BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Annual Application	)	
of Columbia Gas of Ohio, Inc. for an	)	Case No. 19-1940-GA-RDR
Adjustment to Rider IRP and Rider DSM	)	
Rates.	)	

PUBLIC VERSION

DIRECT TESTIMONY
OF
COLLEEN SHUTRUMP

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

April 20, 2020

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1 **I. BACKGROUND**

2

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

4 *A1.* My name is Colleen Shutrump. I am employed as the Energy Resource Planning Advisor

5 for the Office of the Ohio Consumers' Counsel ("OCC"). My business address is 65 East

6 State Street, Suite 700, Columbus, Ohio 43215.

7

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

9 *EXPERIENCE.*

10 *A2.* I have a Bachelor of Science in Business Administration from the Youngstown State

11 University with a major in Management and a Master of Business Administration from

12 Baldwin Wallace College with emphasis in International Business. I have worked over

13 ten years in electric utility regulation with emphasis on customer-funded energy

14 efficiency programs. I started as a Utility Analyst at the Indiana Utility Regulatory

15 Commission in 2009. I was promoted to Senior Utility Analyst in 2015. While there, I

16 attended the Institute of Public Utilities Michigan State University Advanced Regulatory

17 Studies Program and Camp NARUC. I began work as an Energy Resource Planning

18 Advisor with OCC in August 2015. In spring 2016, I completed a graduate-level course

19 on Utility Regulation and Deregulation at the Ohio State University, John Glenn College

20 of Public Affairs.

1   ***Q3.***   ***WHAT ARE YOUR DUTIES AT THE OHIO CONSUMERS' COUNSEL?***

2   ***A3***.   I provide analytical support on energy resource planning issues impacting Ohio

3   consumers' interests. I serve as the Analytical Department's lead analyst and policy

4   advisor for the OCC on cases and issues relating to customer-funded energy efficiency

5   and demand side management programs. This includes, among other things, advocating

6   for (i) consumer options to reduce their energy use and save money on their utility bills

7   and (ii) developing OCC policy that addresses consumer-protection issues. I was

8   extensively involved in each of the four 2016 electric energy efficiency portfolio cases

9   before the Public Utilities Commission of Ohio ("PUCO"). My involvement included

10   providing testimony on electric energy efficiency programs in the Dayton Power &

11   Light[1] and Duke Energy Ohio[2] portfolio cases affecting consumers. I also testified on

12   necessary consumer protections for gas programs in the Vectren rate case.[3] I am also

13   extensively involved in proceedings about the electric and gas riders that consumers pay

14   to support energy efficiency programs. I participate in energy efficiency collaborative

15   meetings for utility-led electric and gas programs and the work groups on grid

16   modernization data sharing and distribution system planning (*i.e.*, the PowerForward

17   workgroups).

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[1] *See* http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=e5387ca7-b061-4e9a-bc4b-66d71fafa20b.

[2] *See* http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=086ff9ae-a122-4479-9a18-fcaefc81f584.

[3] *See* http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=43f018b1-7394-4e2d-9708-26d64b02aafd,
http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=ca349b36-83ee-4ca7-acfd-09a80f3e28f2,
http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=0bbabc31-2fc9-4c10-affa-eb256e9a449b.

1   **II.**   **PURPOSE OF TESTIMONY AND SUMMARY OF RECOMMENDATIONS**

2

3   *Q4*.   *WHAT IS THE PURPOSE OF YOUR TESTIMONY?*

4   *A4.*   The purpose of my testimony is to provide recommendations and support for why the

5   PUCO should suspend Columbia's non-low-income energy efficiency programs and

6   suspend Columbia's charges that make a million Columbia customers subsidize the

7   programs. The PUCO should find ways to reduce charges to consumers given the health

8   emergency and the related developing financial emergency that many Ohioans will face

9   for possibly years. Columbia's non-low-income energy efficiency programs and related

10   subsidy charges to consumers should be suspended until and unless the PUCO decides

11   otherwise.

12

13   It is worth noting that Columbia's energy efficiency programs, that Columbia charges

14   consumers to subsidize, are ongoing at a time when elected officials ended mandated

15   programs and related consumer payments for electric energy efficiency. Columbia has

16   implemented $200 million in natural gas energy efficiency programs without mandates,

17   at the expense of consumers for programs costs and profits to Columbia.

18

19   *Q5.*   *WHAT ARE YOUR RECOMMENDATIONS?*

20   *A5*.   As stated, the PUCO should find ways to reduce charges to consumers given the health

21   emergency and the related developing financial emergency that many Ohioans will face

22   for possibly years. Columbia's non-low-income energy efficiency programs and related

23   subsidy charges to consumers should be suspended until and unless the PUCO decides

1   otherwise. Columbia's upcoming charges to customers for energy efficiency program

2   costs, including for Columbia profits, are expected to be up to $20 million in each of

3   2021 and 2022.[4]

4

5   Also, regarding last year's programs, I have a recommendation that the PUCO should not

6   allow Columbia to charge customers for profits.

7

8   **Q6.**   **WHY DO YOU RECOMMEND SUSPENDING COLUMBIA'S NON-LOW-INCOME**

9   **ENERGY EFFICIENCY PROGRAMS AND THE RELATED CHARGES TO**

10 **CONSUMERS?**

11 **A6.**   The PUCO should find ways to reduce charges to consumers given the health emergency

12 and the related developing financial emergency that many Ohioans will face, possibly for

13 years. Columbia's non-low-income energy efficiency programs and related subsidy

14 charges to consumers should be suspended until and unless the PUCO decides otherwise.

15 My recommendations should be adopted because:

16

17 1.   The coronavirus emergency is resulting in lost income and other financial

18 difficulties for Ohioans. These difficulties could last for years. Accordingly,

19 many consumers have or will have a significant need for assistance in paying

20 their utility bills. The PUCO should look for ways to reduce consumer bills and

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[4] Application, Appendix B, Table 3, Case No. 16-1309-GA-UNC. This does not include administrative costs or shared savings. Also removes from the table $70,000/year for lunches per Stipulation filed August 12, 2016.

1   suspending consumer subsidies for Columbia's energy efficiency programs

2   should be part of this effort.

3

4   2.   Residential non-low-income programs[5] by gas utilities have already achieved the

5   regulatory objectives for which they were established. Those objectives were to

6   stimulate the market and help mitigate high gas bills (from high natural gas

7   prices) for consumers. The market for energy efficient products has greatly

8   expanded since 2008 when Columbia's non-low-income programs were first

9   approved. Today, the energy efficiency market is competitive, and consumers are

10   making decisions on their own about whether and how to participate in that

11   market.

12

13   Further, the regulatory policy that provided for Columbia's non-low-income

14   energy efficiency programs originated in a case where Columbia was filing

15   monthly Gas Cost Recovery (GCR) rates as high as $14.27 per Mcf. [6] But in June

16   of 2016, when Columbia requested approval to continue programs in Case No.

17   16-1309-GA-UNC, Columbia's natural gas price was a mere $4.34 per Mcf.[7] It is

18   axiomatic that low natural gas prices reduce the value proposition for utility-run

19   energy efficiency programs, such as the programs that Columbia Gas consumers

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[5] Columbia non-low-income programs were first approved by stipulation on January 23, 2008. *See* http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=660f7c43-0c23-4aff-90c2-aab8d9fd2edc.

[6] Columbia Gas Cost Recovery Report filed November 20, 2008 in Case No. 07-221-GA-GCR, page 3, *available at* http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=99ef0fa4-ba0d-4b13-ab69-9cd044e302fc.

[7] Columbia Revised Tariff filed June 28, 2016 in Case No. 12-2637-GA-EXM, *available at* http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=3f48b84f-0f23-4e14-86fc-a2ed7aef5466.

1   are subsidizing. And natural gas prices are projected to remain low well into the

2   future.[8] Despite this lower price, the PUCO approved the continuation of

3   Columbia's programs under a stipulation. *Today's* gas cost is even lower—just

4    $2.70 per Mcf.[9]

5

6   For electric programs, there was a legislative energy efficiency mandate that

7   required electric utilities to meet increasing annual savings targets each year in

8   order to be in compliance with the law. Not so for gas. No law mandates the

9   natural gas energy efficiency programs that Columbia runs, at consumer expense.

10   And the passage of House Bill 6 last year ended the electric energy efficiency

11   mandates.

12

13   3.   When using the appropriate discount rate to calculate the utility cost test, certain

14   of Columbia's programs cost more to run than they save for consumers. Even

15   using Columbia's own numbers, Columbia's low-income program (WarmChoice)

16   and many of its non-low-income programs (Home Performance Solutions,

17   Residential Energy Efficiency Education for Students, EPA Portfolio Manager,

18   and Online Energy Audit) cost more money than they save consumers. Customer-

19   funded energy efficiency programs that cost more money than they save should

20   absolutely be suspended in this time where utilities should be striving for least

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[8] *See e.g.,* the U.S. Energy Information Agency
https://www.eia.gov/outlooks/aeo/pdf/AEO2020%20Natural%20Gas.pdf, at Slide 5.

[9] Columbia Tariff 128th Revised Sheet No. 22 SCO Rider price of $0.2704 rate per 100 cubic feet of all gas consumed each billing period. https://www.columbiagasohio.com/our-company/about-us/regulatory-information.

1   cost planning management and implementation. Following concepts of least cost

2   planning should be a top priority to minimize the immediate and long-term stress

3   that customers and the economy are bearing during this health and related

4   financial crisis.

5

6   **Q7.   WHY SHOULD THE PUCO RETHINK CHARGES FOR ENERGY EFFICIENCY?**

7   **A7.**   The PUCO should rethink and end the Columbia energy efficiency charges, due to the

8   financial harm that Ohioans are suffering and may suffer for years as a result of the

9   coronavirus emergency. Due to the coronavirus pandemic, Ohioans face an

10   unprecedented and precipitous rise in unemployment claims, with severe financial

11   consequences.

12

13   On March 22, 2020, Ohio Department of Health Director Amy Acton issued a "stay at

14   home" order directing businesses and operations in the state to cease all activities, for the

15   imperative to protect the public from the coronavirus. For the week ending March 21,

16   unemployment claims in the state were estimated at 187,784.[10] This number represents a

17   massive increase over the previous week, when just 7,046 claims were made in Ohio. In

18   fact, the only state with more claims during the week ending March 21 was Pennsylvania

19   at 378,908 claims. The impacts from these numbers will produce a whole new set of

20   customers that likely paid their bills on time and in full in the past, but now because of

21   the coronavirus, will receive a gas bill that is suddenly not affordable. Unemployed

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[10] *See* Attachment CLS-1 (U.S. Department of Labor Summary of Unemployment Claims).

1   Ohioans are evaluating their household budgets to determine how to meet basic needs

2   including home energy costs.

3   The PUCO should evaluate whether bill charges for energy efficiency, which are not

4   necessary for safe and reliable service, are reasonable in light of the pandemic's

5   deleterious impact on consumers. The answer should be that the charges are not

6   reasonable.

7

8   *Q8.   COULD YOU BE MORE SPECIFIC ABOUT THE UNEMPLOYMENT IMPACT IN*

9   *COLUMBIA'S SERVICE TERRITORY?*

10   *A8.*   During the week of March 21, 2020, the number of initial unemployment claims[11] in the

11   61 counties served by Columbia represent 71% of total claims filed statewide. A map of

12   Columbia's service area is attached as Attachment CLS-6. The table below shows how

13   each county Columbia serves is impacted by the loss of income. The financial impact to

14   consumers is massive and does not discriminate based on county of residence. In the

15   aggregate, the number of initial unemployment claims filed by consumers in March of

16   2020 represents a 1587% increase over the number of initial claims filed in March 2019.

17   And this trend is true in every single county that Columbia serves. The economic impact

18   of the coronavirus emergency at the local level demonstrates the seriousness of the

19   financial loss to the individual paying the natural gas bill.

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[11] These numbers do not include continued claims https://ohiolmi.com/portals/206/UC/weekly/UC236cw_2012.pdf.

1

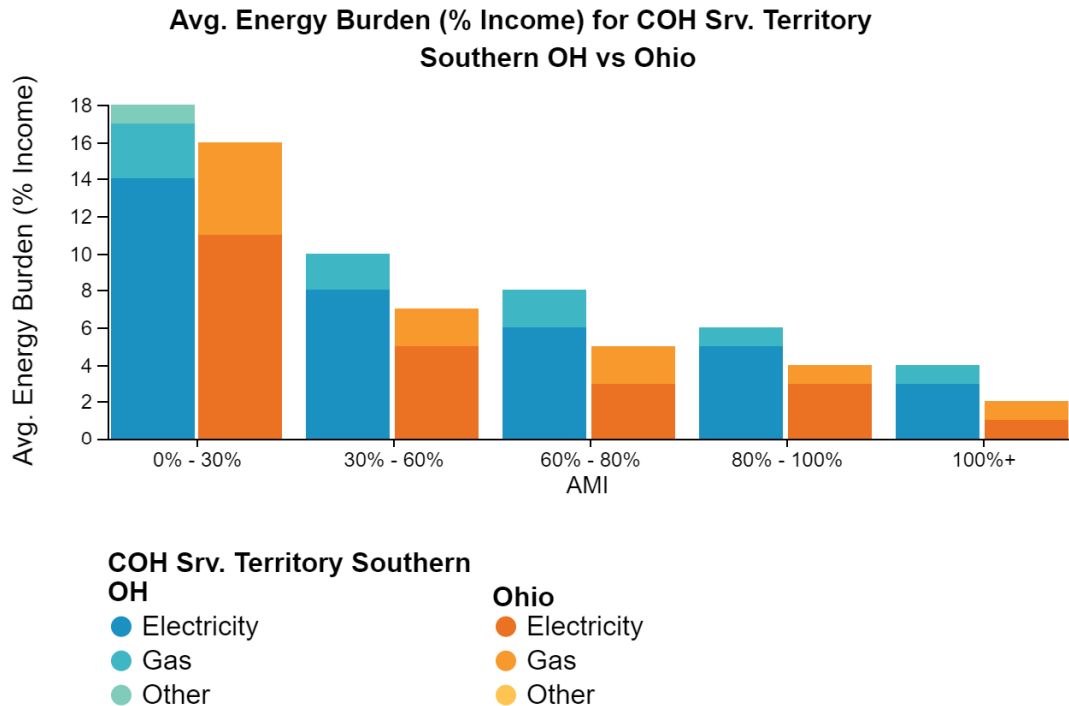| County	Initial Claims March 2020	Initial Claims March 2019	County	Initial Claims March 2020	Initial Claims March 2019	County	Initial Claims March 2020	Initial Claims March 2019
Allen	6,042	222	Harrison	508	37	Noble	158	31
Athens	2,037	60	Hocking	345	60	Ottawa	2,328	136
Belmont	2,179	179	Holmes	891	17	Perry	1,602	29
Carroll	1,330	113	Huron	4,214	182	Pickaway	2,092	78
Champaign	1,775	69	Jackson	261	108	Richland	6,557	251
Clark	1,992	183	Jefferson	2,123	197	Ross	1,041	118
Columbiana	4,901	258	Lawrence	312	90	Sandusky	887	181
Coshocton	1,325	73	Licking	7,315	289	Scioto	2,283	187
Crawford	3,063	200	Logan	2,406	58	Seneca	4,227	111
Cuyahoga	62,685	2,986	Lorain	18,178	992	Stark	19,694	1,296
Delaware	7,281	185	Lucas	8,690	1,120	Summit	27,268	1,172
Erie	6,570	421	Madison	1,434	45	Trumbull	11,055	1,207
Fairfield	6,743	246	Mahoning	13,481	1,283	Tuscarawes	4,501	305
Franklin	23,527	1,975	Marion	838	94	Union	732	41
Fulton	611	105	Medina	9,209	418	Vinton	459	39
Gallia	885	62	Meigs	165	96	Warren	9,332	351
Geauga	3,461	107	Monroe	326	36	Washington	617	154
Greene	6,984	224	Morgan	600	52	Wayne	4,865	126
Guernsey	538	114	Morrow	507	46	Wood	2,179	279
Hancock	5,355	103	Muskingum	3,725	187	Wyandot	288	36
Hardin	1,516	52						

2

3 *See* https://ohiolmi.com/home/UIclaims#c2.

1   And as demonstrated in the chart below, Ohioans in southern Ohio are already struggling

2   with the burden of utility costs[12] (the percentage of household income that goes toward

3   energy costs) that are higher than the rest of the state. This is an example of an already

4   vulnerable group of Columbia customers that should not be paying to support energy

5   efficiency programs.

6

7   The chart below shows energy burden (vertical axis) and Area Median Income (AMI) on

8   the horizontal axis, which is the household income for the median household in a

9   specified area. Incomes below 80% of the AMI are considered "low-income." Incomes

10   above 80% and up to 120% of the median income are considered "moderate-income."

11   These groups are expected to pay Columbia's energy efficiency charge (about $1.50 per

12   month for a typical customer) for the next two years. Yet their energy burden is higher

13   than the rest of Ohio. And for non-participating customers within these groups, the

14   energy efficiency charge that supports the ability for others to get a discounted gas

15   furnace or smart thermostat is an injustice.

---

[12] Lifting the High Energy Burden in America's Largest Cities, April 2016 American Council for an Energy
Efficient Economy (ACEEE). https://www.aceee.org/sites/default/files/publications/researchreports/u1602.pdf.

Avg. Energy Burden (% Income) for COH Srv. Territory
Southern OH vs Ohio

COH Srv. Territory Southern OH
- Electricity
- Gas
- Other

Ohio
- Electricity
- Gas
- Other

Low-Income Energy Affordability Data Tool Chart Export (https://www.energy.gov
Exported On: 3/26/2020
COH Srv. Territory Southern OH: Vinton County, Jackson County, Gallia County, Scioto
AMI: 0% - 30%, 30% - 60%, 60% - 80%, 80% - 100%, 100%+

1

2 **Q9.** **PLEASE EXPLAIN HOW THE MARKET FOR ENERGY EFFICIENCY HAS**

3 **EVOLVED.**

4 **A9.** While energy efficiency products existed in the market decades ago, relatively few were

5 sold. To remedy this, utilities were viewed by regulators as the most practical market

6 intervention tool to provide information and bring public awareness to their customers

7 about efficiency benefits using bill inserts, providing web content and offering rebates for

8 products. Utility programs initially helped move the market toward higher customer

9 adoption rates for energy efficiency products in the home. But now there is a thriving

10 competitive market for the provision of energy-efficient technologies, numerous

1   manufacturers producing those technologies, and many retailers offering those

2   technologies.

3

4   Education and information through utility programs and state and federal programs has

5   also increased market availability over time. One example is the ENERGY STAR

6   program, an information and branding campaign that for the last 20 years has

7   revolutionized the market for energy-consuming products. More than 80% of American

8   consumers now recognize the ENERGY STAR label.[13] And, there are more than 70

9   product categories that are ENERGY STAR certified.[14] This would suggest that

10 consumers have options to choose among a variety of energy efficient options depending

11 on how much they choose to save and at what price. Regulatory expert Kenneth Costello

12 (who is a witness for OCC in this case) agreed with this sentiment in a recent paper,

13 concluding: "[C]ustomers have better information on [energy efficiency] programs ...

14 Presumably, the most cost-effective actions have already been exploited. Thus, market

15 failures for [energy efficiency] have decreased over time, lessening the need to have

16 utility or government intervention to advance [energy efficiency]."[15]

---

[13] Energy Star® Products 20 Years of Helping America Save Energy Save Money and Protect the Environment; https://www.energystar.gov/ia/products/downloads/ES_Anniv_Book_030712_508compliant_v2.pdf.

[14] https://energystar.zendesk.com/hc/en-us/articles/212112307-I-was-shopping-for-appliances-and-a-lot-of-models-were-ENERGY-STAR-I-thought-it-was-supposed-to-be-hard-to-get-.

[15] *See* Attachment CLS-5. A copy of the paper is also currently available at https://www.cato.org/sites/cato.org/files/serials/files/regulation/2019/3/regulation-v42n1-4_0.pdf. ("Costello"). Mr. Costello's paper is also attached to his testimony on behalf of OCC in this case.

1   Requiring consumers to subsidize natural gas energy efficiency programs is unnecessary

2   and unreasonable given that the competitive market for energy efficient products is

3   strong. Consumers are acting on their own (or deciding not to act) for being more energy

4   efficient. Today, the competitive market provides that connection between energy

5   efficiency products and the information needed by consumers to make informed savings

6   decisions. Decades of marketing the benefits of energy efficiency programs have resulted

7   in much better information on energy efficiency programs and more consumer awareness.

8   The market has transformed and utility involvement in offering programs is not needed.

9   The Ohio General Assembly seems to have reached a similar conclusion in House Bill 6

10   last year, when it ended requirements for utility-run electric energy efficiency programs.
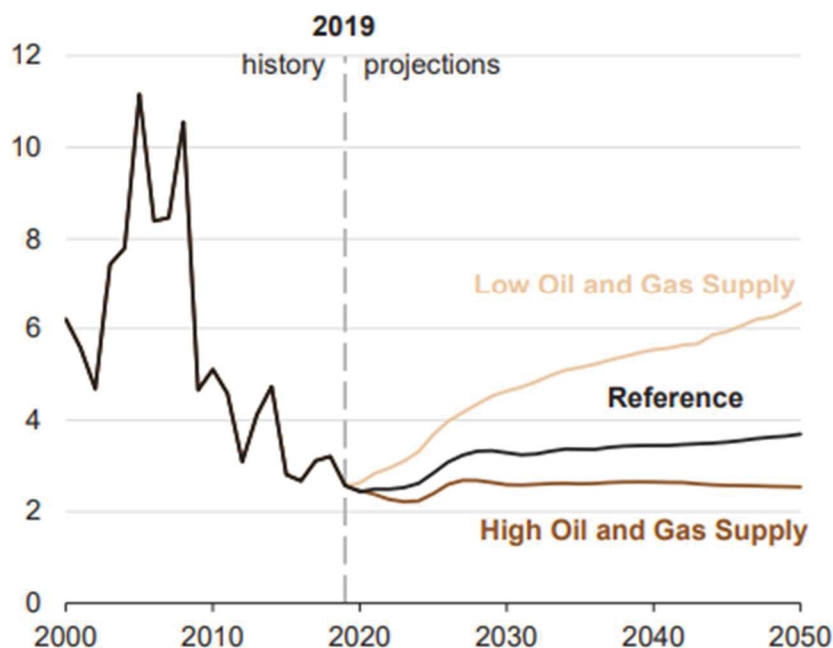
11

12   **Q10.   HOW DOES THE PRICE OF NATURAL GAS IMPACT THE REASONABLENESS**

13   **OF UTILITY ENERGY EFFICIENCY PROGRAMS?**

14   **A10.**   Natural gas prices have a fundamental impact on the reasonableness of energy efficiency

15   programs. Henry Hub gas prices, as reported in the U.S. Energy Information

16   Administration's Annual Energy Outlook 2020 reference case remain lower than $4.00

17   per million British Thermal Units (BTU) throughout the projection period as shown

18   below to 2050.[16]

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[16] Annual Energy Outlook 2020 Natural Gas Sector https://www.eia.gov/outlooks/aeo/.

AEO2020 natural gas spot price at Henry Hub
2019 dollars per million British thermal units

2019

history | projections

Low Oil and Gas Supply

Reference

High Oil and Gas Supply

1

2   As explained earlier, natural gas energy efficiency programs were initiated largely as a

3   response to higher gas prices. Mr. Costello (who is also testifying for OCC in this case)

4   explained in his recent paper that "the rationales for EE programs of both electric and gas

5   utilities are less valid today than when they were first implemented" because "natural gas

6   prices are low and expect to remain so for the next several years."[17] I agree. When gas

7   prices are low, the programs are less cost-effective and the payback period for energy

8   efficiency equipment is much longer. The competitive market, not utility monopolies, is

9   preferred for the provision of natural gas energy efficiency services and products to

10   consumers. Again, I refer to Mr. Costello's succinct conclusion: "[S]ociety should rely

11   more heavily on the marketplace to influence EE investments, or the role of utilities

---

[17] Attachment CLS-5 (which is also attached to Mr. Costello's testimony).

1   should be increasingly displaced by better-functioning market mechanisms that rely on

2   the self-interest of individual customers to reduce their energy bills."[18]

3

4   **Q11.   ARE COLUMBIA'S PROGRAMS COST-EFFECTIVE?**

5   **A11.**   No, not in the aggregate. But the PUCO's approved energy efficiency tariff rider itself

6   requires the programs to be cost-effective. That tariff describes the charge as: "An

7   additional charge, for all gas consumed, to recover the costs associated with the

8   implementation of comprehensive, cost-effective energy efficiency programs made

9   available to residential and commercial customers."[19] Columbia uses an unjustifiably and

10   unrealistically low discount rate to inflate its cost-effectiveness scores (analysis) and to

11   inflate claims that its programs are beneficial to consumers who pay to subsidize the

12   programs. Indeed, as OCC witness Costello said in his paper, "Utility-sponsored studies

13   of [energy efficiency] proposals often yield results that are much more optimistic about

14   energy savings than subsequent academic, peer-reviewed studies of the programs once

15   they are in place. Why does this happen, and whose results should regulators believe?"[20]

16

17   **Q12.   WHY IS THE DISCOUNT RATE IMPORTANT?**

18   **A12.**   When calculating the costs and monetary benefits (*i.e.*, present value) of natural gas

19   energy efficiency programs, it is necessary to apply a discount rate. The discount rate can

20   have a large impact on the cost-effectiveness results for energy efficiency. Columbia

---

[18] Costello at 29.

[19] *See* Application, Sixteenth Revised Sheet No. 28 (Demand Side Management Rider).

[20] Costello at 28.

1   claims that its natural gas energy efficiency programs are cost-effective (*i.e.*, that the

2   benefits of the programs outweigh the costs for consumers) at least in the aggregate.[21]

3   According to Columbia, its programs will save customers $34,171,734 (net present value)

4   and cost customers $29,559,487, thus making the programs cost effective.[22] But

5   Columbia's programs are only cost effective when using Columbia's chosen discount

6   rate, ▮▮▮▮ And, generally, the lower the discount rate used in the net present value

7   calculation, the more beneficial the utility's programs will appear to be for consumers—if

8   the programs are beneficial at all in the aggregate.

9

10   However, Columbia does not explain anywhere in its application or testimony how it

11   arrived at its chosen discount rate. It would be difficult to explain such a low discount

12   rate. And indeed, Columbia's use of this low discount rate is inconsistent with PUCO

13   precedent and is contrary to how professionals in the field evaluate energy efficiency

14   savings.[23] The PUCO has previously found that the utility weighted average cost of

15   capital is the appropriate discount rate for the Utility Cost Test: "For the …[Utility Cost

16   Test] …the after-tax weighted average cost of capital has generally been adopted because

17   this is the same discount rate as is used from a utility perspective to evaluate supply-side

18   investments."[24]

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[21] *See* Application, Schedule DSM-5 (claiming $34.1 million in benefits compared to $29.6 million in costs).

[22] *See* Application, Schedule DSM-5.

[23] Comments by the Office of the Ohio Consumers' Counsel filed March 20, 2020, Case No. 19-1940-GA-RDR.

[24] *In re Protocols for the Measurement and Verification of energy Efficiency & Peak Demand Reduction Measures*, Case No. 09-512-GE-UNC, Finding & Order (Oct. 15, 2009).

1   When using the appropriate discount rate of 8.12% (which is Columbia's weighted

2   average cost of capital),[25] the total net benefits from the programs for consumers are just

3     $27,571,011. That amount of benefits is *lower* than the $29,559,487 in total costs for

4   consumers.[26] This revised analysis shows that Columbia's programs are not cost-effective

5   for consumers overall. That means the programs are losing money on the whole for

6   residential and small business customers. That means the programs are overall not

7   beneficial for consumers. And that means, by the terms of Columbia's aforementioned

8   tariff, Columbia should not be charging consumers.

9

10   Two of Columbia's programs are particularly problematic when it comes to costs and

11   benefits. Even using Columbia's own calculations (including its self-serving ▮▮▮

12   discount rate), its non-low-income home audit program (called "Home Performance

13   Solutions") is incredibly unsuccessful. Columbia projects that despite costing customers

14     $6.1 million, it will only save ▮▮▮▮ for consumers.[27] Customers should not pay

15   Columbia for Columbia to lose them ▮▮▮▮ on home audits. Columbia's low-

16   income weatherization program, WarmChoice, is also losing tons of money for

17   consumers. Again, using Columbia's own calculations (including its unrealistically low

18   discount rate), the program cost customers $11.3 million in 2019 but will save customers

19   just ▮▮▮▮[28] Columbia's 2019 WarmChoice program is causing customers to *lose*

---

[25] *See* Attachment CLS-2.

[26] *See* Attachment CLS-3.

[27] *See* Attachment CLS-4.

[28] *See* Attachment CLS-4.

1   more than ▮▮▮▮▮▮. This simply cannot be an appropriate use of customers' money

2   right now in this time of health and financial crisis (or at any time).

3

4   **Q13.** **DO NATURAL GAS EFFICIENCY PROGRAMS BENEFIT ALL CUSTOMERS,**

5   **INCLUDING THOSE CUSTOMERS THAT PAY FOR PROGRAMS BUT DON'T**

6   **PARTICIPATE?**

7   **A13.** No. Electric energy efficiency programs may benefit all customers (including those who

8   do not participate in the programs) by lowering market prices and deferring the need for

9   new power plants that can cost money for consumers. But there is no such benefit to non-

10   participating customers for natural gas energy efficiency. That point was made years ago

11   by the PUCO Staff when gas prices were considerably higher.[29]

12

13   **Q14.** **SHOULD COLUMBIA BE ALLOWED TO CHARGE CUSTOMERS FOR UTILITY**

14   **PROFITS FOR ITS 2019 PROGRAMS?**

15   **A14.** No. In its application, Columbia seeks to charge customers $461,225 for utility profits,

16   plus Columbia's taxes on those profits, for a total of $583,827 in so-called "shared

17   savings."[30] But Columbia is only allowed to charge customers for profits if its programs

18   are cost-effective. And as I explained above, when the appropriate 8.12% discount rate is

19   used, Columbia's programs are not cost-effective. Therefore, Columbia should not be

20   allowed to charge customers for profits. Based on this more reasonable analysis, the

21   PUCO should deny Columbia's request for $583,827 in shared savings profits.

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[29] *See* Prefiled Testimony of Stephen E. Puican, Case No. 05-1444-GA-UNC (March 20, 2006).

[30] Application, Schedule DSM-5.

1 ***Q15.   DO YOU HAVE ANY OTHER CONCERNS ABOUT COLUMBIA'S ENERGY***

2 ***EFFICIENCY PROGRAMS?***

3 ***A15.*** Yes. Essential elements of Columbia's programs are not open and transparent to

4 consumers who are subsidizing the programs. That should be changed. Transparency to

5 the public about the costs they pay under government regulation is essential, especially

6 considering that customers are paying to subsidize more than $20 million annually to

7 support these programs on the premise that they are beneficial. Columbia should be held

8 accountable to provide information about its programs in the public domain, including

9 detailed information about whether the programs are beneficial to consumers.

10

11 ***Q16.   DOES THIS CONCLUDE YOUR TESTIMONY?***

12 ***A16.*** Yes. However, I reserve the right to supplement my testimony if additional testimony is

13 filed, or if new information or data in connection with this proceeding becomes available.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Public Version Direct Testimony of Colleen Shutrump on Behalf of the Office of the Ohio Consumers' Counsel* was served via electronic transmission to the persons listed below on this 20th day of April 2020.

/s/ Christopher Healey
Assistant Consumers' Counsel

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

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News Release

COVID-19 Impact

During the week ending March 21, the increase in initial claims are due to the impacts of the COVID-19 virus. Nearly every state providing comments cited the COVID-19 virus impacts. States continued to cite services industries broadly, particularly accommodation and food services. Additional industries heavily cited for the increases included the health care and social assistance, arts, entertainment and recreation, transportation and warehousing, and manufacturing industries.


UNEMPLOYMENT INSURANCE WEEKLY CLAIMS

SEASONALLY ADJUSTED DATA

In the week ending March 21, the advance figure for seasonally adjusted **initial claims** was 3,283,000, an increase of 3,001,000 from the previous week's revised level. This marks the highest level of seasonally adjusted initial claims in the history of the seasonally adjusted series. The previous high was 695,000 in October of 1982. The previous week's level was revised up by 1,000 from 281,000 to 282,000. The 4-week moving average was 998,250, an increase of 765,750 from the previous week's revised average. The previous week's average was revised up by 250 from 232,250 to 232,500.

The advance seasonally adjusted **insured unemployment rate** was 1.2 percent for the week ending March 14, unchanged from the previous week's unrevised rate. The advance number for seasonally adjusted **insured unemployment** during the week ending March 14 was 1,803,000, an increase of 101,000 from the previous week's revised level. This is the highest level for insured unemployment since April 14, 2018 when it was 1,824,000. The previous week's level was revised up 1,000 from 1,701,000 to 1,702,000. The 4-week moving average was 1,731,000, an increase of 27,500 from the previous week's revised average. The previous week's average was revised up by 250 from 1,703,250 to 1,703,500.

Seasonally Adjusted Initial Claims
March 23, 2019 - March 21, 2020
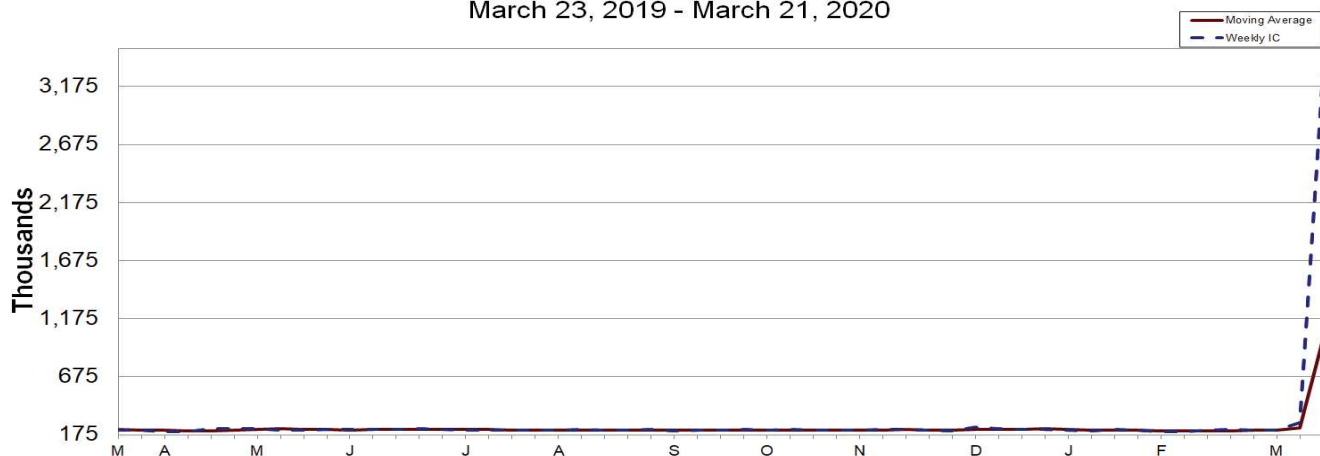
Seasonally Adjusted Insured Unemployment
### March 16, 2019 - March 14, 2020
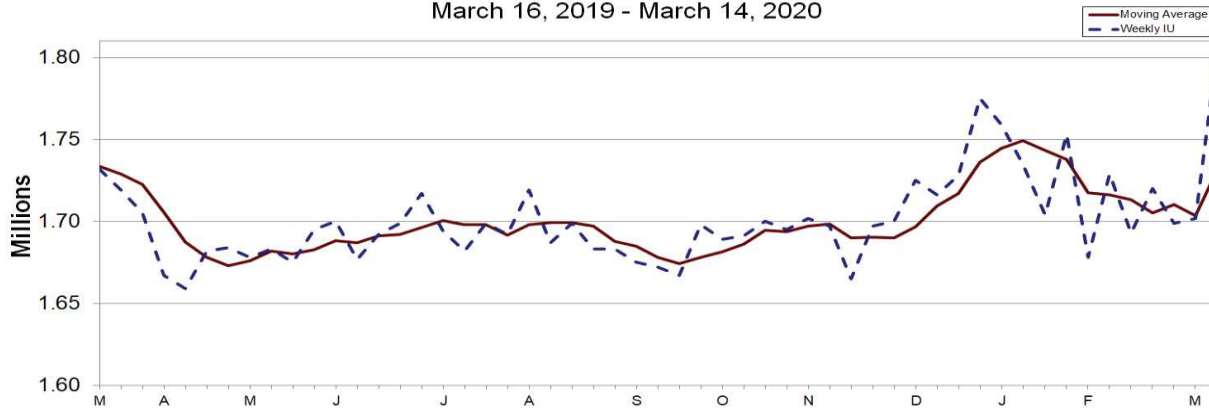
UNADJUSTED DATA

The advance number of actual initial claims under state programs, unadjusted, totaled 2,898,450 in the week ending March 21, an increase of 2,647,034 (or 1,052.9 percent) from the previous week. The seasonal factors had expected a decrease of 2,815 (or -1.1 percent) from the previous week. There were 190,023 initial claims in the comparable week in 2019.

The advance unadjusted insured unemployment rate was 1.4 percent during the week ending March 14, unchanged from the prior week. The advance unadjusted number for persons claiming UI benefits in state programs totaled 2,097,193, an increase of 119,945 (or 6.1 percent) from the preceding week. The seasonal factors had expected an increase of 1,702 (or 0.1 percent) from the previous week. A year earlier the rate was 1.4 percent and the volume was 2,009,317.

Not Seasonally Adjusted Initial Claims
March 24, 2018   March 21, 2020
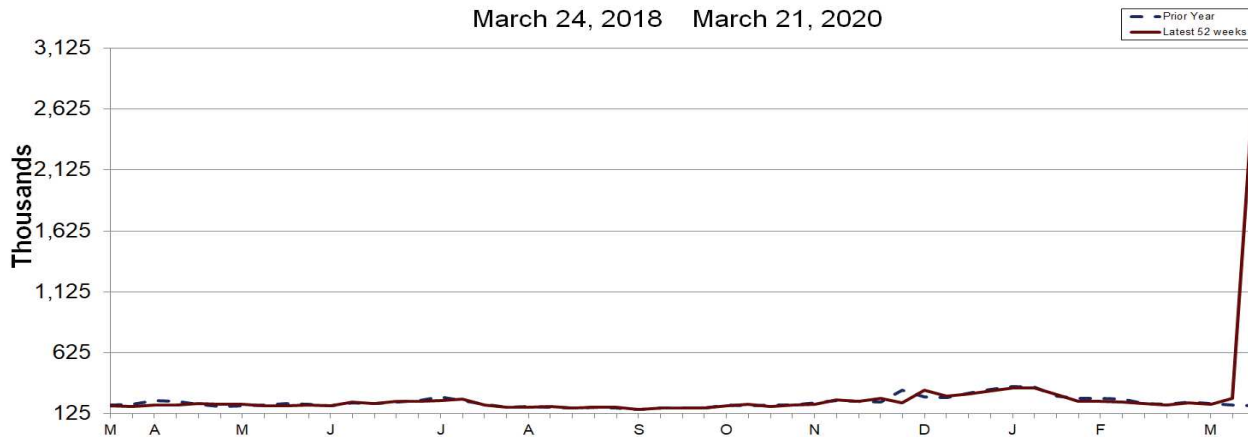
Not Seasonally Adjusted Insured Unemployment
March 17, 2018 - March 14, 2020
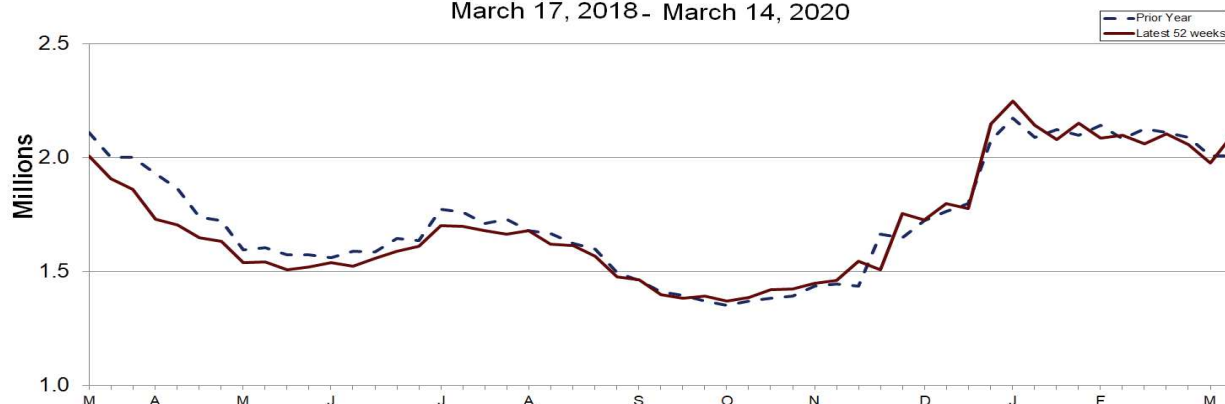
The total number of people claiming benefits in all programs for the week ending March 7 was 2,006,363, a decrease of 80,856 from the previous week. There were 2,039,322 persons claiming benefits in all programs in the comparable week in 2019.

No state was triggered "on" the Extended Benefits program during the week ending March 7.

Initial claims for UI benefits filed by former Federal civilian employees totaled 573 in the week ending March 14, an increase of 20 from the prior week. There were 436 initial claims filed by newly discharged veterans, a decrease of 71 from the preceding week.

There were 9,644 former Federal civilian employees claiming UI benefits for the week ending March 7, a decrease of 852 from the previous week. Newly discharged veterans claiming benefits totaled 5,207, a decrease of 145 from the prior week.

The highest insured unemployment rates in the week ending March 7 were in Alaska (2.8), New Jersey (2.6), Connecticut (2.4), Rhode Island (2.3), West Virginia (2.3), Illinois (2.2), Minnesota (2.2), Montana (2.2), Pennsylvania (2.2), and Puerto Rico (2.2).

The largest increases in initial claims for the week ending March 14 were in California (+14,221), Washington (+7,624), Nevada (+4,047), Pennsylvania (+3,212), and Massachusetts (+2,737), while the largest decreases were in Arkansas (-461), Alabama (-341), Puerto Rico (-171), West Virginia (-168), and Maine (-81).

UNEMPLOYMENT INSURANCE DATA FOR REGULAR STATE PROGRAMS

WEEK ENDING	March 21	March 14	Change	March 7	Prior Year[1]
Initial Claims (SA)	3,283,000	282,000	+3,001,000	211,000	215,000
Initial Claims (NSA)	2,898,450	251,416	+2,647,034	200,382	190,023
4-Wk Moving Average (SA)	998,250	232,500	+765,750	215,750	219,500

WEEK ENDING	March 14	March 7	Change	February 29	Prior Year[1]
Insured Unemployment (SA)	1,803,000	1,702,000	+101,000	1,699,000	1,732,000
Insured Unemployment (NSA)	2,097,193	1,977,248	+119,945	2,057,280	2,009,317
4-Wk Moving Average (SA)	1,731,000	1,703,500	+27,500	1,710,250	1,733,750
Insured Unemployment Rate (SA)[2]	1.2%	1.2%	0.0	1.2%	1.2%
Insured Unemployment Rate (NSA)[2]	1.4%	1.4%	0.0	1.4%	1.4%

INITIAL CLAIMS FILED IN FEDERAL PROGRAMS (UNADJUSTED)

WEEK ENDING	March 14	March 7	Change	Prior Year[1]
Federal Employees (UCFE)	573	553	+20	579
Newly Discharged Veterans (UCX)	436	507	-71	507

PERSONS CLAIMING UI BENEFITS IN ALL PROGRAMS (UNADJUSTED)

WEEK ENDING	March 7	February 29	Change	Prior Year[1]
Regular State	1,973,560	2,054,152	-80,592	2,005,466
Federal Employees	9,644	10,496	-852	10,705
Newly Discharged Veterans	5,207	5,352	-145	6,135
Extended Benefits[3]	0	0	0	1
State Additional Benefits[4]	5,584	5,641	-57	6,063
STC / Workshare[5]	12,368	11,578	+790	10,952
TOTAL	2,006,363	2,087,219	-80,856	2,039,322

FOOTNOTES
SA - Seasonally Adjusted Data, NSA - Not Seasonally Adjusted Data

1. Prior year is comparable to most recent data.
2. Most recent week used covered employment of 145,230,691 as denominator.
3. Information on the EB program can be found here: EB Program information
4. Some states maintain additional benefit programs for those claimants who exhaust regular benefits, and when applicable, extended benefits. Information on states that participate, and the extent of benefits paid, can be found starting on page 4-4 of this link: Extensions and Special Programs PDF
5. Information on STC/Worksharing can be found starting on page 4-8 of the following link: Extensions and Special Programs PDF

Advance State Claims - Not Seasonally Adjusted

STATE	Initial Claims Filed During Week Ended March 21			Insured Unemployment For Week Ended March 14		
	Advance	Prior Wk	Change	Advance	Prior Wk	Change
Alabama	9,490	1,819	7,671	11,070	13,070	-2,000
Alaska	8,225	1,120	7,105	8,407	8,522	-115
Arizona	29,268	3,844	25,424	16,076	17,595	-1,519
Arkansas	8,958	1,382	7,576	9,851	11,514	-1,663
California	186,809	57,606	129,203	430,335	351,344	78,991
Colorado	19,429	2,321	17,108	21,987	21,260	727
Connecticut	25,098	3,440	21,658	45,284	39,786	5,498
Delaware	10,720	472	10,248	5,627	5,310	317
District of Columbia	13,473	1,213	12,260	7,093	6,746	347
Florida	74,021	6,463	67,558	29,612	32,244	-2,632
Georgia	11,746	5,445	6,301	26,644	25,352	1,292
Hawaii	8,904	1,589	7,315	6,700	6,171	529
Idaho	13,314	1,031	12,283	7,562	9,336	-1,774
Illinois	114,663	10,870	103,793	125,914	130,325	-4,411
Indiana	61,635	2,596	59,039	22,440	21,473	967
Iowa	41,890	2,229	39,661	27,172	27,816	-644
Kansas	23,687	1,755	21,932	10,245	9,771	474
Kentucky	48,847	2,785	46,062	21,885	22,940	-1,055
Louisiana	72,620	2,255	70,365	12,052	13,987	-1,935
Maine	21,197	634	20,563	8,620	8,451	169
Maryland	41,882	3,864	38,018	26,072	27,046	-974
Massachusetts	147,995	7,449	140,546	82,475	74,336	8,139
Michigan	129,298	5,338	123,960	78,824	75,757	3,067
Minnesota	116,438	4,010	112,428	70,530	61,781	8,749
Mississippi	6,723	1,147	5,576	5,714	7,098	-1,384
Missouri	40,508	4,016	36,492	22,188	22,381	-193
Montana	14,704	817	13,887	10,054	10,112	-58
Nebraska	15,668	795	14,873	4,603	5,076	-473
Nevada	93,036	6,356	86,680	20,852	19,475	1,377
New Hampshire	21,878	642	21236	3,731	3,909	-178
New Jersey	155,454	9,467	145,987	108,091	104,283	3,808
New Mexico	17,187	869	16,318	9,707	9,566	141
New York	80,334	14,272	66,062	168,921	158,268	10,653
North Carolina	93,587	3,533	90,054	19,377	19,683	-306
North Dakota	5,968	415	5,553	7,165	6,349	816
Ohio*	187,784	7,046	180,738	68,743	68,516	227
Oklahoma	17,720	1,836	15,884	15,863	16,482	-619
Oregon	22,824	4,269	18,555	30,488	29,002	1,486
Pennsylvania*	378,908	15,439	363,469	128,932	128,842	90
Puerto Rico*	1,471	1,172	299	17,198	18,704	-1,506
Rhode Island	35,436	1,108	34,328	11,011	10,692	319
South Carolina	31,064	2,093	28,971	14,780	15,032	-252
South Dakota	1,703	190	1513	2,657	2,870	-213
Tennessee	39,096	2,702	36,394	17,235	18,450	-1,215
Texas	155,657	16,176	139,481	126,955	127,905	-950
Utah	1,314	1,305	9	10,324	10,701	-377
Vermont	3,667	659	3,008	5,055	4,896	159
Virgin Islands	58	44	14	588	592	-4
Virginia	46,885	2,706	44,179	22,291	21,336	955
Washington	133,478	14,240	119,238	67,415	55,588	11,827
West Virginia	3,435	865	2,570	16,571	15,394	1,177
Wisconsin	50,957	5,190	45,767	44,278	40,738	3,540
Wyoming	2,339	517	1,822	3,929	3,375	554
US Total	2,898,450	251,416	2,647,034	2,097,193	1,977,248	119,945

Note: Advance claims are not directly comparable to claims reported in prior weeks. Advance claims are reported by the state liable for paying the unemployment compensation, whereas previous weeks reported claims reflect claimants by state of residence. In addition, claims reported as "workshare equivalent" in the previous week are added to the advance claims as a proxy for the current week's "workshare equivalent" activity.

*Denotes state estimate.

Seasonally Adjusted US Weekly UI Claims (in thousands)

Week Ending	Initial Claims	Change from Prior Week	4-Week Average	Insured Unemployment	Change from Prior Week	4-Week Average	IUR
March 16, 2019	219	-5	221.75	1,732	-2	1,733.75	1.2
March 23, 2019	215	-4	219.50	1,719	-13	1,728.75	1.2
March 30, 2019	211	-4	217.25	1,705	-14	1,722.50	1.2
April 6, 2019	203	-8	212.00	1,667	-38	1,705.75	1.2
April 13, 2019	203	0	208.00	1,659	-8	1,687.50	1.2
April 20, 2019	226	23	210.75	1,682	23	1,678.25	1.2
April 27, 2019	230	4	215.50	1,684	2	1,673.00	1.2
May 4, 2019	225	-5	221.00	1,678	-6	1,675.75	1.2
May 11, 2019	217	-8	224.50	1,683	5	1,681.75	1.2
May 18, 2019	213	-4	221.25	1,675	-8	1,680.00	1.2
May 25, 2019	218	5	218.25	1,695	20	1,682.75	1.2
June 1, 2019	220	2	217.00	1,700	5	1,688.25	1.2
June 8, 2019	220	0	217.75	1,677	-23	1,686.75	1.2
June 15, 2019	219	-1	219.25	1,692	15	1,691.00	1.2
June 22, 2019	224	5	220.75	1,699	7	1,692.00	1.2
June 29, 2019	222	-2	221.25	1,717	18	1,696.25	1.2
July 6, 2019	211	-11	219.00	1,694	-23	1,700.50	1.2
July 13, 2019	217	6	218.50	1,682	-12	1,698.00	1.2
July 20, 2019	211	-6	215.25	1,699	17	1,698.00	1.2
July 27, 2019	216	5	213.75	1,692	-7	1,691.75	1.2
August 3, 2019	214	-2	214.50	1,719	27	1,698.00	1.2
August 10, 2019	218	4	214.75	1,687	-32	1,699.25	1.2
August 17, 2019	215	-3	215.75	1,699	12	1,699.25	1.2
August 24, 2019	215	0	215.50	1,683	-16	1,697.00	1.2
August 31, 2019	219	4	216.75	1,683	0	1,688.00	1.2
September 7, 2019	208	-11	214.25	1,675	-8	1,685.00	1.2
September 14, 2019	211	3	213.25	1,672	-3	1,678.25	1.2
September 21, 2019	215	4	213.25	1,667	-5	1,674.25	1.2
September 28, 2019	218	3	213.00	1,698	31	1,678.00	1.2
October 5, 2019	212	-6	214.00	1,689	-9	1,681.50	1.2
October 12, 2019	218	6	215.75	1,691	2	1,686.25	1.2
October 19, 2019	213	-5	215.25	1,700	9	1,694.50	1.2
October 26, 2019	217	4	215.00	1,695	-5	1,693.75	1.2
November 2, 2019	212	-5	215.00	1,702	7	1,697.00	1.2
November 9, 2019	222	10	216.00	1,697	-5	1,698.50	1.2
November 16, 2019	223	1	218.50	1,665	-32	1,689.75	1.2
November 23, 2019	211	-12	217.00	1,697	32	1,690.25	1.2
November 30, 2019	206	-5	215.50	1,700	3	1,689.75	1.2
December 7, 2019	237	31	219.25	1,725	25	1,696.75	1.2
December 14, 2019	229	-8	220.75	1,716	-9	1,709.50	1.2
December 21, 2019	218	-11	222.50	1,728	12	1,717.25	1.2
December 28, 2019	220	2	226.00	1,775	47	1,736.00	1.2
January 4, 2020	212	-8	219.75	1,759	-16	1,744.50	1.2
January 11, 2020	207	-5	214.25	1,735	-24	1,749.25	1.2
January 18, 2020	220	13	214.75	1,704	-31	1,743.25	1.2
January 25, 2020	212	-8	212.75	1,753	49	1,737.75	1.2
February 1, 2020	201	-11	210.00	1,678	-75	1,717.50	1.2
February 8, 2020	204	3	209.25	1,729	51	1,716.00	1.2
February 15, 2020	215	11	208.00	1,693	-36	1,713.25	1.2
February 22, 2020	220	5	210.00	1,720	27	1,705.00	1.2
February 29, 2020	217	-3	214.00	1,699	-21	1,710.25	1.2
March 7, 2020	211	-6	215.75	1,702	3	1,703.50	1.2
March 14, 2020	282	71	232.50	1,803	101	1,731.00	1.2
March 21, 2020	3,283	3,001	998.25				

| | INITIAL CLAIMS FILED DURING WEEK ENDED MARCH 14 | | | | | INSURED UNEMPLOYMENT FOR WEEK ENDED MARCH 7 | | | | | | |
| | | CHANGE FROM | | | | | | CHANGE FROM | | | | ALL PROGRAMS EXCLUDING RAILROAD RETIREMENT |
STATE NAME	STATE	LAST WEEK	YEAR AGO	UCFE[1]	UCX[1]	STATE	(%)[2]	LAST WEEK	YEAR AGO	UCFE[1]	UCX[1]	
Alabama	1819	-341	-330	6	3	13070	0.7	-2707	-1302	58	46	13174
Alaska	1120	305	165	6	0	8522	2.8	256	-412	127	9	8658
Arizona	3844	487	456	1	2	17595	0.6	2	-1493	183	30	17808
Arkansas	1382	-461	-60	2	3	11514	1.0	-104	541	51	31	11596
California	57606	14221	16478	127	57	351344	2.0	-27520	-20962	2225	1003	354572
Colorado	2321	456	815	14	19	21260	0.8	-1648	71	219	122	21601
Connecticut	3440	913	619	2	5	39786	2.4	-852	-1282	45	62	39893
Delaware	472	-46	12	0	1	5310	1.2	-170	-425	13	10	5333
District of Columbia	1213	742	783	11	3	6746	1.2	-46	-513	186	5	6937
Florida	6463	1138	662	20	26	32244	0.4	-18	-2507	148	91	32483
Georgia	5445	876	1058	23	14	25352	0.6	273	670	180	123	25655
Hawaii	1589	314	434	2	4	6171	1.0	127	-431	62	60	6293
Idaho	1031	93	-12	10	1	9336	1.3	-831	-361	259	12	9607
Illinois	10870	2143	2883	5	3	130325	2.2	-6071	4863	369	148	130842
Indiana	2596	373	508	3	3	21473	0.7	-1113	791	25	25	21523
Iowa	2229	8	-119	4	1	27816	1.8	-1608	-2518	57	22	27895
Kansas	1755	390	107	0	0	9771	0.7	-1232	-1422	24	21	9816
Kentucky	2785	322	680	3	3	22940	1.2	170	2795	108	127	23175
Louisiana	2255	557	594	5	2	13987	0.7	-212	-281	40	14	14041
Maine	634	-81	15	0	1	8451	1.4	-288	-42	45	6	8502
Maryland	3864	1189	1271	13	4	27046	1.1	-1022	-3571	175	74	27295
Massachusetts	7449	2737	3095	10	7	74336	2.1	-1216	-5238	136	91	74563
Michigan	5338	188	182	14	12	75757	1.8	-1904	-327	198	88	76043
Minnesota	4010	522	781	4	4	61781	2.2	-986	3247	122	62	61965
Mississippi	1147	268	12	5	2	7098	0.6	-318	-258	72	17	7187
Missouri	4016	1022	783	3	1	22381	0.8	-2844	-3410	83	27	22491
Montana	817	103	43	20	0	10112	2.2	-670	-1489	434	19	10565
Nebraska	795	294	7	6	0	5076	0.5	-505	-1995	18	9	5103
Nevada	6356	4047	4068	7	1	19475	1.4	-375	-113	137	43	19655
New Hampshire	642	147	124	0	0	3909	0.6	-566	-575	8	3	3920
New Jersey	9467	1471	1614	27	23	104283	2.6	-3363	-3045	224	265	104772
New Mexico	869	179	192	2	4	9566	1.2	-279	-56	212	35	9813
New York	14272	237	1357	14	18	158268	1.7	-3624	1292	291	316	158875
North Carolina	3533	958	865	13	20	19683	0.4	-513	1070	114	85	19882
North Dakota	415	-8	127	2	0	6349	1.5	-194	188	16	3	6368
Ohio	7046	501	597	7	12	68516	1.3	-4607	1130	106	117	68739
Oklahoma	1836	267	-833	8	5	16482	1.1	-585	2955	52	48	16582
Oregon	4269	115	563	20	6	29002	1.5	-515	-2987	557	51	29610
Pennsylvania	15439	3212	2361	70	26	128842	2.2	-8089	-1259	483	199	129524
Puerto Rico	1172	-171	-3	3	4	18704	2.2	47	2896	179	72	18955
Rhode Island	1108	408	221	2	3	10692	2.3	-438	-1108	15	6	10713
South Carolina	2093	204	16	3	2	15032	0.7	-309	596	39	56	15127
South Dakota	190	5	47	2	0	2870	0.7	-189	-442	55	4	2929
Tennessee	2702	670	454	4	4	18450	0.6	-585	297	82	49	18581
Texas	16176	1821	4596	34	89	127905	1.0	2653	14449	418	838	129161
Utah	1305	290	391	5	3	10701	0.7	-376	-57	161	14	10876
Vermont	659	213	18	0	1	4896	1.6	-323	-323	11	1	4908
Virgin Islands	44	-20	24	0	0	592	1.7	6	46	4	0	596
Virginia	2706	179	496	5	8	21336	0.6	-1378	-591	169	179	21684
Washington	14240	7624	8453	7	23	55588	1.7	-925	-7301	450	400	56438
West Virginia	865	-168	25	0	3	15394	2.3	-716	1862	42	38	15474
Wisconsin	5190	138	-809	5	0	40738	1.4	-1599	-3209	96	28	40862
Wyoming	517	-17	195	14	0	3375	1.3	-133	446	61	3	3439
Totals	251416	51034	57081	573	436	1977248	1.4	-80032	-31100	9644	5207	1992099

Figures appearing in columns showing over-the-week changes reflect all revisions in data for prior week submitted by state agencies.

1. The Unemployment Compensation program for Federal Employees (UCFE) and the Unemployment Compensation for Ex-servicemembers (UCX) exclude claims filed jointly under other programs to avoid duplication.
2. Rate is not seasonally adjusted. The source of U.S. total covered employment is BLS.

UNADJUSTED INITIAL CLAIMS FOR WEEK ENDED MARCH 14, 2020

STATES WITH AN INCREASE OF MORE THAN 1,000

State	Change	State Supplied Comment
CA	+14,221	Layoffs in the service industry.
WA	+7,624	Layoffs in the transportation and warehousing, real estate rental and leasing, arts, entertainment and recreation, accommodation and food services, and service industries.
NV	+4,047	Increase in layoffs are due to the COVID-19 virus.
PA	+3,212	Layoffs in the accommodation and food services, transportation and warehousing, and educational service industries.
MA	+2,737	Increase in layoffs are due to the COVID-19 virus.
IL	+2,143	Layoffs in the construction, accommodation and food services, and administrative, support, waste management, and remediation services industries.
TX	+1,821	Layoffs in the transportation and warehousing, administrative, support, waste management, and remediation services, accommodation and food services, health care and social assistance, and arts, entertainment and recreation industries.
NJ	+1,471	Layoffs in the accommodation and food services, transportation and warehousing, and educational service industries. Increase due to the COVID-19 virus.
MD	+1,189	No comment.
FL	+1,138	Layoffs in the agriculture, forestry, fishing, and hunting, manufacturing, wholesale trade, and retail trade industries.
MO	+1,022	Layoffs in the transportation and warehousing, accommodation and food services, and administrative, support, waste management, and remediation services industries.

STATES WITH A DECREASE OF MORE THAN 1,000

State	Change	State Supplied Comment
None		

TECHNICAL NOTES

This news release presents the weekly unemployment insurance (UI) claims reported by each state's unemployment insurance program offices. These claims may be used for monitoring workload volume, assessing state program operations and for assessing labor market conditions. States initially report claims directly taken by the state liable for the benefit payments, regardless of where the claimant who filed the claim resided. These are the basis for the advance initial claims and continued claims reported each week. These data come from ETA 538, Advance Weekly Initial and Continued Claims Report. The following week initial claims and continued claims are revised based on a second reporting by states that reflect the claimants by state of residence. These data come from the ETA 539, Weekly Claims and Extended Benefits Trigger Data Report.

A. Initial Claims

An initial claim is a claim filed by an unemployed individual after a separation from an employer. The claimant requests a determination of basic eligibility for the UI program. When an initial claim is filed with a state, certain programmatic activities take place and these result in activity counts including the count of initial claims. The count of U.S. initial claims for unemployment insurance is a leading economic indicator because it is an indication of emerging labor market conditions in the country. However, these are weekly administrative data which are difficult to seasonally adjust, making the series subject to some volatility.

B. Continued Weeks Claimed

A person who has already filed an initial claim and who has experienced a week of unemployment then files a continued claim to claim benefits for that week of unemployment. Continued claims are also referred to as insured unemployment. The count of U.S. continued weeks claimed is also a good indicator of labor market conditions. Continued claims reflect the current number of insured unemployed workers filing for UI benefits in the nation. While continued claims are not a leading indicator (they roughly coincide with economic cycles at their peaks and lag at cycle troughs), they provide confirming evidence of the direction of the U.S. economy.

C. Seasonal Adjustments and Annual Revisions

Over the course of a year, the weekly changes in the levels of initial claims and continued claims undergo regularly occurring fluctuations. These fluctuations may result from seasonal changes in weather, major holidays, the opening and closing of schools, or other similar events. Because these seasonal events follow a more or less regular pattern each year, their influence on the level of a series can be tempered by adjusting for regular seasonal variation. These adjustments make trend and cycle developments easier to spot. At the beginning of each calendar year, the Bureau of Labor Statistics provides the Employment and Training Administration (ETA) with a set of seasonal factors to apply to the unadjusted data during that year. Concurrent with the implementation and release of the new seasonal factors, ETA incorporates revisions to the UI claims historical series caused by updates to the unadjusted data.

Weekly Claims Archives
Weekly Claims Data

U.S. Department of Labor news materials are accessible at http://www.dol.gov. The Department's Reasonable Accommodation Resource Center converts Departmental information and documents into alternative formats, which include Braille and large print. For alternative format requests, please contact the Department at (202) 693-7828 (voice) or (800) 877-8339 (federal relay).

U.S. Department of Labor   Program Contacts:
Employment and Training Administration   Kevin Stapleton: (202) 693-3009
Washington, D.C. 20210   Media Contact: (202) 693-4676
Release Number: USDL 20-510-NAT

PUCO Case Nos. 16-1309-GA-UNC and 16-1310-GA-AAM
OCC Interrogatories Set 5 No. 83
Respondent: Melissa L. Thompson
As to Objections: Joseph M. Clark

COLUMBIA GAS OF OHIO, INC.
RESPONSE TO OCC'S INTERROGATORIES
DATED SEPTEMBER 1, 2016

INT-83.   What is Columbia's weighted average cost of capital?

RESPONSE:

Objection – the interrogatory is not likely to lead to the discovery of admissible evidence.

Subject to and without waiving any of its objections, in an effort to cooperate in discovery, Columbia answers as follows: In Case No. 08-72-GA-AIR, *et al.*, the Public Utilities Commission of Ohio set a rate of return of 8.12% for Columbia.

ATTACHMENT CLS-3

(SHUTRUMP CALCULATION OF PROGRAM BENEFITS)

FILED UNDER SEAL

INTENTIONALLY OMITTED

ATTACHMENT CLS-4

(COLUMBIA COST EFFECTIVENESS RESULTS)

FILED UNDER SEAL

INTENTIONALLY OMITTED

ENERGY & ENVIRONMENT

A Cautionary Tale About Energy Efficiency Initiatives

If these programs are such bargains, then why does government mandate them and energy utilities push for them?

✎ BY KENNETH W. COSTELLO

I constantly hear about how wonderful utility and government-mandated energy efficiency (EE) initiatives are. Many EE supporters claim these efforts to push consumers to buy higher-efficiency appliances and use more insulating materials are "negative-cost" ways to reduce carbon emissions—that by reducing energy consumption along with emissions, these changes more than pay for themselves.

For instance, in 2009 the consulting firm McKinsey & Co. estimated that adoption of cost-effective EE investments in the United States could generate $700 billion in net private cost savings. Amory Lovins, an environmental scientist and chairman of the Rocky Mountain Institute, once remarked that EE is the "lunch you are paid to eat."

Yet these free lunches seem suspicious to me—and to many analysts who have studied the benefits and costs of EE initiatives. If these efforts are such a bargain, then why must government mandate them and utilities push for them?

WHY DO WE NEED EE POLICY?

The conventional economic defense for government-imposed EE standards begins by assuming deep flaws in consumer rationality, barriers to information, or underpricing of energy. Supposedly, these factors lead to consumers making incorrect calculations and tradeoffs between the initial costs of appliances and their subsequent energy-use costs. Consumers allegedly are unwilling to pay more initially for consumer durables that would use

less energy and save money in present value. Instead, they buy cheap durables that are costlier to run over time. Mandatory energy standards force consumers to make the "correct" tradeoff between initial and operating costs, "purchase" more energy efficiency, and eliminate the so-called "EE gap."

In the typical EE gap study, analysts often calculate the savings in energy costs over the lifetime of an appliance by using a discount rate converting the stream of annual costs into a present value. If the present value of cost savings from an efficient appliance is greater than the incremental cost of the efficient appliance relative to a conventional substitute, then an EE gap is said to exist. Said differently, the discount rate that consumers appear to use in their decisions about paying more initially for later energy savings is "too high" relative to the "market" discount rate used by the analyst.

This gap provides the justification for both government EE standards and utility EE initiatives. Policymakers attribute the "low" adoption of EE investments to market failure or consumer-behavioral problems. The presumption is that consumers are incapable of making the correct calculations or else make decisions contrary to their self-interest.

Hence, there is an economic rationale for government policies such as energy building codes, appliance standards, and utility subsidies. However, this rationale includes two assumptions that often go unrecognized by EE supporters:

- The gap truly represents a market or behavioral failure.
- The benefits from correcting this failure are greater than the costs.

Just because market problems exist that might hinder EE invest-

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ments does not mean that utility or governmental intervention is socially desirable.

RECONCILING AN EE GAP AND RATIONAL CONSUMERS

Energy consumers who do not invest in seemingly cost-effective EE can be acting rationally. To understand why, we must keep in mind three additional factors.

First, consumers have difficulty verifying energy savings claims. And even if the energy savings are verifiable, future energy prices are not. Past energy prices have varied dramatically; they were much higher in the 1970s, then low from the mid-1980s through the early 2000s, high again in the mid-2000s, and now they are low again. Thus, consumers have reason to balk at making EE investments because of uncertainty over whether those investments will pan out.

The second factor is consumer heterogeneity—the simple fact that different people use energy differently. Although the average consumer may find an EE investment economically attractive, some may not because of differences in preferences, the level of energy usage, and the cost of borrowing.

The third factor is the need to consider costs borne by consum-

ers themselves. These include transaction costs (e.g., the time spent by households in searching for energy-efficient appliances), poor appliance performance (e.g., dishwashers and clothes washers that do a poor job on especially soiled loads), and so forth.

ACADEMIC VS. UTILITY EVALUATIONS OF EE PROGRAMS

Another problem is that supposedly objective analyses of specific EE initiatives often reach very different conclusions. Utility-sponsored studies of EE proposals often yield results that are much more optimistic about energy savings than subsequent academic, peer-reviewed studies of the programs once they are in place. Why does this happen, and whose results should regulators believe?

Academic reviews of EE programs conclude that such programs are not the "low-hanging fruit" that many people believe. Academic reviews find that utilities grossly overstate energy savings from EE programs because they rely on *ex-ante* engineering estimates. The reviews also note that utilities often fail to consider "hidden costs" for consumers from the time and effort spent on both energy audits and investments. The combination of these factors, according to some academic studies, has led to

Utility-sponsored ex-ante studies of energy-efficiency proposals often yield results that are much more optimistic about energy savings than subsequent academic, peer-reviewed studies of the programs once they are in place.

utilities understating the costs of EE programs by as much as 50% or more.

Academic research on utility studies has also found "rebound effects" that reduce anticipated energy savings. A "rebound" occurs when energy consumers use their air conditioners and heating systems more intensively because of lower operating costs for the EE technologies. This reduces the actual energy savings relative to those predicted by engineering possibilities.

Academic studies also find "free riders." These are individuals who would have purchased lower energy-use appliances or HVAC systems regardless of the existence of the EE programs and thus their energy savings should not be counted as benefits created by the policy. The subsidies they receive for purchasing their EE products are pure transfers from other utility customers, many of whom are low-income households. For instance, a 2016 *Energy Journal* paper by Anna Alberini, Will Gans, and Charles Towe document this effect in a heat pump subsidy program.

EE building codes have also produced less-than-expected energy savings. For instance, a 2016 *American Economic Review*

article by Arik Levinson found that California's strict EE building codes have resulted in much less energy savings than projected.

The common perception is that residential weatherization programs have produced large and cost-effective savings to low-income households. But a 2015 *American Economic Review: Papers and Proceedings* article by Meredith Fowlie, Michael Greenstone, and Catherine Wolfram and a 2016 *Energy Journal* paper by Joshua Graff Zivin and Kevin Novan provide empirical evidence to the contrary. They find *ex-ante* energy savings projections to be grossly high and the overall net benefits to participating households in many instances to be negative.

Most utilities fail to apply the best analytical tools to their evaluations of EE programs. These tools include randomized trials and quasi-experimental designs to measure energy savings and understand consumer behavior. The problem with other approaches is that they do not reliably measure the actual energy savings from individual EE programs.

WHY ARE EE PROGRAMS SO POPULAR?

Despite the negative evaluations of EE programs by academics, these programs are politically popular. Legislatures, governors, and state public utility commissions (PUCs) want utilities to promote EE. Some utilities initially balk at this, but PUCs then offer support to ensure the utilities' profitability isn't hurt by reduced energy sales. For instance, about half the states have adopted "revenue decoupling" for gas utilities; that is, the PUCs permit utilities to raise their rates in order to offset lower sales. These initiatives have been instrumental in mitigating utility opposition to EE programs. Instead, the utilities release reports (arguably both biased and technically flawed) showing that EE initiatives are cost-beneficial.

Everyone's happy, right? Well, someone has to pay for these initiatives, and it is almost always the utility's customers. But is it equitable and good public policy to compel utility customers to pay for EE initiatives? Many of these initiatives benefit only a relatively few customers, most of whom can afford to pay for higher EE without any financial assistance. Besides, these consumers are quite capable of making rational decisions, just like they do when they invest in other activities. So, why should utilities offer these customers subsidies and why should other customers bear the costs?

ARE SOME EE PROGRAMS NOW UNECONOMICAL?

An especially relevant question for gas utilities today is, should they have eliminated or downsized some of their EE programs over the course of the "fracking" era? After all, shale gas has greatly increased the supply and lowered the cost of gas, thereby altering the energy efficiency calculus. Yet, gas utilities now spend

about $1.5 billion annually on EE programs, up from $320 million in 2007.

It seems that the rationales for EE programs of both electric and gas utilities are less valid today than when they were first implemented. Their customers have better information on EE programs, and natural gas prices are low and expect to remain so for the next several years. Presumably, the most cost-effective actions have already been exploited. Thus, market failures for EE have decreased over time, lessening the need to have utility or government intervention to advance EE.

Over time (we are talking about decades), we should expect to see a continual erosion of market problems, as well as consumer-behavioral ones, warranting fewer utility/regulatory ("bureaucratic") programs. That is, society should rely more heavily on the marketplace to influence EE investments, or the role of utilities should be increasingly displaced by better-functioning market mechanisms that rely on the self-interest of individual customers to reduce their energy bills.

THE PUSH FOR ELECTRIFICATION RESEMBLES THE PUSH FOR ENERGY EFFICIENCY

"Electrification" refers to the enactment of policies to induce consumers to use electricity rather than natural gas and other fossil fuels for specific end-use applications. Electrification can include conversion from natural gas heating to an electric heat pump in an existing home, or conversion from gasoline to electricity for transportation.

Electrification, according to its advocates, would reduce carbon emissions, lower energy costs for at least some consumers, and increase EE by reducing the primary energy use per unit of energy service (e.g., the full-cycle energy usage per mile of driving or gallon of heated water). These advocates assume that an "electrification gap" exists—that is, there is a deviation between socially optimal electrification and actual electrification.

Electrification advocates inevitably push for additional subsidies and out-of-market incentives to accelerate electrification. (Both electric vehicles and electric heat pumps presently receive subsidies from both the government and utilities.) Advocates have referred to electrification as "strategic electrification," "smart electrification," "beneficial electrification," "efficient electrification," and "policy-driven electrification." I would add to this lexicon "bad electrification" and "artificial or subsidized electrification."

Studies have shown electrification to be technically feasible in many end-use applications and economically feasible in at least some applications. Technological advances and public policy (e.g., digitization and the focus on clean energy) seem to favor electricity over fossil fuels in the future. Electrification proponents champion policies that would accelerate electrification. Before committing to such policies, should we not have more precise calculations of the costs and benefits, instead of referring to them in qualitative terms (which so far has dominated the analyses)?

Lacking today is evidence that market and behavioral problems are severe enough to warrant additional government intervention to hasten the pace of electrification. There is a more-than-remote chance that subsidized electrification will have a negative effect on society.

The question at present for policymakers is how fast electrification should develop. We should expect the electrification advocates in the coming years to employ many of the same justifications that are now used to advocate EE.

CONCLUSION

The best available evidence—peer-reviewed studies conducted by disinterested analysts using sophisticated methods—suggests that EE initiatives funded by utility customers should be scrutinized rather than reflexively praised by policymakers. Even if EE programs were ever cost effective, the "shale gas" era has made many of them ineffective now. The best available evidence suggests that EE programs transfer money from some utility customers to others with no gains in efficiency.

Regretfully, this evidence has had little effect on these programs because the public is unaware of the transfers, energy efficiency is culturally popular, and utilities can enjoy their support without suffering any financial consequences. Despite that, many of these programs would fail a benefit–cost test and should be called into question.   R

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Ohio | Public Utilities Commission

Natural Gas Distribution Service Providers

As of August 28, 2019

County labels and providers

- Williams — OGC
- Fulton — OGC, CGO / OGC SNG WGO
- Lucas — CGO
- Ottawa — CGO
- Ashtabula — DEO, ENG NON, KEC VEC, NON
- Lake — DEO, NON, KEC
- Defiance — OGC
- Henry — OGC SNG
- Wood — CGO, ANG KNG SNG WGO
- Erie — CGO, VEC, CGO, SWG
- Cuyahoga — CGO DEO, CGC KEC
- Geauga — CGO DEO
- Trumbull — CGC, ENG NON, CGO
- Paulding — DEO, OGC, OMG
- Putnam — OGC, DEO
- Hancock — CGO, AAE, KNG, ANG KNG SGC SNG
- Seneca — KNG SWG
- Sandusky — CGO
- Huron — CGC VEC, CGC VEC
- Lorain — CGO
- Medina — CGO DEO, CGC KEC, NIE NON
- Summit — KEC, CGO DEO
- Portage — DEO, NON
- Mahoning — CGO DEO, NON, CGC KEC
- Van Wert — DEO
- Allen — CGO DEO
- Hardin — CGO DEO
- Wyandot — CGO, CGC, ANG NIE SGC, CGO
- Crawford — CGO
- Richland — CGO, OCG
- Ashland — CGO DEO, CGC, OCG, NON
- Wayne — CGO, CGO DEO
- Stark — CGO DEO, CGC KEC, AAE CGC KEC, NIE NON
- Carroll — CGO DEO, NON, VEC, CGO DEO
- Columbiana — CGO DEO, AAE KEC, CGO DEO
- Jefferson — CGO
- Mercer — DEO, DEO VEO
- Auglaize — DEO
- Logan — SGC, CGO VEO
- Marion — CGO, MEC, SNG
- Morrow — CGO, BEN KEC
- Knox — CGO DEO, CGC
- Holmes — CGO DEO NON OCG PGC, CGC KEC, CGC KEC NGO
- Tuscarawas — KEC, CGO DEO
- Coshocton — NON OCG PGC
- Harrison — NON PGC, VEC, NON, KEC
- Shelby — DEO VEO
- Champaign — CGO VEO, AAE MEC
- Union — CGO, CER
- Delaware — CGO, SNG, BEN CGC KEC MEC
- Licking — OCG, CGC KEC, CGC KEC NGO
- Guernsey — PGC, CGC KEC, NON PGC
- Belmont — CGC KEC NGO, CGO DEO
- Darke — VEO, OVG
- Miami — VEO
- Clark — CGO VEO
- Madison — CGO VEO
- Franklin — CGO, VOO, CGC KEC
- Fairfield — CGC KEC MEC NGO, FGC, NON, LMG
- Perry — CGC MEC NGO, CGO
- Muskingum — CGO, CGC KEC MEC NGO
- Noble — CGC KEC NGO, CGO
- Monroe — CGO DEO, CGC
- Preble — GEO, KEC, KEC VOV
- Montgomery — KEC, VOV, VEO, DUK VEO
- Greene — CGO VEO
- Pickaway — CGO, VOW, KEC MEC
- Hocking — CGO, CGC KEC MEC
- Morgan — CGO, CGC MEC NGO
- Washington — CGC KEC MEC NGO, CGO
- Butler — DUK VEO, COF, GEO, CGO DUK VEO
- Warren — DUK VEO, KEC
- Clinton — DUK VEO, PNG
- Fayette — VEO
- Ross — CGO, PNG, PNG
- Vinton — CGO, CGC MEC, CGC
- Athens — CGO, CGC MEC
- Hamilton — DUK
- Clermont — DUK
- Highland — VEO, PNG
- Pike — CGC, CGO
- Jackson — CGC, CGO
- Gallia — CGC, CGO CGC NGO
- Meigs — CGO CGC NGO
- Brown — DUK
- Adams — DUK
- Scioto — CGO, KEC
- Lawrence — CGC, CGO

Legend

PUCO Regulated Large Companies
- CGO - Columbia Gas of Ohio, Inc.
- DEO - Dominion East Ohio
- DUK - Duke Energy Ohio (Gas)
- VEO - Vectren Energy Delivery of Ohio

PUCO Regulated Small Companies
- ANG - Arlington Natural Gas Company
- ENG - Eastern Natural Gas
- FGC - Foraker Gas Company
- GEO - Glenwood Energy of Oxford, Inc.
- KNG - KNG Energy, Inc.
- NIE - Northern Industrial Energy Development, Inc.
- NON - Northeast Ohio Natural Gas Corporation
- OCG - Ohio Cumberland Gas Company
- OGC - Ohio Gas Company
- OVG - Ohio Valley Gas Corporation
- PGC - Piedmont Gas Company
- PNG - Pike Natural Gas Company
- SGC - Sheldon Gas Company
- SNG - Suburban Natural Gas Company
- SWG - Swickard Gas Company
- WGO - Waterville Gas and Oil Company

Gas Cooperatives
- AAE - All American Energy
- BEN - Bright Energy
- CER - Community Energy Resource Cooperative
- CGC - Consumers Gas Cooperative
- KEC - Knox Energy Cooperative Association, Inc.
- MEC - Madison Energy Cooperative Association, Inc.
- NGO - National Gas and Oil Cooperative
- VEC - Village Energy Cooperative Association, Inc.

Municipal Gas Systems
- COF - City of Hamilton
- LMG - Lancaster Municipal Gas
- OMG - Oakwood Municipal Gas
- VOO - Village of Obetz
- VOV - Village of Verona
- VOW - Village of Williamsport

Notes: Data on operations by county is from the PUCO Gas Pipeline Safety database. Map produced on August 28, 2019.

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in

Case No(s). 19-1940-GA-RDR

Summary: Testimony Direct Testimony of Colleen Shutrump, Public Version, filed on Behalf of the Office of the Ohio Consumers' Counsel electronically filed by Mrs. Tracy J Greene on behalf of Healey, Christopher