

EXHIBIT NO. _____

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Power Company for an Increase in Electric Distribution Rates.)))	Case No. 20-585-EL-AIR
In the Matter of the Application of Ohio Power Company for Tariff Approval.)))	Case No. 20-586-EL-ATA
In the Matter of the Application of Ohio Power Company for Approval to Change Accounting Methods.)))	Case No. 20-587-EL-AAM

DIRECT TESTIMONY OF
JEFFREY W. LEHMAN
ON BEHALF OF
OHIO POWER COMPANY

Management Policies, Practices & Organizations

Operating Income

Rate Base

Allocations

Rate of Return

Rates and Tariffs

X Other

Filed: June 15th, 2020

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JEFFREY W. LEHMAN

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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO
DIRECT TESTIMONY OF
JEFFREY W. LEHMAN
ON BEHALF OF
OHIO POWER COMPANY

1 **I. PERSONAL DATA**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Jeffrey W. Lehman. My business address is 1 Riverside Plaza, Columbus,
4 Ohio 43215.

5 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?**

6 A. I am the Electric Transportation Program Manager for American Electric Power Service
7 Corporation (“AEPSC”).

8 **Q. WOULD YOU PLEASE DESCRIBE YOUR EDUCATIONAL AND
9 PROFESSIONAL BACKGROUND?**

10 A. I earned a Bachelor of Science Degree in Electrical Engineering from Kettering University
11 in 2005, have been a Professional Engineer registered in Michigan since 2010, and earned
12 a Master of Business Administration degree from Otterbein University in 2019. Prior to
13 joining American Electric Power (“AEP”), I worked for electric utilities in Michigan in
14 various roles related to substation and protection and controls design, construction,
15 commissioning, and management. I joined AEP in 2011 as a contract engineer for AEP
16 Transmission, and worked on protection and controls standards, design, commissioning,
17 and support through 2015. At that time, I transitioned to the Generation organization,
18 where I focused on distributed energy resources and technologies, research and
19 development, and identification and vetting of emerging technologies. During 2018, I

1 transitioned to AEP’s Customer organization, where I worked on maximizing value for
2 customers related to electrification – industrial and transportation sectors specifically. I
3 have been in my current role focusing exclusively on electric transportation since
4 November 2018.

5 **Q. WHAT ARE YOUR RESPONSIBILITIES AS ELECTRIC TRANSPORTATION**
6 **PROGRAM MANAGER?**

7 A. As the Electric Transportation Program Manager, my responsibilities include monitoring
8 industry technologies and evolution, participating in program design, advising internal and
9 external stakeholders on vehicle and charging technologies and systems, and supporting all
10 AEP operating companies in their transportation electrification efforts.

11 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY OR TESTIFIED IN ANY**
12 **REGULATORY PROCEEDINGS?**

13 A. Yes. I have testified on behalf of Indiana Michigan Power Company before the Indiana
14 Utility Regulatory Commission in Cause No. 45235 and submitted testimony before the
15 Michigan Public Service Commission in Case No. U-20359.

16 **II. PURPOSE OF TESTIMONY**

17 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

18 A. The purpose of my testimony is to support the Electric Transportation program in the
19 Demand Side Management Plan (“DSM Plan”) that Ohio Power Company (“AEP Ohio”
20 or the “Company”) proposes in these proceedings. Company witness Williams describes
21 and supports the overall DSM Plan, including the Electric Transportation program.

1 **III. AEP OHIO ELECTRIC TRANSPORTATION PROGRAM SUMMARY AND**
 2 **BENEFITS**

3 **Q. PLEASE BRIEFLY SUMMARIZE THE COMPONENTS OF THE ELECTRIC**
 4 **TRANSPORTATION PROGRAM WITHIN AEP OHIO’S DSM PLAN.**

5 A. AEP Ohio is proposing a program that consists of several components that each play an
 6 important role in enabling electric vehicle (EV) adoption in a way that optimizes the overall
 7 electric system. The proposed program cost is \$4.0 million annually, and the components
 8 shown in Table JWL-1 engage with customers to provide incentives that address adoption
 9 barriers and achieve benefits for all AEP Ohio customers.

Table JWL-1

Program Component	Included Applications	Estimated Annual Budget
Corridor Charging	<ul style="list-style-type: none"> • Highway corridor public charging 	\$550,000
Residential Charging	<ul style="list-style-type: none"> • Single Family charging • Multi-Family charging 	\$950,000
Commercial and Public Charging	<ul style="list-style-type: none"> • Non-corridor public charging • Fleet charging • Workplace charging 	\$1,450,000
Electric Transportation Innovation and Technology	<ul style="list-style-type: none"> • Public transit bus • School transit bus • New EV technologies 	\$650,000
Electric Transportation Outreach and Engagement	<ul style="list-style-type: none"> • Program awareness and marketing • Technology information and benefits 	\$400,000
TOTAL		\$4,000,000

10 The proposed program engages to achieve off-peak charging at customer homes, fleet
 11 facilities, and bus depots. In addition to providing cost and emissions savings benefits to the
 12 participants of these programs, every AEP Ohio customer will benefit from the downward
 13 rate pressure these program components realize.

1 Customers also need to have confidence in their ability to charge within their
2 community and along transportation corridors. The combination of corridor fast charging
3 deployments, public charging incentives, and workplace charging incentives will help to build
4 robust customer charging options in the Company's service territory.

5 This proposed program will also help to pilot public service benefits by incentivizing
6 electric bus options for transit and school fleets. Moving these applications to electric brings
7 both the cost savings benefits to broad parts of our communities, and the emissions reductions
8 benefits for members of our communities that depend on bus transit to get to school, work,
9 and around their community.

10 To support all of these program components to achieve awareness, participation, and
11 downward rate pressure that benefits all AEP Ohio customers, the proposed program will
12 provide customer engagement and outreach. AEP Ohio will work with our customers and
13 stakeholders including individuals, municipalities, businesses, dealerships, automakers,
14 public representatives, and others to provide helpful information, guidance, tools, and
15 resources.

16 For additional information on the proposed program and its components, refer to
17 Exhibit JFW-1, Figure 2, p.13, of Company witness Williams.

18 **Q. PLEASE DESCRIBE THE BENEFITS OF THE PROPOSED ELECTRIC**
19 **TRANSPORTATION PROGRAM.**

20 A. There are five primary benefits of the proposed electric transportation program:

- 21 1. Downward electricity rate pressure. This benefit accrues from participation in
22 program components that ensure efficient electric transportation load integration, and
23 accrues to all who drive electric vehicles, as well as all AEP Ohio customers.

1 Downward rate pressure occurs when increased electricity usage from one or more
2 customers spreads utility system costs over greater kilowatt-hours for all utility
3 customers. Synapse Energy quantified this benefit in California where supporting
4 data is significant and available, concluding that “EVs in California have increased
5 utility revenues more than they have increased utility costs, leading to downward
6 pressure on electric rates for EV-owners and non-EV owners alike.”¹ These revenues
7 were shown to be approximately 200-300% of costs in the utility areas studied.²

8 2. Reduced system peak due to managed charging. Customers who participate in
9 programs designed to achieve off-peak EV charging have been observed to
10 significantly shift their EV charging load to the desired times regardless of program
11 design approach or geography. This is especially valuable in residential and fleet
12 applications. As an example, where Pacific Gas and Electric was able to specifically
13 measure the EV charging that occurred off-peak, it found these residential participants
14 to charge their EVs 92% off-peak on average.³

15 3. Reduction of transportation emissions. When including upstream emissions attributed
16 to electricity and gasoline creation and delivery, a current generation EV emits less
17 than half the equivalent carbon dioxide of the average new combustion gasoline
18 vehicle in Columbus, Ohio.⁴ As proposed, just the residential component of AEP
19 Ohio’s Electric Transportation program would realize lifetime carbon emissions

¹ Synapse Energy Economics Inc., “Electric Vehicles Are Driving Electric Rates Down”, available at:
<https://www.synapse-energy.com/sites/default/files/EVs-Driving-Rates-Down-8-122.pdf>

² *Id.*

³ California Energy Commission, “7th Joint IOU Electric Vehicle Load Research Report: April 2019”, available at:
<https://efiling.energy.ca.gov/GetDocument.aspx?tn=228787-14&DocumentContentId=60075>

⁴ FuelEconomy.gov, “Beyond Tailpipe Emissions”, available at:
<https://www.fueleconomy.gov/feg/Find.do?zipCode=43215&year=2019&vehicleId=40520&action=bt3>

1 reductions of approximately 16,000 tons for each plan year. See Exhibit JFW-1,
2 Section V.g, p.21. This benefit accrues to many parties, including:

- 3 a. Electric vehicle drivers and operators;
- 4 b. People that regularly ride with and live in immediate proximity of the
5 electric driver or operator, such as transit members, school children, and
6 family;
- 7 c. People that live and work within the community near the electric driver or
8 operator and their routes; and
- 9 d. The broader region surrounding the electric driver or operator.

10 4. Improved system information from program participation. This benefit accrues to
11 AEP Ohio and its customers as it allows the Company to better understand emerging
12 impacts to the electrical system, and plan for the system and its maintenance more
13 effectively and efficiently.

14 5. Increased access to public and corridor charging. This benefit accrues to all drivers
15 or operators of EVs moving through or within AEP Ohio's service territory, and
16 ensures all AEP Ohio customers will have equitable access to charging facilities
17 regardless of their work or housing situation. This also addresses potential barriers to
18 tourism and visitors to Ohio by out of state EV drivers and those within Ohio traveling
19 across the state.

20 **Q. WHY IS THE COMPANY PROPOSING AN ELECTRIC TRANSPORTATION**
21 **PROGRAM AT THIS TIME?**

22 A. The Electric Transportation program is needed to achieve benefits for all customers across the
23 state of Ohio by:

- 1 1. Increasing customer access to EV charging where it is most necessary;
- 2 2. Achieving downward rate pressure from managed and off-peak EV charging; and
- 3 3. Integrating EV charging into the electric grid efficiently.

4 The adoption of electric vehicles relies on convenient access to charging infrastructure,
5 and AEP Ohio desires to expand access to charging options to all customers, including low
6 income customers, rural and urban customers, government and municipal entities, and
7 customers who utilize mass transit options. AEP Ohio intends for all utility customers to
8 benefit from this program, not just the users of electric transportation, through lower total
9 energy costs and improved air quality. Additionally, AEP Ohio intends to work with program
10 participants and reduce the system peak demand through the demand response program and
11 tariff options. The comprehensive data collection and analysis from the program will allow
12 AEP Ohio to better understand emerging impacts to the electrical system and more effectively
13 plan the grid system and its maintenance. Additionally, AEP Ohio seeks to build on the
14 momentum of its pilot EV charging station rebate program.⁵

15 **Q. WHAT LEARNINGS FROM AEP OHIO’S PILOT ELECTRIC VEHICLE**
16 **CHARGING STATION REBATE PROGRAM HAVE GUIDED THE FORMATION**
17 **OF THIS PROGRAM?**

- 18 A. First, there is tremendous demand from AEP Ohio customers for EV charging, as evidenced
19 by the fact that the four-year pilot program was fully subscribed within seventeen months of
20 receiving applications. Continued demand remains high, as evidenced by the wait list of
21 applications received, even after customers understood the program was fully subscribed.
22 There is a specific desire for charging infrastructure from various AEP Ohio customer

⁵ ESP IV Order, ¶ 61, Case No. 16-1852-EL-SSO.

1 segments that do not have the budget flexibility to fund the installation costs, including low
2 income customers and public-serving municipalities, school districts and government entities.

3 Secondly, AEP Ohio’s pilot program did not address certain customer segments. It
4 did not address the single family residential market segment at all, and going forward that
5 segment is key to maximizing the benefits to all customers as further discussed below. Mass
6 transit and fleet segments were added to the pilot program mid-stream, and AEP Ohio barely
7 scratched the surface of addressing those key segments. The pilot program also did not
8 include any funding for educational programs to consumers, vehicle dealers, government
9 entities, non-profit organizations, businesses, etc.

10 Thirdly, the pilot program did not address many locations where EV charging is
11 lacking. The majority of first-come-first-serve incentives went to customers in the Columbus
12 footprint. There are large segments of AEP Ohio’s service territory that need more assistance,
13 and there are interstate and highway corridors where fast charging stations are needed.

14 The pilot program also provided valuable insights on project costs, customer
15 sensitivities to incentives, locational coverage (and gaps) and charging behavior. The
16 incentives in AEP Ohio’s proposed program will be designed to be flexible and maximize
17 both the customer utilization as well as the benefits to all.

18 **IV. ELECTRIC TRANSPORTATION PROGRAM COMPONENTS**

19 **A. CORRIDOR CHARGING**

20 **Q. PLEASE DESCRIBE WHY THIS PROGRAM COMPONENT IS NECESSARY.**

21 A. Interstate corridor charging describes EV fast-charging equipment installed along major
22 highway corridors. This equipment enables drivers with electric vehicles to travel long
23 distances away from their home.

1 When appropriate equipment is deployed in locations along transportation corridors
2 to create a backbone of electric fueling, EV drivers are able to travel from their home or work
3 location to these sites, along the transportation corridor, and to their ultimate destination. This
4 is incredibly important both as a charging access equity issue, as well as to enable convenient
5 long distance electric travel.

6 **Q. WHAT IS AEP OHIO PROPOSING FOR INTERSTATE CORRIDOR CHARGING?**

7 A. AEP Ohio is proposing to offer incentives to help realize appropriate corridor fast charging
8 equipment to fill transportation corridor gaps that have not yet been addressed through market
9 participation. This will enable convenient long distance electric travel for EVs throughout the
10 State of Ohio as well as provide equitable charging access throughout AEP Ohio’s service
11 territory in rural areas between the larger urban areas. Please refer to Exhibit JFW-1, Figure
12 2, p.13, of Company witness Williams for additional details.

13 **B. RESIDENTIAL CHARGING**

14 **Q. PLEASE DESCRIBE WHY THIS PROGRAM COMPONENT IS NECESSARY.**

15 A. Home charging is unique in that it is important, convenient, and inexpensive for EV drivers
16 while offering the most significant opportunity to integrate EV charging during off-peak
17 system periods and provide downward rate pressure for all utility customers.

18 Customer behavior studies have consistently found that when available, home
19 charging comprises 80 percent or more of the transportation energy needs. Customers
20 typically simply plug in the vehicle when arriving home, and leave for work the next morning
21 with a full charge. While the vehicles are connected during these extended times, load
22 management can easily occur via multiple vehicle or charger technologies to ensure that
23 customer needs are met while simultaneously avoiding peak system periods and improving

1 electric system utilization. Please see Exhibit JFW-2, Sections VII, pp.21-26 for additional
2 details and supporting references on home charging, downward rate pressure, driver charging
3 behavior, and off-peak charging.

4 To illustrate the significant value of engaging to achieve off-peak charging with
5 residential customers, consider a typical driver and EV with the following characteristics:

- 6 • 40 miles driven per weekday, exclusively charged at home
- 7 • Vehicle efficiency of 3 miles per kilowatt-hour
- 8 • Vehicle charging power of 7.4 kilowatts
- 9 • Annual energy required – 3,467 kilowatt-hours

10 Using these characteristics in the context of the AEP Ohio residential tariff, downward
11 rate pressure benefits to all AEP Ohio customers are significantly different depending on
12 when the charging occurs – when completely off-peak the annual benefit in this scenario is
13 \$236 per vehicle, while only \$29 in benefits are realized if charging is completely on-peak.
14 These downward rate pressure benefits were provided by Company witness Moore, who can
15 provide further detail.

16 When considering an ongoing program that achieves completely off-peak residential
17 charging with 500 participants added each year, the incremental downward pressure provided
18 to AEP Ohio customer rates will be significant as shown in Table JWL-2. This downward
19 rate pressure directly benefits all AEP Ohio customers.

Table JWL-2

	Year 1	Year 2	Year 3	Year 4	Year 5	TOTAL
Cumulative Participants	500	1,000	1,500	2,000	2,500	7,500
On-Peak Downward Rate Pressure Benefit	\$14,689	\$29,378	\$44,067	\$58,756	\$73,445	\$220,335
Off-Peak Downward Rate Pressure Benefit	\$117,964	\$235,928	\$353,892	\$471,856	\$589,820	\$1,769,460
Incremental Downward Rate Pressure Benefit	\$103,275	\$206,550	\$309,825	\$413,100	\$516,375	\$1,549,125

1 Beyond incremental downward rate pressure benefits, this illustrative ongoing
2 program with 500 participants added each year would also avoid system capacity costs by
3 completely charging off-peak – the net present value of this avoidance is approximately
4 \$1MM for the new participants added each program year. Avoided costs refer to the costs of
5 the electricity resources that are avoided, as defined in Exhibit JFW-1.

6 To consider total possible benefits of achieving off-peak charging beyond this
7 illustrative program example, forecasted EV quantities within the Company service territory
8 can be used. Internal forecasts expect EV adoption of approximately 33,000 EVs within AEP
9 Ohio service territory by 2025. See Exhibit JFW-2, Section X, p.44. If all of these vehicles
10 were to charge completely off-peak as opposed to completely on-peak using the previous
11 characteristics and parameters, the downward rate pressure benefit would be nearly \$7MM in
12 2025, and the avoided capacity cost benefit would be nearly \$6.5MM in that same year. Please
13 see Exhibit JFW-2, Section VI, pp.19-20 for more details on avoided capacity costs and

1 Section VII, pp.21-26 for more details on downward rate pressure and benefits for all AEP
2 Ohio customers.

3 **Q. WHAT IS AEP OHIO PROPOSING FOR SINGLE FAMILY RESIDENTIAL**
4 **CHARGING?**

5 A. AEP Ohio is proposing a residential program component that provides participant incentives
6 for off-peak EV charging, with customer choice of several programmatic options. These
7 options, which will include various demand response programs as defined in the DSM Plan,
8 and a whole-home time-of-use (“TOU”) tariff, not only provide customer choice for their
9 primary and preferred charging location, but also provide flexibility and enable AEP Ohio to
10 learn more about customer EV charging behaviors and preferences. Please refer to Exhibit
11 JFW-1, Figure 2, p.13, of Company witness Williams for additional details, as well as Exhibit
12 JFW-2, Sections VII, pp.21-26 for supporting references on downward rate pressure, driver
13 charging behavior, and off-peak charging.

14 **Q. WHAT IS AEP OHIO PROPOSING FOR MULTI-FAMILY DWELLING**
15 **CHARGING?**

16 A. AEP Ohio is proposing a multi-family dwelling (“MFD”) charging program component that
17 provides incentives for participants to avoid on-peak EV charging using multiple optional
18 mechanisms. These options not only provide customer choice, but also allow learnings and
19 flexibility that will benefit future evolutions of the program to be more efficient and effective.

20 MFDs are an important application to address, as they have the same potential to
21 provide benefits to all customers as residential charging, previously addressed above.
22 However, these relatively new amenities are difficult for facility owners to install within their
23 existing electrical service, and installations can be very costly. AEP Ohio is proposing to

1 provide incentives to these customers to help address these cost barriers and add this capability
2 for their tenants. Please refer to Exhibit JFW-1, Figure 2, p.13, of Company witness Williams
3 for additional details, and Exhibit JFW-2, Sections VII, pp.21-26 for supporting references on
4 downward rate pressure, driver charging behavior, and off-peak charging.

5 **C. COMMERCIAL AND PUBLIC CHARGING**

6 **Q. PLEASE DESCRIBE WHY PUBLICLY AVAILABLE CHARGING IS**
7 **NECESSARY.**

8 A. Publicly available charging outside of the corridor locations, both level 2 and DC fast
9 charging, provides additional comfort and confidence for consumers who are considering a
10 new and different fuel – electricity – for their transportation needs. While charging where
11 you park at home and work provides maximum convenience, this is a new and unique option
12 that EVs allow – consumers considering EVs initially look for publicly available charging
13 options before understanding and shifting to charging primarily at home and work.

14 Charging options within and around communities not only adds confidence and
15 convenience, it can also be an important asset to ensure access to charging for customers who
16 may not have the ability to charge where they live or work. Additionally, these publicly
17 available charging sites have the potential to attract consumer interest and achieve economic
18 and business development benefits.

19 **Q. WHAT IS AEP OHIO PROPOSING FOR FLEET AND WORKPLACE**
20 **CHARGING?**

21 A. AEP Ohio is proposing a fleet and workplace charging program component that provides
22 incentives for participants to avoid on-peak EV charging using multiple optional mechanisms.

1 These options not only provide customer choice, but also allow learnings and flexibility that
2 will benefit future evolutions of the program to be more efficient and effective.

3 Employers and fleet managers are becoming more interested in electrifying their fleets
4 and helping their employees drive electric for many reasons, but are finding new equipment
5 and installation costs that did not exist with conventional combustion vehicles. These costs
6 can become a barrier to choosing EV options, and may prevent these customers from adopting
7 and operating EVs that will provide benefit to all AEP Ohio customers. AEP Ohio is
8 proposing to provide incentives to these customers to help address these cost barriers. As
9 more vehicles are deployed in these applications with the existing appropriate commercial
10 rates and demand response mechanisms, all AEP Ohio customers benefit. Please refer to
11 Exhibit JFW-1, Figure 2, p.13, of Company witness Williams for additional details, and
12 Exhibit JFW-2, Sections VII, pp.21-26 for supporting references on downward rate pressure,
13 driver charging behavior, and off-peak charging.

14 **E. ELECTRIC TRANSPORTATION INNOVATION AND TECHNOLOGY**

15 **Q. WHAT IS AEP OHIO PROPOSING FOR ELECTRIC TRANSPORTATION**
16 **INNOVATION AND TECHNOLOGY?**

17 A. AEP Ohio will explore new and evolving technologies to identify customer transportation
18 solutions throughout the AEP Ohio service territory. AEP Ohio would like to pursue
19 innovative technologies such as transit busing, integration with storage, autonomous
20 transportation solutions, and vehicle-sharing applications. AEP Ohio will also look for
21 opportunities to partner these funds with other grants and funding mechanisms to maximize
22 the program impact. Initially, AEP Ohio plans to provide Transit and School busing systems
23 with the opportunity to pilot electric bus and charging solutions. AEP Ohio is proposing to

1 offer pilot incentives to help offset the incremental price of school and transit buses and
2 infrastructure for school districts and transit agencies, while ensuring that this new electric
3 load does not exacerbate existing utility system peaks through participation in demand
4 response mechanisms.

5 Currently, electric school and transit buses are significantly more expensive than their
6 combustion engine alternatives. While electric buses would realize significant operational
7 savings and emissions reductions over their life, the initial price premium makes consideration
8 by these entities difficult or impossible. By piloting an incentive to address bus and
9 infrastructure cost barriers, AEP Ohio is helping to make electric buses a viable choice for
10 these applications while the market continues to mature. Interested schools and transit
11 agencies will be able to demonstrate operational viability and performance while immediately
12 achieving significant emissions reductions that benefit the communities they serve. Please
13 refer to Exhibit JFW-1, Figure 2, p.13, of Company witness Williams for additional details,
14 and Exhibit JFW-2, Section VII, pp.21-26 for supporting references on downward rate
15 pressure and off-peak charging.

16 **F. ELECTRIC TRANSPORTATION OUTREACH AND ENGAGEMENT**

17 **Q. PLEASE DESCRIBE WHY UTILITY OUTREACH AND ENGAGEMENT FOR**
18 **ELECTRIC TRANSPORTATION IS NEEDED.**

19 A. AEP Ohio’s customers are similar to most consumers throughout the United States when it
20 comes to low awareness of EV technologies and their benefits.⁶ Additionally, program
21 participation and the corresponding downward rate pressure for all AEP Ohio customers will

⁶ UC Davis, “Automakers and Policymakers May be on a Path to Electric Vehicles; Consumers Aren’t”, available at:
<https://its.ucdavis.edu/blog-post/automakers-policymakers-on-path-to-electric-vehicles-consumers-are-not/>

1 not occur without customer awareness of program availability and benefits. This is a problem
2 that AEP Ohio can help to solve by engaging with our customers and communities, including:

- 3 1. Marketing of program availability and details;
- 4 2. Targeted engagement with dealers; and
- 5 3. Digital and traditional engagement with customers.

6 Please refer to Exhibit JFW-1, Figure 2, p.13, of Company witness Williams for more details.

7 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

8 A. Yes.

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Direct Testimony of Jeffrey W. Lehman* was sent by, or on behalf of, the undersigned counsel to the following parties of record this 15th day of June 2020, via electronic transmission.

/s/ *Steven T. Nourse* _____

Steven T. Nourse

EMAIL SERVICE LIST

angela.obrien@occ.ohio.gov;
Bethany.Allen@igs.com;
Christopher.Healey@occ.ohio.gov;
jkylercohn@BKLawfirm.com;
joliker@igsenergy.com;
Bojko@carpenterlipps.com;
kboehm@BKLawfirm.com;
mpritchard@mwncmh.com;
mkurtz@BKLawfirm.com;
mnugent@igsenergy.com;
paul@carpenterlipps.com;
rglover@mcneeslaw.com;
rdove@keglerbrown.com;

Attorney Examiner

Greta.See@puc.state.oh.us;
Sarah.Parrot@puc.state.oh.us;

Attorney General

Werner.margard@ohioattorneygeneral.gov;
steven.darnell@ohioattorneygeneral.gov;
Andrew.shaffer@ohioattorneygeneral.gov;
Kimberly.Naeder@ohioattorneygeneral.gov;

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Summary: Testimony -Direct Testimony of Jeffrey W. Lehman on Behalf of Ohio Power Company electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company