

**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.    )

**DIRECT TESTIMONY  
OF  
JAMES D. WILLIAMS**

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

**April 20, 2020**

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## **ATTACHMENT**

Attachment JDW-01 List of Previous Testimony Filed at the PUCO by James Williams

1    **I.        INTRODUCTION**

2

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

4    ***A1.***    My name is James D. Williams. My business address is 65 East State Street, 7th  
5            Floor, Columbus, Ohio 43215. I am employed by the Office of the Ohio  
6            Consumers' Counsel ("OCC") as a Utility Consumer Policy Expert.

7

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

10   ***A2.***    I am a 1994 graduate of Webster University, in St. Louis, Missouri, with a Master  
11            of Business Administration, and a 1978 graduate of Franklin University, in  
12            Columbus, Ohio, with a Bachelor of Science, Engineering Technology. My  
13            professional experience includes a career in the United States Air Force and over  
14            24 years of utility regulatory experience with the OCC.

15

16            Initially, I served as a compliance specialist with the OCC. My duties included the  
17            development of programs for agency review of the extent to which electric,  
18            natural gas, and water industries (including competitive suppliers of natural gas  
19            and electric service) were complying with laws and rules for consumer protection.

20            Later, I was designated to manage all of the agency's specialists who were  
21            developing compliance programs in each of the utility industries. My role evolved  
22            into the management of OCC's consumer hotline, which was the direct service  
23            provided to consumers to resolve complaints and inquiries that involved Ohio

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1 utilities and competitive suppliers of retail natural gas and electric services. More  
2 recently, following time as a Consumer Protection Research Analyst, I was  
3 promoted to an Expert Utility Consumer Policy Analyst. In this role, I am  
4 responsible for developing and recommending policy positions on a host of utility  
5 issues. Those issues include protections for low-income and non-low-income  
6 consumers, bill affordability and utility bill payment assistance programs that are  
7 all intended to help residential consumers including at-risk Ohioans that OCC is  
8 seeking to help in this case.

9  
10 In this proceeding, I reviewed the Application and supporting testimony filed by  
11 Columbia Gas of Ohio (“Columbia”) on February 28, 2020. I also assisted in  
12 developing OCC comments filed in this proceeding on March 20, 2020. Finally, I  
13 reviewed the testimony of OCC witness Shutrump and the recommendations  
14 made in her testimony.

15

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

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

**II. PURPOSE/BACKGROUND**

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

**A4.** The purpose of my testimony is to recommend that the \$14 million in consumer funding for Columbia's low-income energy efficiency program be repurposed to serve the greatest good for the greatest number of at-risk Ohioans in the Columbia area. These consumers are suffering the health and financial pain of the coronavirus emergency—and there likely will be consumer suffering for years as a result. Under these terrible circumstances, the annual \$14 million in energy efficiency subsidies that Columbia collects from consumers should be repurposed to where they can do the greatest good. That means the current use for weatherizing up to 2,000 homes annually should be promptly repurposed to providing bill payment assistance (money) for up to 80,000 of Columbia's residential consumers.

On April 15, 2020, the editorial board of The New York Times published an editorial under the headline, "Stop Dawdling. People Need Money."<sup>1</sup> Of further relevance to the issue in this case, the Times editorial included the following words about the current suffering of Americans:

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<sup>1</sup> <https://www.nytimes.com/2020/04/15/opinion/coronavirus-stimulus-check-payment.html>

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1           The economic shutdown caused by the coronavirus has left a growing  
2           number of American families desperately short of money. Images of  
3           hundreds of cars [waiting in long lines](#) at food banks across the country  
4           have become a symbol of the crisis, a contemporary equivalent of the  
5           old black-and-white images of Americans standing in bread lines during  
6           the Great Depression.

7  
8           To [ease the pain](#), at least a little, Congress voted in late March to send  
9           \$1,200 each to most American adults. In this era of high-speed trading,  
10          digital wallets and instant payments, one might have imagined that the  
11          federal stimulus payments would be distributed quickly, too.

12          Instead, the first large wave of payments is only landing in bank  
13          accounts on Wednesday.

14  
15          And tens of millions of Americans won't get their stimulus payments  
16          until May — or later.<sup>2</sup>

17  
18          The Times' reference to "People Need Money" is highly relevant to the issue I  
19          explain above for Ohioans. The Time's reference to "Stop Dawdling" is to the  
20          federal government. But it also has relevance here where a special-interest group  
21          of weatherization providers, named Ohio Partners for Affordable Energy  
22          ("OPAE"), is resisting OCC's call to repurpose these consumer-funded subsidies.

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<sup>2</sup> *Id.*

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1 OPAE uses the subsidies to weatherize up to 2,000 homes annually, whereas OCC  
2 is recommending the fulfillment of the greater need of providing bill-payment  
3 money for up to 80,000 Ohio consumers annually.

4  
5 Energy efficiency (weatherization) programs might provide some low-income  
6 consumers (up to 2,000 homes in the Columbia area) with benefits in the long run.  
7 But in this time of crisis many more consumers need money and they need it now,  
8 not over an energy efficiency payback period of ten or more years. OCC's  
9 recommendation would provide money to at-risk Ohioans now, by funding  
10 increased bill payment assistance for up to 80,000 Ohioans.

11  
12 In this regard, the low-income weatherization program in Columbia's areas is not  
13 even currently operational. It has been suspended by the PUCO along with other  
14 activities and non-essential functions in customer homes that may create  
15 unnecessary coronavirus risks associated with social contact.<sup>3</sup>

16  
17 Therefore, I recommend the following:

- 18 • Repurpose the consumer-funded subsidies currently earmarked for  
19 Columbia's low-income weatherization program (about \$14  
20 million per year for up to 2,000 homes) to instead be used for bill

---

<sup>3</sup> *In re the Proper Procedures and Process for the Commission's Operations & Procedures During the Declared State of Emergency & Related Matters*, Case 20-591-AU-UNC, Entry (Mar. 20, 2020). *In re the Motion to Suspend of Columbia Gas of Ohio, Inc. for Procedures and Process During the Declared State of Emergency and Related Matters*, Case 20-637-GA-UNC, Application (Mar. 18, 2020) at 4.

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1 payment assistance (for up to about 80,000 at-risk Columbia  
2 consumers). This approach for use of the funds will do the greatest  
3 good for the greatest number of Ohioans. This consumer benefit  
4 should begin promptly and continue until and unless the PUCO  
5 decides the funds should be used otherwise for people.

- 6  
7 • Make the money for the expanded bill payment assistance  
8 available to any Columbia customer with an income below 300%  
9 of the federal poverty guidelines. Currently, customers are only  
10 eligible for bill payment assistance under the Low-Income Home  
11 Energy Assistance Program (“HEAP”) if their income is below  
12 175% of the federal poverty guidelines.  
13
- 14 • Allow customers to be eligible for bill payment assistance under  
15 OCC’s proposal once per year. Customers eligible for PIPP<sup>4</sup> could  
16 receive up to \$150 and non-PIPP customers up to \$250. Under this  
17 proposal, assuming an average benefit of \$175 per customer  
18 (inclusive of administrative charges), approximately 80,000  
19 Columbia customers per year could benefit from the bill payment  
20 assistance, compared to just 2,000 who receive weatherization for  
21 the same \$14 million annual cost.

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<sup>4</sup> Customers can qualify for PIPP if their household income is at or below 150 percent of the federal poverty guidelines.



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- Enable customers receiving these payments to be eligible for participation in other payment plans and assistance programs, like PIPP, HEAP, the Ohio Home Weatherization Assistance Program (“HWAP”), and deferred payment plans.
- Allocate any repurposed funds that are not ultimately used for bill payment assistance to offsetting Columbia’s uncollectible expense. This approach would reduce what all customers pay to Columbia for uncollectible expense (when customers do not pay their utility bills).

***Q5. WHY ARE YOU RECOMMENDING REPURPOSING THE CONSUMER SUBSIDIES THAT HAVE BEEN USED FOR LOW-INCOME WEATHERIZATION TO NOW BE USED FOR BILL PAYMENT ASSISTANCE?***

***A5.*** I will begin by noting that the virus does not itself target people based on their income, but its terrible harms can reveal difficult realities for people in various at-risk segments of our society. In this regard, weatherization is not a long-term solution to certain of society’s problems that pre-existed this health emergency (but that can be all the more aggravated by this health emergency). Such societal problems include but are not limited to poverty and food insecurity. These problems are not unique to Ohio, but certainly exist in Ohio.

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1 State-wide, poverty affects 14.0 percent of Ohio's population.<sup>5</sup> Poverty rates  
2 exceed 30 percent in the Ohio cities of Athens, Bowling Green, Cleveland,  
3 Dayton, Kent, Oxford, Portsmouth, Warren and Youngstown. And 14.5 percent of  
4 Ohioans have experienced food insecurity.<sup>6</sup> Food insecurity rates are a measure of  
5 the total number of persons who do not have sufficient financial resources to  
6 maintain a healthy supply of food at their household. These numbers predate the  
7 pandemic, but during this emergency there is legitimate concern that these  
8 problems are rapidly increasing. In the coming months and potentially years,  
9 many Ohioans will struggle to pay their utility bills. Those Ohioans with financial  
10 challenges will include customers who have historically paid their bills in full and  
11 on time but who may be unable to continue doing so following the economic  
12 fallout of the coronavirus pandemic. Ohio businesses and families will face  
13 financial burdens that were unforeseeable just a few months ago.

14  
15 ***Q6. WHO HAS VOICED OPPOSITION TO OCC'S RECOMMENDATION?***

16 ***A6.*** One outspoken critic of OCC's recommendation has been the special-interest  
17 group, Ohio Partners for Affordable Energy. Recent OPAE-sourced information  
18 online reflects its opposition to OCC and to the repurposing of funds for serving  
19 more Ohioans. In its Motion to Intervene, OPAE notes that many of its members

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<sup>5</sup> Ohio Poverty Report, Ohio Development Services Agency (February 2019) at 6.  
<https://development.ohio.gov/files/research/P7005.pdf>

<sup>6</sup> Map the Meal Gap 2019.  
[https://public.tableau.com/profile/feeding.america.research#!/vizhome/2017StateWorkbook-Public\\_15568266651950/CountyDetailDataPublic](https://public.tableau.com/profile/feeding.america.research#!/vizhome/2017StateWorkbook-Public_15568266651950/CountyDetailDataPublic)

1 are Community Action Agencies.<sup>7</sup> Interestingly, part of my recommendation  
2 includes that the repurposed funds could potentially be distributed by the  
3 Community Action Agencies that are also part of the OPAE network. The  
4 Community Action Agency members of OPAE might find value in participating  
5 in a diverse network of social service providers who are helping Ohioans  
6 consistent with OCC's recommendation.

7

8 **Q7. IS OPAE A CONSUMER GROUP?**

9 **A7.** No. OPAE is a special-interest group representing a number of organizations  
10 including low-income weatherization providers.

11

12 **Q8. WHAT IS YOUR JUSTIFICATION FOR RECOMMENDING TO**  
13 **REPURPOSE CONSUMER FUNDS BEING USED FOR LOW-INCOME**  
14 **WEATHERIZATION TO BEING USED FOR BILL PAYMENT**  
15 **ASSISTANCE?**

16 **A8.** The greater need of low-income Columbia consumers now is for money to assist  
17 with payment of their Columbia bills. And there is a far greater number of  
18 consumers who can benefit from bill payment assistance than from  
19 weatherization.

20

21 This repurposing should occur even if there are benefits from the limited  
22 weatherization program. But there has been a demonstration that the Columbia

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<sup>7</sup> OPAE Motion to Intervene (March 20, 2020).

1 energy efficiency programs lack proven customer benefits. See testimony of OCC  
2 witness Collen Shutrump.

3  
4 The lost wages, financial losses, and immeasurable suffering that many Ohioans  
5 are experiencing as a result of the coronavirus pandemic can be mitigated by  
6 repurposing dollars that Columbia is currently spending on low-income energy  
7 efficiency programs. While the dollars spent on low-income energy efficiency  
8 might help a small number of customers achieve lower utility bills (2,000  
9 weatherized homes annually), they can be put to better use today by providing  
10 immediate bill payment assistance for up to 80,000 customers in need. The  
11 repurposing of low-income weatherization funds will provide the greatest amount  
12 of good for the greatest number.

13  
14 **III. OHIOANS COULD BENEFIT IF LOW-INCOME ENERGY EFFICIENCY**  
15 **PROGRAM FUNDING WERE REPURPOSED TO PROVIDE**  
16 **ADDITIONAL BILL PAYMENT ASSISTANCE.**

17  
18 ***Q9. PLEASE DESCRIBE SOME OF THE CONSUMER PROTECTIONS THAT***  
19 ***ARE AVAILABLE TO HELP RESIDENTIAL CUSTOMERS THAT ARE***  
20 ***IMPACTED BY THE CORONAVIRUS.***

21 ***A9.*** Currently, the PUCO has directed Columbia and all other utilities in Ohio to  
22 update their policies to suspend disconnections for non-payment to mitigate the  
23 potential hardships on customers, and to help avoid unnecessary risks associated

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1 with the spread of the coronavirus through social contact with the public.<sup>8</sup> The  
2 PUCO, in its March 20 Order, suspended for the duration of the emergency all  
3 non-essential functions that would require or cause in-person contact that may  
4 create unnecessary coronavirus spread, and specifically found that non-essential  
5 functions include in-home energy efficiency audits and weatherization programs.  
6 Columbia filed an application to amend a number of requirements including  
7 suspending disconnections for non-payment and to suspend continuing to provide  
8 weatherization services in the home.<sup>9</sup>

9  
10 In addition, the PUCO has extended the protections under the special Winter  
11 Reconnection Order (“WRO”)<sup>10</sup> through May 1, 2020.<sup>11</sup> Under the WRO,  
12 residential customers have the option to make a payment of up to \$175 to avoid  
13 having service disconnected for non-payment, have services reconnected, or  
14 initiate new service. Customers can use the payment option once to avoid  
15 disconnection under the reconnection order during the period October 14, 2019  
16 and May 1, 2020.

17  
18 The bill payment assistance I am proposing in this testimony will help those  
19 customers who already used the one-time payment to avoid disconnection during  
20 the winter and now need more assistance because of the coronavirus. My proposal

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<sup>8</sup> Case No. 20-591-AU-UNC, Entry (Mar. 13, 2020).

<sup>9</sup> Case 20-637-GA-UNC, Application (March 18, 2020) at 4.

<sup>10</sup> 19-1472-GE-UNC, Finding & Order (Sept. 11, 2019).

<sup>11</sup> Case No. 20-591-AU-UNC, Entry (Mar. 13, 2020).

1 will also help PIPP customers remain current in paying their PIPP bill so that they  
2 are not at risk of being removed from PIPP.

3

4 ***Q10. CAN YOU PROVIDE ADDITIONAL DETAILS ABOUT THE BILL***  
5 ***PAYMENT ASSISTANCE PROGRAM FOR LOW-INCOME CUSTOMERS***  
6 ***KNOWN AS THE “PIPP” PROGRAM?***

7 ***A10.*** Yes. The Ohio PIPP program is a mainstay of low-income bill payment assistance  
8 programs in the state. The PUCO originally created it during the early 1980s as a  
9 response to an earlier state emergency with high energy costs, economic  
10 recession, and the crisis of many low-income customers who were facing  
11 disconnection for non-payment.

12

13 PIPP enables low-income households to pay a percentage of their monthly income  
14 (six percent of household income or \$10.00, whichever is greater), as payment  
15 towards their gas bill.<sup>12</sup> A companion program was created by the PUCO for  
16 electric low-income customers and was later codified in Ohio law, where low-  
17 income Ohioans could pay a percentage of their monthly household income  
18 towards their electric utility bills. Administered by the Ohio Development  
19 Services Agency (“ODSA”),<sup>13</sup> low-income electric customers pay six percent of  
20 their monthly household income or \$10.00 (whichever is greater) towards their  
21 electric bill.

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<sup>12</sup> <http://codes.ohio.gov/oac/4901:1-18-13v1>

<sup>13</sup> Ohio Adm. Code 122:5-3.

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1 Customers are eligible for PIPP if their household income for the past three  
2 months is at or below 150 percent of the federal poverty guidelines.<sup>14</sup> For a family  
3 of four, the total annual household incomes of at or below \$38,625 can qualify for  
4 PIPP. However, the majority of PIPP customers have household incomes below  
5 75% percent of the federal poverty guidelines.

6  
7 PIPP is not a social give-away. And in fact, PIPP participants are ultimately  
8 responsible for paying the difference between the actual natural gas and/or  
9 electric bill and the PIPP payment amount. There are strict payment guidelines in  
10 the rules that require on-time and in-full payment of the PIPP amount that can  
11 help customers avoid building-up large natural gas arrearages. But if the payments  
12 are not made on-time and in-full, customers miss the opportunity to obtain  
13 immediate incentive credits towards their arrearages<sup>15</sup>. And for customers who  
14 have gone off the regular PIPP program and are now on Graduate-PIPP, all  
15 payments must be made in-full and on-time for the customers to fully discharge  
16 their PIPP debt. Bill payment assistance could be the only option that is available  
17 to help these recent PIPP customers who are just coming out of poverty avoid  
18 accruing additional personal debt.

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<sup>14</sup> <http://codes.ohio.gov/oac/4901:1-18-12v1>

<sup>15</sup> <http://codes.ohio.gov/oac/4901:1-18-14v1>

1    ***Q11. HOW IS THE LOW-INCOME ASSISTANCE PROGRAM (PIPP) PAID FOR?***

2    ***A11.*** PIPP is paid for through a rider on all Columbia customer bills.<sup>16</sup> The rider itself  
3       collects the difference between customers' actual bills and the PIPP payment  
4       made by customers. In addition, the rider collects the cost associated with  
5       arrearages that are owed by customers prior to enrolling on PIPP (pre-PIPP  
6       arrearages), and delinquent charges if customers do not make their PIPP  
7       payments.

8

9    ***Q12. WILL REPURPOSING LOW-INCOME ENERGY EFFICIENCY FUNDING***  
10   ***HELP PIPP CUSTOMERS AVOID BUILDING LARGE ARREARAGES,***  
11   ***LOSING ACCESS TO PIPP, AND ALSO HELP REDUCE WHAT ALL***  
12   ***OTHER CUSTOMERS PAY TO FUND PIPP AS MORE CUSTOMERS***  
13   ***ENROLL ON PIPP?***

14   ***A12.*** Yes. Repurposing low-income energy efficiency funds serves two purposes. First,  
15       the repurposed funds help PIPP customers pay their bill to take advantage of  
16       incentive credits tied to in-full and on-time payments and thus avoid building up  
17       large arrearages that can lead to their eventual removal from PIPP. Second, the  
18       repurposed funds will help to avoid increases in uncollected PIPP charges and  
19       pre-PIPP arrearages, thus reducing the potential impact of future increases in what  
20       all customers pay to fund the PIPP rider as more customers enroll in PIPP.

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<sup>16</sup> Columbia Tariff, P.U.C.O. No. 2, Sixteenth Revised Sheet No. 24, PIP Plan Tariff Schedule Rider.



1   ***Q13. CAN YOU PROVIDE ADDITIONAL DETAILS ON THE TYPES OF***  
2           ***PAYMENT PLANS THAT COLUMBIA IS REQUIRED TO OFFER***  
3           ***RESIDENTIAL CUSTOMERS WHO MAY NOT QUALIFY FOR LOW-***  
4           ***INCOME ASSISTANCE?***

5   ***A13.*** Yes. The PUCO's Minimum Service Standards require utilities to offer payment  
6           plans including one-third, one-sixth, and one-ninth payment plans to customers  
7           who are delinquent in payments or who wish to avoid delinquency.<sup>17</sup>

8  
9           The one-third payment plan is required during the winter heating season between  
10          the months of November through April of each year. Under that plan customers  
11          can pay one-third of the actual bill (including both current and past due  
12          charges).<sup>18</sup>

13  
14          Under the one-sixth payment plan customers can pay one sixth of the past due  
15          amount over six equal installments along with the current monthly charges on the  
16          bill.<sup>19</sup>

17  
18          Under the one-ninth payment plan customers can pay equal installment of one  
19          ninth of the past due amount in addition to a uniform budget bill payment  
20          amount.<sup>20</sup>

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<sup>17</sup> Ohio Adm. Code 4901:1-18-05(B).

<sup>18</sup> <http://codes.ohio.gov/oac/4901:1-18-05v1>.

<sup>19</sup> *Id.*

<sup>20</sup> *Id.*

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1 While these installment payment plans are helpful to some consumers, the  
2 additional burden of paying current charges along with a past delinquent amounts  
3 can be unmanageable for many consumers and especially for those who recently  
4 lost their jobs and income because of the coronavirus. The bill payment assistance  
5 I am proposing will help lessen the chance that PIPP and non-PIPP customers will  
6 not meet their payment plan obligations.

7

8 ***Q14. ARE THERE OTHER PAYMENT PLANS THAT COLUMBIA IS REQUIRED***  
9 ***TO PROVIDE RESIDENTIAL CUSTOMERS?***

10 ***A14.*** Yes. Ohio Admin. Code 4901:1-18-05(A) requires Columbia to make reasonable  
11 payment extensions or other extended payment plans under terms that are  
12 appropriate for both the customer and Columbia. These are the types of payment  
13 plans that are negotiated between Columbia and the customer that hopefully the  
14 customers will be able to maintain. But Columbia has the final say in determining  
15 if it will accept these types of plans. The rules prescribe criteria that Columbia is  
16 required to consider including the customer's recent payment history, the reasons  
17 why payment has not been made, and any other relevant factors concerning the  
18 customer including health, age, and family circumstances. But customers may still  
19 need some type of immediate payment assistance. The bill payment assistance  
20 that I am proposing could be available for making this one-time immediate  
21 payment that many customers may need until they are back to work or until they  
22 can qualify for other available assistance programs.

1    ***Q15. IF CUSTOMERS FAIL TO PAY THEIR COLUMBIA BILL, HOW IS THE***  
2           ***BAD DEBT COLLECTED?***

3    ***A15.*** All customers pay for the bad debt expenses through an uncollectible expense  
4           rider on Columbia Gas bills.<sup>21</sup> This is why it is so important for customers to be  
5           able to pay their natural gas bills. And this is also why the payment plans that are  
6           explained above and the bill payment assistance program that I am proposing  
7           serve an important role in helping customers avoid delinquency on the natural gas  
8           account.

9  
10   ***Q16. WILL REPURPOSING LOW-INCOME ENERGY EFFICIENCY FUNDING***  
11           ***HELP CUSTOMERS AVOID LOSING SERVICE AND ALSO HELP***  
12           ***MITIGATE THE COSTS THAT ALL CUSTOMERS PAY FOR***  
13           ***UNCOLLECTABLE DEBT?***

14   ***A16.*** Yes. Repurposing low-income energy efficiency funds serves two purposes. First,  
15           the repurposed funds help customers pay their bills. While there is an immediate  
16           suspension on disconnections for non-payment due to the coronavirus emergency,  
17           any help that can be provided now to help prevent customers from getting  
18           delinquent in their payments is beneficial. Second, the repurposed funds help to  
19           avoid increased charges to other customers that Columbia collects for revenues it  
20           does not collect from low-income customers.

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<sup>21</sup> Columbia Tariff, P.U.C.O. 2, Nineteenth Revised Sheet No. 29, Uncollectible Expense Rider.

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1 Local news reporting across Ohio is telling a dismal story of potentially hundreds  
2 of thousands of Ohioans who are facing financial crisis and the reality of  
3 determining how limited available dollars are being spent in their households.  
4 Many of these customers could have already been falling behind on their natural  
5 gas bills coming out of the winter heating season and the coronavirus crisis  
6 simply exacerbates their financial problems. While Columbia may have  
7 suspended the disconnection for non-payment of customers during the  
8 coronavirus pandemic, these customers are still facing mounting utility bills each  
9 month. And with many customers working at home, the utility bills in general are  
10 likely to be higher because of increased usage. Repurposing the low-income  
11 energy efficiency funds to bill payment assistance will help keep customers  
12 current in their payments. And the repurposed funds will help mitigate the impact  
13 of future increases in the uncollectible rider, which will benefit all consumers.  
14 Indeed, the PUCO Staff made a similar recommendation in a recent case  
15 involving AEP. There, AEP recommended that \$2.1 million in unspent funds be  
16 made available to the Ohio Hospital Association. The Staff instead recommended  
17 that the money be used to provide assistance to residential customers to maintain  
18 service, thus preventing an increase in bad debt or Universal Service Fund  
19 charges that other customers would have to pay to their utility.<sup>22</sup>

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<sup>22</sup> See <http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=6cc101c4-1314-45cf-aa9d-d556f692a70e>.

1   ***Q17. AREN'T THERE OTHER BILL PAYMENT/FINANCIAL ASSISTANCE***  
2       ***PROGRAMS AVAILABLE FOR COLUMBIA RESIDENTIAL CUSTOMERS?***

3   ***A17.*** Yes. But many of these programs have restrictions on their use that may or may  
4       not be helpful for Columbia customers who are now facing sudden and/or  
5       sustained loss of income and family financial crisis because of the coronavirus.

6  
7   ***Q18. PLEASE EXPLAIN.***

8   ***A18.*** The primary financial assistance program is the federal Low-Income Home  
9       Energy Assistance Program (“HEAP”). HEAP is administered by the Ohio  
10      Development Services Agency and provides both regular HEAP benefits in the  
11      form of a credit towards winter heating costs and crisis assistance for eligible  
12      customers during the winter and summer months. Columbia also has a fuel fund  
13      program where assistance of up to \$250 can be provided during the winter heating  
14      season.<sup>23</sup>

15  
16   ***Q19. CAN YOU DISCUSS THE ELIGIBILITY CRITERIA FOR THE HEAP***  
17       ***PROGRAM?***

18   ***A19.*** Yes. According to the ODSA, households with annual incomes that are at or  
19      below 175% of the federal poverty guidelines can qualify on an annual basis for  
20      one-time assistance through HEAP.<sup>24</sup> For a household of four, this would be an

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<sup>23</sup> <https://www.columbiagasohio.com/bills-and-payments/financial-support/income-eligible-assistance-programs>.

<sup>24</sup> [https://development.ohio.gov/is/is\\_heap.htm](https://development.ohio.gov/is/is_heap.htm).

1 annual income at or below \$45,063. Additionally, for the winter crisis program,  
2 HEAP can assist households with annual incomes at or below 175% of the federal  
3 poverty guidelines that are facing disconnection or have been disconnected.<sup>25</sup> The  
4 summer crisis program funded through HEAP is only available for cooling  
5 assistance.<sup>26</sup> While the HEAP summer crisis program may be available to help  
6 customers this summer with their electric cooling bills, this is not an available  
7 option for natural gas customers.  
8

9 ***Q20. ARE THE CURRENT FINANCIAL ASSISTANCE/ BILL PAYMENT***  
10 ***ASSISTANCE PROGRAMS SUFFICIENT TO HELP ALL COLUMBIA***  
11 ***CUSTOMERS (THOSE WHO QUALIFY AND THOSE WHO DON'T) WHO***  
12 ***COULD STRUGGLE PAYING THEIR NATURAL GAS BILLS?***

13 ***A20.*** No. Households with annual incomes that are above 175% of the federal poverty  
14 guidelines are ineligible for HEAP financial assistance. Households with incomes  
15 above 150% of the federal poverty guidelines are ineligible for PIPP. While  
16 combined, PIPP and HEAP assistance might be able to help approximately 26%  
17 of Ohio households, there are a substantial number of households with incomes  
18 above 175% of the federal poverty guidelines that have few (if any) available  
19 options for assistance in paying their gas bill.

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<sup>25</sup> [https://development.ohio.gov/is/is\\_heapwinter.htm](https://development.ohio.gov/is/is_heapwinter.htm).

<sup>26</sup> [https://development.ohio.gov/is/is\\_heapsummer.htm](https://development.ohio.gov/is/is_heapsummer.htm).

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1 Specifically, approximately 8.9% of Ohio households have incomes between 150  
2 and 200% of the federal poverty guidelines. While the exact number of Columbia  
3 customers who have incomes in the range of 150% poverty to 200% poverty is  
4 unknown, this could be a sizeable number. There are perhaps thousands of  
5 Columbia customers who could use bill payment assistance yet are ineligible for  
6 PIPP or other payment assistance programs. My proposal would extend the bill  
7 payment assistance to Columbia customers with household incomes at or below  
8 300% of the federal poverty guidelines on an annualized basis.

9

10 ***Q21. ISN'T THERE ADDITIONAL FEDERAL HEAP FUNDING THAT IS***  
11 ***BEING MADE AVAILABLE TO HELP CONSUMERS?***

12 ***A21.*** Yes. Additional HEAP dollars will be made available in Ohio as part of a  
13 stimulus bill to respond to the coronavirus pandemic that was passed by Congress  
14 and signed by the President on March 27, 2020.<sup>27</sup> While the exact amount of  
15 funding is unknown at this time, the Ohio allocation could be approximately \$45  
16 million if the federal government uses the same allocations as the current fiscal  
17 year funding.<sup>28</sup>

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<sup>27</sup> <https://liheapch.acf.hhs.gov/>

<sup>28</sup> [https://www.acf.hhs.gov/sites/default/files/ocs/comm\\_liheap\\_secondreleasedclstateterrtable\\_fy2020.pdf](https://www.acf.hhs.gov/sites/default/files/ocs/comm_liheap_secondreleasedclstateterrtable_fy2020.pdf)

1   ***Q22. DOES THE ADDITIONAL FEDERAL FUNDING FOR HEAP MEAN THAT***  
2                   ***THERE IS NO NEED FOR ADDITIONAL BILL PAYMENT ASSISTANCE***  
3                   ***FOR COLUMBIA'S CUSTOMERS?***

4   ***A22.*** No. The additional HEAP funding will be made available throughout Ohio and  
5           not just for Columbia customers. HEAP is made available for financial assistance  
6           for customers using multiple fuel types and crossing many different industries in  
7           Ohio. To the extent that the repurposed low-income energy efficiency funds can  
8           be used to help Columbia customers now, this will help reduce the statewide  
9           demand that hundreds of thousands of Ohioans could have for the additional  
10          HEAP funding.

11

12   ***Q23. ARE YOU RECOMMENDING EXPANDING THE NUMBER OF***  
13                   ***COLUMBIA CUSTOMERS WHO COULD BENEFIT BY RECEIVING BILL***  
14                   ***PAYMENT ASSISTANCE?***

15   ***A23.*** Yes. My recommendation is that any Columbia customer with a household  
16           income at or below 300% of the federal poverty guidelines (calculated on a  
17           quarterly basis) be able to use these funds. This includes households that are  
18           eligible to participate in PIPP and/or those households that can apply for HEAP  
19           under the income guidelines established for those programs. Funds will be made  
20           available on a first-come, first-serve basis to help as many Columbia customers as  
21           possible obtain bill payment assistance. Similar programs are being implemented



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1 in other parts of the country to help customers who may not income-qualify for  
2 the more common low-income assistance programs.<sup>29</sup>

3  
4 OCC's proposal perfectly aligns with the PUCO and ODSA programs and rules to  
5 provide comprehensive immediate help to Columbia customers who are  
6 financially impacted during the coronavirus emergency. And as the statutory  
7 representative of all residential utility consumers in Ohio, OCC stands ready to  
8 continue working with the PUCO and ODSA to find ways to help all consumers  
9 during this difficult time.

10

11 ***Q24. MUST CUSTOMERS HAVE A DISCONNECTION NOTICE FROM***  
12 ***COLUMBIA IN ORDER TO QUALIFY UNDER THE BILL PAYMENT***  
13 ***ASSISTANCE THAT OCC IS RECOMMENDING FOR COLUMBIA'S***  
14 ***CUSTOMERS?***

15 ***A24.*** Absolutely not. While this criterion must be met to obtain crisis assistance under  
16 the HEAP guidelines, I recommend that these additional funds be used to help  
17 customers avoid getting behind in their payments to begin with.

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<sup>29</sup> <https://www.mytpu.org/emergencyassistance/>. New Jersey is also repurposing funds for the purpose of bill payment assistance.  
[http://custom.statenet.com/public/resources.cgi?id=ID:bill:NJ2020000S2362&cuiq=4fda1955-d0b1-5df5-a31b-59129580a045&client\\_md=4a1c71e7a908986e6e768a28115948cb&mode=current\\_text](http://custom.statenet.com/public/resources.cgi?id=ID:bill:NJ2020000S2362&cuiq=4fda1955-d0b1-5df5-a31b-59129580a045&client_md=4a1c71e7a908986e6e768a28115948cb&mode=current_text)

1    ***Q25. IF CUSTOMERS RECEIVE REPURPOSED FUNDS UNDER OCC'S***  
2            ***PROPOSAL, SHOULD THEY BE PROHIBITED FROM RECEIVING***  
3            ***OTHER FORMS OF CONSUMER ASSISTANCE?***

4    ***A25.*** Absolutely not. While I recommend that customers be eligible for using the  
5            repurposed funds once per calendar year, I do not recommend restricting  
6            customers from accessing any other financial assistance or bill payment programs  
7            for which they are eligible. The health emergency is also a financial emergency  
8            for many Ohioans, and the government should make help broadly available to  
9            Ohioans commensurate with this terrible circumstance.

10

11   ***Q26. DO YOU HAVE A PROPOSED CAP FOR THE AMOUNT OF BILL***  
12            ***PAYMENT ASSISTANCE THAT COULD BE PROVIDED TO INDIVIDUAL***  
13            ***ELIGIBLE CUSTOMERS?***

14   ***A26.*** Yes. My recommendation is that PIPP customers could be provided up to \$150 of  
15            one-time assistance towards their PIPP bill and non-PIPP customers could be  
16            provided up to \$250.

17

18   ***Q27. HOW WOULD THE BILL PAYMENT ASSISTANCE FUNDS BE***  
19            ***DISTRIBUTED TO CUSTOMERS?***

20   ***A27.*** There are different options that are considered for distributing the funds. AEP  
21            Ohio for example collects donations from customers through the Neighbor to  
22            Neighbor program and distributes the funds to customers in need through a  
23            network of agencies in its service territory through what is called the Dollar

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1       Energy Fund. The agencies that participate in the distribution of the funds verify  
2       the customer eligibility based on pre-established AEP criteria and document the  
3       request for funding in a grant application form. Once the social service agency  
4       completes the form, it is then provided to AEP so that the grant amount can be  
5       applied on the customer account. The agencies that distribute these funds tend to  
6       be the very same local agencies where customers would currently be seeking  
7       assistance because of loss of income, jobs, or requesting other family assistance.

8  
9       Another option is to distribute the funds through as many agencies as possible in  
10      each of the counties where Columbia serves customers. This proposal helps  
11      create jobs for a diverse network of social service agencies such as Job and  
12      Family Services offices, senior services, community action, Salvation Army, and  
13      other community-based organizations that are already at the forefront in helping  
14      Ohioans impacted by the coronavirus. Creating such diversity in the network of  
15      agencies that distribute these funds benefits customers by streamlining the help  
16      that customers need to their specific situation. For example, some agencies may  
17      be best suited to help the very low-income customers, whereas other agencies  
18      may be better suited for helping customers with the higher income guidelines.  
19      And of course, customers will be able to apply for assistance over the telephone  
20      or on the agency website (if available) during the emergency to safeguard their  
21      health and the health of the social workers.

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1 A network like this was established in 2009 during the recession to help distribute  
2 utility assistance funding to FirstEnergy customers. A grant form was developed  
3 that included obtaining the specific information that was necessary to verify  
4 customer eligibility. Once the form was completed, the social service agencies  
5 emailed the form to a centralized contact group in FirstEnergy that could apply  
6 the approved grant funds to the customer account. The formation of the network  
7 was relatively straight-forward involving coordination and agreement between  
8 FirstEnergy and the social services group.

9  
10 My recommendation is that a network like this be implemented by Columbia to  
11 distribute the repurposed funds. However, if it would be more cost-effective for  
12 Columbia to arrange the distribution of funds through a third-party like Dollar  
13 Energy, I would not be opposed to this.

14

15 ***Q28. HOW WILL THE SOCIAL SERVICE AGENCIES BE RECOMPENSED FOR***  
16 ***DISTRIBUTING THE BILL PAYMENT ASSISTANCE FUNDING THAT***  
17 ***OCC PROPOSES?***

18 ***A28.*** My recommendation is that administrative fees be controlled to the maximum  
19 extent possible so that more funds are available to help Columbia customers. The  
20 social service agencies can be recompensed though a fee not to exceed \$20 for  
21 each completed grant application. Alternatively, the social service agencies could  
22 be compensated as a (low) percentage of the total grant dollars that the agency

1 processes. This is one of the details that will need to be addressed with each  
2 agency.

3

4 ***Q29. WHAT ARE THE NEXT STEPS IN ESTABLISHING A NETWORK TO***  
5 ***DISTRIBUTE THE BILL PAYMENT ASSISTANCE FUNDS TO COLUMBIA***  
6 ***CUSTOMERS THAT OCC RECOMMENDS?***

7 ***A29.*** When the PUCO approves the repurposing of low-income energy efficiency funds  
8 for bill payment assistance, Columbia should provide a full accounting of the  
9 dollars that are available for bill payment assistance for the remainder of the year  
10 and through 2021. In addition, Columbia should report on the number of  
11 Columbia residential customers in each county (and city) where it serves.  
12 Columbia should work cooperatively with OCC and others that may be interested  
13 in identifying and to establish contracts with the social service agencies that will  
14 distribute the funds. A standard grant application form could be used for  
15 documenting eligibility as well as the customer specific requests for assistance  
16 with each of the agencies. Columbia should designate contacts for processing the  
17 grants and posting the awarded amount on customer accounts. Finally, the PUCO  
18 should have the PUCO Staff serve in a monitoring role to assist in coordinating  
19 activities with the PUCO, reviewing progress in distributing the funds, referring  
20 customers in need to the assistance, and monitoring the overall impact that the  
21 fund is having to help consumers.

1   ***Q30. IS THERE AMPLE FUNDING AVAILABLE IN THE STATE TO ADDRESS***  
2       ***EMERGENCY WEATHERIZATION NEEDS THAT MIGHT ARISE FOR***  
3       ***CUSTOMERS?***

4   ***A30.*** Yes. Traditionally up to 15% of the Ohio HEAP block grant was transferred for  
5       the purpose of providing weatherization under the Home Weatherization  
6       Assistance Program (“HWAP”). These funds can be used to continue addressing  
7       any home weatherization emergencies that might arise. I would note that in two  
8       recent laws (Ohio House Bill 166<sup>30</sup> of the 133rd General Assembly section 259.70  
9       and Ohio House Bill 6 of the 133rd<sup>31</sup> General Assembly section 5), the 15%  
10      allocation was increased to 20% and then to 25% of HEAP funds being used for  
11      weatherization. I understand that OPAE supported these shifts of funds away from  
12      bill-payment assistance and toward the low-income weatherization (that OPAE  
13      members provide). Thus, this likely shifting of bill-payment funds to  
14      weatherization could help protect jobs for weatherization providers.

15  
16   ***Q31. IF ANY OF THE REPURPOSED ENERGY EFFICIENCY FUNDS ARE NOT***  
17       ***EXPENDED, DO YOU HAVE A RECOMMENDATION FOR HOW THE***  
18       ***FUNDS SHOULD BE USED TO BENEFIT COLUMBIA’S CUSTOMERS?***

19   ***A31.*** Yes. Any repurposed funds that are not ultimately used to pay for previous low-  
20      income weatherization expenses that have yet to be collected from customers or  
21      bill payment assistance should be used to offset Columbia’s uncollectible rider

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<sup>30</sup> [http://search-prod.lis.state.oh.us/solarapi/v1/general\\_assembly\\_133/bills/hb166/EN/09?format=pdf](http://search-prod.lis.state.oh.us/solarapi/v1/general_assembly_133/bills/hb166/EN/09?format=pdf)

<sup>31</sup> [http://search-prod.lis.state.oh.us/solarapi/v1/general\\_assembly\\_133/bills/hb6/EN/06?format=pdf](http://search-prod.lis.state.oh.us/solarapi/v1/general_assembly_133/bills/hb6/EN/06?format=pdf)

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1 costs to consumers. This provides the greatest benefit by reducing the burden on  
2 all customers who pay for amounts Columbia is unable to collect.

3

4 ***Q32. PLEASE EXPLAIN WHAT YOU ARE PROPOSING WOULD BE THE***  
5 ***REPURPOSED FUNDS?***

6 ***A32.*** Some utilities collect the costs to run their energy efficiency programs based on  
7 projections of future costs. Thus, they effectively collect their costs in real time.  
8 Columbia's rider, however, is backward looking only. That is, Columbia is  
9 seeking in this case to collect the costs from its 2019 programs—costs that have  
10 already been spent. I am proposing the repurposing of Columbia's 2020 low-  
11 income program costs, some of which won't be collected until 2021. Thus, I  
12 propose the following:

13

14 First, with regard to Columbia's charges of \$7.1 million to customers per year  
15 through base rates for its low-income weatherization program, I recommend that  
16 those consumer-funded amounts for 2020 be immediately repurposed for my  
17 proposed bill payment assistance. Second, Columbia's continued charges to  
18 customers through its Demand-Side Management (energy efficiency) rider should  
19 also be used for low-income bill-payment assistance. Any amounts that Columbia  
20 would otherwise collect for its 2019 programs should be deferred for future  
21 collection after the coronavirus emergency ends. Columbia will be made whole in  
22 the future, and customers will benefit from much needed immediate bill payment

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1 assistance relief as a result of the emergency affecting consumers' health and  
2 finances.

3

4 **IV. CONCLUSION**

5

6 ***Q33. DOES THIS CONCLUDE YOUR TESTIMONY?***

7 ***A33.*** Yes. However, I reserve the right to incorporate new information that may  
8 subsequently become available.



## **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing *Direct Testimony of James D. Williams on Behalf of the Office of the Ohio Consumers' Counsel* was served via electronic transmission to the persons listed below on this 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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**Testimony of James D. Williams**  
**Filed at the Public Utilities Commission of Ohio**

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

10. *In the Matter of the Application of The Ohio American Water Company to Increase its Rates/or Water Service and Sewer Service, Case No. 11-4161-WS-AIR (March 1, 2012).*
11. *In the Matter a/Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan, Case No. 11-346-EL- SSO, et al (May 4, 2012).*
12. *In the Matter of the Application o/The Dayton Power and Light Company for Approval of its Market Rate Offer, Case No. 12-426-EL-SSO (June 13, 2012).*
13. *In the Matter of the Application of Ohio Power Company to Establish Initial Storm Damage Recovery Rider Rates, Case No. 12-3255-EL-RDR (December 27, 2013).*
14. *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan, Case No. 13-2385-EL-SSO (May 6, 2014).*
15. *In the Matter of the Application of Duke Energy Ohio/or Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan, Accounting Modifications and Tariffs for Generation Service, Case 14-841-EL-SSO (May 29, 2014).*
16. *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan, Case No. 14-1297-EL-SSO (December 22, 2014).*
17. *In the Matter of the Application of Duke Energy Ohio, Inc., to A4just Rider DR- IM and Rider AU for 2013 Grid Modernization Costs, Case No. 14-1051-EL- RDR (December 31, 2014) and (February 6, 2015).*
18. *In the Matter of the Application Not for an Increase in Rates Pursuant to Section 4901:18, Revised Code, of Ohio Power Company to Establish Meter Opt-Out Tariff, Case No. 14-1158-EL-ATA (April 24, 2015).*
19. *In the Matter of the Application of Duke Energy of Ohio, Inc., for Approval of a Grid Modernization Opt-out Tariff and for a Change in Accounting Procedures Including a Cost Recovery Mechanism., Case 14-1160-EL-UNC and 14-1161-EL- AAM (September 18, 2015).*

20. *In the Matter of the Application of Duke Energy Ohio, Inc., for Approval of an Alternative Rate Plan Pursuant to Section 4929.05, Revised Code, for an Accelerated Service Line Replacement Programs*, Case No. 14-1622-GA-ALT (November 6, 2015).
21. *In the Matter of the Complaint of Jeffrey Pitzer, Complainant, v. Duke Energy Ohio, Inc. Respondent.*, Case No. 15-298-GE-CSS (December 30, 2015).
22. *In the Matter of the Application of Ohio Power Company to Initiate Phase 2 of Its gridSMART Project and to Establish the gridSMART Phase 2 Rider*, Case No. 13-1939-EL-RDR (July 22, 2016).
23. *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of Demand Side Management Program for its Residential and Commercial Customers*, Case No. 16-1309-GA-UNC (September 13, 2016).
24. *In the Matter of the Application of the Dayton Power and Light Company for Approval of Its Electric Security Plan*, Case No. 16-0395-EL-SSO (November 21, 2016). Supplemental Testimony, (March 29, 2017).
25. *In the Matter of the Application of Aqua Ohio, Inc. to Increase Its Rates and Charges for Its Waterworks Service.*, Case No. 16-0907-WW-AIR (December 19, 2016).
26. *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143, in the Form of an Electric Security Plan*, Case No. 16-1852-EL-SSO, (May 2, 2017).
27. *In the Matter of the Application of the Ohio Development Services Agency for an Order Approving Adjustments to the Universal Service Fund Riders of Jurisdictional Ohio Electric Distribution Utilities*, Case No. 17-1377-EL-USF, (August 11, 2017).
28. *In the Matter of the Application of Duke Energy Ohio, Inc. to Adjust Rider AU for 2016 Grid Modernization Costs*, Case No. 17-690-GA-RDR, (August 18, 2017).
29. *In the Matter of the Application of Duke Energy Ohio, Inc., for an Adjustment to Rider AMRP Rates*, Case No. 17-2318-GA-RDR, (April 5, 2018).
30. *In the Matter of the Application of Dayton Power and Light Company for an Increase in Electric Distribution Rates*, Case No. 15-1830-EL-AIR, (April 11, 2018).
31. *In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Electric Distribution Rates*, Case No. 17-032-EL-AIR, et al, (June 25, 2018).

32. *In the Matter of the Complaint of Citizens Against Clear Cutting, et al., Complainants, v. Duke Energy Ohio, Inc. Respondent*, Case No. 17-2344-EL-CSS (August 27, 2018). Supplemented Direct Testimony (November 9, 2018).
33. *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval of an Increase in Gas Rates*, Case No. 18-0298-GA-AIR (November 7, 2018). Supplemental Testimony (January 22, 2019).
34. *In the Matter of the Application of Ohio Power Company to Update Its Enhanced Service Reliability Rider*, Case No. 17-1914-EL-RDR (May 3, 2019).
35. *In the Matter of the Review of Duke Energy Ohio, Inc.'s Distribution Capital Investment Rider. Case No. 18-1036-EL-RDR*, (July 8, 2019).

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