.    And then subsequently they amended that,  
22   updated it a little bit, September, I think the 19th.  
23   And you haven't read either one of those two  
24   documents?

25          A.    That's correct.

1 Q. Any parts of those documents?

2 A. I may have, but I doubt that I have.

3 Q. So just a question, when you -- when you  
4 were hired -- you were hired by the OCC to put your  
5 testimony together, correct?

6 A. To conduct an independent evaluation of  
7 the Navigant survey.

8 Q. And so, I think in all the machinations  
9 that went into a week or so ago, when we had  
10 objections to you testifying, and I think that you  
11 had, on behalf of your lawyer, on behalf of you, had  
12 filed some paperwork in the docket regarding your  
13 relationship and agreement with OCC and what you were  
14 to review and testify on here today?

15 A. I believe my contract with Consumers'  
16 Counsel was provided as a -- as an appendix to  
17 that -- to that filing.

18 Q. Okay. And do you remember, did that  
19 contract ask you to review the Application and the  
20 Amendment?

21 MS. WILLIS: Objection. Relevance.

22 MR. MILLER: I'm trying to determine  
23 whether he read it. He put documentation into this  
24 docket that indicates what his task was, and I am  
25 trying to get to an understanding of what he did to

1 prepare to submit his testimony we're talking about  
2 here today. And I think it's an important part of  
3 grasping the breadth of his understanding of the  
4 process in this case, the specific items and issues  
5 in the case he testified on. I think it's completely  
6 relevant.

7 MS. WILLIS: Dr. Dormady was hired to  
8 evaluate a survey, not to evaluate a long-term  
9 forecast filing.

10 MR. MILLER: I think the survey is part  
11 and parcel of this case and is based on the issues  
12 being requested in the long-term forecast, and to say  
13 that he was hired to review something that wasn't  
14 essentially part of this case is ludicrous at best.

15 EXAMINER PARROT: The objection is  
16 overruled.

17 Q. Do you want that read back?

18 A. Yes, please.

19 MR. MILLER: Karen, can you read that  
20 back, please?

21 (Record read.)

22 A. It's my understanding, my recollection, I  
23 don't remember the exact language in the contract.  
24 It was a lengthy document. But it was my  
25 understanding that review of the survey and items

1     pertinent to it was specifically what I was asked to  
2     do in that contract.

3             Q.     And so, if I ask you if reviewing the  
4     Application was pertinent to the survey, would you  
5     have a response to that?

6             A.     It would be my understanding it would not  
7     be.

8             Q.     Did you review any of the Company's  
9     witnesses testimony in this case?

10            A.     I did.

11            Q.     And what did you review?

12            A.     I reviewed Horner's testimony and Fry's  
13     testimony.

14            Q.     Okay. Any of the other witnesses?

15            A.     I reviewed a portion, I believe, of  
16     Mr. Allen's testimony.

17            Q.     And you said a portion. So you reviewed  
18     all of Fry's and all of Horner's?

19            A.     That's correct.

20            Q.     And then a portion of Allen's; is that  
21     correct?

22                    We talked about your survey experience a  
23     minute ago. And I wanted to ask you a quick couple  
24     of questions about that. I think you indicated that  
25     you had done some surveys and you had done those

1 surveys with predominantly entities or organizations  
2 where you reached out to them and took survey  
3 information. Can you give me an idea, based on your  
4 experience with doing those things, what -- what  
5 number, you know, in any given survey you may have  
6 performed, what are we talking about in terms of the  
7 number of respondents?

8 A. Number of respondents?

9 Q. Sure.

10 A. Smaller than in this Application.  
11 Typically, between 1 and 300 response -- respondents.

12 Q. And so what --

13 A. Actually, let me clarify that. Typically  
14 the largest survey, if I recall correctly, had only  
15 about 220 responses.

16 Q. And what about the population of the pool  
17 of requests? So you got 200-and-some responses and  
18 that went out to how many? Do you remember?

19 A. I don't recall. I don't recall, but I  
20 can tell you -- I can tell you we typically have a  
21 response rate of 20 percent or less. That's my best  
22 guess of the response rate. So if you are trying to  
23 get a sense of the larger pool and our response rate  
24 on these surveys, it's typically approximately 20  
25 percent to the best of my recollection.

1           Q.    So in this case, when we are talking  
2   about this example and you indicated it was sort of  
3   the normal response rate.  If you got 200 responses,  
4   for example, you would have, what, a thousand  
5   solicitations that would go out and --

6           A.    In some cases more.  But approximately,  
7   yeah.

8           Q.    Some cases less?

9           A.    Less than a thousand?

10          Q.    No, no, no.  Less than the response.  Let  
11   me reask the question because I think we are talking  
12   past each other perhaps.

13          A.    Sure.

14          Q.    So you normally, if you had a thousand  
15   requests -- survey selections that went out to --

16          A.    Let's call those "invites."

17          Q.    Invites, sure.  So you had a thousand  
18   invites.  You normally, in your experience, get  
19   approximately, I think you said, a 20-percent  
20   response rate?

21          A.    That's correct, yeah.

22          Q.    And --

23          A.    Or less.

24          Q.    Or less.  20 percent or less, I'm sorry.

25   And --

1           A.    Let me just clarify though. My surveys  
2   are post-disaster surveys, right? I surveyed firms  
3   in Texas, recently a survey firm that we hired, we  
4   surveyed firms in the entirety of the State of Texas  
5   after Hurricane Harvey. Firms are difficult to get  
6   ahold of in the aftermath of a major disaster so.  
7   We -- it's -- for these types of surveys, although  
8   our response rate is appropriate.

9           Q.    And so, you said these are post-disaster.  
10   And is -- is there a minimum type of disaster? Are  
11   we talking, you know, act of God? Earthquakes?  
12   Hurricanes? Or is --

13          A.    We are talking hurricanes or major  
14   disasters, yeah.

15          Q.    And so all of the people you were getting  
16   responses from have lived through that disaster  
17   experience?

18          A.    That's correct.

19          Q.    And so they've had that -- they've  
20   experienced that disaster and you were asking them  
21   those questions to try to understand.

22          A.    I would not -- great question. I would  
23   not survey a business to evaluate how they responded  
24   to or to measure their resilience or recovery from a  
25   natural disaster if they did not live through that

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1 natural disaster. So all -- in all cases, all of my  
2 survey research would screen out firms that did not,  
3 in fact, live through that disaster.

4 Q. So your -- I think your testimony  
5 indicates that you provided -- you provided direct  
6 testimony in other PUCO proceedings; is that correct?

7 A. That's correct.

8 Q. What were those -- what were those cases?  
9 Do you remember?

10 A. I don't remember the case numbers. But  
11 you cross-examined me.

12 Q. I did.

13 A. The case -- the case with your company  
14 was the PPA Rider case.

15 Q. I think you laid out the cases that you  
16 provided testimony in in your CV?

17 A. That's correct.

18 Q. And I have a question for you because I'm  
19 not clear and I want to understand this, I think one  
20 of the cases you indicated that you provided  
21 testimony in was a case that was for Dayton Power &  
22 Light.

23 A. That's correct.

24 Q. And so, you provided written testimony  
25 for a Dayton Power & Light case?



1           A.    Say that one more time, please.

2           Q.    So you provided written testimony for a  
3 Dayton Power & Light case in front of the Commission?

4           A.    I did. That's correct. It was my  
5 understanding that the Consumers' Counsel, due to  
6 some external -- external event, decided to not file  
7 my testimony and a few others. I provided the  
8 testimony, provided the work to the Consumers'  
9 Counsel. It was ultimately up to them to file it.

10          Q.    So let me understand, so you -- they  
11 hired you to prepare it.

12          A.    That's correct.

13          Q.    And you did. And for whatever reason,  
14 they chose not to submit it in the docket and have it  
15 be testimony in the case.

16          A.    That's correct.

17          Q.    What was that case about?

18          A.    The Dayton Power & Light case?

19          Q.    Yes, sir.

20          A.    It was very similar to the power purchase  
21 agreement case.

22          Q.    And just generally, and I don't want to  
23 get into the details, just generally what was your  
24 testimony to be about? What was it to focus on?

25          A.    In that case, I believe my testimony was

1 focused on the economic impacts of -- to evaluate the  
2 macroeconomic impacts as provided by your company.

3 Q. By AEP?

4 A. By AEP.

5 Q. Or --

6 A. Excuse me. Not by your company. Forgive  
7 me. By DP&L.

8 Q. And so that testimony, although it was  
9 never entered into the record, was -- it opposed the  
10 Company's position or request in some way?

11 MS. WILLIS: Objection. Relevance.

12 MR. MILLER: We've got a listing here of  
13 expert testimony he's given. It appears that it  
14 wasn't actually ever filed, and certainly in my  
15 review of the docket it didn't indicate it was there,  
16 and I am trying to discern exactly what this was and  
17 in what case.

18 MS. WILLIS: I would also object on the  
19 basis of, you know, attorney work product and  
20 privilege. He was not offered as a witness in that  
21 case. He was merely -- his role was a consultant.  
22 He did not file testimony. So I think this is --  
23 this cross-examination is -- is inappropriate and not  
24 relevant.

25 MR. MILLER: If I may, it's in his CV. I

1 would assume, I don't know, but I would assume his  
2 counsel reviewed this before it was introduced as  
3 testimony in this case. I think it's fair game  
4 because it's part of his credentials. And again, I  
5 don't want to get into the specific details of what  
6 he did or didn't draft, or may have or may not have  
7 drafted. I am trying to get a general understanding  
8 of what -- what he was generally taking a position on  
9 in that proceeding.

10 EXAMINER PARROT: With respect to the  
11 question that's pending, the objection is overruled.

12 Go ahead, Dr. Dormady.

13 THE WITNESS: Can you read the question  
14 back, please.

15 EXAMINER PARROT: We can do that.

16 (Record read.)

17 A. No, it did not.

18 Q. It did not -- it wasn't testimony that  
19 was in opposition to the Company's position, I think  
20 is what Karen --

21 A. I conduct independent analyses. I don't  
22 oppose or support any particular intervenor in any  
23 case.

24 Q. Normally, testimony takes a position on  
25 something. Did you take a position on that testimony

1 or was it --

2 A. The position taken in my testimony, if I  
3 recall, was very similar to my testimony in this  
4 case, where I was simply identifying as to whether or  
5 not a particular piece of analysis should be  
6 evaluated and trusted. Just as in this case, my  
7 testimony takes the position that the Navigant survey  
8 is unreliable and should not be trusted.

9 Q. So when you are retained to put those  
10 kind of pieces of testimony together, those  
11 positions, are you -- are you directing your  
12 testimony. In other words -- let me ask you the  
13 question this way: When you are hired, you are hired  
14 to do certain things by OCC in this case, correct?  
15 Perform certain work.

16 A. I don't understand the question, I'm  
17 sorry. What do you mean by "certain things"?

18 Q. There's a task they want you to perform.

19 A. That's correct.

20 Q. And you indicated that you provide an  
21 independent analysis.

22 A. That's correct.

23 Q. Are you ever asked to perform a task that  
24 directs your -- directs the result, perhaps on the  
25 outcome, and they ask you to fill in the blanks in

1    how to get there?  In other words, have you ever been  
2    asked to provide testimony where somebody says "I  
3    would like you to prove I'm wrong, tell me how"?

4               MS. WILLIS:  Objection.  Relevance, your  
5    Honor.  I think we've been pretty patient here.  I  
6    don't know where this is going.  You know, it's going  
7    to testimony that was not even filed, not even  
8    presented.  And I don't see the relevance at all of  
9    this line of questioning and we've been very patient  
10   so far.

11              MR. MILLER:  Your Honor, the witness said  
12   he took independent views.  I am trying to understand  
13   what that means to him.  I am trying to understand  
14   how his retention process works.  He has been  
15   retained several times.  I don't know that this is  
16   necessarily directed at the Dayton Power & Light  
17   case.  He has been hired in at least three cases by  
18   the OCC, for example.

19              MS. WILLIS:  What does OCC's retention  
20   process have to do with the issues presented before  
21   this Commission?

22              MR. MILLER:  I think, among other things,  
23   this witness has provided testimony that talks about  
24   AEP's retention process of their surveying analytics  
25   firm, and he's provided essentially a rebuttal, and I

1 want to know how they retained their analysis and how  
2 they retained their analysts.

3 MS. WILLIS: Your Honor, with all due  
4 respect, we are talking apples and oranges. OCC does  
5 not have the burden of proof and is not asking for  
6 hundreds of millions of dollars to be spent on a -- a  
7 project. We are talking about, you know, OCC  
8 presenting a case. It has nothing to do with what --  
9 our retention process and what we do with our  
10 consultants is not relevant to the issues presented  
11 before the Commission.

12 MR. MILLER: Your Honor, the witness has  
13 testified he was retained by the OCC to provide  
14 testimony in the Dayton Power & Light case. He  
15 listed it in his CV. I would assume his lawyers or  
16 the lawyers for OCC, reviewed that before it was  
17 admitted into evidence in this case. Or going to be  
18 admitted into evidence in this case. And it's a  
19 little bit troubling to think he provided some kind  
20 of analysis in the Dayton Power & Light case that the  
21 OCC made the determination not to submit. And I am  
22 not asking him why they didn't submit it.

23 MS. WILLIS: Your Honor --

24 MR. MILLER: I am trying to determine  
25 what this gentleman believes his level of independent

1 analysis happens to be.

2 MS. WILLIS: Your Honor --

3 MS. BOJKO: Your Honor, I am going to  
4 object.

5 EXAMINER PARROT: To the question that is  
6 pending, the objection is overruled.

7 THE WITNESS: Can I have the question  
8 again, please?

9 (Record read.)

10 A. In all cases, I direct the means of the  
11 analysis. I would never enter into an agreement  
12 where the outcome was predetermined.

13 Q. So we talked a little bit about your  
14 agreement with the OCC in this case. I think you  
15 said that was -- your lawyer had attached it as a  
16 document, I believe, to some of the filings that were  
17 made, I think, last week. Do you remember, we talked  
18 about some of your recollections of what that  
19 agreement said in regards to reviewing testimony  
20 which you were hired to do. Do you remember language  
21 in that agreement that reflected on the fact you were  
22 specifically hired to point out bias?

23 MS. BOJKO: Objection, your Honor. I  
24 think that if counsel is asking about a contract in  
25 this case, then we can ask that question. But I'm

1 going to object to the continuing referral to the  
2 docket as being evidence. The docket -- a filing in  
3 the docket is not evidence. And secondly,  
4 inappropriate -- what I believe was an inappropriate  
5 motion to exclude testimony and the proceedings that  
6 occurred around that have no bearing or relevance  
7 now. You've already made a ruling on that, and  
8 counsel keeps going back to those pleadings which  
9 have nothing to do with the case at hand. You made a  
10 ruling, and I think that he needs to talk about this  
11 case and contracts in this case.

12 MR. MILLER: Your Honor, I would perhaps  
13 choose "record" as opposed to "evidence," but this  
14 information is in the record. This gentleman filed  
15 or had his lawyer file an entire set of information a  
16 week ago, on the record, which he signed an affidavit  
17 that said it was true and factual and accurate. And  
18 I am trying to get an understanding, like we talked  
19 about earlier, what his relationship happens to be in  
20 providing independent analysis. I don't think it's  
21 unfair to ask him about things that he swore to  
22 previously and submitted in the record of this case.

23 EXAMINER PARROT: The objection is  
24 overruled.

25 THE WITNESS: One more time, please.



1 (Record read.)

2 A. There are several questions in that. Can  
3 we clarify?

4 Q. Yeah. Let me sort of break it down for  
5 you, and if goes like it has been going, we will have  
6 to have her go back and reread it. Let me try to  
7 break this down. So would it be fair to say that you  
8 were hired by the OCC in this case to evaluate  
9 potential bias and shortcomings in the Navigant  
10 survey?

11 A. To evaluate the credibility of the survey  
12 which would include bias, yes.

13 Q. And the shortcomings.

14 A. Shortcomings, yes.

15 Q. Okay. Have you ever provided testimony  
16 on behalf of a regulated utility?

17 A. No, I have not.

18 Q. Have you ever testified in favor of any  
19 requests made by a regulated utility?

20 A. No, I have not.

21 Q. You've only testified in opposition to  
22 requests made by public utilities; is that correct?

23 A. That's correct. Well, let me clarify.  
24 You asked this question a few minutes ago. I never  
25 take a position for or against any intervenor in a

1 case. I would never conduct an analysis where I am  
2 not in control of the means of the analysis, whether  
3 or not it supports a particular side or not. So I  
4 guess to the degree that, as a witness, I can object  
5 to the characterization of your question, I would ask  
6 you to rephrase the question. In every case, I  
7 control the means of the analysis.

8 Q. And were you asking me to ask the  
9 question again? I think we're fine, so.

10 A. I think we're fine.

11 Q. Okay. So your testimony in this case  
12 challenges the Voice of the Customer survey designed  
13 and administered by Navigant. We talked about you  
14 reviewing the testimony, in this case, of witness  
15 Horner and witness Fry.

16 A. That's correct.

17 Q. And you did that. You did that, I think,  
18 in its entirety, reviewed all the documentation they  
19 provided and put into the record, correct?

20 A. That's correct.

21 Q. And you reviewed the actual survey and  
22 the survey results?

23 A. I did -- I did evaluate the survey and  
24 review the survey results, that's correct.

25 Q. So what else did you do in preparing your

1 testimony? I know you reviewed their testimony, you  
2 reviewed the survey. Anything else?

3 A. I sub -- supplied questions for  
4 discovery. And reviewed those questions -- those  
5 responses, those interrogatories.

6 Q. Do you have a sense of how much time you  
7 spent preparing all of that?

8 A. I keep a record of my time, yes. I don't  
9 have the exact number now. I make every effort to  
10 keep -- I make every effort to keep my time as short  
11 as possible, in the public interest, given this is a  
12 public agency. But I do have a record of that, not  
13 on me.

14 Q. And so, you keep a record of that time  
15 and what do you do with that information?

16 A. With that record?

17 Q. Right.

18 A. I don't understand. I'm sorry.

19 Q. Is there a purpose? Is there a reason  
20 you keep a record of that time?

21 A. For purposes of invoicing.

22 Q. That's what I assumed. I just wanted to  
23 check.

24 A. Correct.

25 Q. On -- do you have your testimony in front

1 of you?

2 A. I do.

3 Q. On page 4, line 4, if you can turn to  
4 that for me. Let me know when you're there.

5 A. I'm here.

6 Q. So I believe on page 4, line 4, you state  
7 the AEP results, as performed by Navigant, are not  
8 reliable. Is that a fair and accurate representation  
9 of your statement?

10 A. Yes.

11 THE WITNESS: If I can interrupt just  
12 briefly? Can I get some water?

13 Thank you, Maureen.

14 MS. WILLIS: If you give me that, I'll  
15 fill it up. I don't have any Perrier left.

16 THE WITNESS: Thank you so much.

17 Q. (By Mr. Miller) Dr. Dormady, are you  
18 ready?

19 A. Yeah.

20 Q. I am just checking. I wanted to make  
21 sure. We asked -- we talked a minute ago, before we  
22 took a break, about the results not being reliable  
23 and that was your conclusion in the regards to the  
24 Voice of the Customer survey?

25 A. That's correct.

1 Q. Are the results accurate?

2 A. I don't believe so.

3 Q. Could they be accurate?

4 A. It's possible.

5 Q. Did you or anyone at the OCC, I think we  
6 asked a similar question before but I will try not to  
7 reask the same one, you were asked -- let me say it  
8 this way: You were asked if you performed a survey,  
9 correct?

10 A. I believe, a few minutes ago, I was, yes.

11 Q. And your answer was, of course, no. I  
12 believe that's what it was.

13 A. That's correct.

14 Q. Did anyone at the OCC perform a survey,  
15 as far as you know, regarding the opinion of AEP's  
16 customers, concerning renewable energy and what they  
17 may be willing to pay?

18 A. As far as I know, they did not.

19 Q. Did you or anyone at the OCC perform  
20 research or conduct any due diligence regarding  
21 whether any similar studies had been performed? In  
22 Ohio?

23 A. Other similar willingness-to-pay  
24 estimates work performed or preference assessments  
25 for renewables?

1           Q.    Well, let's break it down a little bit.  
2 Did you review any other studies or surveys regarding  
3 renewables before you -- before you put together your  
4 testimony in this case?

5           A.    I did not. I was aware of them in the  
6 literature, but I did not need to use billable hours  
7 to do that. If that makes sense.

8           Q.    What literature are you referring to?

9           A.    The peer-reviewed published literature on  
10 the subject.

11          Q.    Are you aware of any similar studies in  
12 Ohio that you might have taken a look at in regards  
13 to renewables and customers' willingness to pay?

14          A.    I am not.

15          Q.    When you were retained by the OCC, was it  
16 in your scope of work to review other available  
17 studies?

18          A.    I don't believe that it was in my scope,  
19 no. I was asked simply to conduct an evaluation of  
20 the quality of this particular survey, the Navigant  
21 survey.

22          Q.    Do you know, in talking a little about  
23 the OCC and you have worked for them several times  
24 now, they represent the residential ratepayers of  
25 Ohio, correct?

1           A.    That's my understanding, yes.

2           Q.    In your course of working for OCC, have  
3 you talked to them about what other types of surveys  
4 they may have done in regards to their constituency?

5           A.    I have not.

6           Q.    Do you have any idea how the OCC may  
7 discern what its constituency is thinking if they  
8 don't do surveys?

9                   MS. BOJKO:  Objection, your Honor.  
10 Assumes facts not in evidence and mischaracterizes  
11 what the witness just stated.

12                   MS. WILLIS:  I'll join.

13                   MR. MILLER:  I am not sure I  
14 mischaracterized what he stated.  I asked a question.

15                   EXAMINER PARROT:  Overruled.

16                   MR. MILLER:  It was an open-ended  
17 question.

18                   EXAMINER PARROT:  Overruled.

19           A.    When you say what their customers are  
20 thinking, what are you referring to?

21           Q.    I will ask you the question about  
22 surveys.

23           A.    I assume you don't mean Ohio State  
24 football.

25           Q.    No.  I think everybody south of Toledo,

1 we know what they're thinking. No, I think what I am  
2 getting at is you worked for them several times. We  
3 talked about that. Do you have any sense of how they  
4 determine what their customers want in regards to the  
5 services they may provide to their customers?

6 A. I'm sorry. I don't understand the  
7 question.

8 Q. The OCC doesn't do surveys as far as you  
9 know or have been informed, correct?

10 A. I am not informed of all of the dealings  
11 of the Ohio Consumers' Counsel.

12 Q. And you've never been involved in a  
13 survey for the OCC?

14 A. That's correct.

15 Q. Are you personally in favor of renewable  
16 energy?

17 MS. WILLIS: Objection, relevance.

18 MR. MILLER: I think we've seen similar  
19 questions like this of other witnesses. I think this  
20 case is covering renewables. I think he is an  
21 expert. I think he is -- has a long curriculum vitae  
22 and he indicates he's an independent and, again, I am  
23 trying just to understand what his view of  
24 independence is and what his perspectives are, and I  
25 think that's an important part of us being able to



1     prove our case.

2                     EXAMINER PARROT: Overruled.

3                     THE WITNESS: Can I have the question  
4     again, please?

5                     (Record read.)

6             A.     What do you mean by "in favor of"?

7             Q.     Supportive.

8             A.     I think that's a synonym. Do you mean  
9     willing to pay as in the Navigant survey's approach  
10    or do you mean generally in favor as, you know, I  
11    support it like I support the color purple?

12            Q.     I am not sure about purple, but let's ask  
13    both those questions. So would you be willing to pay  
14    more for renewable energy?

15            A.     I am one of the few customers in the  
16    State of Ohio who agrees, through his CRES provider,  
17    to pay a slightly higher rate for renewables, yes.

18            Q.     And so, the other question, like you  
19    broke that down, are you generally in favor of it as  
20    you may support the color purple, I think was the way  
21    you put it?

22            A.     I am willing to pay, I am a customer who  
23    is willing to pay a slightly higher premium on his  
24    electric bill for renewables; and if that means that  
25    I support renewables, yes.

1           Q.    You didn't participate in the AEP survey,  
2    did you?

3           A.    I did not.

4           Q.    Do you believe base -- because you're a  
5    professor, you deal with energy policy all the time.  
6    I think you have been very involved with the  
7    personalities at the Commission, for example, and the  
8    industry in town and in the state. And knowing all  
9    that, I kind of wanted to ask you the question, do  
10   you believe that the people in Ohio are generally in  
11   favor of renewables?

12           MS. WILLIS: I am going to object and  
13   move to strike the colloquy or whatever it was about  
14   the personalities and I don't understand what that  
15   means. I don't want it being part of the record. It  
16   doesn't help the record. It's a statement and I  
17   don't know what it's good for.

18           EXAMINER PARROT: Let's rephrase.

19           Q.    (By Mr. Miller) You're -- you are an  
20   expert in energy policy in the State of Ohio,  
21   correct?

22           A.    I believe that's correct, yes.

23           Q.    Do you believe people in Ohio are  
24   generally in favor of renewable energy?

25           A.    I do not.

1 Q. What about the rest of the United States?

2 A. Let me clarify my response. When I say  
3 "in favor of" or "supportive of" in response to  
4 consistent with -- consistent with your prior  
5 question, I mean willingness to pay.

6 Q. Is there a different answer if you  
7 separate those two things out into sort of  
8 independent categories?

9 A. Absolutely.

10 Q. And again, you haven't done any surveys  
11 or studies in regards to whether people are  
12 supportive of renewable energy or whether people are  
13 supportive of renewable energy and willing to pay  
14 more, either of those?

15 A. Can I ask you to be a little bit clearer  
16 in your question when you say "supportive"? Can you  
17 either phrase it in terms of willingness to pay or  
18 some other construct, so I can be precise in my  
19 response?

20 Q. When I say "supportive," would like to  
21 see or have the marketplace construct, build, deploy.

22 A. Regardless of their costs?

23 Q. Correct.

24 A. Okay. Say the question one more time  
25 then.

1           Q.    So I think you qualified your support for  
2 renewable energy, and I asked you the question about  
3 whether or not people in Ohio support renewable  
4 energy. And I think, again, you sort of qualified it  
5 with a willingness to pay or not. And I think the  
6 question I'm asking you is, do you think the people  
7 in Ohio support renewable energy, economics aside?

8           MS. BOJKO:  Objection, your Honor.  I  
9 would ask for further clarification if we're talking  
10 about AEP Ohio developing or are we talking about  
11 market based.  He asked the question twice and he  
12 included one time the marketplace and the other time  
13 he did not.  So is the question do people support AEP  
14 Ohio developing or the marketplace developing?  
15 Because those are different questions.

16           MR. MILLER:  I don't think I asked the  
17 question, I didn't intend to ask the question about  
18 AEP Ohio in a reference.  I think what we were  
19 talking about was people in Ohio, not just AEP Ohio.  
20 And I think he asked for additional explanation.  I  
21 was trying to kind of put some parameters on that so  
22 he could answer the question.

23           MS. WILLIS:  And I would object on  
24 relevance.  I think we are talking about AEP  
25 customers in this case.  We are not talking generally

1 about the State of Ohio.

2 EXAMINER PARROT: Overruled.

3 THE WITNESS: One more time with that  
4 question, please.

5 (Record read.)

6 A. How can you separate economics from such  
7 an important question?

8 Q. I am going to ask you to try real hard.

9 A. Try really hard. I really don't know how  
10 to answer that question. Sorry.

11 Q. So as an expert, you don't think the two  
12 things can be separated.

13 A. If you are asking me if I believe that  
14 Ohio customers, regardless of service territory, in  
15 the aggregate in general support renewables, and  
16 there's no change in their costs whatsoever, I would  
17 have no -- no evidence to support a claim either way.

18 Q. What if it were lower cost? Reduced,  
19 cost was reduced, in other words, your bill went  
20 down?

21 A. Typically the law of demand would dictate  
22 their demand would increase.

23 Q. So let me understand, I think --

24 A. Let me say this: "Demand" I use  
25 synonymously with "willingness to pay" as I do in my

1 testimony.

2 Q. So to be clear, I think what you are  
3 saying is costs were -- if it was a benefit to the  
4 customer, not an outflow of cash but it was cheaper  
5 for them, you think that they would be more  
6 supportive -- or supportive, I guess I should say,  
7 supportive of renewable energy projects?

8 A. Correct.

9 Q. Are you -- are you aware that the Sierra  
10 Club is supportive of renewables?

11 A. I don't know the particular background or  
12 degree of support of any Intervenor in this case.  
13 Again, I am an independent objective analyst.

14 Q. Are you aware that there are Intervenors  
15 in this case that are supporting the Company's  
16 request for construction of utility-scale --

17 A. Of course.

18 Q. -- renewables? Do those entities  
19 represent residential ratepayers in Ohio?

20 MS. WILLIS: Objection, relevance. We'll  
21 stipulate they do not represent other -- the  
22 residential customer classes, if that's what counsel  
23 would like.

24 MR. MILLER: I think counsel --

25 MS. MOONEY: We wouldn't like that.

1 MS. WILLIS: Directly, we directly  
2 represent residential customers.

3 MS. MOONEY: OPAGE also represents  
4 residential customers.

5 EXAMINER PARROT: Overruled.

6 THE WITNESS: One more time, please.

7 (Record read.)

8 A. I don't know that I would characterize  
9 any entities or Intervenor in this case representing  
10 residential consumers as having a position for or  
11 against renewable energy in the broad sense that  
12 you've described the term a few minutes ago.

13 Q. Do you know who OPAGE represents?

14 A. I do not.

15 Q. Do you know what OPAGE is?

16 A. Yes, I do.

17 Q. Can you tell me what you think OPAGE is?

18 A. Ohio Partners for Affordable Energy.

19 Q. And do you know who they serve, who they  
20 say they serve?

21 A. Generally speaking, I don't have any  
22 specifics but, yes.

23 Q. So generally speaking who would that be?

24 A. I believe they represent, in the  
25 aggregate, customers very similar to the Consumers'

1 Counsel. Customers in addition to small and mid-size  
2 business, business customers.

3 Q. So is -- is your testimony here today  
4 made to suggest AEP's customers do not want  
5 renewables?

6 A. Not at all. My testimony is entirely  
7 about flaws or biases in the -- in the instrument  
8 used to measure demand or willingness to pay of those  
9 customers.

10 Q. And along those lines, can you turn to  
11 page 7.

12 A. Sure.

13 Q. Lines approximately 1 through 12, sort of  
14 the majority of the top part of that page, first  
15 half.

16 A. Which line?

17 Q. Just 1 through 12, all of it. And I kind  
18 of want to get an understanding of this, and I am  
19 going to -- I guess the best way to say it, I am  
20 going to explain to you what my understanding is, and  
21 perhaps we can talk a little bit about what your  
22 representation is here in this part of your  
23 testimony.

24 A. Sure. Go ahead.

25 Q. So I think here you are talking about a



1 restaurant chain considering higher tiers on its wine  
2 menu to illustrate what you believe the differences  
3 between the stated preference and a revealed  
4 preference; so you are using this restaurant analogy  
5 or --

6 A. A hypothetical, yeah.

7 Q. Hypothetical. And I think your  
8 suggestion is for the purposes of survey reliability,  
9 it would be more appropriate in this hypothetical for  
10 them -- the restaurant chain to rely upon another  
11 similar chain's actual data and the results of  
12 perhaps the experiences that similar chain had had,  
13 and that would be a revealed preference analogy,  
14 right, that you are analogizing to reveal preference?

15 A. That's correct. The revealed preference  
16 study is where you are actually observing,  
17 non-hypothetical responses, customers' actual  
18 behavior in the marketplace.

19 Q. And I think you contrast this with a  
20 stated preference which is that same restaurant  
21 trying to figure out what to do with the high-tier  
22 wine menu, they would just ask local households what  
23 to do and that wouldn't be the same. It would be  
24 different, right? It's a stated preference, and it  
25 wouldn't be actual in the sense of there's no

1 experience there to reflect upon.

2 A. That's correct.

3 Q. And so in your hypothetical data, that  
4 analysis requires there be a similar restaurant chain  
5 that has that actual data to arrive at that result  
6 which, in your mind, is more accurate.

7 A. That's correct.

8 Q. Do you know, is a nonbypassable charge or  
9 tariff rider for renewables in any other electric  
10 utility Standard Service Offer currently in place in  
11 Ohio?

12 A. I don't understand your question. Say  
13 that one more time, please.

14 Q. Do you know if any other electric utility  
15 in Ohio has a nonbypassable charge in place in  
16 regards to their standard offer, Standard Service  
17 Offer, that has to do with renewable costs?

18 A. I'm not familiar with all of the -- there  
19 is a multitude of riders in each of -- for each of  
20 the utilities. I'm not familiar with the details of  
21 any -- of any of them.

22 Q. So you wouldn't know.

23 A. That's correct.

24 Q. Would you know if any electric utility  
25 had ever had a nonbypassable renewable charge in

1 place?

2 A. Say that one more time, please.

3 Q. Would you know if any electric utility  
4 ever had a nonbypassable charge in place regarding  
5 renewables?

6 A. I would not.

7 Q. So you're not aware of any -- you are not  
8 aware there would be any data out there perhaps to  
9 compare to what the Company's asked in this case?

10 A. That's incorrect. There is data out  
11 there.

12 MR. MILLER: I don't think I have  
13 anything further. Thank you.

14 THE WITNESS: Thank you.

15 EXAMINER PARROT: Ms. Willis, redirect?

16 MS. WILLIS: If I may have a moment, your  
17 Honor? Thank you.

18 (Pause in proceedings.)

19 MS. WILLIS: Thank you, your Honor. We  
20 have no redirect. At this time, we move for the  
21 admission of OCC Exhibit No. 24.

22 EXAMINER PARROT: Are there any  
23 objections to the admission of OCC Exhibit 24?

24 Hearing none, it is admitted into the  
25 record.

1 (EXHIBIT ADMITTED INTO EVIDENCE.)

2 EXAMINER PARROT: Thank you, Dr. Dormady.

3 THE WITNESS: Thank you.

4 EXAMINER PARROT: Is there anything else  
5 we need to deal with before we adjourn for today?

6 MR. NOURSE: No.

7 EXAMINER PARROT: Okay. We will  
8 reconvene on Friday, February 8, at 9:00 a.m., with  
9 the rebuttal testimony that the Company has already  
10 filed. I will let you know about the room. I  
11 believe we will be here again, but I want to confirm,  
12 so we'll notify you. Thank you.

13 (Thereupon, at 3:17 p.m., the hearing was  
14 adjourned.)

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## 1 CERTIFICATE

2 I do hereby certify that the foregoing is a  
3 true and correct transcript of the proceedings taken  
4 by me in this matter on Wednesday, February 6, 2019,  
5 and carefully compared with my original stenographic  
6 notes.

7  
8 \_\_\_\_\_  
Karen Sue Gibson, Registered  
Merit Reporter.

9  
10 \_\_\_\_\_  
Carolyn M. Burke, Registered  
Professional Reporter.

11  
12 (KSG-6690)

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**Case No(s). 18-0501-EL-FOR, 18-1392-EL-RDR, 18-1393-EL-ATA**

Summary: Transcript in the matter of the Long-Term Forecast Report of the Ohio Power Company hearing held on 02/06/19 - Volume XI electronically filed by Mr. Ken Spencer on behalf of Armstrong & Okey, Inc. and Gibson, Karen Sue Mrs.